

J6 – SUMMARY OF REPRESENTATIONS WEST WINCH TOPIC PAPER (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 F51 - West Winch Topic Paper	None	No	Noted	n/a
	Historic England	Whole document	<p>In preparation of the Local Plan, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.</p> <p>We should like to stress that this response is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise, where we consider that these would have an adverse effect upon the historic environment.</p>	None	No	Noted	n/a
	Norfolk CC (LLFA)	Whole document	Over the last 16 months we have further investigated a number of issues in the Local Plan area and have a better understanding and knowledge of it. We have provided comments along with some suggested amendments that will require considering. We have also provided informative comments that seek to strengthen the topic paper.	Not Specified	No	Noted	No change
	West Winch PC	General observations	<p>The Borough Council still seem to be adopting a Predict and provide way of working which comes up with a conclusion and retro fits studies to try to support that.</p> <p>WWPC would prefer to see a more proactive positive approach incorporating Decide and Provide thinking.</p>	Not Specified	Yes	Noted	n/a
	Want, Paulette	Whole document	Concerned that the development of West Winch will negatively impact the village of Setchey and the wider area in terms of existing infrastructure capacity – particularly in relation to highways.	Not Specified	No	<p>The Council has produced a significant level of evidence to support the sustainable delivery of West Winch over the longer-term. With a new settlement, the delivery of new housing and infrastructure will be implemented through various phases. The development of the site will go beyond the emerging plan period so a long term view needs to be considered.</p> <p>F48 Update on Technical Note on transport Evidence states that ‘Delivery of the WWHAR scheme will also ensure that the local highway network and associated communities will not be adversely affected by increases in traffic growth’. (Page 4, Paragraph 9)</p> <p>The evidence identifies the necessary mitigation/infrastructure required to support a larger scale development. New infrastructure will include public open spaces, sports facilities, sustainable travel, two primary schools, a local centre for shops and services and a health facility.</p> <p>The Council’s Infrastructure Delivery Plan will detail the level of infrastructure required and how this will be delivered over the plan period.</p>	No Change

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	Bennett Homes	Para 131	The additional growth at West Winch appears to be driven by the commercial viability associated with and justification for delivery of the West Winch Housing Access Road, forgoing the wider environmental impacts this would have, particularly on the existing AQMA in King's Lynn arising from road traffic emissions. No real prospect of genuine alternatives to offer a choice of sustainable transport modes has been considered by the Council.	Not Specified	Yes	As a new settlement, it will take time to deliver both the housing, infrastructure including transport measures. The delivery of the development will take place in phases and each phase will likely be delivered with an appropriate level of infrastructure necessary to support a new settlement. This is and will further be underpinned through a wider Masterplan for the site.	No change
TRANSPORT IMPACTS							
	Kemp (Cllr A) – Norfolk CC	Para 21-32	<p>MAKE THE A10 A SAFE SPACE FIRST</p> <p>The 300 homes opposite this very location at the Winch, that the Council thinks could come before the bypass, would necessarily experience the same severe absence of residential amenity, unless and until the traffic is removed by the bypass, so the A10 becomes a safe space for pedestrians, cyclists and bus passengers.</p> <p>When you travel South from the Hardwick to Lemuel Burt Way, it is often unsafe to make a right-hand turn into the site, with a long queue of fast-moving oncoming cars on the other side, streaming round the blind bend.</p> <p>Rear end shunts are a key accident risk on the A10. I often have to make a mile- long detour to Chapel Lane to turn round and return on the A10, to access the site safely, from the left-hand side of the A10.</p>	The Major Modification needs to state clearly that the prerequisite to development, is the delivery in full of the West Winch Housing Access Road.	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. 	No change

