

Dear Mr Hogger,

Regarding E1.17 Lynnsport Park Major Housing Development.

Please see below my representation in relation to the Borough Council of Kings Lynn and West Norfolk's SADMP. In particular I would like to respond to question 1.4 of the Issues and Questions document.

- 1.4 In broad terms is the SADMP based on a sound process of sustainability appraisal and testing of reasonable alternatives, and does it represent the most appropriate strategy in the circumstances? Has the site selection process been objective and based on appropriate criteria? Is there clear evidence demonstrating how and why the preferred strategy was selected? Does the Plan provide for a satisfactory mix of housing to serve the needs of different groups in the community (NPPF paragraph 50)?
[Detailed site specific issues will be dealt with under the relevant settlement/allocation]

In my response I would like to respond to the BCKLWN's Sustainability Appraisal Report, a document which was made available on the council website.

Section 1.3 of the report 'Results of Appraisal' includes, it appears, as evidence a graph called *Figure 1.3a*. This chart is not actually referenced in any of the text. The chart is, in my opinion, meaningless. There is no legend or scale, simply a number of bars with various positive and negative values. Nowhere is there any reference as to how this scoring was completed, what factors were considered and any weightings applied to the scoring. This is a very disappointing chart to include in a local government document.

The second graph in this section, *Figure 1.3b*, shows significant negative scores in terms of Economy, Flood Risk and Infrastructure, and yet are used as evidence of a sustainable development.

Section 3.1.1 states '*There can be a danger that a proliferation of data and complex processes may tend to obscure, rather than illuminate, the key issues and choices to be faced.*' In reference to my above point the council appear to have taken this to the extreme and enter a wholly inadequate graph as supporting evidence. This statement could be seen as self permission to withhold facts and data and thus make it difficult for members of the public to test the robustness of the process.

Section 3.2 list the Key Sustainability issues for West Norfolk, which one could reasonably expect to be given significant weight in terms of assessing developments.

Section 3.2.2, Environment, lists these challenges:

Impending Climate Change and issues associated with it. *Figure 1.3b* scores a significant negative on flood risk, which is a forecast issue with climate change for this coastal region

Much of the Borough is low-lying, meaning it may be at risk of flooding. Coastal locations are particularly at risk. *Figure 1.3b* scores a significant negative on flood risk. Flooding is highlighted by the council as a significant risk, and yet their own scoring of management policies for this are a

substantial negative suggesting they are inadequate at protecting residents from flooding and do not give significant weight to this when considering developments.

Greenhouse gas emissions from the Borough are contributing to climate change, and are higher than the national average. Air quality targets are unlikely to be met for nitrogen dioxide and PM10. With this in mind, is the removal of a significant of green open space and carbon dioxide absorbing tree's at the Lynnsport development and their replacement with 100's of houses and associated cars really a sustainable and sensible development decision?

National policy pressure for increase renewable energy generation and for improvements in the energy efficiency of buildings. When questioned at Marsh Lane consultation, the developers were at first unwilling to answer questions as to why they would not use this development as an opportunity to address this issue through the installation of solar panels and heat source pumps at the build stage. After a few minutes of complete silence the housing office from Lovells stated they will not be installing any renewable energy sources on the proposed developments due to the cost to them, the developer.

Increased impact of traffic on town centres and rural areas. The Lynnsport development will see hundreds of houses built in an area where there is already significantly congested road systems, with suggestion that these roads are already near to capacity. The council has at no time shown evidence of an assessment of traffic impact of all of the proposed developments. Even though they have been asked for the reports.

High percentage of journeys to work undertaken by cars. The increase concentration of houses and removal of green space and increased car journeys will impact air quality and pedestrian safety.

High number of vacant dwelling Whilst I do not have the exact number of empty dwellings in the borough, I understand it is over 1500 which is significantly higher than the Lynnsport development. Assuming this is the case, surely a proactive approach and enforcement of council powers in this matter would be the truly sustainable approach to releasing available housing stock.

