

Dear Mr Hogger

Issue 4: Kings Lynn and West Lynn (E.1) - Wednesday 8th July – 14.00

Policy E1.7 King's Lynn – Land at Lynnsport

Question 1.3

From the Council's Statement of Community Involvement:
Government objectives

2.3 Guidance from central Government

'Local communities and all stakeholders will be involved from the outset and throughout the preparation of local development documents'.

There were not representatives from all local communities from the outset. Gaywood and North Lynn were not represented.

You can make your views known to your Ward Councillor

I have emailed my ward councillors several times and have very few or in some cases no replies. I therefore do not feel that my views have been represented.

There was minimal information, no posters, leaflets or magazines. Consultations were badly advertised with short notice. For example a consultation for site 3 to be held Monday 22nd June was only advertised in the local paper on Friday 19th June. The road to access the housing was described in early consultations as stopping at Lynnsport, then as an access road however once planning was approved it became a through road taking traffic from Edward Benefer Way through residential areas and connecting estates. Residents at consultations were asked to put pins in areas where they believed access points should be but these were ignored and accesses were made elsewhere. The public lost interest in consultations as they were merely public relation exercises.

88 objections were made against the planning for the road. At the early consultations a survey showed that most members of the public when asked disliked the road.

At consultations many people handed in written objections to the whole development however when it came to the full council meeting these and other objections were summarised by Councillor Beales. Councillors in response to my emails said they did not receive many objections and I believe that all emails should have been made available if they were to have an open vote on the decision.

I was pleased when the Council removed site 2 from the planned development however I have been advised there is an even higher flooding risk here because the ground is lower. This is River Lane playing fields and hosts football and cricket pitches used regularly by local teams and attract spectators and was in place before Lynnsport was built. Lynnsport 2 has been given Fields in Trust status however we know this could change in the future.

A residents association, Lynnsport Area Resident's Association (LARA) of which I am a member began in frustration because the public were not being listened to and we are supported by the public who strongly object to this development, nearly 1100 people have signed an on-line petition with hundreds more signatures on paper copies calling for a Public Inquiry.

Question 1.4

15% of the dwellings will be 'affordable rent' (80% of market rent) and the remainder will be sold. Homechoice the Councils Housing Lettings Team have between 3000 and 4000 people on the waiting list, the majority are already in social housing (60% of market rent) and wish to move but remain in social housing as it is cheaper than affordable rent. The 15% are to be a mix of houses and flats. This development will therefore have little effect on reducing the Councils waiting list or serve the needs of different groups in the community.

Question 1.7

At the Scrutiny Meeting on 19th February for the development and road a Councillor asked Councillor Beales if he would support residents in developing a Neighbourhood Plan. He clearly said no. Around March 13th myself and 2 members of LARA visited the Council and spoke to Dale Gagen the Project manager, we gave Dale an alternative plan for Lynnsport with proposals of a garden village with nature trails, to build something special rather than just as many houses as possible that we believed would be a more acceptable alternative. Dale said that plans for housing had not yet been drawn up. (We were informed later by the local newspaper that our plans would not be considered). We discussed developing a Neighbourhood Plan and Dale said Cllr Beales would not support this. He said there is no need for a longer term plan as there is no-where else in the area left to develop. We all left feeling we were deliberately being dissuaded from developing a plan.

The following is on a questions and answers topic on the Councils web site for Lynnsport:

Residents wished to set up a Neighbourhood Forum – will this give them the ability to influence this development?

A group of local people have recently enquired about the possibility of preparing a neighbourhood plan for the area. Neighbourhood plans are prepared by the local community. These plans can shape how development happens, but cannot halt development or plan for less development than included in the Borough's Local Plan.

It typically takes around 18 months to 2 years to prepare a neighbourhood plan, so this is unlikely to directly influence the current development proposals and hence the Major Housing Consultative Group and specific local consultations on the development are a more effective forum in the short term. The local group is currently considering whether to seek to prepare a neighbourhood plan to influence the area in the longer term. The Borough Council will advise and assist them should they wish to proceed.

We believe this is a deliberate attempt to dissuade the public from entering into a Neighbourhood Plan.