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	Kemp (Cllr A) – Norfolk CC	Para 21-32	<ul style="list-style-type: none"> Vague timelines drawn up by the Council, showing that only 12 homes will be occupied before the WWHAR is open, give no comfort or certainty and need to be translated into firm planning conditions. The Highway Authority says that 1,100 homes will only come forward, if Hopkins decides to build part of the WWHAR to connect to the A47, before it is built in its entirety. But Hopkins have not agreed to build this short access road. This means that there is no current plan for the complete build-out of the West Winch Housing Access Road. Hopkins are relying on the public sector’s delivery of the WWHAR, to unlock the 800 additional homes. The Highway Authority’s Planning Condition that prior to the occupation of the 301st house, that Hopkins should construct a link road to the A47, would provide no protection that the bypass in West Winch is ever built, if Government does not grant the Major Route Network funding. It implies that West Winch could be left with the traffic from 300 homes on the A10, potentially over 600 cars a day, and no bypass. This is unsustainable. 	<p><u>Proposal for Revised MAJOR MODIFICATION TO WEST WINCH POLICY 2.1</u></p> <p>To ensure that traffic impacts remain within a tolerable level:</p> <ol style="list-style-type: none"> No new development onto the current a10 or a47 before the west winch housing access road is built out in full. Hopkins homes to deliver an audible traffic-lit crossing at the winch, prior to occupation of the first house. Land shall be safeguarded in the local plan to enable the future linking of the west winch housing access road to the a134 roundabout to take through-traffic out of setchey and open up land for development Remove allocation west of gravel hill lane due to flood risk 	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 requirement is that a link to the A47 is provided which must be compatible with the WWHAR. They are not required to build part of the WWHAR.</p> <p>Hopkins planning application is not subject to this consultation.</p> <p>Hopkins planning application is not subject to this consultation.</p> <p>Hopkins planning application is not subject to this consultation.</p> <p>The evidence submitted at Appendix 4 of the Topic Paper (A10 Headroom Analysis) concludes that there is capacity for 300 dwellings to be built before a link to the A47 is required and that up to 1100 homes can be built before the WWHAR is in place.</p> <p>Not subject to this consultation.</p> <p>Not subject to this consultation.</p>	No change

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	West Winch PC	Para 21-26	<p>21 – This data was collected 5 years ago in 2018. Norfolk County Council (NCC) have more recent data from October 2022.</p> <p>25 – The Kings Lynn Transport study is not relevant to WWGA as that document para 3.5.2 states WWGA is a separate study.for the separate study of the West Winch development proposals which are being assessed separately from this study.“</p> <p>26 – The Technical note in Appendix 3 demonstrates in Table 5 that based on the 2018/19 baseline figures many areas of the transport network have capacity issues. As these are baseline figures they do not take into account the sugar beet campaign which massively increases the number of HGV’s on the network or the holiday traffic which already results in queues of many miles and long delays.</p>	Not Specified	Yes	<p>Noted. It is important to understand the context for the selection of the WWGA; particularly that it represents an existing commitment, in the current Local Plan.</p> <p>The Technical Transport Note Appendix 3 of F51 sets out the transport work that has been undertaken to support the submitted Plan.</p> <p>The text has been written with reference to the best information available at the time of writing.</p>	No change
	West Winch PC	Para 21-26	<p>All these issues should be addressed alongside the provision of the WWHAR. The note does not address the impact of development on the A10 south of Gravel Hill Lane where the WWHAR is planned to start. This leaves the West Winch and Setchey residents with the prospect of increased traffic along a narrow section of the A10 where no relief is planned.</p> <p>We note that the Transport technical note is using data from 2018 despite a large amount of data being collected in October 2022 by NCC in support of the WWHAR. The headroom study uses the more up to date data.</p>	Not Specified	Yes	<p>Noted. It is important to understand the context for the selection of the WWGA; particularly that it represents an existing commitment, in the current Local Plan.</p> <p>F48 Update on Technical Note on transport Evidence states that ‘Delivery of the WWHAR scheme will also ensure that the local highway network and associated communities will not be adversely affected by increases in traffic growth’. (Page 4, Paragraph 9)</p> <p>Appendix 3 Technical Transport Note sets out the transport work that was done to support the submission plan.</p> <p>The text has been written with reference to the best information available at the time of writing.</p>	No change