Areas of poor quality environment in urban areas. This will only be made worse by the removal of green open parkland & playing fields and their replacement with high density housing. This impact is in terms of air quality, noise, traffic congestion and the loss of free, open green areas.

Threatened landscape charter. Lynnsport is a beautiful landscaped area, once called the jewel of Kings Lynn. When it was first developed it was marketed as parkland and now homw to many species of birds and mamels. Its loss would be nothing short of criminal for this generation and those who follow.

Section 3.2.2, Social, lists these challenges:

There are higher proportions of people living with limiting long term illness in the Borough then national, regional or county averages. Decreasing urban air quality and the removal of green

open space will surely contribute to maintaining or worsening statistics on this. Three boroughs in Kings Lynn are in the 10% most deprived in the country.

The difference in life expectancy between the best and worst wards in the Borough is 10 years, representing significant health inequalities This is a frankly shocking fact. The council need to proactively address this problem and doing everything they can to promote a healthy lifestyle at zero cost to the most vulnerable in our communities.

Lack of facilities for young people. This leads to younger people leaving the area and not returning. Young people want and need recreational facilities including sports fields that are free and easy to access. Lynnsport open space is to be replaced with pay to use sports pitches. The surrounding areas are some of the poorest in the country. This is not sustainable.

The Borough has been identified as an area of high deprivation, 3 of the 8 wards are in the most deprived 10% in England. The removal of free to use sports fields and park land that is within walking distance to vital to these residents. This also questions the mix of housing that is planned. Does the mix of planned housing in Kings Lynn reflect this? Low incomes mean there is a greater need for social housing with good local facilities.

There is a low proportion of affordable housing developed in the borough as well as a poor mix of housing types and sizes. The plans that have been show during consultations seem to ignore this fact. This brings into question the objectivity of the plans. Are these houses, particularly on the Lynnsport planned development, being built to address the housing needs? Or, is this the opportunity to raise much needed funds by the Borough council due to the poor state of the finances. I have been told by an ex councillor that £2 million has had to be pulled forward from next years budget to balance the books. This in itself is deeply concerning in terms of accounting transparency and integrity, but equally casts a shadow over any possible suggestion of objectivity.

Shortage of local services such as surgeries, schools, post offices, village shops and local leisure centres. Do any of the plans for additional houses address these shortages as I have seen none referenced. If not, this will put additional pressure on existing services.

Low average earning. Who is going to buy these houses? If average earnings are low then is this the correct mix of property types? It is stated in section 3.2.4 that there problems attracting people to the area.

Attracting and retaining key workers in the Borough. Who is going to buy these houses?

Poor perception of the Kings Lynn area. This will not be helped by the fact our beautiful parkland and sports fields at the Lynnsport park. This will make the town more unattractive.

Section 3.3 of the documents list the Local Plan Sustainability Objectives, the criteria which the completed plan is assessed against. I would like to argue, as detailed below that the Borough council has failed to meet these criteria to a satisfactory level in at, but not limited to, the proposed Lynnsport and Marsh Lane developments.

Biodiversity and Geodiversity 4 & 5 -The Lynnsport development see plans to fill in a pond that has been proven to have water vole resident as well as a wide variety of nesting birds. This habitat will not be replaced.

Landscape, Townscape 7 – The removal of the playing fields and ponds does not maintain or enhance the diversity of the landscape character, it does exactly the opposite.

Climate change & pollution 9 – Parts of Kings Lynn already have road based emission levels greater than in parts of central London. The additional houses in the town centre area will only serve to increase pollution levels and potentially in more areas than are currently affected.

Healthy communities 12 & 13– There is growing evidence that the access to green open space is good for the mind and body. Lynnsport park's free, accessible green open space will be significantly reduced. This goes against the objective to improve the quality and quantity of accessible open space. The new sports pitches will be pay to use or limited to members of the hockey club. (There is suggestion Councillor Beales daughter is a member at this club which raises the question of the appropriate and unbiased distribution of public funds, or any funds made available through the sale of public land.) The wards surrounding the park are deprived areas who's residents may not have the disposable income to join the hockey club or rent pitches. It removes the right that every child has to use jumpers for goal posts on green grassy fields.

