

Ref.	Date	Name / Dept.	Organisation	Address	Postcode	Section	Support	Oppose	Supp w. mods	Comments	Reasons
NFNP-01	13/03/2025	Phillipa Nanson	Water Management Alliance	Pierpoint House, 28 Horsley's Fields, Kings Lynn, Norfolk	PE30 5DD	General	-	-	-	Y	The Board has no additional comments to make on the Newton Flotman Neighbourhood Plan. For our comments, please see our letter dated 05/11/2024.
NFNP-02	14/03/2025	Planning Technical Team	Sport England	Sport Park, 3 Oakwood Drive, Loughborough, Leicester	LE11 3QF	General	-	-	-	Y	<p>The following is a summary. See representation for full details:</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p>
NFNP-03	21/03/2025	Jack Saunders	Environment Agency	Iceni House, Cobham Road, Ipswich	IP3 9JD	General	-	-	-	Y	We previously commented on Regulation 14 of the proposal and have nothing further to add at this stage.
NFNP-04	25/03/2025	Philip Porter	National Highways	Woodlands, Manton Lane, Bedford	MK41 7LW	General	-	-	-	Y	<p>National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN).</p> <p>It has been noted that once adopted, the Neighbourhood Plan will become a material consideration in the determination of planning applications. Where relevant, National Highways will be a statutory consultee on future planning applications within the area and will assess the impact on the SRN of a planning application accordingly.</p> <p>Notwithstanding the above comments, we have reviewed the document and note that the details set out within the document are unlikely to have an severe impact on the operation of the trunk road and we offer No Comment.</p>
NFNP-05	03/04/2025	Julie Curtis	Norfolk Wildlife Trust	Bewick House, 22 Thorpe Road, Norwich	NR1 1RY	Page 18 - Vision statement	Y	-	-	-	In our previous response we recommended that the word 'enhanced' is added to the last sentence of the vision statement, with reference to wildlife and green spaces. We note and welcome this addition.
NFNP-06	03/04/2025	Julie Curtis	Norfolk Wildlife Trust	Bewick House, 22 Thorpe Road, Norwich	NR1 1RY	Pages 41-2 - Policy NF7	Y	-	-	-	In our previous response we recommended that an additional sentence is included at the end of this policy, for example: e. Incorporate green infrastructure into the design and layout of such routes (for example, trees and other vegetation as appropriate). We note and welcome this addition.
NFNP-07	03/04/2025	Julie Curtis	Norfolk Wildlife Trust	Bewick House, 22 Thorpe Road, Norwich	NR1 1RY	Pages 46-7 - Policy NF9	-	-	Y	-	<p>RNRs are managed to benefit the plants and wildlife on these reserves. They are also important in that they act as wildlife corridors for many species, proving invaluable for nature recovery across the landscape. We therefore welcome the addition of 'Roadside Nature Reserves' in the list of important natural assets.</p> <p>County Wildlife Sites are areas of land rich in wildlife and outside of the nationally protected areas. There are two County Wildlife Sites adjacent to the boundary of the Neighbourhood Plan area; Norton's Wood CWS to the west and Smockmill Common CWS (also a Local Nature Reserve), adjacent to the River Tas. In our previous response we recommended policy wording to ensure protection of these County Wildlife Sites from any adverse impacts from development from within the Neighbourhood Plan area. We therefore welcome inclusion of County Wildlife Sites, as assets to be conserved.</p> <p>We also note that Smockmill Common is important to residents and the biodiversity of Newton Flotman. To provide clarity, it would be useful to include some wording in the supporting text to explain that the intention is to protect these adjacent County Wildlife Sites from adverse impacts from any development within the Neighbourhood Plan boundary area. Any new County Wildlife Sites which could potentially be designated within the Neighbourhood Plan boundary in the future should also be protected.</p> <p>Priority Habitats are areas of principle importance for the conservation of biodiversity. There are large areas of Deciduous Woodland (Priority Habitat) and some Traditional Orchard (Priority Habitat) within the boundary of the Neighbourhood Plan area. We therefore recommend also including Priority Habitats in the list of important natural assets.</p> <p>We also previously recommended including some wording in the preamble to this policy on the emerging 'Local Nature Recovery Strategies' which are currently being prepared by responsible authorities. We note the following has been added: 'Longer term, this could lead to a Local Nature Recovery Strategy for Newton Flotman.'</p> <p>To provide clarity, we recommend the following wording or similar on Local Nature Recovery Strategies (LNRS): 'Opportunities and priorities for nature restoration within the Neighbourhood Plan boundary should be in line with priorities identified by the Norfolk Local Nature Recovery Strategy (LNRS). For reference see: Local Nature Recovery Strategy - What a Local Nature Recovery Strategy is - Norfolk County Council'</p>
NFNP-08	03/04/2025	Julie Curtis	Norfolk Wildlife Trust	Bewick House, 22 Thorpe Road, Norwich	NR1 1RY	Pages 58-59 - Policy NF10	Y	-	-	-	We support the designation of the Local Green Spaces. As Roadside Nature Reserves (RNR's) are a valuable natural asset which provide numerous benefits for nature recovery, we particularly welcome and support the addition of the Roadside Nature Reserve (RNR 190) on Pound Lane (number 16).