	Holden, Robert	Para 21-32	<p>I object to the risk that the Borough Council's proposed main modification for Policy E2.1, will let major development come forward before the West Winch Housing Access Road is completed, or never in fact built.</p>	Not Specified	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>Notwithstanding, the requirements of Policy E2.1 act as a “backstop”, in the event that the road could not be delivered as strategic infrastructure. Policy E2.1 is clear that delivery of any significant growth (in excess of 1,100 dwellings) at West Winch would, in practice, require delivery of the WWHAR.</p>	No change
	Holden, Robert	Para 21-32	<p>There have already been two local consultations regarding the Proposed Growth Area Plan for West Winch (by Kings Lynn Borough Council) and the Proposed West Winch Housing Access Road (by Norfolk County Council). Objections at both Consultations have always been that because the A10 is so heavily congested with Local, HGV and through traffic.</p> <p>NO development should take place until a bypass is built.</p>	Not Specified	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>Notwithstanding, the requirements of Policy E2.1 act as a “backstop”, in the event that the road could not be delivered as strategic infrastructure. Policy E2.1 is clear that delivery of any significant growth (in excess of 1,100 dwellings) at West Winch would, in practice, require delivery of the WWHAR.</p>	No change

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	Holden, Robert	Para 21-32	<p>I have made comments to both consultation groups on this matter and so have many hundreds of others and if you inspect the Borough Council consultation comments regarding the Growth Area Plan almost 100% demand a bypass before house building commences. All such comments were dismissed because the consultation doesn't deal with the new proposed Access Road (a total cop out in my opinion). Unfortunately despite my request to Norfolk County Council they have not published their consultation comments regarding the new road???</p> <p>Norfolk County Council should publish consultation comments regarding new road</p>	Not Specified	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>Notwithstanding, the requirements of Policy E2.1 act as a "backstop", in the event that the road could not be delivered as strategic infrastructure. Policy E2.1 is clear that delivery of any significant growth (in excess of 1,100 dwellings) at West Winch would, in practice, require delivery of the WWHAR.</p> <p>The consultation on the WWHAR undertaken by NCC is not subject to this consultation.</p>	No change
	Smith, Susan	Para 21-32	<p>Traffic Congestion. At present traffic on the A10 is not at a tolerable level with residents' struggling to access the A10 from Chapel Lane and Long Lane on a weekday. If 300 homes were built opposite The Winch without the 'bypass' then this would increase the traffic to a position whereby it is both unsustainable and dangerous. Friends' who live on Main Road have already shifted their hours of work from 0800 to 0730 to ensure they can gain access to the A10 going into Lynn – otherwise they were not able to get to work on time as the traffic was so heavy.</p> <p>If the extra 300 homes are built with no bypass then what time will they have to leave?</p>	Not Specified	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. 	No change
	Smith, Susan	Para 21-32	<p>Dangerous road conditions for pedestrians – including primary school children. School children attending West Winch Primary currently cycle and walk along the A10 to get to school. There is presently a danger due to narrow pavements in certain parts of this walk but with the increased traffic this danger would increase. Therefore parents' will take their children by car to school which again increases traffic.</p>	Not Specified	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. 	No change
	Smith, Susan	Para 21-32	<p>The traffic modelling does not reflect either (a) the current experience of residents'; (b) the implications of the school run – both at present and with the increased children coming from the 300 houses; (c) does not take into account holiday time – with the knock on of congestion onto the Hardwick Roundabout and the A149 route to Sandringham and the coast. The A10 is the major route to Kings Lynn port and industrial areas for HGV's from the south. If there is increased congestion then they will seek alternative routes – along even smaller villages like North Runcton. Not only will this endanger the residents' there but will increase the damage to the roads. Look at the constant work that has to be done on the A10 to fill in potholes that cause damage and are dangerous to driving.</p> <p>This will be exacerbated without the housing access road – especially as you will also have the construction traffic using the A10.</p>	Not Specified	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>F48 Update on Technical Note on Transport Evidence provides transport evidence for the Plan area and states at paragraph 9 on page 4 that 'Delivery of the WWHAR scheme will also ensure that the local highway network and associated communities will not be adversely affected by increases in traffic growth'.</p>	No change