Inclusive communities 15 – Playing fields will be removed

Inclusive communities 17 – The plans for the Borough do not seem to reflect the need for affordable and social housing

Inclusive communities 18 – Events such as the Villages games are currently held at Lynnsport, will this still be possible when the houses are build. The public have also been discouraged from developing a neighbourhood plan by the council, which would have seen wide variety of people coming together to play a part in shaping our local environment. In Fact we feel we have been discouraged heavily on starting a neighbourhood plan and was first told in January 2015 by Alister Beales that we couldn't start one, only after researching this ourselves did we learn that not only could we start one there should be assistance with this.

Referenced from the BCKLWN website:

“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. “

I hope that the points I have raised above communicate my deep concern that the Borough Council are attempting to push ahead with a development which clearly goes against their own Sustainability Objectives and ignore the required mix of housing, favouring the most profitable.

The public have been told there are significant financial implications to the Lynnsport development not going ahead but the details have been kept secret. If this is indeed due to the mismanagement of the budget and these funds are required to balance the books then how can this be in any way objective. The Lynnsport park area is owned by the council/public so the sale of the land and houses will directly profit the council. Lynnsport is designated as greenfields in the Kings Lynn site assessment table <http://www.west-norfolk.gov.uk/pdf/Site%20Assessment%20%20Kings%20Lynn.pdf>

Indeed, this document all states:

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.

It is my opinion that the council is ignoring all of its only recommendations in the light of financial requirements. I ask that this is fully looked into to ensure that due process has been followed.

I have included below some reference on the positive impact open space has on health.

Below are just some examples of evidence based research that discuss health concerns, taken from The Kingsfund publication Improving Public Health.

- *A study in the Netherlands showed that every 10 per cent increase in exposure to green space translated into a reduction of five years in age in terms of expected health problems (Groenewegen et al 2003) with similar benefits found by studies in Canada (Villenveuve et al 2012) and Japan (Takano et al 2002).*
- *Green space has been linked with reduced levels of obesity in children and young people in America (Liu et al 2007). There is also strong evidence that access to open spaces and sports facilities is associated with higher levels of physical activity (Coombes et al 2010; Lee and Maheswaran 2010) and reductions in a number of long-term conditions such as heart disease, cancer, and musculoskeletal conditions (Department of Health 2012).*
- *The proportion of green and open space is linked to self-reported levels of health and mental health (Barton and Pretty 2010) for all ages and socio-economic groups (Maas et al 2006), through improving companionship, sense of identity and belonging (Pinder et al 2009) and happiness (White 2013).*

- *Living in areas with green spaces is associated with significantly less income-related health inequality, weakening the effect of deprivation on health (Mitchell and Popham 2008). In greener areas, all-cause mortality rates are only 43 per cent higher for deprived groups, compared to 93 per cent higher in less green areas.*
- *However, people from more deprived areas have less access; children in deprived areas are nine times less likely to have access to green space and places to play (National Children's Bureau 2013).*

DEPRIVATION

The kings fund also states that local authorities should work with local communities to help them develop strategic plans for green space within broader neighbourhood plans.

At the full council meeting Date 26/02/2015 a councillor stated that green space in Kings Lynn was at a premium when speaking about a small community project.

Minutes from the meeting:

“Councillor Humphrey commended Councillor Pope on the progress with the Kettlewell Lane improvement works which were being carried out including considerable community involvement in the scheme. He also asked about the Green Flag status. Councillor Pope responded that he considered the green space to be a premium in the area, that the site would be safer with more lighting, clearing rubbish and scrub and making it a wildlife haven alongside the river bank creating a green space in the town centre which in twelve months he hoped would be beautiful. He also informed Members that the Borough currently had 4 green flags but was trying for 6. Councillor Pope also commended the gardens at the Crematorium which were a picture”

Yours Sincerely

Miss Verity Connolly