

Swainsthorpe Neighbourhood Plan - Reg. 16 Representations Summary

Ref.	Title	First Name	Surname	Position	Organisation	Part of Plan	Support	Support w. mods	Oppose	Comment	Response
SNP-01	Dr	Sarah	Eglington	Campaigns & Policy Officer	The Wildlife Trust	Policy SWS1: Design	Y				We support the inclusion of clause j around climate change and water. We support clause g around lighting, to ensure development proposals demonstrate compliance with best practice guidance for avoiding artificial lighting impacts on bats. In order to create environmentally resilient places, nature should be at the heart of design and therefore we recommend that this is also reflected within the policy wording.
SNP-02	Dr	Sarah	Eglington	Campaigns & Policy Officer	The Wildlife Trust	Policy SWS3: Connections and Rights of Way	Y				We support the policy wording promoting opportunities to incorporate green infrastructure into new pedestrian/cycle routes, for example, trees, shrubs, rain gardens, swales etc. as appropriate.
SNP-03	Dr	Sarah	Eglington	Campaigns & Policy Officer	The Wildlife Trust	Policy SWS5: Green Spaces	Y				Green spaces offer numerous benefits; providing important habitats for wildlife, acting as natural wildlife corridors, aiding drainage which in turn reduces flooding, acting as a carbon sink, purifying air, contributing to biodiversity whilst providing vibrant spaces and health benefits. As designation provides a strong level of protection for these spaces, we support the listed Local Green Spaces and the intention to create new green spaces.
SNP-04	Dr	Sarah	Eglington	Campaigns & Policy Officer	The Wildlife Trust	Policy SWS6: Biodiversity	Y				We strongly support this policy. For clarity, we suggest including an explanation of what exactly constitutes ‘existing ecological networks’. We suggest that this should incorporate both statutory and non-statutory protected sites (ie CWSs and RNRs). We welcome the reference in the supporting text and within policy SW26 to the River Tas, other areas of priority habitat and roadside nature reserves. We strongly support the additional text about the implementation of buffer zones. We support the text in paragraph 8.26 and 8.27 to encourage suitable planting schemes, the addition of wildlife boxes and ponds. We recommend that there is a presumption against the use of artificial grass. We strongly support the reference to a consideration for moving towards an ambition of 20% Biodiversity Net Gain (para 8.21). We support the additional text to encourage the use of green roofs/walls to buildings and structures where appropriate.
SNP-05	Dr	Sarah	Eglington	Campaigns & Policy Officer	The Wildlife Trust	Policy SWS7: Flood Risk	Y				Sustainable Urban Drainage Systems (SuDS) are extremely important in reducing flood risk, reducing pollution locally, increasing biodiversity and when used effectively can provide habitat connectivity. We therefore support the policy wording promoting the use of SuDS.
SNP-06	Dr	Sarah	Eglington	Campaigns & Policy Officer	The Wildlife Trust	Policy SWS9: Mitigating the impacts of energy projects	Y				We support the inclusion of text stating that all energy projects should seek to avoid/minimise any adverse impacts on the natural environment. We also strongly support the text aiming to ensure that any consented developments maximise opportunities for biodiversity enhancement.
SNP-07		Emily	Halliwell	Planning Adviser	Environment Agency	Whole Plan				Y	The following is a summary: Having commented previously on this plan we are pleased to see that our previous comments have been taken on board. We therefore have no further detailed comments to make in relation to this plan.
SNP-08		Shamsul	Hoque	Assistant Spatial Planner	National Highways	Whole Plan				Y	The following is a summary: The vision, objective, and proposed policies within this Neighbourhood Plan Review 2026-2046 Submission Draft (Regulation 16) would not have any predicted adverse impact on the Strategic Road Network (SRN). We offer No Comment.
SNP-09		Steve	Hickling	Historic Environment Officer	Norfolk County Council Historic Environment	Environment & SW5 Heriage				Y	Thank you for consulting the Historic Environment team. Unfortunately, previous advice, dated 9th December 2025 (our ref: CNF51462_1), has yet to be incorporated, so to reissue: Although the historic buildings are well accounted for in the draft plan, the buried archaeological remains are barely mentioned. There are cropmarks surrounding the village and recent works on the Bloys Grove Solar Farm to the southwest of the village have returned significant results, although investigations to the north of the village generally have not. As such I would strongly recommend consulting the county Historic Environment Record for further details.