	Smith, Susan	Para 21-32	<p>The impact of pollution. With a huge increase in traffic volume comes the increased risk of the hazards of air pollution and the increased risk of asthma attacks especially amongst the young and old. The dreadful case of the 7 year old Ella Kissi Debrah in South East London who died of air pollution should be a salutary reminder to councils everywhere (if not developers) that the impact of heavy traffic can be deadly.</p> <p>Walking along the A10 at the moment is already an unpleasant experience for anyone with breathing difficulties.</p>	Not Specified	Yes	<p>Noted. The Topic Paper is supported by appendices. Appendices 8, 9 and 10 (regarding acoustics, noise and air quality respectively) provide the supporting technical evidence regarding these environmental concerns and have informed the proposed Major Modifications to Policy E1.2.</p>	No change

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WEST WINCH HOUSING ACCESS ROAD							
	Kemp (Cllr A) – Norfolk CC	Transport Impacts (para 21-32) West Winch Housing Access Road (para 33-46)	<p>As the Local County Councillor, I object to the risk that the Borough Council's proposed main modification for Policy E2.1, will let major development come forward before the West Winch Housing Access Road is completed, or never in fact built, and before the introduction of necessary capacity improvements at the congestion and accident blackspot at the Hardwick Interchange. This would be totally unacceptable, unsustainable and against national planning policy for sustainable transport strategy in new development, and would massively worsen the poor residential amenity of residents living on the A10 and the estate roads in the village of West Winch.</p> <p>The forecast scenario is unacceptable network performance, if the west winch growth area comes forward, but the west winch housing access road does not.</p> <p>So it is outrageous for the Council to propose up to 300 houses with access to the A10 without further strategic intervention” in the same breath and paragraph, as saying “ to ensure traffic impacts remain within a tolerable level”.</p> <p>The A10 in West Winch cannot take any more traffic.</p> <p>The transport modelling does not reflect residents' lived experience, the danger of turning onto key junctions in a high risk accident road, to the noise, congestion, hostile environment for walking and cycling, and the extent of residential disamenity from the delays and congestion.</p>	Removal all references to scenarios where any development could take place before delivery of the West Winch Housing Access Road (WWHAR).	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. 	No change

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	Kemp (Cllr A) – Norfolk CC	Transport Impacts (para 21-32) West Winch Housing Access Road (para 33-46)	<p>Case for the West Winch Housing Access Road The need for West Winch Housing Access Road to come first, to take the traffic out of the village, for the development to be sustainable, underpins the funding case for the road itself.</p> <p>Norfolk County Council’s most compelling case to HM Government to provide Major Route Network Funding immediately for the West Winch Housing Access Road, is that the development will not be sustainable unless the traffic is taken off the A10 and out of the village.</p> <ul style="list-style-type: none"> • The existing severe capacity issues on the A10 already cause a hostile environment for walking and cycling, and any more traffic from development will increase reliance on the private car. • The A10 carries 20,000 vehicles a day, at least 11% of them HGV’s and has a high accident rate, as the A10 has wide bends with poor sightlines, that lead to rear-end shunt accidents. There are 800 lorry movements a day of maximum HGV sugar beet lorries from Wissington, causing noise and congestion. Residents living along the A10 cannot get out of their driveways or the estate roads safely. • The A10, as a corridor of movement, cannot function properly now, and additional delay to freight lorries, congestion and uncertain arrival times would represent an even greater productivity cost to business and a deterrent to trade and commerce and to the prosperity of King’s Lynn and West Norfolk. • The A10 in West Winch and Setchey cannot function as a Major Route Network, and is sub-standard in its design. Allowing any more development without the WWHAR first in place, will represent a cost to local business and amenity, prosperity and will lead to dangerous detours on narrow side roads, as people seek to avoid the A10 during peak times. • There would be no school onsite, till after delivery of 300 homes, so people will drive infants to school at peak times south on the A10 to West Winch Primary, adding to pressure on the A10. • Walking along the A10 on narrow pavements close to juggernauts, which create a backdraft of turbulence that make one feel about to be blown back into the hedge, is a frightening experience for grown adults, let alone small children. It is not a safe route to school. Parents will not let their infants walk a mile and a half from the Winch all the way to West Winch Primary. <p>Until the heavy traffic is taken out of the current A10 and it is traffic-calmed to a village road, the new development would be severed from the rest of the village and the additional noise, congestion from traffic from homes on the new turning opposite the Winch, would increase the hostility of the environment for walking and cycling and new residents will just get into their cars to access amenities.</p>	Not Specified	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. 	No change

