



Norfolk County Council

Norfolk County Council Comments on the: Docking Neighbourhood Plan (Reg 16) 13 March 2026

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 team, our advice remains unchanged from those given in March 2025.

- 2.2. Further, Historic England's published guidance on the preparation of Neighbourhood Plans should be consulted, please visit <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>. It encourages the full consideration of heritage assets and suggests ways with which this can be achieved. Based on this guidance, it is also suggested that the authors of the Neighbourhood Plan follow the steps indicated below:

- 1) Study Historic England's published guidance and consider how the Neighbourhood Plan can take its advice on board.
- 2) Contact the Norfolk Historic Environment Record (NHER) and request information on designated and undesignated heritage assets within the Neighbourhood Plan area. The NHER can be contacted at [REDACTED]
- 3) Consider the full range of heritage assets within the Neighbourhood Plan area and identify those they feel are most significant. The Neighbourhood Planning group may wish to prepare a local list of heritage assets they believe should be protected and enhanced and put this to the community for consideration.
- 4) Directly consult the Historic Environment Service's planning advice team, who can be contacted at [REDACTED] they can provide advice on which heritage assets are most significant and ways in which they can be protected and enhanced. They can also offer advice on the wording of historic environment policies.

- 2.3. Should you have any queries with the above comments please contact John

Percival (Historic Environment Senior Officer) at
[REDACTED]

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

3. **Lead Local Flood Authority**

- 3.1. Thank you for your consultation on the Docking Neighbourhood Plan 2023 – 2039, Submission Version and supporting documents received by the LLFA on 5th February 2026 (LLFA Ref: FW2026_0110). The LLFA note that we previously provided comments on the Docking Neighbourhood Plan at Regulation 14 (LLFA Ref: FW2025_0135) as part of the NCC Corporate Response.
- 3.2. The LLFA comments at Regulation 16 stage are as follows:
- 3.3. The LLFA welcomes that the Docking Neighbourhood Plan 2023 – 2039, Submission Version and its 12 no. proposed policies make some references to flooding from various sources such as surface water and to the implications of climate change on development and flood risk. It is however noted that there are still no references made to groundwater flooding within the document. Policy 1: Biodiversity and Green Ecological Corridors, Policy 3: Local Green Spaces and Policy 6: Design, are of most relevance to matters for consideration by the LLFA.
- 3.4. Whilst there are some references made to flood risk and Sustainable Drainage Systems in Policy 6: Design, as noted at Regulation 14 stage there are no specific policies relating to flood risk and surface water drainage included within the Regulation 16 document. The LLFA consider that the document would benefit from the inclusion of such a policy, supported by EA mapping covering the whole Parish, to ensure adequate consideration is given of the implications of new development in the Parish on all sources of flood risk including surface water, fluvial (rivers) and groundwater and to ensure new development does not result in new or exacerbate existing flooding and surface water drainage problems within the Parish of Docking.
- 3.5. Furthermore, it is welcomed that the inclusion of SuDS (Sustainable Drainage Systems) is now referenced in Policy 6: Design in the Regulation 16 document. However, as noted in our previously, the LLFA would welcome reference also being 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.](#)

- 3.6. The LLFA welcomes references to the Docking Neighbourhood Plan Regulation 16 Document complimenting Strategic Policies included within the Borough of Kings Lynn and West Norfolk Local Plan Norfolk Minerals and Waste Local Plan and the National Planning Policy Framework (NPPF).
- 3.7. According to LLFA datasets (extending from 2011 to present day) we have 3 no. records of internal flooding and 1 no. record of external/anecdotal flooding in the Parish of Docking. 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.
- 3.8. We advise that Norfolk County Council (NCC), as the LLFA for Norfolk, publish completed flood investigation reports [here](#).
- 3.9. According to Environment Agency datasets, there are areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parish of Docking.
- 3.10. The LLFA are not aware of AW DG5 records within the Parish of Docking, however, this will need to be confirmed with/by Anglian Water.
- 3.11. The LLFA note that no flood risk mapping has been included in the Neighbourhood Plan document. The LLFA recommends that mapping be provided for all sources of flooding. Information on this and associated tools/reference documents can be found at:
- [GOV.UK – Flood map for planning](#)
 - [GOV.UK – Check your long term flood risk](#)
 - [Norfolk County Council \(NCC\) – Flood and Water Management Policies](#)
 - [Norfolk County Council \(NCC\) – Lead Local Flood Authority \(LLFA\) Statutory Consultee for Planning: Guidance Document](#)
- 3.12. **Allocation of Sites**
- 3.13. 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 (although 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.

3.14. LLFA Review of Local Green Spaces (LGSs)

3.15. The LLFA note that the Docking Regulation 16 document now proposes 16 no. Local Green Spaces which are identified in Policy 3: Local Green Space, Figures 8 and 9 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.