SNP-10					Norfolk County Council Lead Local Flood Authority	Environment & SW7 Flood Risk				Y	The following is a summary; The LLFA welcomes references in the Plan for the need for developments to mitigate against flood risk and the document now includes reference to also consider the risk of flooding from groundwater. The LLFA also welcomes the enhancement of Policy SWS7. According to LLFA datasets (extending from 2011 to present day) we have 1 no. record of internal flooding and 3 no. records of external/anecdotal flooding in the Parish of Swainsthorpe. 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. According to Environment Agency datasets, there are areas of localised surface water flooding (ponding), as well as surface water flowpaths present within the Parish of Swainsthorpe. The LLFA have no comments to make on the proposed LGSs in the plan.

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SNP-11					Norfolk County Council Public Health	Whole Plan				Y	NCC Public Health have no specific comments regarding the Plan. However, if they have not already done so, they may find it helpful to consult the Health in Neighbourhood Plans guidance.
SNP-12				Group Manager - Operational Risk and Policy	Norfolk Fire & Rescue	Whole Plan				Y	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. 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. To ensure that NFRS can respond appropriately to the increased risks and demand - Policy SWS2 (New Developments) or 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. 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 SWS2 (New Developments) should make appropriate reference to the need for fire hydrant provision associated with new development. Due to the risk of fire spread Policy SWS1: Design should make clear that any purpose-built structure to house refuse or recycling bins should not be built next to residential houses. Policy SWS1(F) (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'). 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. Policy SWS1: 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.
SNP-13	Mr	Ross	McGiven	Historic Places Adviser	Historic England	Whole Plan				Y	Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide additional comments at this time.
SNP-14	Mr	Geoff	Curran	Resident		Whole Plan	Y				I totally support the Neighbourhood Plan for the benefits that it can bring to our village
SNP-15	Mrs	Sheena	Curran	Resident		Whole Plan	Y				I think it is good for the village going forward especially as we are being surrounded by too many electrical installations
SNP-16				Planning Policy Team	South Norfolk Council	General Comments				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 South Norfolk Council still considers that changes are necessary in order for the Plan to meet the basic conditions.
SNP-17				Planning Policy Team	South Norfolk Council	Page 24 Paragraph 6.10				Y	Para 6.10 needs updating now that the Design Code has been adopted. We would suggest something along the lines of 'South Norfolk Council has now adopted the South Norfolk and Broadland Design Code Supplementary Planning Document (SPD), which takes its lead from the national guidance.' We would also suggest they a footnote is included, with a link to our webpage (www.southnorfolkandbroadland.gov.uk/planning/future-development/supplementary-planning-documents/broadland-and-south-norfolk-district-wide-design-codes).
SNP-18				Planning Policy Team	South Norfolk Council	Page 27 Para 6.14				Y	We noted at the Regulation 14 stage that there was an incomplete sentence in this paragraph. The second sentence of the paragraph remains incomplete and needs clarifying.
SNP-19				Planning Policy Team	South Norfolk Council	Policy SWS1: Design		Y			Parking states "Parking should not be placed in front of the ground floor windows of any habitable rooms" This actually goes against secured by design advice that recommends ground floor windows to overlook parking spaces. I don't think this sentence is necessary. It also means if you are having on plot parking it could result in blank elevations where there is parking – which could result in poor elevational treatment.

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SNP-20				Planning Policy Team	South Norfolk Council	Policy SWS6: Biodiversity		Y			In our Regulation 14 consultation response, we noted that there were issues with this policy in terms of proportionality of the requirements and also some confusion as to how different elements of the policy overlap with the national BNG requirements. Although certain amendments have been made, it is still considered there is a lack of clarity and it tends to repeat elements of national legislation and policy relating to BNG when there is no need to do so. In addition, not all proposals are required to deliver 10% BNG. Despite the policy having been split into two sections (the second of which deals with BNG), the first section, which it is suggested deals with the ‘Retention of existing biodiversity features’, still deals with the ‘enhancement of ecological networks’ (which is effectively achieved via BNG). The footnote that has been added to ‘new development’ in the first sentence confuses matters by referring to the fact that ‘there are exemptions from BNG’. In addition, there remain general issues with proportionality by simply referring to ‘new development’ and not qualifying it by adding ‘where appropriate to its scale, nature and location’, or similar. Paragraphs three and four add further confusion in terms of the relationship to BNG, referring to loss and enhancement of biodiversity features, including the maintenance of mitigation measures (all dealt with in BNG legislation). In addition, we would query the categoric wording in paragraph three (‘development proposals must...’) - which is, in fact, then countered by paragraph four, which deals with exceptions to this stipulation. The final sentence of paragraph four also appears to pre-determine the outcome of planning applications. As regards the elements of the first paragraph under ‘Biodiversity Net Gain’, where it states, ‘...for example the creation of new and the restoration and enhancement of existing natural habitats...’, the BNG mitigation hierarchy is written into the Environment Act which looks to enhance existing habitats on-site prior to the creation of new on-site habitats. We would suggest the order of this list be revised accordingly so that creation of new habitats is placed at the end of this sentence. We welcome the reference to the LNRS map and the Areas the Could Become of Importance to Biodiversity.