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	Holden, Robert	Para 33-36	<p>The A10 is a Major Road into the town and to the Hardwick Interchange, both commuter and HGV traffic. Also the A134 merges with the A10 at Setchey. This is a solid reason why the bypass must also bypass Setchey and not as proposed. Proposals for a bypass dating back as far as 1990 always included Setchey, for good reason. Since 1990 traffic through the two villages has greatly increased.</p> <p>Highways accepts that this section of the A10 is heavily congested and one of the busiest 'A' road 'single' carriageways in the country. This is why they have until now always objected to any planning applications that required a new access onto the A10.</p>	Not Specified	Yes	<p>Noted.</p> <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. 	No change
	Holden, Robert	Para 33-36	<p>I accept the need for new housing and its urgency. To enable house building to start before the new road (bypass) is built.</p> <p>A traffic census from 2018 states that there were 24100 daily traffic movements on the A10 (The Winch area) and only 19500 daily traffic movements on the A47 (Constitution Hill area). This information is from the Highways pamphlet.</p> <p>This indicates to me that instead of further congesting the A10 with more traffic by accessing the new housing from a new roundabout at The Winch on the A10.</p> <p>A new roundabout should be built on the A47 (Constitution Hill) to provide access to the new housing. The roundabout would eventually become part of the proposed new bypass when funds become available</p>	Not Specified	Yes	<p>Noted. The design of the WWHAR is part of the work being undertaken by Norfolk County Council as the Highways Authority and the design of the WWHAR which will be the subject of a planning application is not part of this consultation.</p>	No change
	Smith, Susan	Para 33-36	<p>I gather the Planning Inspectorate is due to return shortly to examine the local plan. I would say that at present the car-dependent development is unsustainable as it would create a worsening of highways safety and exceptionally heavy traffic to West Winch.</p> <p>The West Winch Housing Access Road must be fully built before ANY houses are built.</p>	Not Specified	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. 	No change
	Moore, Claire	Para 33-36	<p>I object to the Borough's plan to allow 1100 homes before the West Winch House Access Road is fully built.</p> <p>I am a current resident of West Winch and experience the travel chaos of the A10 on a daily basis, if I do not leave my house by 7.30am then I stand no chance of getting to work, the north side of King's Lynn, on time due to the current traffic volume!</p> <p>Till the WWHAR is in place, the traffic and HGV's cannot be taken out of the village and the current A10 cannot be traffic-calmed.</p>	Not Specified	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. 	No change
DFT FUNDING							
	Smith, Susan	Para 37-42	<p>Funding – as I understand it the developers' have not yet succeeded in acquiring government funding for the bypass. Therefore what guarantee do West Winch residents' have that the bypass will be built if the housing is given the go ahead first?</p>	Not Specified	Yes	<p>The Topic paper (para 33-42) sets out the current position as to how funding for the West Winch Housing Access Road is to be secured. Proposed modifications to Policy provides for the unlikely event that the funding is not forthcoming for the WWHAR:</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
DELIVERY/PHASING							

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	Kemp (Cllr A) – Norfolk CC	Para 43-46	Hardwick Green would be a desert island, stranded in the middle of the A10 and A47, not a proper community, until it is connected to the village via a traffic-calmed A10. With 2 large supermarkets and out of town retail site north of the Hardwick Roundabout, there will be little incentive for businesses to set up retail outlets on Hardwick Green. Leading to more car dependency, unless active travel is incentivised by the creation of a safe highway environment.	Not Specified	Yes	Not the subject of the consultation	No change
