

# King's Lynn and West Norfolk Local Plan: SADMP Examination Comments on BCKLWN 'Follow Up Work'

Comments from North Runcton and West Winch Neighbourhood Plan Steering Group  
(Represented at hearing by Richard Morrish – Chair of Steering Group)

Comments on issue 4 FW01 Note on Site Allocations, Transport Evidence and Assessments and Policy DM 12. (Referred sections in green, comments in black).

## 1. Relationship between the Core Strategy and the SADMP (Page 3)

*1.4 The Core strategy does not define the delivery of KLATS measures in any detail, nor does it tie it to phasing of development in the town. Policy CS11 identifies the key strategic issues and the requirement for development to assess its transportation impacts.*

KLATS was primarily a study of the town of Kings Lynn. The south-east quadrant (West Winch and North Runcton) was not part of the original study area. The KLATS2 study includes some discussion of the area but primarily makes the point under 4.5 that "Preparing a Masterplan for this development, as part of the LDF process, is a key piece of work that needs to be taken forward." We contend it is the cumulative transportation impacts that will cause further congestion on the strategic networks in West Norfolk. There is still no strategic transport assessment of this cumulative impact, or a masterplan of infrastructure likely to be required to achieve this development. Requiring developers to provide a transport plan for their own development will not address this wider issue.

We are concerned that the revised *Statement of Common Ground September 2015 – Policy E2.1 West Winch Growth Area Strategic* (signed by BCKLWN and major developers and land owners in September October 2015) para 4.5 c proposes changes to SADMP policy E2.1 i.e. c) "Remove the requirement for a comprehensive strategic transport plan".

This proposed amendment (apparently now agreed by BCKLWN) appears to contradict this reply to the inspector's question.

*1.5 "the expansion area at West Winch was supported on the basis that it was a means of providing a long held aspiration for a bypass to West Winch relieving the existing community on the A10"*

One thing has become apparent through the discussions held by the Neighbourhood Plan group with representatives from The Highways Agency, NCC BCKLWN, land owners and developers. There is **no funding for a bypass and no plans by anyone to build one**. The proposed link road will not create a bypass. It is required for access for the new development areas and although it may take traffic away from a section of the A10, it will not in itself provide any relief to the Hardwick roundabout or the wider road network. If this is the basis for expansion of West Winch then it is no basis at all.

It is true that there has been a long held aspiration for a bypass and that this was proposed in the core strategy. (CS11 Transport Policy.) Many local residents remember the consultation many years ago about the proposed route for a bypass and many of them are still angry that it these plans never came to fruition. They believed that the proposal in the core strategy meant that a bypass would compensate any new development. It was on this basis that the residents were initially willing to listen to new proposals.

*1.5 The West Winch growth location will provide an urban extension of a scale to develop a range of local services eg primary schools.*

West Winch / North Runcton are villages, not an urban area. All the previous neighbourhood planning and indeed the Borough planning discussion of this area has previously promoted the formation of walkable neighbourhoods with a village scale – and we are very concerned that there now appears to be an incremental shift in the scale and vision of development for the area - exemplified by the Common Ground document introducing a new end figure of 5050 dwellings.

## **2. Update of New Evidence (Page 4)**

*2.1 Norfolk's Second Local Transport Plan 2006-2011 (LTP2), adopted in March 2006 identifies a King's Lynn Sub-regional Strategy to 2021. A key influence on that strategy was the need to manage the impacts of emerging plans for large scale growth in King's Lynn of around 11,000 homes to 2021.*

The Kings Lynn regional sub strategy document does not add anything new to the KLATS study and is mainly concerned with Kings Lynn town.

