

J3 – SUMMARY OF REPRESENTATIONS UPDATE ON TECHNICAL NOTE ON TRANSPORT EVIDENCE (October 2023)

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
TOPIC PAPER							
GENERIC/ OVERALL COMMENTS							
	Natural England	n/a	Natural England does not have any specific comments on F48 - Update on Technical Note on Transport Evidence	n/a	No	Noted	n/a
	South Wootton, North Wootton, Castle Rising Parish Councils	General observations	<p>We do not believe the NCC Highways and Public Transport team based in Norwich are fit for purpose as far as West Norfolk is concerned. Secondly, we see a repeat performance developing at West Winch where to a large extent the Parish voice and concerns have also been ignored.</p> <p>Large Planning Applications should not be imposed on Parish Councils. They should be worked on in conjunction with the PCs. Early meaningful consultation is needed as required by the NPPF. There exists a vast pool of local knowledge and experience which the Borough and County Councils should use; this would save so much time and lead to improved outcomes.</p>	Not Specified	Yes	<p>NCC is the Highway Authority and are the statutory experts providing technical highway advice and are the experts in this area.</p> <p>Planning applications are considered against the development plan for the area and Parish Councils are consulted at the appropriate stage of the planning application and plan preparation stages and comments are considered.</p>	No change
SUMMARY OF RESULTS AND FINDINGS OF MODELLING							
RECOMMENDED TRANSPORT INFRASTRUCTURE							
	National Highways	Whole document	National Highways' supports the view of the Council that the West Winch Housing Access Road infrastructure project is required as a prerequisite to the West Winch Growth Area coming forward for development. National Highways have been working proactively and positively with the design team to fully assess the proposal, a modelling review is being carried out as part of this engagement. National Highways will continue to work together with the County Council as this project moves forward.	Not specified	No	Noted	n/a
	National Highways	Whole document	It is noted that the A47/A17 Pullover roundabout identifies all arms are over capacity in either the AM or PM peak. Proposed mitigation is being considered by Norfolk County Council in this location, and National Highways' look forward to engaging with the County looking at proposed improvements in this location.	Not specified	No	Noted	n/a
	West Winch PC	Para 17	WWPC is pleased to see an emphasis on sustainability in the WWHAR documents.	None	n/a	Supporting representation noted	n/a
	Congham Parish Council	Whole document	Concerned that the evidence does nothing to mitigate or reduce the impact of traffic on local roads. Lack of a push to use model shift as a way to help reduce traffic in new development.	Not specified	Yes	<p>Transport evidence has demonstrated that to fully deliver the West Winch growth area, the WWHAR is needed to help manage and distribute traffic over the plan period. The Council consider the WWHAR a deliverable piece of infrastructure as it has been through a significant level of pre-planning and has Government support.</p> <p>Until the WWHAR is completed and to support the long-term sustainable development at West Winch, the Local Plan proposes an appropriate delivery cap in the number of dwellings that can be delivered. The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> 300 dwellings can be built before strategic intervention is required on the A10 For more than 300 dwellings a link to the A47 will be required, and For more than 1,100 dwellings completion of the WWHAR will be required. <p>In addition to the WWHAR, transport evidence also identifies the need for other forms of transport mitigation at West Winch such as sustainable travel infrastructure, including bus services and walking and cycling connections. These forms of transport mitigation will help deliver some model-shift from traditional forms of travel to more sustainable travel.</p>	No Change
TRANSPORT STRATEGIES							

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	West Winch PC	n/a	West Winch Parish Council is still hoping to see a Comprehensive Transport Strategy for West Norfolk. Summary of results and findings of modelling. A model and traffic forecasting is not a strategy.	Not specified	Yes	Noted.	n/a
KING'S LYNN TRANSPORT STRATEGY							
	West Winch PC	Para 23/ 33	Para 23 the King's Lynn transport strategy looks in detail at changes that could be made in King's Lynn but not the wider area. Para 33 The Cycling and walking plan lists some cycle routes to King's Lynn and says what needs doing. The KL Transport Strategy and the Cycling and walking plan do not reference each other. The documents mentioned do not link to one another online and are difficult to find. While it good to see a transport strategy for Norfolk, it is a huge county and we need something specific to West Norfolk.	Not specified	Yes	Noted	No change