	Kemp (Cllr A) – Norfolk CC	Para 43-46	<p>SUSTAINABILITY</p> <p>Traffic Calming on the current A10 Cannot Work Until Heavy Traffic Routed out of Village by WWHAR</p> <p>The Local Plan at E2.1 says that within 12 months of the start of development, traffic calming measure on the A10 must be installed. I believe the measures should include:</p> <ul style="list-style-type: none"> the West Winch Housing Access Road first speed limits lowered to 30/20 mph along the A10 a 7.5 tonne weight limit narrowing of the carriageway widening of the cycle path and pedestrian pathway, segregated audible pedestrian crossings at the Winch, Chapel Lane, Long Lane, Gravel Hill Lane and Setchey more frequent buses at peak times, so people can rely on them to go to work. audible crossings on the Hardwick Roundabout Bus priority measure a transport hub on the A10 with secure cycle parking a bus lane on the A10 a railway station in West Winch on the Strategic Growth Corridor mainline a tram system a walking and cycling underpass under the A149 along the disused railway route a segregated cycle route round the Hardwick Roundabout and along Hardwick Road 	Specific infrastructure noted – transport hub, bus lane, railway station, tram system, walking and cycling underpass, segregated cycle route	Yes	<p>The IDP identifies where and at what time that infrastructure is required and sets out the agreed principles, processes and delivery mechanisms that will be updated as and when planning applications are progressed. Details of the key infrastructure projects in relation to West Winch Growth Area are set out in the Infrastructure Delivery Schedule included in the Plan’s Infrastructure Delivery Plan [F24].</p> <p>Page 7 of Appendix B (Sustainable Transport Narrative) to the Update on Technical Note on Transport Evidence provides details of the sustainable transport measure for the West Winch Growth Area.</p> <p>There are no proposals for a transport hub, railway station, tram system or an underpass and these are not subject to this consultation.</p>	No change
	West Winch PC	Para 46 (New Criterion (Part A following criterion 4))	<p>The issue of the new road has been very contentious locally. Despite the consultation sessions there is still confusion amongst local people.</p> <p>The October 2013 Transport Assessment which accompanied the Hopkins initial application stated: 5.9. Proposed West Winch Link Road ... which would form the basis of a wider link road between the A10 and A47. This would allow vehicles to leave the A10 at Setchey and route through the growth area to connect to the A47 avoiding the existing A10 route through West Winch.</p> <p>SADMP 2015 confirmed the link road.</p>	Not Specified	Yes	Noted. The 2013 Hopkins application precedes the adoption of the 2016 SADMP. The latter sets out criteria for delivering WWGA, including provision of the link road. This is carried forward into the replacement Local Plan.	No change

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	West Winch PC	Para 46 (New Criterion (Part A following criterion 4))	<p>Part A Outcomes Para 4 <i>A new road linking the A10 and A47.</i> Policy E2.2 of the SADMP stated no significant development will be permitted to obtain access to the A10 in advance of the new West Winch Link Road opening. This was understood to be the link road from Gravel Hill Lane.</p> <p>Local people therefore believed that the “link road” in the SADMP is the “link road” referred to in the proviso that only 300 houses could be built. But Hopkins had also called their new road through their estate a link road. This has been compounded by council briefings stating they expect to have the new WWHAR road open long before 300 houses are built.</p> <p>The Local Plan link road was more recently named the WWHAR for the purposes of the transport grant application. It remains designated the Link road in the SADMP, while the other road has been named the link road.</p> <p>WWPC requests that all references to link roads are renamed.</p>	Not Specified	Yes	<p>Noted. It is accepted that there may be some confusion in terminology. A “link road”, as referenced within the text, explains the function of any road; be it the WWHAR or any other connecting roads that may serve the development.</p> <p>By contrast, WWHAR, explicitly refers to the new road linking the A10 and A47</p>	No change