*2.2. The outcome of this work was set out in the King's Lynn Area Transportation and Land Use Study Stage 1 Final Report March 2009 (referred to above) and contained six key themes:*

- Sustainable transport measures to support large scale growth in the south-east*
- Improvements to the central gyratory system to reduce congestion and address air quality issues*
- New sustainable transport corridor on the Sandline railway (when it becomes available), or adjacent to it, and links to it from the Fairstead estate*
- Dualling or capacity improvements to the A149 eastern bypass*
- A new multi storey car park and re-use of existing surface car parks for other town centre uses and consideration of Park and Ride*
- Queen Elizabeth hospital access and parking improvements.*

We have not been able to find evidence in the KLATS final report 2009 of any assessment of 'large scale growth' south-east of Lynn. Nor have we been able to find these 6 themes clearly defined in the document. The 6 themes are in fact mentioned in the KLATS2 document as the preferred options from a workshop held in 2009.

The KLATS1 overview talks of it being a detailed and specific strategy for King's Lynn (town centre). It looked in detail at parking, public transport and cycling within the town. It was at the time widely regarded as a study for the town of King's Lynn and certainly not a wider transport study.

The *Sustainable transport measures to support large scale growth in the southeast* appears in fact to relate to the identification of a tunnel under the A47 (still existing), through which a small bus might pass. The former rail tunnel has been used as a farm route between fields north and south of the road. The route is unlikely to be suitable for bus access although we have promoted it as a potential future cycle route. However this is now in question as NCC have begun to highlight the need for this section of the A47 to be upgraded to dual carriageway.

## **3. Interventions and Investment in the Kings Lynn area since 2009 (Page 5)**

*2012 - Worked with the Prince's Foundation and the local parishes to masterplan the growth area to minimise travel and maximise internalisation of trips*

The local parishes are not aware of any masterplan pertaining to travel.

*2013 determined an appropriate form of a relief road*

Local parishes are still not happy with the current proposals for a relief road whilst its design and delivery timetable are so vague. There is no funding in place or route agreed or land acquired.

*2014 -Extensive work to determine the required highway improvements in the Hardwick area to accommodate the impacts of housing and jobs growth.*

We presume this comment relates to the Hardwick Interchange Transport Strategy (HITS).

This study states

*By 2026 (the end of the Core Strategy period) it is assumed that the new A47-A10 link road will be in place and will carry 70% of all traffic to/from the south of Hardwick, with the remaining 30% on the existing A10. To achieve such a split will require the link road to be the signed route for all A10 through traffic from the south and it may also require traffic calming on the existing A10 route to encourage greater use of the new Link Road.*

*This re-assignment of traffic onto the new link road would mean that the capacity of the existing single carriageway section of the A47 immediately east of Hardwick would be greatly exceeded.*

The Mott Macdonald study showed that if nothing is done to improve the Hardwick Junction, (the "Do nothing" capacity analysis) that the A47 queue in 2026 will have 1160 vehicles in the morning and 815 vehicles in the afternoon. The junction would be at 99% capacity by June 2026 (Hardwick Interchange Transport Strategy October 2014 Sean Finney)

The Mott Macdonald analysis figures are based on June figures, so do not take into account the hugely increased traffic at holiday periods and during the sugar beet campaign.

Only in the later written introduction to the final report is there reference to the other development proposed in South Wootton and elsewhere. The traffic flow modeling for the study only used the proposed development south-east of King's Lynn for its figures. It did not take into account the other proposed development.

It also did not take into account the fact that most of the HGV traffic is generated outside the borough, most notably in Thetford and no attempt has been made to analyse the impact of any increase in this traffic. For example there will be an increase in HGV traffic when the Thetford Sewage treatment plant is partially closed.

Also the proposals do not take into account the traffic which is being generated by the expansion of Downham Market and the recent announcement of plans for a new campus focusing on data management and knowledge engineering which would create 4,500 jobs with an associated population increase.

The proposals for the improvements to the Hardwick junction are predicated on the link road being in place and open to traffic. However there is, as yet, no agreed route for the relief road, no land has been procured and no agreed funding, and we have been repeatedly told that it will have to be mostly paid for by development and could, therefore happen piecemeal. When we wanted to put such conditions in our neighbourhood plan to ensure that the road would be in place and open to traffic before too many houses were occupied we have been told that it is not possible to ensure that the road is completed before many houses are occupied.