	West Winch PC	Para 23-33	Transport East, while mainly concerned with the Eastern region as a whole, is the national lead for rural mobility and as such has a Compendium of Practice in Rural Mobility as well as other advice for comprehensive travel planning for rural areas such as West Norfolk. https://www.transporeast.gov.uk/wp-content/uploads/RuralMobility_CompdiumpofBestPractice.pdf With massive development planned around the Wootton's, Knights Hill and West Winch as well as other expanding areas of West Norfolk and the holiday traffic congestion and the Sugar beet Campaign we would like to see something along the lines of the series of Growth and Transport plans produced by Hertfordshire under an overarching County plan. They bring together all the strands in one coherent document. WWPC request that the Local Plan should be underpinned by a Comprehensive Travel and Transport Strategy which acknowledges the rural nature of West Norfolk, seasonal differences and the planned development and takes active measures to promote sustainable travel across the whole borough.	Not specified	Yes	Noted. F48 and its supporting appendices are intended to address the deficit, regarding published transport evidence in support of the Local Plan.	No change
	King's Lynn Civic Society	Para 23-33	Considers the Transport Evidence to not lead to any real solution on a worsening traffic problem around Kings Lynn.	Not specified	Yes	F48 Update on Technical Note on Transport Evidence and its Appendices set out the transport modelling and sustainable transport strategies as well as identifying areas that may see congestion in the plan period and identifies mitigation measures in King's Lynn. (F48 Table 2 page 5)	No Change
LOCAL TRANSPORT PLAN (LTP4)							
LOCAL CYCLING AND WALKING INFRASTRUCTURE PLAN							
	Kemp (Cllr A) – Norfolk CC	Para 36	Missing Funding for Walking and Cycling LCWIP Schemes The Technical Transport Note says at page 36 that the Active Travel Network Improvement Schemes have been priority funded. Could the Inspector ask the Council what schemes these are, as there has been no funding from Active Travel funding, allocated to improve the cycle paths along the A10, necessary for linking the new development in to the community. A grandad from Lemuel Burt Way at the Winch said when he tried to walk his grandchildren to school one day this Summer, but they were late as they could not cross the side roads and there was no continuous footpath.	Not specified	Yes	Figure 1. Map of King's Lynn active travel network at paragraph 37 provides an overview of the routes and the LCWIP includes further information on the individual Active Travel improvement measures proposed at various points along them. Appendix B Sustainable Transport Strategy Narrative, Page 3 under Existing Active Travel Facilities states that the A10 is flanked by shared surface pedestrian and cycle routes on both sides.	No change
BUS SERVICE IMPROVEMENT PLAN							
SUSTAINABLE TRANSPORT STRATEGY O SUPPLEMENT THE WWHAR							

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	Murray, Andrew	Para 49	<p>Suggestions as to how a genuine choice of travel modes can be provided to support a modal shift away from dependence on private cars and to promote sustainability.</p> <ol style="list-style-type: none"> 1. Draw up a completely new Masterplan. 2. Do not construct a LTN 1.20 compliant walking and cycling route along the west side of the WWHAC where pedestrians and cyclists will come into conflict with vehicles joining or leaving the WWHAC. 3. Use the funds saved by measure 2 to build a pedestrian and cycle way in a north south direction down the middle of the development. The distance between the present A10 on the west of the development to the proposed WWHAC on the east side is almost one kilometre, so the distance of the suggested middle way would be less than half a kilometre from any dwelling. This would encourage walking and cycling. 4. Consider a public transport route alongside suggestion 3. Even if it was only in one direction it would facilitate a round route. 5. Align the roofs of the buildings to maximise solar gain and the generation of solar energy. 6. The implications of the removal of the small island on the A47 just east of the Hardwick roundabout need to be carefully assessed. It will no longer be possible for the considerable traffic from the north Norfolk coast coming along the A149 to leave the main roundabout at its first exit in order to go towards Peterborough, Northampton or Leicester. Instead it will have to go three quarters of the way around the main island to gain access onto the A47W. This will be problematic especially on Sunday evenings. 