



Norfolk County Council

Norfolk County Council Comments on the: Ringstead Neighbourhood Plan (Reg 16) 09 August 2024

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. Norfolk Fire and Rescue

2.1. Background and Context

2.2. 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.

2.3. 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.

2.4. 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.

2.5. Neighbourhood Plan Comments

2.6. **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.

- 2.7. To ensure that NFRS can respond appropriately to the increased risks and demand – **Policy R7 (Infrastructure)** and / or the supporting text should make it clear that developers will be expected 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.
- 2.8. 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 R7 (Infrastructure)** should make appropriate reference to the need for fire hydrant provision associated with new development.
- 2.9. **Policy R8 (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’).
- 2.10. **Policy R3 (Eco Design) and Policy R17 (Land at Dobson and Horrell)** - NFRS recognises the need for Councils to have a positive strategy to promote renewable energy generation in developments.
- 2.11. 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.
- 2.12. **Policy R8 (Parking)** should clearly reflect the above fire safety issues/requirements.
- 2.13. Should you have any queries with the above comments please contact:
Jennie Schamp, Group Manager - Operational Risk and Policy Norfolk Fire and Rescue Service jennifer.schamp@norfolk.gov.uk

3. Libraries

- 3.1. Libraries are very much at the heart of their communities, supporting them to flourish through reading, learning and information as well as through connections with culture and heritage.
- 3.2. The Public Libraries and Museums Act 1964 places an obligation on Library Authorities to provide comprehensive and efficient library services for all persons desiring to make use of it. This established the principle that the Library Authority did not have to prove that additional residents, as a result of new development, would be “users”.
- 3.3. In Norfolk, public library services are currently delivered through 47 libraries, including the flagship Norfolk and Norwich Millennium Library plus 5 mobile libraries.
- 3.4. 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.
- 3.5. Public libraries in Norfolk have the power to enrich the lives of individuals and communities. At a local, community level they:
 - build a literate and confident society by developing, delivering and promoting creative reading and learning activities in libraries
 - support the health and wellbeing of local people and communities through services that inform, engage and connect
 - ensure local communities have access to quality information and digital services, to learn new skills and to feel safe online
 - enable local communities to access and participate in a variety of quality and diverse arts and cultural experiences.
- 3.6. Your local library is a source of trusted information and will signpost you to the right support. It is recognised that post-pandemic, communities need support to combat social isolation and achieve cohesion. Your local library is a ready-made, welcoming and neutral community hub that will enable you to make valuable social connections.
- 3.7. It is well documented that libraries enhance communities, facilities, and economic life: [New research reveals England's public libraries generate value of £3.4 billion a year | Libraries Connected](#)
- 3.8. For future reference – for additional Library capacity, the applied average national standard is 30m² per 1,000 population.
- 3.9. Should you have any queries with the above comments please contact the Libraries team at libs.planning.obligations@norfolk.gov.uk

4. **Lead Local Flood Authority**

- 4.1. Thank you for your consultation on the Ringstead Neighbourhood Plan Regulation 1 Version 2021 – 2036 March 2024 and its supporting documents (LLFA Reference: FW204_0564), received by the LLFA on 16th July 2024. Please note that the LLFA also previously provided comments to the Regulation 14 Consultation Document (LLFA Ref: FW204_0157) as part of the NCC corporate response.
- 4.2. The LLFA comments at Regulation 16 stage are as follows:
- 4.3. The LLFA welcomes that the Ringstead Neighbourhood Plan Regulation 15 Pre-Document March 2024 and its 14 no. proposed policies retain references to flood risk from various sources including surface water, groundwater and fluvial flooding and the implications of climate change upon flood risk, with the Section of the document entitled Flood and Water Management, RNP Policy 3: Land off Peddars Way North, RNP Policy 10: Surface Water Management and RNP Community Action 2: Maintenance of Drainage Ditches, being the most relevant to matters for consideration by the LLFA.
- 4.4. The LLFA particularly welcomes the retention and enhancements to RNP Policy 10: Surface Water Management (along with Figure 34: Examples of Surface water Risk) within the Flood and Water Management Section of the document which relates to flood risk from various sources such as fluvial (rivers) and surface water and recognises the importance of considering flood risk early in the development process in order to help avoid it, manage it more efficiently or in a way that adds value to the natural environment and biodiversity. It is however noted that full consideration has not been given to all sources of flood risk with limited flood risk mapping included.
- 4.5. The LLFA further welcome the retention of references and enhancements made to RNP Policy 10 and its supporting text in respect SuDS and the inclusion of sustainable drainage features within new developments such as attenuation ponds, permeable surfaces, rainwater harvesting/storage and green roofs and walls, along with recognising the wider benefits which can arise from seeking to achieve the four pillars of SuDS, namely water quality, water quantity, amenity and biodiversity.
- 4.6. The LLFA also welcomes references retained to the Neighbourhood Plan Document complimenting Strategic Policies included within the Kings Lynn and West Norfolk Local Plan, the emerging Local Plan and National Planning Policy Framework (NPPF).
- 4.7. Furthermore, the LLFA welcomes that this latest document references guidance available to developers from relevant Agencies such as the Norfolk

County Council LLFA and the Environment Agency relating to flood risk management, drainage and flooding matters, and in particular reference made to the LLFA guidance contained within 'Norfolk County Council LLFA Statutory Consultee for Planning: Guidance Document' with the inclusion of a link to allow accessibility.

- 4.8. The LLFA are not aware of AW DG5 records within the Parish of Ringstead, however, this will need to be confirmed with/by Anglian Water.
- 4.9. According to LLFA datasets (extending from 2011 to present day) we have no records of internal flooding, along with no records of external/anecdotal flooding in the Parish of Ringstead. 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.
- 4.10. We advise that Norfolk County Council (NCC), as the LLFA for Norfolk, publish completed flood investigation reports [here](#).
- 4.11. According to Environment Agency datasets, there are areas of localised surface water flooding (ponding) and surface water flowpaths present within the Parish of Ringstead.
- 4.12. The LLFA note that no 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](#)

4.13. Allocation of Sites

- 4.14. 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 (it is noted that RNP Policy 3: Land off Peddars Way North (RNP1) identified in Figure 14 is retained in the document seeking to allocate land for 6 no. affordable dwellings to the east of Peddars Way North). 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.

4.15. LLFA Review of Local Green Spaces (LGS)

4.16. As previously, the Regulation 16 document proposes 8 no. Local Green Spaces which are identified in RNP Policy 8: Local Green Spaces and Figure 29. 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.

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