



Norfolk County Council

Norfolk County Council Comments on the: The Walpoles Neighbourhood Plan (Reg 16) 13 May 2025

1. Preface

- 1.1. The officer-level comments below are made without prejudice.
- 1.2. The County Council welcomes the opportunity to comment on the emerging Neighbourhood Plan and recognises the considerable amount of work and effort which has been put into developing the Neighbourhood Plan to date.

2. Historic Environment

- 2.1. Thank you for consulting the historic environment specialist advice team on the above and apologies for the delay in getting back to you.
- 2.2. We recommend that the neighbourhood plan should include more detailed consideration of designated and undesignated heritage assets of all kinds including undesignated historic buildings and archaeological sites.
- 2.3. We recommend that the authors of the plan contact the Norfolk Historic Environment Record at heritage@norfolk.gov.uk to obtain a full Historic Environment record search.
- 2.4. The authors of the plan should be aware that even appropriately derived Norfolk Historic Environment Record data is not static and may be subject to change and enhancement within the lifetime (up to 2038) of the Walpole Cross. New discoveries are made and existing sites and buildings can be reinterpreted. The implementation of new nationally or locally derived guidance and policies can lead to reassessment of the significance of individual or groups of heritage assets.
- 2.5. At least one other neighbourhood plan in Norfolk has recommended that potential developers with concerns about how their development may affect the historic environment (below-ground archaeology) should contact Norfolk County Council Environment Service historic environment specialist advice team at hep@norfolk.gov.uk directly for pre-application advice to identify archaeological implications.
- 2.6. The plan appears to handle the subject of the historic environment well and shows that some research has taken place. However, we would like a statement recognising that all planning applications within the parish are examined by the Norfolk County Council Historic Environment Strategy and Advice Team and archaeological mitigation recommended when required.

- 2.7. Should you have any queries with the above comments please contact Steve Hickling (Historic Environment Officer) at [REDACTED] or call 01362 869285.

3. **Lead Local Flood Authority**

- 3.1. Thank you for your consultation on The Walpoles Neighbourhood Plan 2022 - 2036 Regulation 15 Version and supporting documents (LLFA Reference: FW2025_0277) received by the LLFA on 8th April 2025. From our records it does not appear that the LLFA were previously consulted on The Walpoles Neighbourhood Plan at the Regulation 14 stage.
- 3.2. The LLFA comments at Regulation 16 stage are as follows:
- 3.3. The LLFA welcomes that The Walpoles Neighbourhood Plan 2022 - 2036 and its 10 proposed policies make references to flooding from various sources such as surface water, sea and fluvial flooding and to the implications of climate change upon development and flood risk. It is however noted that no reference is made within the document to other sources of flood risk such as groundwater. It is considered that Policy 3: Design, Policy 6: Local Green Spaces and Policy 8: Water Management (SuDS) and their supporting text, Objective D and Community Action 2 are of most relevance to matters for consideration by the LLFA.
- 3.4. The LLFA particularly welcomes the inclusion of Policy 3: Design and Policy 8: Water Management (SuDS) within the Surface Water Management Section in respect of flood risk and references made to the consideration of flooding in future development within the Parish, along with the implications of climate change and areas identified which have been affected by surface water flooding. The LLFA further welcomes references made to ensuring new developments seek to reduce the impacts of flooding and ensure that surface water flood risk is not exacerbated by new development (supported with relevant mapping in Figures 19 and 20 for fluvial/sea/surface water flooding).
- 3.5. The LLFA also welcomes references made in Policy 3 and Policy 8 of the Neighbourhood Plan to the principle and benefits of Sustainable Drainage Systems (SuDS) being incorporated into new developments, along with providing examples of SuDS features both within Policy 8 and Figure 21 such as permeable paving, rainwater harvesting and green roofs and walls. We note that Paragraph 91 refers to the associated Policy being Policy 9 and believe this may be an error and should read Policy 8.
- 3.6. The LLFA also note references on the document to along with the presence watercourses within the Parish including many drainage ditches, ordinary watercourses falling under the control of the Internal Drainage Board (IDB) and

an EA Main River to the west. The LLFA would suggest reference made to this being the Kings Lynn IDB.