7. Build a new parkway type rail station near to the A47 Saddlebow roundabout in order to relieve congestion on the central gyratory in King's Lynn which suffers from poor air quality. It would be fairly readily accessed from the West Winch development and encourage travel by electric train into town or south to Ely, Cambridge or London. 	Not specified	Yes	<p>Noted.</p> <p>The Masterplan SPD provides the framework for delivering a sustainable development at West Winch. The indicative connectivity plan (South East King's Lynn Growth Area Framework Masterplan South East King's Lynn Growth Area Framework Masterplan Borough Council of King's Lynn & West Norfolk (west-norfolk.gov.uk), p21) illustrates just one such approach that the scheme may be delivered. The Masterplan SPD is not subject of this consultation.</p> <p>Proposed sustainable transport measures to supplement the WWHAR are being devised as part of the Outline Business Case for the WWHAR but has not yet been finalised.</p> <p>The proposed Climate Changes policy requires consideration of design and layout of buildings for solar gain etc.</p> <p>This will be done as part of the WWHAR work and planning application.</p> <p>There are no plans for a station.</p>	No change
	Holme Next The Sea Parish Council	Para 49/ Appendix A	<p>The analysis indicates that without the WWHAR residents would find further growth in congestion unacceptable (and this presumably would apply to other road users). Rail travel has not been included in the analysis.</p> <p>The Area-Wide modelling suggests that the impacts of proposed growth on the transport network are acceptable. However, the assumptions require explanation.</p>	None specified	Yes	<p>Transport evidence has demonstrated that to fully deliver the West Winch growth area, the WWHAR is needed to help manage and distribute traffic over the plan period. The Council consider the WWHAR a deliverable piece of infrastructure as it has been through a significant level of pre-planning and has Government support.</p> <p>Until the WWHAR is completed and to support the long-term sustainable development at West Winch, the Local Plan proposes an appropriate delivery cap in the number of dwellings that can be delivered. The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> • 300 dwellings can be built before strategic intervention is required on the A10 • For more than 300 dwellings a link to the A47 will be required, and • For more than 1,100 dwellings completion of the WWHAR will be required.. 	No Change
	Bennett Homes	Para 49	<p>Too much uncertainty in this technical note on what the final mitigation measures for the new road to release the West Winch Growth Area will be.</p>	Not specified	Yes	<p>Transport evidence has demonstrated that to fully deliver the West Winch growth area, the WWHAR is needed to help manage and distribute traffic over the plan period. The Council consider the WWHAR a deliverable piece of infrastructure as it has been through a significant level of pre-planning and has Government support.</p> <p>Further mitigation measures specific to the WWHAR will be dealt with at the planning application stage.</p>	No Change

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	Bennett Homes	Para 49	West Winch is likely to be dominated by road travel and the evidence does not identify any substantial sustainable transport measures to help reduce the need to travel by car.	Not specified	Yes	<p>Until the WWHAR is completed and to support the long-term sustainable development at West Winch, the Local Plan proposes an appropriate delivery cap in the number of dwellings that can be delivered. The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> • 300 dwellings can be built before strategic intervention is required on the A10 • For more than 300 dwellings a link to the A47 will be required, and • For more than 1,100 dwellings completion of the WWHAR will be required. <p>Proposed sustainable transport measures to supplement the WWHAR are being devised as part of the Outline Business Case for the WWHAR but has not yet been finalised. Walking and cycle routes are identified in the Masterplan SPD and set out in Appendix B Sustainable Transport Strategy Narrative.</p>	No Change
	Bennett Homes	Para 49	Level of uncertainty around Government funding for the WWHAR leads to uncertainty around the proposed housing trajectory.	Not specified	Yes	<p>Agreed. The Updated Housing Supply Paper and associated Housing Trajectory assume that a total of 2,020 dwellings will be delivered over the Plan period and assumes the delivery of the WWHAR. The proposed modifications to Policy E2.1 provide that 1,100 dwellings can be built without the WWHAR, in the unlikely event that the WWHAR does not proceed. The outcome of the OBC will be known in the coming months and will be considered as part of the Examination process in due course.</p>	No Change
