



Norfolk County Council

Norfolk County Council Comments on the: Walpole Cross Keys 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, we have no comments in addition to those made in our most recent response.
- 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]

3. **Lead Local Flood Authority**

- 3.1. Thank you for your consultation on the Walpole Cross Keys Neighbourhood Plan Review 2022 – 2038, Statement of Modifications and supporting documents received by the LLFA on 5th February 2026 (LLFA Ref: FW2026_0109). The LLFA note that we previously provided comments on the Walpole Cross Keys Neighbourhood Plan at Regulation 14 and 16 stages (LLFA Ref: FW2025_0509 and FW2025_0276) as part of the NCC Corporate Responses. We understand that this subsequent Regulation 16 consultation is in response to concerns raised at examination stage relating to compliance with the elements of the Neighbourhood Plan procedures and changes in local and national planning policy.
- 3.2. The LLFA comments to this additional Regulation 16 consultation are as follows:
- 3.3. The LLFA welcomes that the Walpole Cross Keys Neighbourhood Plan 2022 - 2038 and its 13 no. proposed policies retain references to flooding from various sources such as surface water and fluvial flooding and to the implications of climate change upon development and flood risk. It is however noted that there are still no references made to groundwater flooding. Policy 5: Design, Policy 6: Residential Parking Standards and Policy 7: Flood Risk and Water Management, and their supporting text, along with Community Action 1: Maintenance of Drainage Ditches, are of most relevance to matters for consideration by the LLFA.
- 3.4. The LLFA welcomes the enhancements made to Policy 7: Flood Risk and Water management) which recognises the importance of the consideration of flooding from various sources in future developments within the Parish, the implications of climate change and the wider benefits of the inclusion of Sustainable Drainage Systems (SuDS). However, as noted in our previous response, the LLFA would welcome reference 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.](#)
- 3.5. The LLFA welcomes references to the Neighbourhood Plan Regulation 16 Document complimenting Strategic Policies included within the Borough of Kings Lynn and West Norfolk Local Plan and the National Planning Policy Framework (NPPF).

- 3.6. According to LLFA datasets (extending from 2011 to present day) we have 1 no. records of internal flooding and 2 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.
- 3.7. We advise that Norfolk County Council (NCC), as the LLFA for Norfolk, publish completed flood investigation reports [here](#).
- 3.8. 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.
- 3.9. 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.
- 3.10. The LLFA welcomes some flood risk mapping has been included in the Neighbourhood Plan document within Figure 17. However, it would be beneficial if the mapping showed the whole Parish area with the extent of the Parish boundary marked for clarity. 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](#)
- 3.11. Allocation of Sites**
- 3.12. 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.
- 3.13. LLFA Review of Local Green Spaces (LGS)**

3.14. As was the case with the previous Regulation 16 consultation, the LLFA note that no Local Green Spaces have been proposed as part of the Walpole Cross Keys Neighbourhood Plan.

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

4. Norfolk Fire and Rescue Service

4.1. Background and Context:

4.2. Underpinned by statutory obligations within the Fire and Rescue Services Act 2004, the Fire and Rescue National Framework for England provide 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.

4.3. 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.

4.4. 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.

4.5. Neighbourhood Plan Comments:

4.6. New 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.

- 4.7. To ensure that NFRS can respond appropriately to the increased risks and demand - Policy 1 (New Residential Development in the Neighbourhood Development Plan Area) and 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.
- 4.8. 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 1 (New Residential Development in the Neighbourhood Development Plan Area) should make appropriate reference to the need for fire hydrant provision associated with new development.
- 4.9. Due to the risk of fire spread Policy 5: Design should make clear that any purpose-built structure to house refuse or recycling bins should not be built next to residential houses.
- 4.10. Policy 6 (Parking) of the Local Plan 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').
- 4.11. Where residential properties (dwelling houses) 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.
- 4.12. 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.

4.13. 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]

5. **Corporate Property**

5.1. NPS have reviewed the Walpole Cross Keys Neighbourhood Plan Regulation 16 submission on behalf of Norfolk County Council as landowner and the only NCC owned land in Walpole Cross Keys according to Norfolk Mapping Bowser is the Primary school, which is identified in NP Policy 9 as a 'community facility'.

5.2. NPS do not believe Policy 9 of the NP is necessary as the KLWNBC Local Plan includes policy LP39 which allows for the expansion of community facilities (including schools) and their protection, unless it is no longer feasible to retain the premises in that use.

5.3. Should you have any queries with the above comments please contact Richard Smith (Associate Director – Planning) [REDACTED]