NFNP-09	03/04/2025	Julie Curtis	Norfolk Wildlife Trust	Bewick House, 22 Thorpe Road, Norwich	NR1 1RY	Page 63 - Policy NF12	Y	-	-	-	Due to the known adverse impacts on nocturnal wildlife from light pollution we particularly welcome the addition of the following wording: 'Development proposals should demonstrate compliance with best practice guidance for avoiding artificial lighting impacts on bats. Where lighting cannot be avoided altogether in proposals then it must be designed to avoid light spill onto wildlife roosts, foraging habitat, and commuting routes for bats, birds, and other species.'
NFNP-10	03/04/2025	Julie Curtis	Norfolk Wildlife Trust	Bewick House, 22 Thorpe Road, Norwich	NR1 1RY	Page 65 - Policy NF13	-	-	Y	-	<p>Please note that the end of the policy wording is missing.</p> <p>'All new development including minor development, is required to use an appropriate Sustainable urban Drainage System (SuDS) which will mitigate and protect against pollution, provide drainage and wider amenity, recreational and..'</p> <p>The previous Plan included the following text at the end which will need to be added: '..biodiversity benefits commensurate with the size of the development (see Newton Flotman Design Guidance and Codes).'</p>
NFNP-11	03/04/2025	Julie Curtis	Norfolk Wildlife Trust	Bewick House, 22 Thorpe Road, Norwich	NR1 1RY	Page 67 - Community action projects	Y	-	-	-	We are particularly supportive of all the listed community action projects which would benefit wildlife and the natural environment, for example, for a wildlife area/nature reserve, planting fruit trees etc.
NFNP-12	04/04/2025	Consultations Team	Natural England	Hornbeam House, Crewe Business Park, Electra Way, Crewe, Cheshire	CW1 6GJ	General	-	-	-	Y	<p>The following is a summary. See representation for full details:</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p>
NFNP-13	07/04/2025	Edward James	Historic England	24 Brooklands Avenue, Cambridge	CB2 8BU	General	-	-	-	Y	Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: < <a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a> >
NFNP-14	09/04/2025	Spatial & Strategic Planning	Anglian Water	Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire.	PE29 6XU	General	Y	-	-	-	We have previously submitted comments on the pre-submission version (Reg 14) of the neighbourhood plan. We welcome the amendments in the submission version of the neighbourhood plan, following our comments and recommended changes. I can confirm, Anglian Water has no further comments to make on the documents.
NFNP-15	15/04/2025	Place Shaping Team	South Norfolk Council	Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	General	Y	-	-	-	The Council considers that this is a very positive and comprehensive Neighbourhood Plan. It is clear from the Consultation Statement that the comments raised by the Council at the Regulation 14 stage have been considered by the Qualifying Body and that a number of changes have been made in order to address the majority of these issues. The representations below highlight several areas where the Council still considers that changes are necessary in order for the Plan to meet the basic conditions.