SNP-21				Planning Policy Team	South Norfolk Council	Policy SWS9: Mitigating the impacts of energy projects		Y			During the Regulation 14 consultation, South Norfolk Council commented that the policy/supporting text should make it explicit that it does not relate to Nationally Significant Infrastructure Projects (NSIPs) as this is ‘excluded development’ in relation to neighbourhood planning. See section 61K of Schedule 9 of the Localism Act 2011. Suggest adding, ‘...in accordance with national policy’ at the end of the final paragraph. Whilst we acknowledge that the Qualifying Body has added a comment to the supporting text, we still feel that there should be a change made to the policy itself, particularly as the examples mentioned within the policy (e.g pipelines, pylon etc) could well fall under NSIPs.
SNP-22				Planning Policy Team	South Norfolk Council	Policy SWS10: Community Facilities		Y			During the Regulation 14 consultation, South Norfolk Council commented on the difference in exceptions criteria between policy SWS10 in the Neighbourhood Plan and policy DM3.16 in South Norfolk Council’s Development Management Policies document. The latter states that change of use will only be permitted where it can be demonstrated the use is no longer viable or ‘adequate other facilities already exist within a reasonable distance to meet local needs’. SWS10, however, substitutes the latter for ‘where an improved or equivalent facility can be located elsewhere in the parish’. In its Consultation Statement, the Qualifying Body states that it has concerns over what constitutes ‘a reasonable distance’ and therefore it has not amended the policy wording. The Council’s concern is that the statement, ‘the exception will be where an improved or equivalent facility can be located elsewhere in the parish’ (with added emphasis) does not commit a developer to delivering a replacement facility. It simply requires there to be the potential for such a facility to be delivered elsewhere, with no mechanism for doing so. Therefore, whilst the Qualifying Body’s concern is noted, the wording of this exception in SWS10 would arguably place the community in a weaker position than it would be by relying on the wording of the South Norfolk Council policy.
SNP-23				Planning Policy Team	South Norfolk Council	Design Guidance and Codes (Para. 6.10), p.24		Y			Just to note, that the South Norfolk Design Code was adopted by the Council in May. Further information can be found at South Norfolk and Broadland Design Code Supplementary Planning Document (SPD) Broadland and South Norfolk
SNP-24		Angela	Brooks	Partner	Fisher German on behalf of National Grid Electricity Transmission (NGET)	Whole Plan				Y	The following is a summary. Please see full response. National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today’s highly complex network but also to enable the electricity system of tomorrow. Following a review of the above Neighbourhood Plan Document, we have identified one or more NGET assets within the Plan area. Details of NGET assets are provided below; Overhead Transmission Lines: 4YM ROUTE TWR (001 - 195) 400KV Overhead Transmission Line Route: BRAMFORD - NORWICH MAIN 1. BRAMFORD - NORWICH MAIN 2. In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets. With the above context in mind, the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.