	West Winch PC	Para 33-45	<p>Generally locally there is a realisation that new housing is need but local residents think they have been misled about the relationship between the WWHAR and the housing development.</p> <p>It has been requested that WWPC via a resolution at a public Parish Council meeting clearly represent the view of local people. The resolution states ‘The Borough Council’s Main Modification to the Local Plan should say that the West Winch Housing Access Road and a traffic-lit crossing at the Winch, should be fully in place before commencement of the Hopkins Development and of any other Development in the West Winch Growth Area on the A10.’</p> <p>The local residents have the lived experience of the A10 being extremely congested and common sense tells them that putting a roundabout on the A10 where the housing estate traffic will have priority over northbound A10 traffic must result in longer northbound queues.</p>	Not Specified	Yes	<p>Noted. The current Local Plan (2016 SADMP) and replacement Local Plan review have always specified the WWHAR as an integral part of the major WWGA strategic development.</p> <p>National policy (NPPF para 73) requires realism in delivery of larger scale developments, including ensuring that funding can be secured for the delivery of supporting infrastructure.</p> <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. 	No change
	Gibson, Lorraine	Para 43-47	<p>Whilst I do understand the need for growth and development, I am objecting, yet again, to proposal for the initial phase of 300 homes on the Hardwick Green Development as laid out in the New Criterion section printed in red following paragraphs 43-47 of the above referenced document.</p> <p>The existing residents of North Runcton, Setchey and West Winch together with road users of the A10 already experience serious traffic delays and disruption, why should that be subjected to more.</p>	Not Specified	No	<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. 	No change
	Gibson, Lorraine	Para 43-47	<p>Construction traffic and by the residents needing to access the A10 by means of a roundabout planned for construction opposite The Winch public house – Why has this been deemed a suitable option?</p> <p>It will simply create the same traffic snarl ups that occur on a daily basis at the roundabout between those of the Hardwick and the Queen Elizabeth Hospital.</p>	Not Specified	No	<p>Comments relate to the Hopkins Homes planning application and is not subject of this consultation.</p> <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. 	No change

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	Gibson, Lorraine	Para 43-47	<p>King's Lynn and its environs are increasingly subject to serious delays and congestion. Whilst there has been a lot of new homes constructed in and around town in recent years and there are currently a number of developments in progress, these have not been accompanied, it seems, by a road system review. Why is this? The road systems have long been overdue a major upgrade and overhaul and is surely a necessary component to ensure success of any major developments such as the one proposed. Why should residents and businesses of the borough have to consistently experience inconveniences in going about their daily lives? Enough is enough.</p> <p>No houses should be built on the Hardwick Green site until the WWHAR has been constructed and is in use.</p>	Not Specified	No	<p>Noted. The allocation of 4000 dwellings at West Winch is proposed to maximise opportunities for delivery of transport and community infrastructure; i.e. highway capacity, active travel, schools and NHS capacity.</p> <p>F48 Update on Technical Note on Transport Evidence and Appendix 4 A10 Headroom West Winch sets out transport modelling, and proposed modifications to the Policy reflect the findings and will limit development should the funding for the WWHAR is not forthcoming.</p> <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. 	No change
	Hopkins Homes plc	Para 46	<p>Para 46- We support the main modification proposed.</p> <p>General support for the proposed Housing Trajectory.</p>	None	n/a	Supporting representation noted	No Change

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	Maddox planning/ Metacre Limited	Para 46	Support for the delivery of the West Winch Growth Area. However, they believe that the cap on the level of growth before the WWHAR is completed should be 350 dwellings and not 300.	<p>To ensure that traffic impacts remain within a tolerable range development will be subject to the following thresholds, unless further capacity evidence demonstrates additional dwellings can come forward:</p> <ul style="list-style-type: none"> • up to 350 dwellings with access to the A10 without further strategic intervention; • for anything above 350 dwellings, completion of a link to the A47 will be required; and • for more than 1,100 dwellings on site, completion of the West Winch Access Road in full will be required. 	No (Not specified)	The Local Highway Authority has produced the latest transport evidence presented in F51. This indicates the appropriate scale of growth acceptable prior to the development of the WWHAR. The scale of 300 dwellings has been agreed with the Highway Authority and the Borough Council are satisfied that this both an appropriate scale of growth and deliverable without leading to unnecessary adverse impacts to the local highway network.	No change
CUMULATIVE IMPACTS OF ADDITIONAL GROWTH							