WEST WINCH GROWTH AREA SUPPLEMENTARY PLANNING DOCUMENT							
KING'S LYNN TOWN DEAL AND THE ACTIVE AND CLEAN CONNECTIVITY PROGRAMME							
KING'S LYNN SUSTAINABLE TRANSPORT AND REGENERATION SCHEME							
GENERAL COMMENTS							
	Kemp (Clr A) – Norfolk CC		<p>The paper says the strategic modelling shows no significant impediments to the Local Plan's spatial distribution but that "the only proviso is the WWHAR is AN ESSENTIAL PREREQUISITE for the 4,000 houses (paragraph 7). The scheme is to support housing, mitigate the impacts of development on the wider network and ease current capacity issues in the current A10. However, the Transport Study forecasts "unacceptable network performance if the WWHAR does not come forward, but the West Winch Growth Area does".</p> <p>Even with the Bypass, there will be 98% capacity at the A10 approach to the Hardwick Roundabout. The area-wide modelling shows the A149 experiencing significant delays in 2039. This situation already happens now.</p> <p>Where are the safeguards that the WWHAR must definitely be delivered? They are absent from the policy and from the Council's Main Modification.</p> <p>Major Modification Needs to state that the delivery of WWHAR is the prerequisite to development.</p> <p>Prerequisite means "that which is required before". The West Winch Housing Access Road is "required before".</p> <p>So I am asking HM Planning Inspectorate to modify the Council so housing development on the A10 will not start until the West Winch Housing Access Road is fully built out. The housing development cannot come forward without the new highway infrastructure, supported by sustainable transport improvements, that mitigate the impact and help alleviate the current chronic congestion on the A10 through West Winch and Setchey. The Major Modification should also say Hopkins must provide a fully-traffic-lit pedestrian crossing at the Winch before commencement of development, so that existing residents at the Winch are not put in a worse position.</p>		Yes	<p>The proposed modifications reflect the evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) which concludes that:</p> <ul style="list-style-type: none"> • 300 dwellings can be built before strategic intervention is required on the A10 • For more than 300 dwellings a link to the A47 will be required, and • For more than 1,100 dwellings completion of the WWHAR will be required. <p>The Hopkins application is not the subject of this consultation.</p>	No change

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	South Wootton, North Wootton, Castle Rising Parish Councils		<p>As parishes, we have been working hard to ensure an extra 1200 homes can be delivered in the Wootton area in a sustainable manner. Sadly, Parish Councils have been ignored and not heard on important issues. Whilst we accept new homes are needed it should not be at any cost to the local Community. The majority of the 1200 homes are bolted on to Village Boundaries on arable and greenfield sites. Amongst these is a 575 development at Knights Hill. Planning was granted in 2019 on the understanding 3 major Traffic Mitigation measures were adopted.</p> <p>Subsequently, one of these vital measures, an on-site Bus service into the town centre, was cancelled by Norfolk County Council Public Transport team. Of the three, this was the only one designed to reduce car dependency, the other two were to manage the flow from this and other developments more efficiently. This important sustainability measure was cut without any consultation with the Parish Councils or referring back to the Borough's Planning Committee.</p> <p>We do not believe the development is NPPF compliant. We have been battling ever since to reinstate this mitigation, a measure which the developer is supporting and is being required to fund even if it is not procured and supplied.</p>	Not specified	Yes	Noted. The schemes in question are already consented and are all at early stages of delivery and are not subject of this consultation. The Local Plan is about looking forward for the next 15-20 years but recognising that there are already developments coming forward/ in the pipeline at any moment, for which impacts (both at the construction phase and beyond) will need to be considered in plan-making.	No change

APPENDICES

APPENDIX A TRANSPORT TECHNICAL NOTE