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SNP-25	Mr	James	Lawson		James Lawson Planning Ltd - on behalf of Norfolk Constabulary	Chapter 5. Vision, Objectives, Policies & Projects - Vision Statement		Y			<i>This is a summary and forms part of a broader response enclosed with the main response.</i> The vision statement does not sufficiently reflect national planning policy guidance and Secured by Design initiatives which aim to; *Ensure developments create places that are safe, inclusive & accessible; *Promote health & well-being; *Address crime & disorder & the fear of crime; *Determine where additional infrastructure is necessary; As a consequence the vision statement is not considered to sufficiently address the quality of life, community cohesion, resilience & policing considerations, or fully contribute to the achievement of sustainable development; In order to achieve consistency with the national policy provisions, closer alignment with Secured by Design objectives and relevant local community priorities in the Police & Crime Plan, the following modification is proposed; ***Expand the 'Vision Statement' to include reference to – new development creating healthy, inclusive and safe places and providing for the social infrastructure required to mitigate the impacts arising from housing development/ population growth *** Attention is drawn to the Norfolk Constabulary Response to the Regulation 16 Neighbourhood Plan consultation, which is submitted as an accompanying document
SNP-26	Mr	James	Lawson		James Lawson Planning Ltd - on behalf of Norfolk Constabulary	Chapter 5. Vision, Objectives, Policies & Projects - Vision Statement		Y			<i>This is a summary and forms part of a broader response enclosed with the main response.</i> The Objectives do not sufficiently reflect national planning policy guidance and Secured by Design initiatives which aim to; *Ensure developments create places that are safe, inclusive & accessible; *Promote health & well-being; *Address crime & disorder & the fear of crime; *Determine where additional infrastructure is necessary; As a consequence the Objectives are not considered to sufficiently address the quality of life, community cohesion, resilience & policing considerations, or fully contribute to the achievement of sustainable development; In order to achieve consistency with the national policy provisions, closer alignment with Secured by Design objectives and relevant local community priorities in the Police & Crime Plan, the following modification is proposed; ***Expand the 'Objectives' to include reference to promoting community safety, cohesion and well-being through the design, layout and specification of buildings, outside spaces and the provision of infrastructure; *** Attention is drawn to the Norfolk Constabulary Response to the Regulation 16 Neighbourhood Plan consultation, which is submitted as an accompanying document
SNP-27	Mr	James	Lawson		James Lawson Planning Ltd - on behalf of Norfolk Constabulary	Chapter 6. POLICIES: Development & Design - Policy SWS1: Design		Y			<i>This is a summary and forms part of a broader response enclosed with the main response.</i> Policy SWS1 does not sufficiently reflect national planning policy guidance and Secured by Design initiatives which aim to; *Ensure developments create places that are safe, inclusive & accessible; *Promote health & well-being; *Address crime & disorder & the fear of crime; *Determine where additional infrastructure is necessary; As a consequence Policy SWS1 is not considered to sufficiently address the quality of life, community cohesion, resilience & policing considerations, or fully contribute to the achievement of sustainable development; In order to achieve consistency with the national policy provisions, closer alignment with Secured by Design objectives and relevant local community priorities in the Police & Crime Plan, the following modification is proposed; ***Expand 'Policy SWS1' to include a new policy criterion k) referencing the following design principles & infrastructure requirements; k) Create places that are safe, inclusive & accessible with layout/ design principles to promote health & well-being, address crime & disorder & the fear of crime, & require developer funding to ensure that the quality of life, community safety, cohesion & policing impacts are mitigated; Attention is drawn to the Norfolk Constabulary Response to the Regulation 16 Neighbourhood Plan consultation, which is submitted as an accompanying document
SNP-28	Mr	James	Lawson		James Lawson Planning Ltd - on behalf of Norfolk Constabulary	Policy SWS1: Design		Y			<i>This is a summary and forms part of a broader response enclosed with the main response.</i> Policy SWS2 does not sufficiently reflect national planning policy guidance and Secured by Design initiatives which aim to; *Ensure developments create places that are safe, inclusive & accessible; *Promote health & well-being; *Address crime & disorder & the fear of crime; *Determine where additional infrastructure is necessary; As a consequence Policy SWS2 is not considered to sufficiently address the quality of life, community cohesion, resilience & policing considerations, or fully contribute to the achievement of sustainable development; In order to achieve consistency with the national policy provisions, closer alignment with Secured by Design objectives and relevant local community priorities in the Police & Crime Plan, the following modification is proposed; ***Expand Policy SWS2 to include a new paragraph referencing the following infrastructure requirements; * Make provision for an appropriate level of developer funded social infrastructure, including health, police & fire & rescue facilities, in order to promote health & well-being, & address crime & disorder & the fear of crime to ensure that the health, quality of life, community safety, cohesion & policing impacts arising from new development are adequately mitigated; Attention is drawn to the Norfolk Constabulary Response to the Regulation 16 Neighbourhood Plan consultation, which is submitted as an accompanying document.