*Options to resolve the Hardwick junction are estimated at between £22 and £43 million (HITS).*

There is no funding in place for this.

We are extremely concerned that while various transport improvements have gone ahead in recent years through S106 funding initiatives (eg improving access to the hospital) these are small scale compared with the very major works now needed.

There is still no overall transport strategy for the wider area and the Borough Council and Hopkins Homes and ZAL/Northern Trust are apparently proposing to remove this requirement (Common Ground document). Instead each development will be required to produce it's own transport strategy.

We feel strongly there is a great disconnect between development goals and other stated Borough objectives (sustainable infrastructure planning / air quality) and a consistent failure to identify the true impact of proposed expansion plans in the Borough. It will be existing and future residents that will suffer the consequences. This is not a sound plan.

#### 4. **Requirement for Transport Assessments to accompany planning applications (Page 12)**

*3.1 The site allocations proposals build on the Core Strategy and the progress with KLATS which includes the recent work looking at the Hardwick area (CIV09) and identifying the required improvement measures to accommodate the growth. It does not revisit numbers or the principles of location but concerns itself with more detailed requirements of the sites themselves.*

*And,*

*3.6 The County Council is working with the local community, Borough Council, Highways England and developer interests to develop the transport measures that are required to support the West Winch growth location. Traffic assessment work is being carried out and progress continues to be shared with the interested parties. The Hardwick Transport Strategy report (CIV09) includes some information on costs and the phasing of improvements required to accommodate the planned growth.*

As we have previously noted, the recent work looking at the Hardwick area **does not** use up-to-date figures to take into account all planned growth and future traffic movement.

*3.8 Work on developing improvements in King's Lynn to address wider impacts of growth continues through the KLATS implementation plan. Where the need for measures has been attributed to specific development sites, they are identified in policy as requirements of development of that site. Furthermore, further detailed transport assessments (TA) will be required for Knights Hill, South Wootton and West Winch and policies for these sites (with the proposed modification for Knights Hill) state that requirement.*

It makes no sense, to local residents, that with all these different schemes and other development allocations further afield that there is no overarching transport policy for the area.

#### 5. **Wider traffic impacts and funding opportunities (Page 14)**

*4.7 The local authorities are in the process of developing the case for government funding through the next round of Local Growth Fund and the projects under consideration are set out below.*

| <i>Scheme</i>                                 | <i>Description</i>  | <i>Cost</i>   |
|---|---|---|
| <i>A10/A47 link, King's Lynn</i>              | <i>Forward funding of the A10 West Winch bypass to link with A47 east of Hardwick to ensure A10 mitigation is in place before significant numbers of houses are built</i> | <i>£14.2m</i>   |
| <i>A10 West Winch Road Network Management</i> | <i>Mitigation measures arising from development proposals</i>   | <i>To be funded by developer as part of mitigation measures</i> |

As noted previously, the road as proposed is not a bypass. It is otherwise variously referred to as a link or relief road. We note the requirement for the road to be forward funded and would ask that this is included as policy in the SADMP (as previously requested).

**6. Policy DM12 – relationship of restrictions on new accesses and new allocations proposed in SADMP (Page 16)**

5.1 *Policy DM12 – Strategic Road Network aims to resist development along strategic routes, which would prejudice the ability of such routes to carry traffic freely and safely. In doing so, development is focused towards urban areas with high connectivity and therefore to more accessible locations where the ability to travel more sustainably is maximised. Conversely, locating development alongside the strategic road network, outside urban areas, would severely curtail opportunities to provide high quality access to public transport and safe walking/cycling route.*

5.2 *Sporadic development along strategic routes has the effect of further reducing the connectivity of the rural areas, an adverse effect that the policy seeks to avoid.*

5.3 *The Policy is not intended to apply to allocated sites and a modification is proposed to clarify this (see Proposed Modifications section).*

Not applying this policy to allocated sites seems nonsensical. **It is the large volumes of new traffic from the allocated sites that are going to cause the traffic problems.** Development at West Winch and North Runcton is very likely to “prejudice the ability of such routes to carry traffic freely and safely. “

**7. List of modifications proposed (text/policies/glossary) (Page 17)**

As we have noted above – we feel there are serious inadequacies in the evidence base on which the Borough intend to take the Local Plan forward, and simply quoting parts from previous studies that were predicated on different criteria (eg KLATS looking at town centre traffic) is not sufficiently robust.

