



## **KING'S LYNN CIVIC SOCIETY**

**Member of Civic Voice**

Registered Charity 298916

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### **Statement for BCKLWN SADMP Hearing**

#### **King's Lynn Civic Society (438)**

**Represented by Helen Russell Johnson** – Vice Chairman and Planning Committee Secretary, King's Lynn Civic Society.

**Hearing sessions:** Tuesday 7<sup>th</sup> July (afternoon); Wednesday 8<sup>th</sup> July (morning and afternoon); Thursday 9<sup>th</sup> July (morning).

We write to reiterate the points we made in our submission of 18<sup>th</sup> February, 2015.

**DM1** – We think our proposal for a re-phrasing of this policy is appropriate and self-explanatory. We think promoting dialogue between applicants and planning officers represents 'positive planning' – and assures residents that the LPA are looking for the best outcomes.

**DM2** – Whilst we recognise that there are sustainability arguments for expanding the population of Kings Lynn and restricting the size of villages (especially where village expansion could lead to settlement merger or sprawl into countryside), we feel the present SADMP puts too much emphasis on growing King's Lynn (with a consequential need for significant additional infrastructure), where appropriate growth in villages might actually have sustainability advantages – which would be more consistent with national policy.

**DM8** – We have never really understood the 15% affordable in Lynn and 20% elsewhere plan. It doesn't seem justified.

**DM9** – We have frequently raised concerns about the loss of local shops, post offices, pubs – which we imagine BCKLWN are trying to address in this policy – but we have doubts as to whether the current policy wording can prevent the trend. Therefore we wonder whether it will be effective.

**DM10** – Again, we are not convinced this policy will be effective in halting the current trend for edge-of-town expansion – the latest 'threat' being Morston Point.

**DM12** – Ensuring the provision of adequate transport provision for proposed development (particularly substantial new residential development as proposed in and around King's Lynn), without undermining the existing transport network, seems to us to be a quintessential aspect of defining development 'sustainability'. In our view if such provision can't be assured, then the development proposal can't be said to be sustainable?

We think the first bullet in this policy is unhelpful. Proposed major allocation sites will lead directly onto the strategic road network?

We feel the suggested additional clause would ensure that development teams address long term transport needs early in the planning process. It may be that roads are not the only transport option.

We understand that additional traffic studies in relation to potential impacts to the Hardwick Roundabout have shown a need for substantial road widening, whilst we don't know that any similar studies have been undertaken for the large allocation sites at Knights Hill, South Wootton and North Lynn. We are not therefore clear the transport evidence is presently robust.

**DM13, DM15, DM16, DM19, DM22** – Protecting GI corridors/ Design / Recreation Space / Green Infrastructure / Protecting Open Space

We feel if we want to ensure healthy, vibrant communities and urban environments that will be robustly sustainable in times of future climatic uncertainty – then these policies will not ensure a sound, positive plan.

KLCS are very concerned about the proposed site allocations that are likely to result in the loss of existing green infrastructure within and around the town. (Other community groups have also made vociferous objections presently and in the past – notably at Lynnsport and on sites in South Lynn). We feel if green space is going to be lost and housing density and the urban population are going to rise, new green infrastructure must be provided.

In our view it would be very useful if busy planning officers have the means to assess the suitability of applications against some clear guidelines - preferably guidelines that are locally specific. We feel the BCKLWN Green Infrastructure Strategy fails to provide this information, and there is little other relevant supplementary planning guidance. Extensive urban expansion could proceed quickly once the SADMP is adopted – and we feel that insufficient time has been spent on planning new green infrastructure and providing the kind of long term vision for its provision that would assist developers and planning officers (and reassure residents). The SADMP is unsound without more guidance on these requirements.

We have elaborated more on these matters in relation to specific sites in and around the town (see pages 7-12 of our original submission – Areas E1.1- E1.15 and also the large allocations around the town at West Winch, South Wootton and Knights Hill.

We also feel that there is insufficient detail in the SADMP regarding **heritage assets**, and that therefore the plan is unsound in relation to the NPPF. We have recommended specific text that we feel could amend this omission. We have also prepared a Local List for King's Lynn and feel that BCKLWN should adopt this as supplementary planning information and that the SADMP should refer to it.

**DM20 / DM21**

KLCS feel that it is regrettable that there is little specific policy to support a low carbon economy – especially when Kings Lynn and much of the Borough would be jeopardised by climate change and rising sea levels. Whilst we recognise that these are national and global issues – we feel our local plan is unsound without seeking to make this a planning priority.

END.