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SNP-29	Mr	Thomas	Clare	Planning Liaison and Policy Manager	NHS Norfolk and Suffolk Integrated Care Board	Whole Plan		Y			The following is a summary. Please see the full response; The ICB welcomes the opportunity to comment on the Swainsthorpe Neighbourhood Plan and supports its overall approach to protecting the rural character of the area while recognising the importance of planning for current and future community needs. • Although the Plan anticipates only limited housing growth within Swainsthorpe itself, the ICB notes that residents rely on nearby settlements for primary care, dental, pharmacy, optometry, community, mental health and acute services, meaning that any future population growth should be carefully monitored for its cumulative impact on healthcare demand. • The ICB supports policies that encourage accessible and adaptable housing, including reference to Building Regulation Part M4(2), M4(3), Lifetime Homes principles, wheelchair accessibility and dementia-friendly design, as these measures can help residents live independently for longer and reduce avoidable pressure on health and care services. • The Plan’s emphasis on active travel, rights of way, green spaces and community facilities is welcomed, as these measures support physical activity, mental wellbeing, social interaction, healthy ageing and access to nature, all of which are important wider determinants of health. • The ICB supports the inclusion of appropriate developer contributions through CIL and/or Section 106 where future development gives rise to additional demand on healthcare infrastructure and services used by Swainsthorpe residents. • The ICB will continue to monitor and review demand and capacity data in relation to population growth, taking account of emerging NHS priorities, the NHS 10 Year Plan and new models of care.
SNP-30	Mr	Joe	Wyatt	Strategic Planner	Norfolk County Council	Policy SWS5: Green Spaces and Appendix C				Y	The plan designates local green spaces. Some of these include land designated as public highway. The boundaries must be redrawn to exclude public highway. Also, the plans for green space designations seem to be wrong, one plan is duplicated under two different descriptions (Millennium Green (incorrect) and Jubilee garden).
SNP-31		Sally	Wintle	Officer	Natural England	Whole Plan				Y	Natural England does not have any specific comments on this draft neighbourhood plan.
SNP-32		Phillipa	Nanson	Sustainable Development Officer	Water Management Alliance	Whole Plan				Y	The following is a summary, please see full response; The parish of Swainsthorpe falls partially within the Internal Drainage District (IDD) of Norfolk Rivers Internal Drainage Board (IDB) and therefore the Board’s Byelaws apply to any development within or directly affecting the Board’s area. Please read the full response for detail of those byelaws.
SNP-33		Tessa	Saunders	Spatial and Strategic Planning Lead	Anglian Water	Policy SWS1: Design		Y			Clause f: Parking: We consider that the detailed design requirements for parking spaces should recommend permeable surfacing to reduce surface water run-off and minimise flood risk. Clause j: Climate Change: Anglian Water welcomes the policy clause regarding climate changes to ensure all new development demonstrates how it is responding to climate change through introducing mitigation and adaptation measures. We fully support the highest levels of water efficiency; however, the Greater Norwich Local Plan only introduces the higher optional standard of 110 litres per person per day. Since the adoption of the Greater Norwich Local Plan the Shared Standards for Water Efficiency in Local Plans has been published in June 2025. The Shared Standards sets out a collaborative and collective approach by Anglian Water, Cambridge Water, Essex & Suffolk Water, Affinity Water, the Environment Agency and Natural England, with the full endorsement of Water Resources East (WRE) as part of strengthening the Regional Water Resources Plan for Eastern England. It recommends that Local Planning Authorities (LPAs) include tighter water efficiency standards in Local Plan policies to support a clean and sustainable supply of water - essential for growth and nature recovery. This includes recommended water efficiency standards up to 85 litres per person per day (l/p/d) with a suggested range between 85 and 95 l/p/d. Anglian Water also provides environmental incentive schemes for developers installing water efficiency measures – Tier 1 for installing fixtures and fittings to meet 90 l/p/d and Tier 2 for installing rainwater harvesting or greywater recycling systems. It is considered that there is clear evidence to support tighter water efficiency standards for new development in the neighbourhood plan, and incentives available to enable this to be achieved.
SNP-34		Tessa	Saunders	Spatial and Strategic Planning Lead	Anglian Water	Policy SWS5: Green Spaces				Y	Anglian Water has underground assets within some of the Local Green Spaces identified in the policy. However, it is not considered that the policy would prevent the repair or maintenance of these assets.