	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	King's Lynn Transport Model (KLTM)	F48 states of the King's Lynn Transport Model (KLTM) "In summary, the range of observed data which has been used to validate the KLTM is considered to be comprehensive and therefore demonstrates it forms a suitable base from which future forecasts can be derived." But that is not so,	Not specified	Yes	<p>The additional evidence base work has been undertaken to provide a sufficiently robust evidence base to fulfil the soundness tests; particularly that the Plan (including E2.1: West Winch Growth Area/ detailed criteria) is justified.</p> <p>The KLTM strategic transport model has been used and is considered the most appropriate modelling tool by the Highways Authority.</p>	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	KLTM	<p>The model defines peak traffic times as 8am to 9am and 5pm to 6pm, which is not the case in King's Lynn. In their A10 West Winch Headroom study (paper F51) the same consultants found the peak flow on A10 to be 7.30am to 8.30am and 4.30pm to 5.30pm. Thus their KLTS modelling, as well as the developers' own Transport Assessments (TAs) understate peak traffic flow by excluding 7.30am to 8am but including the quieter 8.30am to 9am, and similarly in the peak afternoon traffic time.</p> <p>This is similar to the Woottons and Knights Hill development TAs, an inconsistency brought to the Borough's attention at the time.</p>	Not specified	Yes	Noted. As the responsible statutory body, the Highway Authority has considered the additional supporting evidence [F48a/ F48b] and is satisfied that modelling has been undertaken in accordance with the relevant standards.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	KLTM	<p>Hopkins Homes, in the TA for their Hardwick Green development, assumes no parental car traffic to and from King's Lynn High Schools. Because some new homes would be located just under 3 miles from the closest high school, they assume students will cycle along wholly unsuitable roads. Those students from further out, over 3 miles, they have concluded will be bussed to and from school.</p> <p>The failure to recognise the reality of parental concern means that peak traffic flows are seriously understated.</p>	Not specified	Yes	The Hopkins Homes planning application is not subject of this consultation. The Technical Transport Note and Appendices provides the transport modelling supporting the Plan and is considered appropriate.	No change

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	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	KLTM	This is compounded by NCC's wrong interpretation of historic data. Historic data modelled by NCC's education department shows projected demand for primary and then high school places emanating from the WWGA. Divided to get new students per year it shows that numbers drop so that primary school take up is higher than at secondary level. Had they scrutinised it further, they would have found there to be very specific reasons for this which will not be repeated. The provision of high school places and traffic generated are both understated.	Not specified	Yes	NCC as the Education Authority are responsible for planning for education provision. Secondary school provision will be provided as extension to existing secondary schools in the area and primary school provision will initially be provided at the existing primary school and then with the provision of two additional primary schools in due course.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	KLTM	Nationally derived traffic growth forecasts are used in KLTM. It may, or may not, reflect local reality; anecdotally it is understated for the area. Taking all classes of traffic together it shows growth from 2018 to 2039 of 23.4%. However, this is not the same as the amount of road space required: since 1990 cars have grown in size by about 0.75% per annum. Adjusted, the additional road space required by 2039 is in the order of 8% more at about 27%, which has been omitted from calculations.		Yes	High trip rates have been used in the traffic modelling as explained in paragraph 10 on page 4 of F48. The transport modelling considers different sizes of vehicles including cars, HGVs and LGVs etc, and therefore considers different sizes of vehicles. It is not possible to estimate the size of different makes of cars given the sheer number of makes and models and this would be unrealistic in transport assessments.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	KLTM	For all these reasons the peak hour traffic flow on the A10 from West Winch approaching Hardwick Interchange is understated and will result in congestion and tailbacks leading to environmental and economic disbenefits for the community. I ask the Inspectors to note the inconsistency in peak times used, to determine that the Local Plan Review does not accord with Sustainable Transport policy section 9 in the NPPF, to strike out the adoption of KLTS, and to require a new approach to highway and transport planning in West Norfolk.		Yes	High trip rates have been used in the traffic modelling as explained in paragraph 10 on page 4 of F48. The KLTM strategic transport model has been used and is considered the most appropriate modelling tool by the Highways Authority.