



Norfolk County Council

Norfolk County Council Comments on the: Gayton and Gayton Thorpe Neighbourhood Plan (Reg 16) 20 March 2023

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. The Historic Environment team note that in Policy G4 Conserving and enhancing heritage assets in the parish does not mention buried archaeological remains, either known or unknown at present. Recent archaeological investigations recommended by the Historic Environment team in response to planning applications have uncovered significant archaeological remains within the village. It is recommended that Policy G4 includes a statement saying that the County Council Historic Environment Strategy and Advice Team will continue to comment upon and make recommendations for archaeological mitigation on planning applications, if required.
- 2.2. 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 heritage@norfolk.gov.uk.
 - 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 hep@norfolk.gov.uk, 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 Steve Hickling (Historic Environment Officer) at steve.hickling@norfolk.gov.uk or call 01362 869285.
3. **Lead Local Flood Authority**
 - 3.1. The Lead Local Flood Authority (LLFA) welcomes the appropriate references made in the Draft Neighbourhood Plan and its policies to flood risk, with specific references made to drainage, surface water and groundwater, along with references to multiple Risk Management Authorities (RMAs) being made throughout the Plan.
 - 3.2. In particular, the LLFA welcomes the inclusion of Objectives 10 and 11, and note the specific reference made to Development, Drainage and Surface Water Flood Risk within Section 8 of the Plan entitled 'Infrastructure', Policy G10 (Development and Surface water Flood Risk), the connections made with Local Plan Policies such as Policy CS08 (Sustainable Development) and Policy DM 21 (Sites in Areas of Flood Risk) and relevant National Planning policies. The reference made to the Surface Water Management Plan (SWMP) [16] prepared by the Borough Council of King's Lynn and West Norfolk in collaboration with a number of organisations including the NCC, Environment Agency, Anglian Water and the Internal Drainage Board, is also welcomed.
 - 3.3. The LLFA further welcome that the specific references have been made in the Regulation 16 submission to Sustainable Drainage Systems (SuDS), and in particular within Policy G10 which references the adherence to the four pillars of SuDS (water quantity, quality, biodiversity, and amenity and their benefits). The LLFA particularly welcome that Policy G10 which deals with development and surface water flood risk, along with the supporting text, has been significantly expanded and enhanced from the previous version (Policy G11) included as part of the Reg 14 submission, now referencing matters such as SuDS and the drainage hierarchy.
 - 3.4. The LLFA also welcomes the inclusion in Section 4 (Key issues) within the Regulation 16 document relating to Flood Risk, with Environment Agency mapping relating to surface water flooding, tidal/fluviat flooding and reservoir flooding included within figures 15, 16 and 17 and now incorporating the wider Parish (a smaller area was shown as part of the Regulation 14 submission). It is also noted that survey work carried out as part of the preparation of the

Neighbourhood plan identified surface water flooding being one of the key concerns shared by the community.

- 3.5. The LLFA recommended reference be made to the 'Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document Version 6.1' (or the most update version at the time of the adoption of any Neighbourhood Plan) within the Neighbourhood Plan 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. It is noted that this has now been included in the document.
- 3.6. The LLFA welcomes the reference made in submission that according to the LLFA datasets (extending from 2011 to present day), there is 1 record of internal flooding and 1 record of external flooding in the Parish of Gayton, both dated 2021. The LLFA re-iterates 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. It should be noted that all external flood events are deemed anecdotal and have not been subject to an investigation by the LLFA.
- 3.7. The LLFA advise that Norfolk County Council (NCC), as the LLFA for Norfolk, publish completed flood investigation reports [here](#).
- 3.8. The LLFA is aware of AW DG5 records within the Parish of Gayton, however, this will need to be confirmed with/by Anglian Water.
- 3.9. According to Environment Agency datasets, there are areas of localised surface water ponding and surface water flowpaths present within the Parish of Gayton. It is noted that surface water maps are included within the submitted Neighbourhood Plan for the Gayton and Gayton Thorpe Parish.
- 3.10. The LLFA recommend inclusion of surface water flooding maps within the Neighbourhood Plan representative of the entire 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](#)
- 3.11. The LLFA welcome that our informal advice relating to the proposed site of the New Village Hall being at risk of surface water flooding according to Environment Agency datasets, that flood risk as a whole be considered when considering the locations of any such proposals, with reference made to the need for this with in Paragraphs 10.4.10 and 10.4.11.

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