



## **Norfolk County Council Comments on the: Walpole Cross Keys 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. Paragraphs 2 and 3 make reference to information derived from the Norfolk Heritage Explorer website.
- 2.3. The Norfolk Heritage Explorer website contains a partial dataset (extracted from the Norfolk Historic Environment Record) which is updated periodically and is therefore not suitable for use in the planning process. Use of Norfolk Heritage Explorer data for planning purposes is potentially in breach of the terms and conditions of the Norfolk Heritage Explorer website and a breach of Norfolk County Council copyright. We recommend that the authors of the plan contact the Norfolk Historic Environment Record at [REDACTED] to obtain a full Historic Environment record search. References to Norfolk Heritage Explorer should be removed from all documents and replaced with references to the Norfolk Historic Environment Record.
- 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. 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.

- 2.6. 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 [REDACTED] directly for pre-application advice to identify archaeological implications.
- 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 Walpole Cross Keys Neighbourhood Plan Review 2022 - 2038 Regulation 15 Version and supporting documents (LLFA Reference: FW2025\_0276) received by the LLFA on 8<sup>th</sup> April 2025.
- 3.2. The LLFA comments at Regulation 16 stage are as follows:
- 3.3. The LLFA welcomes that the Walpole Cross Keys Neighbourhood Plan Review 2022 - 2038 Regulation 15 Version and its 13 no. policies make references to flooding from various sources such as surface water, coastal and fluvial flooding and to the implications of climate change upon development and flood risk, although we note no reference has been made to other sources of flood risk such as groundwater. Policy 6: Residential Parking Standards, Policy 7: Flood Risk and Water Management, Policy 13: transport and Access, Objective 5 and Community Action 1: Maintenance of Drainage Ditches, are of most relevance to matters for consideration by the LLFA.
- 3.4. The LLFA particularly welcomes the inclusion of Policy 7: Flood Risk and Water Management Development in the Neighbourhood Plan which seeks to ensure that additional development taking place does not exacerbate existing problems in the parish in respect of water infrastructure, including sewers, surface water and other flooding. and that where possible, opportunities are utilised to improve the management of flood risk in the parish, in new and existing development and taking account of climate change. Objective 5 also recognises the need to reduce the impact of flooding and ensure that surface water flood risk is not exacerbated by new development. The inclusion of Policy 13: Transport and Access is also welcomed which seeks to ensure that proposed development does not cause significant harm to the highway network, existing highway verges or dykes which includes to existing local wildlife, current traffic, and existing flood management and seeking appropriate mitigation against any harm.
- 3.5. Policy 7: Flood Risk and Water Management Development is also further welcomed by the LLFA in terms of its aims to incorporating green infrastructure

features such as Sustainable Urban Drainage Systems (SuDS) into proposals, with examples provided of features in Figures 17 and Figure 19. The LLFA advise that the term 'SuDS' (with the Su element taken from the word sustainable) no longer makes reference to 'Urban' given that Sustainable Drainage is applicable in both urban and rural settings.

- 3.6. The LLFA note references made to the Parish being situated predominantly in Flood Zones 2 and 3, with supporting mapping provided in Figure 18 and that surface water flood risk is an issue, particularly at times of heavy rainfall, in most parts of the Parish including within the built-up area around Sutton Road, Little Holme Road, Low Road, Stanton Road South, and Market Lane. It is also noted that the parish is criss-crossed with working dykes of varying sizes which drain the land and properties and can become quite full in wet weather. Repeated filling in by private property owners has rendered parts of the system inoperative as the backfills have not always been efficiently piped (if at all). The LLFA advise that the Parish also falls within the Kings Lynn Internal Drainage Board area.
- 3.7. The LLFA also welcomes references made to the Walpole Cross Keys Neighbourhood Plan Regulation 16 Document complimenting Strategic Policies included those 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 Walpole Cross Keys, however, this will need to be confirmed with/by Anglian Water.
- 3.9. The LLFA recommends that reference be made 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 1 no. record of internal flooding and no records of external/anecdotal flooding in the Parish of Walpole Cross Keys. 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 (NNC), 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 Walpole Cross Keys.

3.13. The LLFA note that some flood risk mapping has been included in the document relating to fluvial and coastal flooding. 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 does not propose any Local Green Spaces. 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 [REDACTED]

## 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 [REDACTED]