- 3.7. The LLFA welcome references in The Walpoles Neighbourhood Plan complimenting Strategic Policies included within the Borough of Kings Lynn and West Norfolk Local Plan and National Planning Policy Framework (NPPF).
- 3.8. The LLFA are not aware of AW DG5 records within the Parish of The Walpoles, however, this will need to be confirmed with/by Anglian Water.
- 3.9. The LLFA welcomes that references also made in the document to the 'Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document within the Neighbourhood Plan (the most relevant updated version depending on the timeframe for the preparation and adoption of the final Neighbourhood Plan document) regarding surface water risk and drainage for any allocated sites or areas of proposed development, available from the ["Information for developers" section of the Norfolk County Council website.](#)
- 3.10. According to LLFA datasets (extending from 2011 to present day) we have 4 no. records of internal flooding and 5 no. records of external/anecdotal flooding in the Parish of The Walpoles. The LLFA highlight the importance of considering surface water, groundwater and flooding from ordinary watercourses within the Neighbourhood Plan in the best interest of further development in the area. We note that all external flood events are deemed anecdotal and have not been subject to an investigation by the LLFA.
- 3.11. We advise that Norfolk County Council (NCC), as the LLFA for Norfolk, publish completed flood investigation reports [here](#).
- 3.12. According to Environment Agency datasets, there are areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parish of The Walpoles.
- 3.13. The LLFA note that some flood risk mapping has been included in the document. The LLFA recommend that mapping be provided for all sources of flooding, with any mapping covering the entirety of the Neighbourhood Plan Area. Information on this and associated tools/reference documents can be found at:
 - [GOV.UK - Long Term Flood Information – Online EA Surface Water Flood Map](#)
 - [Norfolk County Council \(NCC\) – Flood and Water Management Policies](#)
 - [Norfolk County Council \(NCC\) – Lead Local Flood Authority \(LLFA\) Statutory Consultee for Planning: Guidance Document](#)
- 3.14. Allocation of Sites:

3.15. We would expect that the Neighbourhood Planning Process provide a robust assessment of the risk of flooding, from all sources, when allocating sites. It is not evident to the LLFA that this has been undertaken in respect of any site allocations (in this instance it is noted that no housing allocations form part of the Neighbourhood Plan). If a risk of flooding is identified then a sequential test, and exception test where required, should be undertaken. This would be in line with Planning Practice Guidance to ensure that new development is steered to the lowest areas of flood risk. However, any allocated sites will also still be required to provide a flood risk assessment and / or drainage strategy through the development management planning process.

3.16. LLFA Review of Local Green Spaces (LGS):

3.17. The document proposes 3 no. Local Green Spaces which are identified in Policy 6: Local Green Spaces and Figure 17 and on the Policies Map in Appendix A. It is understood that designation of LGSs provides a level of protection against development. The LLFA do not normally comment in LGSs unless they are/are proposed to be part of a SuDS or contribute to current surface water management/land drainage. If it is believed that a designated LGS forms part of a SuDS or contributes to current surface water management/land drainage, this should be appropriately evidenced within the submitted Neighbourhood Plan. The LLFA have no comments to make on the proposed LGSs in the plan.

3.18. Should you have any queries with the above comments please contact the Lead Local Flood Authority at llfa@norfolk.gov.uk.

4. Public Health

4.1. The authors of the reports may find it helpful to consult the attached (appendix a) Health in Neighbourhood Plans guidance, which supports communities to embed health in their plans and includes examples of good practice.

4.2. If they have any specific questions regarding this, they are welcome to contact us at phplanning@norfolk.gov.uk