NFNP-16	15/04/2025	Place Shaping Team	South Norfolk Council	Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Page 21 - Figure 14 (Policies map)	-	-	Y	-	As previously advised, the use of dark blue for both the neighbourhood area and localised flooding zones could cause issues with interpretation. We recommend distinguishing by use of a red line parish boundary. In addition, we would welcome a note of clarification stipulating that the allocations shown on the map originate from the VCHAP rather than the NP. This could be a simple as adding 'VCHAP' in the key.
NFNP-17	15/04/2025	Place Shaping Team	South Norfolk Council	Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Page 27 - Housing mix, type and tenure Page 28 - Policy NF2 Housing Needs Assessment	-	-	Y	-	<p>The Council has previously made detailed comments regarding the need to accurately evidence housing need. We note no changes have been made to the Housing Needs Assessment or relevant plan sections. This could amount to a fundamental undermining of policy evidence and open Policy NF2 to challenge.</p> <p>The Council strongly recommends that the changes proposed in our response to the Regulation 14 consultation are implemented in full.</p>

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NFNP-18	15/04/2025	Place Shaping Team	South Norfolk Council	Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Page 32 - Policy NF4	-	-	Y	-	The Council notes that minor textual changes have been made to Policy NF4 in response to comments made at the Regulation 14 consultation. However, the central query of whether the policy is in addition to the site allocation policy in the SN VCHAP and other policies in the neighbourhood plan remains unanswered. Paragraph 16 (f) of the NPPF requires that plans avoid unnecessary duplication of policies that apply to a particular area. We feel that many of the policy requirements set out in NF4 are already established: a) Duplicates the Housing Mix Policy NF2. b) Reiterates the existing GNLP policy. c) Is not explicitly set out elsewhere and may be worth retaining. d) Is not explicitly set out elsewhere and may be worth retaining. e) Already covered by Policy NF1. f) Alan Avenue is to the north, not south. Access stipulations are already made by the site allocation. g) Is not explicitly set out elsewhere and may be worth retaining. h) Is not explicitly set out elsewhere and may be worth retaining. i) Partly duplicates Policy NF9 and the national BNG regulations (see comments on NF9). Reconsider whether these elements add value to the Policy and comply with the NPPF requirements.
NFNP-19	15/04/2025	Place Shaping Team	South Norfolk Council	Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Page 38 - Policy NF6	-	-	Y	-	The Council has previously made comments enquiring how paragraph 3 of Policy NF7 relates to Policy DM 3.16 'improving the level of community facilities' of SNC's Development Management Policies. The latter states that change of use will only be permitted where adequate other facilities already exist within a reasonable distance to meet local needs. Is there a conscious move to depart from this particular criterion (given that the most up to date adopted policy, on a particular issue, will be the one that takes precedent)? Point 'ii' of this paragraph, whilst echoing DM3.16, does not include the detail within part 1)b. of the DM DPD policy which sets out how developers should demonstrate a lack of viability. Again, the Council is concerned this could result in a more flexible policy requirement than that set out within the DM DPD.
NFNP-20	15/04/2025	Place Shaping Team	South Norfolk Council	Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Page 46 - Natural assets of Newton Flotman	-	-	Y	-	The Council recognises that this paragraph has been included in response to its previous comments. However, there is some confusion in the final sentence over the Local Nature Recovery Strategy (LNRS). The LNRS is a county-wide strategy being developed by the Norfolk Nature Recovery Partnership. Use of the term in the local context could be misleading and reference to the LNRS in this way <b>should be removed</b> .
NFNP-21	15/04/2025	Place Shaping Team	South Norfolk Council	Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Page 46 - Policy NF9	-	-	Y	-	The Council remains of the view that the first paragraph of this policy would be better placed as supporting text. Furthermore, explicit reference should be made to the Biodiversity Net Gain regulations in the second paragraph to avoid misconceptions that the plan is setting a local requirement. Consider adding an entry for BNG in the glossary to avoid reiterating requirements within the policy itself. Where the NP includes provision of 10% BNG in policy (e.g. NF4) please note the PPG on BNG advises that: a) Policies do not need to duplicate statutory provisions for BNG and b) Cannot require it where it is incompatible with the framework – i.e. require 10% BNG on all development. c) Integrated bird boxes, bat boxes and hedgehog highways do not contribute to the 10% BNG as BNG is habitat based. The policy can secure these measures in addition to (e.g. as general biodiversity enhancements), and would benefit from being more specific e.g. 1 bird box/dwelling, 1 bat box per 4 dwellings, and 2 hedgehog gaps per garden. The habitats created for BNG will be bee and butterfly friendly.