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	KLTM	There is a broader issue concerning high school location. The developments at the Woottons and West Winch are being levied to provide additional high school spaces at the town's three high schools yet it is known there is no available capacity for any of the new build development, per an email from NCC education department to Borough planning department, January 2019. In the case of West Winch the levy is some £12.5m, so including The Woottons some £16m in total. A new High School should be built instead at WWGA to serve the growth area, also drawing students from adjacent villages to avoid them travelling into the town, providing complementary community facilities, importantly reducing congestion and reducing CO2 emissions at Gaywood, the worst area for air quality in Norfolk and one of the worst in the country. Instead the planned outcome is to assuredly make it worse – not just for new residents' children – but for all. I therefore ask the Inspectors to require the County and Borough Councils to jointly investigate the building of a relocated High School from the town centre area to the West Winch Growth Area and to calculate the full range of benefits associated with it, including the addition of community use facilities and the reduction in CO2 emissions in King's Lynn's three AQMAS.		Yes	A secondary school is not planned for the Growth Area. Primary school provision will be made on site. The Infrastructure Delivery Plan for the West Winch Growth Area clearly sets out the education requirements as informed by NCC as the Education Authority. Expansion of existing secondary schools will be required in the future and will be financed via developer contributions. There are currently no plans for a secondary school within the West Winch Growth Area. The Education Authority will advise on future secondary education needs.	No change

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	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	P10	F48 states "it is considered that if a trip generation exercise were to be conducted for the West Winch development masterplan, including taking account of potential to shift to more sustainable modes of travel, trip generation would be lower." The words "if a trip generation exercise." indicates one hasn't been done so it is pure conjecture. And what is meant by "sustainable modes of travel" are chosen by residents? I therefore ask the Inspectors to require these to be modelled so that the claims are evidence-based rather than speculative comment and for them to only accept the point as valid if empirical evidence indicates it is.		Yes	It is F48a Appendix A Technical Note that states this in the context of demonstrating that the trip generations used are considered to be 'high'. This is explained in F48 at paragraph 10 on page 4. There is no reference in F48, F48a or F48b relating to 'sustainable modes of travel' are chosen by residents?'. Unable to provide a comment.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Transport Technical Note	KLTM included area-wide traffic generation from new developments in the wider area, especially in South Wootton and Knights Hill. However, traffic generated in that part of the town is also understated because new housing figures were taken from Neighbourhood and Local Plans whereas, following intervention by the Inspector examining the 2016 SADMP, the actual figure is approximately double that. The Borough Council also advised that seven local developments (not listed so cannot be checked) and those out of Borough, which includes 950 new homes at Fakenham should be ignored in the calculations. I ask the Inspectors to require Norfolk County Council to provide an evidence base of where traffic will be over-capacity in King's Lynn and the immediately adjacent area, and for appropriate mitigation measures to be approved – aligned to NPPF section 9 – before accepting any assurances that this is so.		Yes	Diagrams on pages 2 and 3 of the F48a Appendix A Transport Note clearly shows the KLTM Model extent within the Kings Lynn and West Winch Area and the wider area. Table 1 on page 9 of the same document makes it clear that housing completion figures have been used to inform the KLTM traffic forecasts. It is therefore considered that the existing 2039 KLTM forecasts are suitable. The results of the Area Wide Modelling are discussed on pages 23 to 33 of Appendix A. In summary, the Area Wide Modelling has identified various locations across KLWN which experience congestion issues. It is considered all of the locations which are flagged will either have proposals in place to deal with future traffic growth or are locations which show congestion but would continue to operate within capacity. The Area Wide Modelling is considered to demonstrate that the highway traffic growth associated with the developments within the KLWN Local Plan can be accommodated.