

**Saham Toney Neighbourhood Plan  
Submission Consultation  
Representation Form**

Saham Toney Parish Council has prepared a submission version of the Neighbourhood Plan for the Saham Toney Neighbourhood Area. Breckland Council are inviting you to make comments on it **by no later than 5pm on Thursday 10th December 2020**.

In order for your representations (comments) to be taken into account when the Neighbourhood Plan is submitted for Examination, and also to keep you informed of the future progress of the Neighbourhood Plan, your contact details are needed.

All comments may be made publicly available on Breckland Council's website, and comments will be identifiable by name (and organisation where applicable). Please note that any other personal information provided will be processed in line with the Data Protection Act 1998 and not made available on the website.

**Personal Details**

Please fill in your contact details below:

<b>Name: Naomi Chamberlain (on behalf of the Highway Authority and Lead Local Flood Authority)</b>
<b>Capacity in which commenting on the Plan</b> <i>(Please tick all boxes that apply):</i>  Statutory Consultee <input type="checkbox"/>
<b>Organisation represented</b> <i>(where applicable):</i> Norfolk County Council
<b>Address:</b> County Hall, Norwich
<b>Postcode:</b> NR1 2DH
<b>Telep</b> [REDACTED]
<b>Email address:</b> [REDACTED]@k

### Policy Representation (comments)

In the table below please complete each column to show:

- which part of the Neighbourhood Plan your representation (comments) relates to;
- details of what you are supporting or objecting to, and why, and
- any change you think necessary e.g. new/revised policy or supporting text wording.

Please note, your comments should briefly cover all the information, evidence and supporting information necessary to support/justify the comments and the suggested change, as there will not normally be a subsequent opportunity to make further comments.

Page & Policy/ Paragraph Number	Comment and reason	Suggested Change
<b>Highway Authority Comments - contact [REDACTED]</b>		
STNP1	We reiterate our comments of no objection subject to the allocation policy requiring the highway conditions set out in planning application 3PL/2015/1430/F.	Visibility requirements should not be left to general policy on highway visibility. The exact requirement must be included in the site-specific policy. The allocation policy should incorporate the requirements of Policy 2F.5 If these cannot be met the site will not be able to meet the basic highway safety requirements.
SNTP2	The objection remains as the site cannot provide a footway on Hills Road and the policy does not make this a requirement, so the original objection stands.	
STNP7	No objections to the proposals	The allocation policy should incorporate the requirements of Policy 2F.5. Policy 2F visibility requirements should be included in each allocation and not left to general policy. If these cannot be met the site will not be able to meet the basic highway safety requirements.

Page & Policy/ Paragraph Number	Comment	Suggested Change
STNP9	Our objection on the lack of continuous footway provision remains.	The policy only proposes frontage footway but does not link to the existing provision.
STNP13 and STNP14	Our objections remain as the sites cannot provide a footway on Hills Road and the policies do not make this a requirement, so the original objections stand.	
STNP15	The Highway Authority objects on the basis that it is not demonstrated that adequate visibility can be achieved. The plan submitted demonstrates that acceptable visibility cannot be achieved to the west indicating only 8m can be achieved, which is well below the required standard.	
STNP16	No objections	The allocation policy should incorporate the requirements of Policy 2F.5. Policy 2F visibility requirements should be included in each allocation and not left to general policy. If these cannot be met the site will not be able to meet the basic highway safety requirements.
<b>Lead Local Flood Authority (LLFA) Comments – contact [REDACTED]</b>		
General Supporting Comments	<p>The LLFA welcome the widespread references to flood risk, surface water, drainage and SuDS in the submitted Neighbourhood Plan.</p> <p>We welcome the acknowledgement of our previous comments made at the Reg 14 stage of consultation.</p> <p>The LLFA appreciate the specific references to the LLFA Statutory Consultee for Planning Guidance Document.</p>	