NFNP-22	15/04/2025	Place Shaping Team	South Norfolk Council	Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Page 47 - Local Green Spaces	-	-	Y	-	Note that only one reference to NPPF paragraphs has been updated (para 8.7), and these remain incorrect.
NFNP-23	15/04/2025	Place Shaping Team	South Norfolk Council	Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Page 65 - Policy NF13	-	-	Y	-	Be aware that the last two lines of the policy have been lost due to a formatting issue.
NFNP-24	15/04/2025	Place Shaping Team	South Norfolk Council	Horizon Centre, Broadland Business Park, Peachman Way, Norwich	NR7 0WF	Design Guidance and Codes. Page 11 - DC.03	-	-	Y	-	Where the NP includes provision of 10% BNG in policy (e.g. NF4) please note the PPG on BNG advises that: a) Policies do not need to duplicate statutory provisions for BNG and b) Cannot require it where it is incompatible with the framework – i.e. require 10% BNG on all development.
NFNP-25	23/04/2025	Historic Environment	Norfolk County Council	County Hall, Martineau Lane, Norwich	NR1 2DH	General	-	-	-	Y	The following is a summary. See representation for full details:  Our previous advice (for Reg. 14 version) remains valid. Although the built heritage is well covered, buried remains are rarely mentioned.
NFNP-26	23/04/2025	Lead Local Flood Authority	Norfolk County Council	County Hall, Martineau Lane, Norwich	NR1 2DH	General	-	-	Y	-	The following is a summary. See representation for full details:  The LLFA welcomes that the Newton Flotman Neighbourhood Plan 2024 - 2038 Submission Version February 2025 (Regulation 16) and its 13no. proposed policies make 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 no reference is made within the document to sources such as groundwater flooding, with no groundwater mapping provided or comprehensive mapping for other sources of flood risk such as surface water. According to LLFA datasets (extending from 2011 to present day) we have 1 no. records of internal flooding and 6 no. records of external/anecdotal flooding in the Parish of Newton Flotman. 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. 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.
NFNP-27	23/04/2025	Highways Authority	Norfolk County Council	County Hall, Martineau Lane, Norwich	NR1 2DH	General	-	-	-	Y	It appears that no previous highway comments made at Reg 14 have been taken on board. Therefore, all highway comments made at Reg 14 still apply.
NFNP-28	23/04/2025	Highways Authority	Norfolk County Council	County Hall, Martineau Lane, Norwich	NR1 2DH	Pages 47-59 - Local Green Spaces	-	Y	-	-	A number of the proposed Local Green Spaces allocations within Newton Flottman's NP look to allocate highway land and could negatively impact the operation of the highway. The Highway Authority objects to the allocation of sites 5, 6, 12, 13, 15. It is unclear whether sites 9 and 10 include highway land within the proposed allocations. For sites 9 and 10, the Parish Council will need to request highway boundary plans from our Highway Boundaries team to determine whether highway land is included prior to allocating these sites. If so, the HA objects to sites 9 and 10 for the reason stated above. The HA has no objection to Local Green Space allocations 1, 2, 3, 4, 7, 8, 11, 14. In addition, site 16 is a new site. It seeks to allocate highway land, so we object to that too.
NFNP-29	23/04/2025	Library Service	Norfolk County Council	County Hall, Martineau Lane, Norwich	NR1 2DH	General	-	-	-	Y	The following is a summary. See representation for full details:  Increased development and housing places additional needs and demands on the capacity of the council's existing provision, triggering the need to improve the scope of their local services involving, for example, additional or reconfigured space, digital capacity and accessibility, book-stock provision and, in some areas, mobile library provision. There is a strong need to flag this early, at the planning stage. For additional Library capacity, the applied average national standard is 30m2 per 1,000 population.