3.16. Should you have any queries with the above comments please contact the Lead Local Flood Authority at [REDACTED]

4. Corporate Property

4.1. NPS has reviewed the Docking Reg 16 Neighbourhood Plan submission on behalf of Norfolk County Council as landowner. Open space designation LGS6- Field of Dreams, rear of Docking Church of England Primary and Nursery School is still being proposed. We previously objected to this allocation on behalf of NCC Children Services as the land is in educational use and this would prevent any future expansion/development at the school and limit its use. We would ask for LGS6 to be removed from the Neighbourhood Plan.

4.2. Please note; NPS cannot find reference to our original comments on behalf of NCC Children Services in the NP Consultation Statement or NP Green Space Assessment.

4.3. Should you have any queries with the above comments please contact Richard Drake (Richard Smith – Associate Director, Planning - NPS) at [REDACTED].

5. Norfolk Fire and Rescue Service

5.1. Background and Context

5.2. Underpinned by statutory obligations within the Fire and Rescue Services Act 2004, the Fire and Rescue National Framework for England provides the overall strategic direction for Fire and Rescue authorities. Within the framework, each authority is required to produce a Community Risk Management Plan (CRMP) that identifies and assesses all foreseeable fire and rescue related risks that could affect its community.

5.3. Each CRMP must demonstrate how prevention, protection and response activities will best be used to mitigate the impact of risk on its communities.

Through local determination of risk and local determination of response standards, it is expected that this will:

Reduce the number of emergency incidents occurring.

- Reduce death and injury from fire and other emergency incidents.
- Ensures emergency response standards of 10 minutes are met.
- Reduce the socio-economic impacts of fire.
- Protect heritage.
- Safeguard the environment.
- Contribute to the development of stronger, more self-sufficient, and cohesive communities.
- Provide value for money.

5.4. The above legislation imposes a requirement on Fire and Rescue Authorities to ensure efficient and effective fire and rescue provision, and to ensure that the Service contributes effectively to the wider community safety agenda.

5.5. **Neighbourhood Plan Comments**

5.6. Housing developments as set out in Neighbourhood Plans can potentially change the risk profile for the area and increase attendance times to incidents. Increases in population place additional demand on fire and rescue resources, both in terms of the need for additional capital investment in new facilities and vehicles and funding for additional equipment based on increased risks. This also impacts revenue budgets for firefighters, officers, and support staff. NFRS dynamically reallocates resources across the county to meet changes in risk and demand.

5.7. To ensure that NFRS can respond appropriately to the increased risks and demand - **Policy 6 (Design)** and **Policy 7 (Housing Mix)** the supporting text should make it clear that developers will be asked to contribute to fire service vehicles, equipment, facilities and response provision through s106 agreements, where this meets the legal tests set out in the Community Infrastructure Levy Regulations.

5.8. The capability and availability of water resources to fight fires is also a key consideration for the Service. The provision of public fire hydrants on residential developments is not covered by Building Regulations 2010 (Part B5 as supported by Secretary of State Guidance 'Approved Document B'). Developers are expected to make provision for fire hydrants to adequately protect a development site for fire-fighting purposes. **Policy 6 (Design)** should make appropriate reference to the need for fire hydrant provision associated with new development.

5.9. Due to the risk of fire spread **Policy 6 (Design)** should make clear that any purpose-built structure to house refuse or recycling bins should not be built next

to residential houses.

- 5.10. **Policy 6 (Design)** of NP should have regard to the need for Fire appliance access to all areas of developments as this is vital for emergency response and should be in compliance with Building Regulations 2010 (Part B5 as supported by Secretary of State Guidance 'Approved Document B').
- 5.11. Where residential properties (dwellinghouses) are located more than 45 meters away (furthest point of floorplan) from the closest fire appliance access location British Standard 9991 directs that domestic sprinklers should be installed in accordance with British Standard 9251 and this will allow a maximum access distance of 90 metres to the furthest point of the floorplan in dwellinghouses with no floor more than 4.5 metres above ground. This is reduced to 75 metres where a floor is over 4.5 metres above ground. Norfolk Fire & Rescue Service would expect developers to adhere to the access distances given above or prove comparable safety of occupants should they wish to deviate from these.
- 5.12. **Policy 6 (Design)** - NFRS recognises the need for Councils to have a positive strategy to promote renewable energy generation in developments. However, the risk of grid scale Battery Energy Storage Systems (BESS) when involved in fire requires mitigation at design stage and consultation with NFRS before and during planning stage.
- 5.13. Developments which include PV arrays, Domestic Energy Storage Systems (DESS) and electric vehicle charging points should comply with national guidance, Institute of Engineering and Technology Codes of Practice and PAS63100:2024. Developers should consult with NFRS both before and during planning stage on safe installation and location within residential dwellings.
- 5.14. Should you have any queries with the above comments please contact: **Clive Denniss, Group Manager - Operational Risk and Policy** Norfolk Fire and Rescue Service [REDACTED]