



Norfolk County Council

Norfolk County Council Comments on the: Mattishall Neighbourhood Plan (Reg 16) 16 September 2024

1. Preface

- 1.1. The officer-level comments below are made without prejudice, the County Council reserves the right to make to any further comments the County Council may have on future iterations of the emerging Neighbourhood Plan.
- 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 Plan to date.

2. Children's Services

- 2.1. Even though some amendments have been made to paragraph 7.6 of the neighbourhood plan, the County Council would prefer to this be explicitly stated, as per the regulation 14 comments, see below.
- 2.2. Policy MNP ENV4 paragraph 95 states *'It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should: a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on application.....'*
- 2.3. **Policy MNP ENV4 paragraph 2 should be amended to the following:**
'Development on these sites will not be acceptable other than in very special circumstances in line with national policy or the expansion of the Primary School for LGS Area 6, or where it will enhance the function of the space without compromising the principal function of the space as a Local Green Space.' To ensure that any future expansion of the school is not restricted if expansion is required.
- 2.4. Should you have any queries with the above comments please contact Paul Harker at paul.harker@norfolk.gov.uk.

3. Lead Local Flood Authority

- 3.1. The LLFA welcomes that the Mattishall Neighbourhood Plan Review 2024 – 2036 Submission Version April 2024 (Regulation 16) and its proposed policies retain references to flooding from various sources such as surface water and

fluvial flooding and to the implications of climate change upon flood risk. It is however noted whilst reference is made within the document to groundwater flooding, no mapping has been provided. Of the 25 policies proposed, Policy MNP ENV4: Open and Local Green Spaces, Policy MNP ENV9: Flood Risk and Drainage, Policy MNP HOU5: Sustainable Design and Construction and Maps 7, 8, 15 and 16 are of most relevance to matters for consideration by the LLFA.

- 3.2. The LLFA note and welcome the information contained within the document relating to surface water flood risk and climate change, and in particular Policy MNP ENV9: Flood Risk and Drainage which refers to there being a number of localities within the Parish of Mattishall where localised surface and fluvial water flooding occurs and, in some locations, this can frequently be during periods of modest rainfall, which in light of climate change is likely to increase. The LLFA further welcomes the re-inclusion of Objective 3 in Section 7: Environment and Landscape previously included within MNP1 to ensure new developments do not create flood risk and problems with surface water drainage.
- 3.3. The LLFA particularly welcome references made in Policy MNP ENV9: Flood Risk and Drainage to ensuring new developments gives adequate and proportional consideration to their likely effect on all sources of flooding and surface water drainage and encourages the inclusion of a range of sustainable drainage features into new developments such as permeable surfaces, rainwater harvesting/storage and green roofs and walls. The LLFA particularly welcomes the enhancements made to Policy MNP ENV9 and supporting text relating to developments seeking to achieve the four pillars of SuDS, namely water quality, water quantity, amenity and biodiversity, with an explanation of what SuDS entails and the wider benefits of their inclusion, with references and a link now included to the role of the LLFA and its Developer Guidance document. Please note that this has recently been updated to Version 7.1 dated June 2024.
- 3.4. The LLFA also welcomes the retention of references made to the Mattishall Neighbourhood Plan Document complimenting Strategic Policies within the Breckland Local Plan and National Planning Policy Framework (NPPF). The LLFA further welcomes references made within the supporting text for Policy MNP ENV9 to the Breckland Strategic Flood Risk Assessment (2017) which provides an assessment of the different sources of flood risk (flooding from rivers, surface water, groundwater, sewers, reservoirs, canals and other artificial sources) and recognises that Mattishall is at particular risk of flooding from rivers (fluvial flooding) and surface water, with Map 15 showing areas at risk from fluvial flooding, with Map 16 showing those at risk from Surface Water Flooding.
- 3.5. The LLFA are aware of AW DG5 records within the Parish of Mattishall however, this will need to be confirmed with/by Anglian Water.

- 3.6. The LLFA recommend reference be made to the ‘Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document Version 6.1’ within the Neighbourhood Plan (or the 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.](#)
- 3.7. According to LLFA datasets (extending from 2011 to present day) we have 2 no. records of internal flooding and 12 records of external/anecdotal flooding in the Parish of Mattishall. 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 , as the LLFA for Norfolk, publish completed flood investigation reports [here.](#)
- 3.9. According to Environment Agency datasets, there are significant areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parish of Mattishall.
- 3.10. Whilst 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](#)

Allocation of Sites

- 3.11. 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.

LLFA Review of Local Green Spaces (LGS)

- 3.12. As was the case at Regulation 14 stage, the document proposes 9 no. Local Green Spaces which are identified in Policy MNP ENV4: Open and Local Green Spaces and Map 7: Proposed 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.
- 3.13. Should you have any queries with the above comments please contact the Lead Local Flood Authority at llfa@norfolk.gov.uk.

4. Minerals and Waste

- 4.1. It is noted that in response to our comment's at the Regulation 14 Consultation stage regarding Local Green Spaces "Land off Back Lane" (approximately 2.9 hectares) and "Thynne's Lane" (approximately 6.1 hectares) being partially underlain by sand and gravel resource, the submission version has been amended to include a paragraph (1.7) about the Minerals and Waste Plan in the Introduction and include a link to the current Minerals and Waste Plan in a new appendix to the NP.
- 4.2. It is also noted designations remain unchanged since the Reg 14 consultation and there are no further comments in the context of minerals and waste.
- 4.3. Should you have any queries with the above comments please contact Caroline Jeffrey (Principal Planner, Minerals and Waste Policy) at caroline.jeffery@norfolk.gov.uk or call 01603 222193.

5. Norfolk Fire and Rescue Service

Background and Context

- 5.1. 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.

5.2. 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.

5.3. 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.

Neighbourhood Plan Comments

5.4. **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.

5.5. **HOU5: Sustainable Design and Construction** - NFRS recognises the need for Councils to have a positive strategy to promote renewable energy generation in developments.

5.6. Developments which include PV arrays, Domestic Energy Storage Systems (DESS) and electric vehicle charging points should comply with national guidance and Institute of Engineering and Technology Codes of Practice. Developers should consult with NFRS both before and during planning stage on safe installation and location within residential dwellings.

5.7. Should you have any queries with the above comments please contact Jennie Schamp (Group Manager - Operational Risk and Policy Norfolk Fire and Rescue Service) at jennifer.schamp@norfolk.gov.uk.

6. Highway Authority

- 6.1. The proposed Policy ENV4 locations 8 & 9 – Dereham Road junction with Parkers Road are on dedicated highway land. The Highway Authority objects to these LGS designations as they could be seen as conflicting with the powers of the Highway Authority and could be used to frustrate operations within public highway.
- 6.2. Should you have any queries with the above comments please contact Richard Doleman (Principal Transport Planner) at richard.doleman@norfolk.gov.uk.