Question 1.8

Brownfield land that is suitable for housing has a vital role to play in meeting the need for new homes

There are adequate brown field sites close by that could be developed and would clear up areas of land in poor condition. There is land on the edge of Lynnsport Leisure Park that was previously used as the local tip for domestic waste, we have been told that this

would be too expensive to clean up. There is a site on Edward Benefer Road which is less than one and a half miles from Lynnsport with planning permission for 98 dwellings. There is land from what a disused factory site available for development for 200 dwellings and other large areas of land in West Lynn where roads are adequate and a regular ferry across the Ouse for residents and cycles to access the town centre without having to drive, there is also a little used route through to the town. The council could purchase these sites for development and this would be more sustainable for all areas and reduce traffic on roads.

The Council have stated that green open space in King's Lynn is at a premium. On a site assessment table for King's Lynn it states that sites at Marsh Lane, Columbia Way and Lynnsport are greenfield sites. The site assessment states as follows:

Summary of constraints:

Site 40 is Lynnsport which is an extensive site used for leisure and recreation comprising a leisure centre, green space, car parks and playing fields. Constraints affecting potential development on the site include a high risk of fluvial flooding affecting almost the whole site, limited access points, and a major powerline runs across part of the site. Part of the site is a former landfill and is therefore unsuitable for housing development.

Development would result in a loss of green space in the urban area which could negatively affect the amenity of residents and reduce potential for wildlife habitats. Site is within Gaywood Valley project area.

Can restraints be overcome:

The whole site is unsuitable for development as it would result in a loss of significant leisure and recreational facilities. If part/s of the site were to be developed a masterplan would be required to address constraints. Any development should not result in a loss of the current provision of existing recreational facilities and pitches. A site specific flood risk assessment would be required. Accessibility to the site and the impact of increased traffic on established routes would need to be determined. A buffer around power lines would be required.

Also on the Detailed Policies and Sites Plan and CIL Viability Study - November 2013 they are shown as greenfield sites. (Cllr Alistair Beales had previously stated in public meetings they are brownfield sites).

Question 4.1 Lynnsport (E1.7)

On the ministerial foreword by Greg Clark MP to the NPF he says Sustainable means ensuring that better lives for ourselves don't worse lives for future generations. Our natural environment is essential to our wellbeing, and it can be better looked after than it has been. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul. Our historic environment – buildings, landscapes, towns and villages – can better be cherished if their spirit of place thrives, rather than withers.

The Park which is one of only 2 large Parks in King's Lynn is actively used by local people of all ages on a daily basis for free play and various leisure activities, in a tranquil and safe environment, free from cars and pollution. The value to the residents of all ages for health and wellbeing is immeasurable.

By developing this land the areas of North Lynn, Marsh Lane and Gaywood will merge into one large urban area and these areas will lose their unique identity.

North Lynn has a large amount of social housing including 2 and 3 storey flats without gardens or courtyards, many residents with low incomes and no transport. North Lynn has 11% less domestic gardens and 17% less greenspace than the rest of England and Wales. North Lynn is identified as being in the top 10% of the most deprived areas in the country with life expectancy between 6 and 10 years less than the national average and poor childhood health.

Under Allocated Sites on the SADM it states The Habitats Regulations Assessment Report identified a potential for adverse effect on the designated nature conservation Special Area of Conservation at Roydon Common from increased recreation arising from

the residents of the housing allocations in King's Lynn (in combination with others). In order to avoid such an effect it is important that these have ample local provision for informal recreation, particularly in relation to dog walking (which is particularly damaging for the designated sites). By ensuring this is provided locally for the larger of these sites (i.e. excluding the small sites at South Quay and Southgates), the likelihood that significant proportions of the residents of these new housing developments will go to the designated sites for such recreation is reduced.

As many local people use Lynnsport for dog walking, particularly elderly residents I do not understand how developing this will protect Roydon Common. Another site at Leziate which was popular for dog walkers has recently closed to the public which means less space for dog walkers. Lynnsport therefore reduces the risk of people using Roydon Common and reduces cars on roads as the Park is in walking distance for the whole of King's Lynn. Reducing the green opens space at Lynnsport significantly increases the risk of the public using Roydon Common for dog walking.

Under allocated sites it states:

"There also needs to be adequate provision of both this and other types of recreation space, such as children's play areas and sports pitches, in the interests of quality of life, amenity and health".

The Borough Council are not replacing the green field sites at Lynnsport therefore they are taking away a much used access to open green space and denying the public such areas to improve their quality of life, amenity and health.