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Transport Technical Note	Despite all this under-calculation, KLTS found a number of points in the network where flow will be over-capacity. As regards one of them, A149 Queen Elizabeth Way, F48 states "Norfolk County Council are currently considering the scope of a study of the A149 corridor which will determine improvements and opportunities for linkages to complementary area-wide sustainable transport improvements". The Norfolk Strategic Planning Framework, adopted in 2017, noted that the A149 was one of two significantly congested roads in the County (the other was the A146), and one of two with high accident rates (the other was a part of the A47 East of Norwich), yet six years later we are told that the Council is considering the scope of such a study. It is difficult to have confidence in this process. I therefore ask the Inspectors to not accept this assurance of future improvements until the study has been completed and evidence deduced rather than just an assurance of a study being scoped.		Yes	Paragraph 13 on page 5 of F48 Update on Technical Note on Transport Evidence states that 'the Area Wide Modelling has identified various locations across KLWN which experience congestion issues' not that 'flow will be over-capacity'. It is important to note that the Area Wide Modelling looks forward to 2039. Table 2 on page 13 sets out the locations where congestion issues have been identified and sets out the solutions for the issues that have been raised including the A149 Queen Elizabeth Way.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Transport Technical Note	Of the town centre traffic over-capacity issues, F48 states "The King's Lynn town centre gyratory forms part of the Sustainable Transport and Regeneration Scheme (STARS)... [which] will be transformative in terms of increased bus and active travel provision and will result in the reconfiguration of the existing gyratory system." Encouraging that may be, but evidence of Norfolk County Council's approach lies in its refusal to include a sustainable traffic mitigation measure, funded by the developer, at the Knights Hill development as recommended in the TA. Against this refusal, relying on STARS – "jam tomorrow" – is insufficient until the detail is known. I therefore ask the Inspectors to not accept this until the STARS proposals for the greater King's Lynn area have been released and scrutinised.		Yes	Paragraph 52 on page 19 of F48 Update on Technical Note on Transport Evidence clearly states that the STARS scheme has secured £24m Levelling up Funding and that NCC and the Borough Council are developing a project. A public consultation was undertaken in October 2022 on the Southgates Masterplan.	No change

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	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Transport Technical Note	In summarising KLTm area-wide modelling F48 states "In summary....[it] is considered to demonstrate that the highway traffic growth associated with the developments within the KLWN Local Plan can be accommodated." The considerable under-inclusion of known traffic flow clearly shows that that is not the case, neither in West Winch nor the Woottons. I would ask the Inspectors to reach a different conclusion and determine that the highway traffic growth associated with the Local Plan cannot be accommodated.		Yes	High trip rates have been used in the traffic modelling as explained in paragraph 10 on page 4 of F48. The KLTm strategic transport model has been used and is considered the most appropriate modelling tool by the Highways Authority.	No change
APPENDIX B SUSTAINABLE TRANSPORT STRATEGY NARRATIVE							
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	P3 (existing Travel Patterns and Accessibility)	The WWGA Masterplan was adopted in July 2022 after two outline planning applications had been submitted by Hopkins and Metacre. Thus, instead of setting the area's strategic infrastructure, the Masterplan sought to weave it into and around the proposed developments, contrary to NPPF policy. This includes the bus only road link, which for a length parallels the West Winch Housing Access Road, taking it away from the new housing it purports to serve. That part of the proposed development will become car-dependent, contrary to NPPF, not so much by design but by Borough Council allowing development applications to run ahead of essential infrastructure planning. I ask the Inspectors to require that consideration of all new housing development applications to be paused and for them to be resubmitted with essential infrastructure planned in first and the development around it, as per the NPPF.		