	<p>We welcome references to publications made by Norfolk County Council (LLFA), noting references to flood investigation reports produced by the LLFA.</p> <p>The LLFA note references to the Environment Agency surface water flood maps. We recommend inclusion of a surface water flood map for the entire parish representative of the 3.33%, 1.0% and 0.1% AEP events.</p> <p>Since the Reg 14 stage of consultation, we have updated our standard wording in regards to surface water flood risk (see below). However, we welcome that that the current level of analysis and information presented by the submitted Neighbourhood Plan covers these points.</p> <p>The LLFA currently hold 18 records of internal flooding dating from 2016 to 2020, 24 records of external flooding dating from 2016 to 2020 and 3 records of anecdotal flooding dating from 2016 to 2020 in the Parish of Saham Toney. We note that our records differ from some of the figures stated within the Neighbourhood Plan.</p>	
Policy 8A	The LLFA do not support Policy 8A, in particular paragraph P8A.5. As we respond to consultations from the LPA on major development following the thresholds in our LLFA Guidance.	P8A.5 should be reworded to: <b>“The LLFA will be consulted on proposals for major development and will receive a substantive response in line with the LLFA Statutory Consultee Guidance”</b> The supporting text – T8A.10 should also be amended to reflect this.
Policy 8B-8H	We welcome Policy 8B, 8C, 8D, 8E, 8F, 8G, and 8H and note the details these policies address. We welcome the supporting information provided to evidence reasoning behind each policy with clear references to specific documents and relevant sourced information.	

<p>Allocation of Sites</p>	<p>We would expect that the Neighbourhood Planning Process provide a robust assessment of the risk of flooding, from all sources, when allocating sites. 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.</p> <p>A number of site allocations are included as part of the Reg 16 consultation. Comments on site allocations were previously provided as part of LLFA response FWS/19/3/7594 (see attached document). These previous comments still stand and the LLFA have no further comments to make.</p>	
<p><b>Local Green Spaces (LGS) ST-GS3 and ST-GS6</b></p>	<p>The document proposes a number of pre-existing spaces as local green spaces (LGS). It is understood that designation of LGS provides a level of protection against development. The LLFA do not normally comment on LGS unless they are/are proposed to be part of a sustainable urban drainage (SuDS) feature. Two of the named spaces are identified as being potential present surface water drainage features:</p> <ul style="list-style-type: none"> <li>• ST-GS3: The land immediately surrounding Saham Mere</li> <li>• ST-GS6: The bird sanctuary</li> </ul> <p>The LLFA would therefore recommend against development of this space to limit any negative impact on the current drainage contributions. The LLFA have no comments to make on all other submitted open spaces.</p>	

**Verbal Examination**

The majority of examinations are expected to be dealt with by written representations (in writing only). However, should it be decided there is a need for a verbal examination (a hearing), please state below whether you would like to participate by ticking the relevant box.

Yes, I wish to participate at an oral examination

Please note the Examiner will decide whether a verbal examination is necessary. If this is the case, please outline why you consider that your participation is necessary.

If required Norfolk County Council would attend a verbal examination.
---

**Update**

If you would like to be notified of Breckland Council's decision to "make" (adopt) the plan, please tick this box.

Please notify me

Thank you for completing this form - your participation is appreciated.

**Signature:** [Redacted] **Date:** 10/12/20

Please return via email to "neighbourhoodplanning@breckland.gov.uk" or send to Neighbourhood Planning, Breckland Council, Neighbourhood Planning, Elizabeth House, Walpole Loke, Dereham, NR19 1EE.

<b>For Council Use only</b>	
Date received:	Ref No:

LLFA comments - Local Plan Site Selection

LLFA Officer	Reference number	Site address	District	Parish	Proposed land use	Capacity		Would Local Flood Risk / Surface Water Drainage constraints be severe enough to prevent development of this site?	Level of Constraint	Recommendations	Major issues / Comments
						Unconstrained	Constrained				
SH	STNP13	Hills Road	Breckland	Saham Toney	Housing			No	1 - Few or no Constraints	Standard information required at a planning stage	There is no surface water risk identified on this site as shown in the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible)
SH	STNP14	Hills Road	Breckland	Saham Toney	Housing			No	1 - Few or no Constraints	Standard information required at a planning stage	There is no surface water risk identified on this site as shown in the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible)
SH	STNP10	Hills Road	Breckland	Saham Toney	Housing			Yes	3 - Significant mitigation required for severe constraints		A flow path, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps, flows through the northern section of the site. Watercourse is not apparent (in relation to SuDS hierarchy if infiltration is not possible). We recommend that there is no development done with in this site location as the surface water flow path covers the whole site. There is also reports flooding down stream to this location
SH	STNP3	Hills Road	Breckland	Saham Toney	Housing			Yes	3 - Significant mitigation required for severe constraints		A flow path, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps, flows through the northern section of the site. Watercourse is not apparent (in relation to SuDS hierarchy if infiltration is not possible). We recommend that there is no development done with in this site location as the surface water flow path covers the whole site. There is also reports flooding down stream to this location.
SH	STNP2	Hills Road	Breckland	Saham Toney	Housing			No	1 - Few or no Constraints	Standard information required at a planning stage	There is no surface water risk identified on this site as shown in the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible)
SH	STNP8	Hills Road	Breckland	Saham Toney	Housing			No	1 - Few or no Constraints	Standard information required at a planning stage	Ponding, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps is shown to the the centre of the site for the 0.1% AEP event.