Over 4,000 new houses are planned for in and around King's Lynn and the 269 dwellings on this Park is a small amount in that larger plan but the loss of the green space that cannot be replaced especially with the increase in population.

Question 4.2

The SADMP shows as follows:

E.1.6 King's Lynn has a distinctive identity which is strengthened by its natural and historic assets and includes the Gaywood Valley as one of the towns 5 Conservations areas.

Lynnsport hosts a wealth of wildlife and the public enjoy spending time watching the animals and birds ranging from deer, rabbits, kingfishers and owls. In such a built up area the value of this to the public particularly the young and old is vast and gives great pleasure to all. A Nature Reserve is planned but this has grown over many years and is already in place but there are other established trees, and woodland areas that host a variety of wildlife and will be destroyed if this development goes ahead.

A Transport Assessment by Mott MacDonald for the Grimston Road junction that leads onto Edward Benefer Road states *that In 2026, the junction is forecast to be operating above capacity and the situation is forecast to deteriorate when taking into account the potential traffic generation, based on our "worst-case" assessment, from the various housing sites that will ultimately feed into the Access Road.*

As the new road is planned to take some of this traffic and reduce traffic elsewhere through town as described by the Council this will undoubtedly lead to the road through North Lynn becoming a 'rat run'. The new road is also required to access the housing but no impact survey was carried out on the expected increase in traffic on Reid Way and Front Way that will result from the housing or the increase in traffic. A survey said

there will be no increase in noise or reduced air quality, how can the council know this if they do not know how much traffic there will be from this and other developments?

Paragraph 123 of the National Planning Policy Framework NPPF states that:

“Planning policies and decisions should aim to:

Υ avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;

Υ mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions;

Υ identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.”

There are no pavements on parts of Front Way and Reid Way and garages and cars parked on drives will reverse onto the new road. A 20 mph speed limit was refused, and it was suggested at the site visit for the road that yellow lines may be put on Front and Reid Way. This was never shown at consultations.

There are 2 sheltered schemes for elderly and disabled people on Columbia Way. All residents have to cross this road to head for schools, shops and work. The road will give a second route out of North Lynn for residents but this will not lead to any of the schools or the town centre and the residents of North Lynn will have to battle with the traffic using the road as a cut through.

There have been 3 major breaches of planning regarding the road. At the first meeting speakers were not given the allocated time for objections, the meeting was then held again, at the second meeting the Vice Chair did not attend the site visit but voted which was against the Council's own constitution. When this was challenged the council removed this part of the constitution. The council did not list all companies as having an interest in the planning application, they put this down to human error. I and others have made official complaints about the conduct of Councillors at meetings. Councillors on the Regeneration Committee who have planned the development have voted for the applications at Full Council and Planning Committees. There has been a total lack of transparency and the public do not have confidence in the Council to determine the scheme objectively given that they are owners and developers and then pass their own planning permission. The public believe that the housing is financially led rather than for the need for housing and decisions are not sound or legally compliant.

2 new hockey pitches and 4 tennis courts are planned for fee paying customers only, the hockey pitches will be for the exclusive use of the Pelicans Hockey Club which is a private concern. I do not understand how council land can be used for this purpose and green space is to be taken away from the public.

The public have used Lynnsport Leisure Park for over 30 years. Newspaper cuttings from when it was first developed refer to it as a 'jewel in the crown of King's Lynn'. Articles, documents and leaflets at the Library from that time describe it as **70 acres of landscaped parkland providing football and hockey pitches, cricket facilities, putting green, petanque terrain, fishing and model boating lakes, the park is also available for everyone to enjoy a variety of informal leisure activities such as walking, cycling and picnicking**. A newspaper cutting dated 18.08.88 shows there was never housing developments planned for sites 1, 2 or 3. The areas at the side of Greenpark Avenue have houses shown but later articles refer to this area being landscaped and a 'pleasant Lynnsport approach urged'. This was completed and Greenpark Avenue is a lovely sweeping complimentary entrance to the Park much loved by the community.

LARA has the support of the public and a very public campaign which is regularly reported in the local press, support is growing and feelings are very strong. LARA asked for a referendum on this development and were refused. On Saturday 27th May we are holding our own consultation for the public and have invited all Councillors, Henry Bellingham and the press. I am respectfully asking for your support and believe you are our last chance of stopping this very unpopular, un-sound and unsustainable development.