Yes	The WWGA Masterplan is not subject to this consultation and only provided an indicative layout of the development. Individual planning applications are not the subject of the consultation. Not within the scope of the Local Plan Examination.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	P3 (existing Travel Patterns and Accessibility)	Modal split data from the 2011 census draws conclusion that maximum walking distance to work is 2km and cycling is 5km. Within these radii are, apparently, 30K and 35.4k jobs respectively. But it is questionable whether this is really within walking and cycling distance, especially comparing active travel journey to work data for the King's Lynn urban area with existing West Winch residents. In stakeholder interviews, West Winch residents say that the A10 and Hardwick Interchange in particular are significant barriers to travel by active modes, contrasting with the developer's TA assumptions, see 2b above. I ask the Inspectors to reflect the views of local residents as expressed in stakeholder interviews and determine that modelling should be based on real-life experience rather than desk-based exercises.		Yes	As explained in the second paragraph on page 3 of F48b Isochrone mapping was carried out and the base network used in the analysis includes existing public rights of way . A maximum travel time of 25 minutes has been considered, based on typical walking speeds of 80m per minute and cycling speed of 200m per minute. This gives a typical travel catchment for these modes of 2km for walking and 5km for cycling.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	P3 (existing Travel Patterns and Accessibility)	The section in Appendix B headed "Existing public transport provision" is misleading and in places factually wrong. It is alright to state "bus services operate....connecting residential areas to major employment sites" if they do so at appropriate times of the day, but the evidence, including interviews in 2023 with both industrialists at Hardwick and job seekers, is that they do not. I ask the Inspectors to note this obviously misleading inconsistency.		Yes	Page 4 of F48b sets out the existing public transport provision. Table 2 on page 4 sets out the frequency and routes of buses provided by the service operators.	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	P3 (existing Travel Patterns and Accessibility)	<p>Appendix B includes answers to a number of issues raised by, and questions to, stakeholders and local residents. This indicates that if there is to be modal shift away from car dependency, there has to be a significant and radical re-design of the local bus network to take people to the destinations they want at the times they want, otherwise car-dependency will become hardwired into the WWGA development. There is no evidence of any appetite by Borough, NCC, local bus operators, or, in their TAs the developers, to consider such an approach and therefore the only rational conclusion is that WWGA will not meet NPPF criteria for sustainable transport provision.</p> <p>I ask the Inspectors to reject all claims of transport sustainability in the WWGA proposals and to require the Borough and County Councils to plan from the outset in line with the views of existing residents, and to model new residents travel patterns and aspirations on Decide and Provide, rather than Predict and Provide principles</p>	.	Yes	<p>Page 6 of F48b under the heading 'Developing Options for Bus and Public Transport Users' sets out a number of existing bus routes that could be enhanced with an increased population.</p> <p>Although not part of this consultation the Masterplan SPD sets out the sustainable transport options (walking/cycling routes etc) and F48b provides an overview of the sustainable transport measures for the WWGA.</p> <p>In addition to this, the proposed sustainable transport measures are being devised as part of the Outline Business Case (OBC) work for the WWHAR to secure significant DfT funding towards the scheme and will be identified in a Sustainable Transport Strategy (STS) to augment the road scheme.</p>	No change
	Holme Next The Sea Parish Council	Developing WWHAR Options for Non-Motorised Users	Beyond the WWGA the analysis of impacts is very limited and the costs and benefits for travellers, residents, businesses and the tourist economy have not been explained (including impacts in terms of travel time, highway safety, air pollution). This is particularly relevant to the already heavily congested A149 Corridor which serves the coast and supports the Borough's tourist economy.		Yes	The Transport Modelling looks at the impact of growth on the Plan area over the Plan period. It considered the amount of traffic likely to be generated from development proposed in the Plan and identifies mitigation for any impact caused.	No Change