SNP-35		Tessa	Saunders	Spatial and Strategic Planning Lead	Anglian Water	Paragraph 8.26				Y	New tree planting schemes should also ensure that the right tree in the right place, takes account of easements for underground utilities such as water mains and sewers. Some of our assets are within Areas that Could Become of Important to Biodiversity (ACB) as identified in the Local Nature Strategy for Norfolk.

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SNP-36		Tessa	Saunders	Spatial and Strategic Planning Lead	Anglian Water	Policy SWS7: Flood Risk	Y				Anglian Water supports the policy approach to ensure that new development is directed away from areas with the highest risk of flooding and should be made safe for its lifetime without increasing flood risk from all sources including surface water and groundwater. Surface water ingress and groundwater inundation to our sewer network can result in hydraulic overloading and therefore measures to avoid these flooding risks are welcomed. We fully support the approach for all development to incorporate SuDS and to ensure that development proposals include the submission of a drainage strategy. Anglian Water requires a sustainable drainage (SuDS) first approach, demonstrating compliance with the surface water drainage hierarchy in accordance with Building Regulations Part H. Surface water connections to the foul sewer network are not permitted, and all foul and surface water flows must be managed and discharged via separate systems. Customers (developers/applicants) must clearly demonstrate that all higher-order drainage options have been fully explored before any connection to the public sewer is considered. It is the developer's responsibility to provide robust evidence confirming that the hierarchy has been followed and to demonstrate that alternative methods of disposal are not feasible. Early engagement with Anglian Water is strongly encouraged, particularly where there is potential for SuDS adoption or where a surface water sewer connection is proposed, to ensure that an appropriate and policy-compliant drainage strategy is agreed. Further guidance can be found on our website Sustainable surface water drainage
SNP-37		Tessa	Saunders	Spatial and Strategic Planning Lead	Anglian Water	Paragraph 8.53		Y			The threshold for nationally significant infrastructure projects which are solar or wind farms increased to 100MW on 31 December 2025 with the introduction of The Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025. Applications for wind or solar farms below this threshold will be determined under the Town and Country Planning Act 1990.
SNP-38		David	Yates		Natural England (Norfolk and Suffolk Area Team)	Environmental Policies		Y			I would like to express support for the following aspects of the Biodiversity policy (SWS6): - The consideration of SSSI Impact Risk Zones and the proximity of other designated protected sites; - The inclusion of Natural England's Priority Habitat mapping (although the lack of intensity of the colours makes it difficult to identify which area represents which priority habitat); - The inclusion of the mapping from the Natural England Green Infrastructure Framework; - The inclusion of the Areas of Particular Importance for Biodiversity and the Areas that Could Become of Particular Importance for Biodiversity layers from the Norfolk Local Nature Recovery Strategy Local Habitat Map. I welcome the reference to using the Areas That Could Become of Particular Importance layer to identify opportunity areas for Biodiversity Net Gain habitat creation. However, I would also encourage reference to be made to the use of the potential measures layer of the LNRS Local Habitat Map in order to see which habitat measure (or measures) has been identified as offering the best opportunity for nature recovery at that particular site. The 15% strategic significance uplift is only available to the person creating the habitat to generate biodiversity units if the habitat being created is the one identified in the LNRS. - The references to providing artificial habitats for wildlife in built development (e.g. bird boxes) and designing development so as to be wildlife-friendly, such as allowing hedgehog movement between gardens and designing lighting in accordance with best practice for avoiding disturbance to bats. I would recommend that the following minor amendments are made: - The document says that Biodiversity Net Gain will be introduced for Nationally Significant Infrastructure Projects in May 2026. This has now been delayed until November 2026. - Within Policy SWS6 there is a reference to creating new wildlife corridors. I would suggest that this could be added to with a further reference to the Norfolk Local Nature Recovery Strategy Local Habitat Map, as this has identified where there are the best opportunities to do this and which habitat measures are the most appropriate ones to use. Furthermore, it will potentially connect any wildlife corridors being created within Swainsthorpe to the environmental setting of the village to help to create a Nature Recovery Network that covers the whole county. In Policy SWS7: Flood Risk, I would like to express my support for the following aspects: - The encouragement of the use of Sustainable Drainage features with a natural rather than an engineered appearance. In the policy on mitigation, I welcome the policy of maximising local biodiversity and incorporating a species-rich buffer of at least 15m around solar farms.