**8. Glossary (Page 17)**

6.2 *Include in the Glossary the following definition of Transport Assessment:*

*Transport assessment: A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures will need to be taken to deal with the anticipated transport impacts of the development.*

We would like to see additional wording along the lines of:

*“Where the traffic assessment identifies that the level of additional traffic cannot be accommodated by existing infrastructure, then off site highway improvements need to be provided to ensure that the impact of the development is neutral, i.e. that it is no worse than existing circumstances. Similarly, pedestrian/cycle routes and public transport facilities should be examined and if improvements are necessary to reduce car traffic then this infrastructure provision should be a condition of planning consent.*

**9. DM12 – Strategic Road Network (Page 18)**

6.3 *In relation to the issue of allocations on the strategic road network for clarity it would be helpful to clarify that Policy DM12 does not apply to allocated sites, to use the term ‘Transport Assessment’ instead of ‘Traffic Impact Assessment’ and to reference Policy CS11 and paragraph 013 of the PPG as follows:*



*“The Strategic Road Network within the Borough, comprising the A10, A17, A47, A134, A148, A149, A1101 & A1122 and shown on the Policies Map, will be protected as follows outside of the settlements specified within Core Strategy policy CS02:*

- New development, apart from specific plan allocations, will not be permitted if it would include the provision of vehicle access leading directly onto a road forming part of this Strategic Road Network;*
- New development served by a side road which connects to a road forming part of the Strategic Road Network will be permitted provided that any resulting increase in traffic would not have a significant adverse effect on:*
  - The route’s national and strategic role as a road for long distance traffic*
  - Highway safety*
  - The route’s traffic capacity*
  - The amenity and access of any adjoining occupiers.*

As we have previously stated - not applying this policy to allocated sites is nonsensical. It is the **allocated sites** that are going to cause the traffic problems.

*In appropriate cases a ~~Traffic Impact~~ Transport Assessment will be required to demonstrate that development proposals can be accommodated on the local road network, taking into account any infrastructure improvements proposed.*

*‘In the absence of any strategic transport policy for the area, Transport Assessments should also take into account the residual cumulative impacts of developments elsewhere’.*

*Policy CS11 of the Adopted Core Strategy sets out the transport requirements for development proposals to demonstrate that they accord with.*

This is unclear

## **10. Conclusion (Page 19)**

*7.3 At this detailed SADMP stage the focus has been on the detailed mitigation necessary for individual sites. Overall concerns about transportation effects of growth on King’s Lynn town are considered to have been dealt with adequately through Core Strategy/ongoing KLATS implementation stages.*

The approach to the West Winch growth area is based on evidence from King’s Lynn town and the Hardwick roundabout and does not consider proposed development in the rest of the borough including that immediately surrounding the town.

*7.4 This site specific consideration is done in the context (as appropriate given the scales of development) of transport assessments triggered for the thresholds in Appendix 2.*

Presumably this appendix B? It would be helpful to have a glossary defining TA, TS & TP and the other acronyms.

### *Appendix 1 KLATS draft updated Implementation Plan 2014*

We had not been previously aware of this document. Also we have not had sight of the Autumn 2010 Implementation Plan mentioned.

We note that the way forward proposed for the ‘South East Quadrant’ recommends that the Borough council carefully considers the planning applications! Also it mentions the Hardwick study, which has been completed, and we have commented on elsewhere. Also we note the onus on developers to ensure public transport links are delivered. We do not consider this to be a comprehensive transport strategy.