

North Runcton and West Winch Neighbourhood Plan Steering Group (1188)

Represented by Richard Morrish – Chair of North Runcton Parish Council; Chair of North Runcton and West Winch Neighbourhood Plan Steering Group.

Hearing sessions: Tuesday 7th July (afternoon); Thursday 9th July (morning).

The following statement mainly reiterates the previously submitted representation submitted by Fran Leamon, Neighbourhood Plan Steering Group secretary in February 2015.

DM2 – Development boundaries.

In our view the development boundary for the ‘West Winch’ growth area, and lack of definitive boundaries for North Runcton and parts of West Winch and Setch will reduce the effectiveness of the SADMP over the plan period. The point is that the only plan and only boundary depicted in the SADMP for West Winch and North Runcton is on Inset E2 (page 107). Although a lot of the land in the ‘West Winch Development Area’ is in North Runcton (parish), the policy G64 states that only very limited development will be expected in North Runcton (village). Whilst most local people will broadly understand that North Runcton ‘village’ is that area centred around All Saints Church, Church Green, New Road etc, the delineation of settlement along Rectory Lane and Common Lane / Chequers Lane becomes less clear, whilst linear development in North Runcton along the A10 is widely perceived as ‘West Winch’.

We have tried to further define where development would and wouldn’t be acceptable in the Neighbourhood Plan, but this obviously still needs to be adopted.

It is felt there is potential for confusion in future – which would affect the soundness of the plan.

DM3 – Infill (See also G.64 – North Runcton)

We don’t think limiting development in smaller villages and hamlets to affordable housing is ‘sound’. Surely provision of a mix of residential development would be more ‘sound’ and ‘sustainable’ to encourage a dynamic mixed community?

We have various former small holdings and farmyards in the neighbourhood plan area, but outside the proposed BCKLWN ‘Growth Area’, where landowners are interested in promoting residential development. Such schemes would need to demonstrate that they do not have significant adverse impacts to the setting, but in theory we feel that development on brownfield or derelict sites would be sustainable – and perhaps preferable to development on actively farmed land. However we are doubtful that schemes of perhaps 10 dwellings or more (we have several example sites) would be viable or desirable if all ‘affordable’.

DM12 - Strategic Road Network

We feel this policy is unsound as it is evident that substantial proposed development will lead directly to the strategic road network – with adverse impacts to traffic, most notably at North Runcton and West Winch with impacts to the A47, A10, Hardwick Interchange and A149. In our view, until a new ‘relief road’ (or other transport infrastructure) is delivered, proposed development at the ‘West Winch’ growth area cannot be delivered in line with this policy. Hence our suggested additional text:

Infrastructure works required to mitigate the impacts of development on strategic roads must be fully designed and accompanied by a viable, funded delivery plan before consent can be granted.

In the view of residents, who already suffer from significant and regular traffic congestion, the prospect of the many years of the situation getting worse before alternative

infrastructure is delivered is simply untenable – and does not represent a sound, effective and sustainable plan.

It should be noted that a study by NCC earlier this year has concluded that a section of the A47 and A149 will need to be widened to dual carriageway in order to take expected traffic from proposed development, with substantial alterations to the Hardwick roundabout. It is not yet clear how such works would be funded – or when they would be deployed. We also note that this study did not extend to the strategic road network adjacent other large allocation sites (Knights Hill / South Wootton), and therefore presumably the cumulative impacts of all growth have not been fully considered.

DM13 – With such a large urban extension proposed at Hardwick, we feel that protecting a potential future off-road route to both Kings Lynn and east towards Mintlyn, the hospital and Bawsey Country Park would be an important proposal for future sustainability. The KL-Fakenham line was previously safeguarded. We feel removing it from the safeguarded routes at this time is therefore unsound.

DM15, DM16, DM19, DM22.

We appreciate that government is attempting to de-regulate technical standards – and that to some extent this affects outdoor space planning. However in regard to the North Runcton/West Winch growth area we feel strongly that:

- The existing community is already statistically short of public open space – as acknowledged in previous BCKLWN surveys.
- That the development in the growth area will remove large areas of semi natural habitat and informal recreation space.
- That development will result in a much greater population in the parishes that will place additional pressures on existing GI assets (POS, tracks and paths, sports facilities).
- Therefore it seems clear to residents that to ensure a sustainable plan for the existing and proposed communities, planning and delivering ‘green infrastructure’ is essential and that the extent of provision should exceed minimum standards.

We have conveyed this in the neighbourhood plan – but feel the SADMP needs to set a more definitive framework around which the NP can add detail.

Similarly – regarding **DM21 (Flood Risk)** and in relation to the North Runcton/West Winch growth area, this area is mainly on higher ground where runoff to lower lying existing settlement (some of which has a history of localised flooding) is a concern for residents. Residents are sceptical of plans to ‘balance’ surface water within the Growth Area as many areas are underlain by clay. The neighbourhood plan includes for all applications to be agreed with the inland drainage boards (who are not statutory consultees) – but it would be beneficial if DM21 specifically identified the IDBs – who have expert local knowledge. A strategic surface water management plan was commissioned by the parish councils to inform the neighbourhood plan and is provided as a supporting document.

Allocations and Policies - E2.1 West Winch

We have made a number of specific proposals to the text of this section of the SADMP – and the Inspector will have to take a view as to whether the matters raised make the policy unsound. In our view it would certainly make the policy more *effective* if the meaning of some sections were clearer and the maps were more specific.

This is particularly the case when it comes to delivery of important infrastructure – especially roads (see also DM12).

A principal concern of the neighbourhood plan team is that residents of both parishes are being asked to accept the prospect of much more development (than 1600 new dwellings by 2026) 'by stealth'. It seems that in order to facilitate necessary infrastructure for the 1600 dwellings, many more than 1600 dwellings might be necessary. The neighbourhood plan resists the commencement of a third centre of development (south of Chequers Lane) as we feel there is no need for this area in order to deliver 1600 dwellings by 2026, and that by spreading development out along the A10 corridor, adverse impacts will be greater, with less guarantee of potential benefits being delivered early.

The Neighbourhood Plan attempts to address these matters. A pre-submission consultation version of the NP will be made available to the Inspector if appropriate.

END.