LLFA Officer	Reference number	Site address	District	Parish	Proposed land use	Capacity		Would Local Flood Risk / Surface Water Drainage constraints be severe enough to prevent development of this site?	Level of Constraint	Recommendations	Major issues / Comments
						Unconstrained	Constrained				
											Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible). AW foul sewer located in Nohighway to N of site
SH	STNP1	Chequers Lane	Breckland	Saham Toney	Housing			No	1 - Few or no Constraints	Standard information required at a planning stage	Ponding, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps is shown to the the centre of the site for the 0.1% AEP event. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible). AW foul sewer located in highway to N of site
SH	STNP6	Pages Lane	Breckland	Saham Toney	Housing			No	1 - Few or no Constraints	Standard information required at a planning stage	Ponding, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps is shown to the the centre of the site for the 0.1% AEP event. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible). AW foul sewer located in highway to N of site
SH	STNP5	Pound Hill	Breckland	Saham Toney	Housing			No	1 - Few or no Constraints	Standard information required at a planning stage	Ponding, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps is shown to the the centre of the site for the 0.1% AEP event. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible). AW foul sewer located in highway to N of site
SH	STNP4	Pound Hill	Breckland	Saham Toney	Housing			No	1 - Few or no Constraints	Standard information required at a planning stage	Ponding, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps is shown to the the centre of the site for the 0.1% AEP event. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible). AW foul sewer located in highway to N of site
SH	STNP7	Pages Lane	Breckland	Saham Toney	Housing			No	2 - Mitigation required for heavy constraints	Significant information required at a planning stage	A flow path, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps, flows through the northern section of the site. Watercourse is apparent (in relation to SuDS hierarchy if infiltration is not possible). We recommend that the site boundry is ammended so not with in this flow path. There is also reports flooding down stream to this location
SH	STNP15	Richmond Road	Breckland	Saham Toney	Housing			No	1 - Few or no Constraints	Standard information required at a planning stage	Ponding, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps is shown to the the centre of the site for the 0.1% AEP event. Watercourse not apparent (in relation to

LLFA Officer	Reference number	Site address	District	Parish	Proposed land use	Capacity		Would Local Flood Risk / Surface Water Drainage constraints be severe enough to prevent development of this site?	Level of Constraint	Recommendations	Major issues / Comments
						Unconstrained	Constrained				
											SuDS hierarchy if infiltration is not possible). AW foul sewer located in highway to N of site
SH	STNP11	Richmond Road	Breckland	Saham Toney	Housing			No	1 - Few or no Constraints	Standard information required at a planning stage	There is no surface water risk identified on this site as shown in the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible)
SH	STNP16	Richmond Road	Breckland	Saham Toney	Housing			No	1 - Few or no Constraints	Standard information required at a planning stage	There is no surface water risk identified on this site as shown in the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible)
SH	STNP12	Richmond Road	Breckland	Saham Toney	Housing			No	1 - Few or no Constraints	Standard information required at a planning stage	There is no surface water risk identified on this site as shown in the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible)
SH	STNP9	Ovington Road	Breckland	Saham Toney	Housing			No	1 - Few or no Constraints	Significant information required at a planning stage	Ponding, as identified on the Environment Agency's Risk of Flooding from Surface Water (RoFSW) maps is shown to the the centre of the site for the 0.1% AEP event. Watercourse not apparent (in relation to SuDS hierarchy if infiltration is not possible). AW foul sewer located in highway to N of site