	Kemp (Cllr A) – Norfolk CC	Para 47-60	<p>The Failure of Sustainability of Recent Development at the Winch</p> <p>If we don't learn the lessons of history, we are doomed to repeat them. This is amply illustrated by the unsustainability of the recent two small housing developments next to the Winch on the A10: 20 houses on Lemuel Burt Way, and 19 residential static caravans for older people, at East View Park Homes. Residents experience severance and severe residential disamenity, from the congestion on the A10, difficulty turning out of the estate entrances, the noise from the A10 day and night, and no safe crossing to and from the bus stop opposite. They are heavily car-dependent. This development is environmentally unsustainable.</p> <p>Residents, many of whom moved in during lockdown or from other counties, now wish they hadn't.</p>	Not Specified	Yes	No comment	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	West Winch PC	Para 47-60	The message from the Borough council is that no more than 1100 houses can be built before the WWHAR is completed but once that road is built you have to then accept at least 4000 houses with no upper limit to continued development in WWGA. WWPC requests that there is a stated upper realistic limit to the number of houses which can be built in the WWGA utilising a more proactive integrated approach across the whole borough.	Not Specified	Yes	Noted. Planned growth (4000) is set at a realistic level, to secure a sustainable development of an appropriate density on the (already) allocated WWGA site (SADMP, Policy E1.2). Paragraph 128 of F51 sets out the indicative capacity of the WWGA having considered required infrastructure and mitigation measures, topography and character. Densities will range from 25dph to 40dph across the site. The average density will therefore be 34.45dph which would result in an overall development capacity of approximately 4,038 dwellings. This does not prevent higher densities being delivered over the site as planning applications will be considered on their merits. NPPF paragraph 124 requires that we should support development that makes efficient use of land.	No change
	Rebecca Schrooder	Para 47-60	I disagree with the assessment in from para 47 through to para 60. I do not believe that the assessment of the impact of the rural character of the area, specifically for Rectory Lane, has been adequately considered. Your proposed mitigating modifications, Do not go nearly far enough to mitigate against the effects which have been graded as potentially highly adverse.	Not Specified	Yes	Appendix 5 Landscape and Visual Appraisal was undertaken by specialists in this area with more than 35 years' experience in this area and is an objective assessment The evidence within the Topic Paper has been produced independently and identifies the necessary mitigation required to reduce the impact of the development on the landscape.	No Change
LANDSCAPE AND VISUAL APPRAISAL							
	Historic England	Para 48-60	The West Winch topic paper summarises the evidence and proposed modifications in relation to landscape at paragraphs 48 – 60. The LVIA itself is ED F51e Appendix 5. We broadly welcome the preparation of this additional evidence to support and justify the allocation.	None	n/a	Supporting comments noted	n/a
	Historic England	Para 48-60	Landscape Character – We note that the LVIA concludes that the anticipated overall effects on local landscape would be slight to moderate adverse (para 5.11). In terms of cumulative effects, the assessment states that this would be the same level but felt over a wider area (para 5.13.)	Not Specified	No	Noted	No change
	Historic England	Para 48-60	Visual Effects – Visual effects are identified as ranging from slight to high adverse. No assessment has been made of the potential visual effects from key heritage assets in this appraisal. We consider this to be an important omission from the appraisal.	Not Specified	No	Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a].	No change
PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART A CRITERION 14							
HERITAGE IMPACT ASSESSMENT							
	Historic England	Para 61-74	Summary position – Historic England welcomed the preparation of the HIA in 2022. However, in our Statement of Common Ground , our hearing statement and our oral evidence at the EiP we stated that it is Historic England's view that the HIA is insufficient and the policy wording not detailed enough to provide sufficient protection for the historic environment. It is disappointing that there has been no further HIA work and no additional proposals for the policy in relation to heritage since the adjournment of the hearings in January.	Not Specified	No	Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a].	No change
	Historic England	Para 61-74	Historic England's position and recommendations – Historic England has advised that a Heritage Impact Assessment (HIA) should be prepared for this site over several years. Whilst we welcome the preparation of an HIA just in advance of the hearings, it is Historic England's view that the assessment was insufficient in some areas. The HIA identifies harm to heritage assets. In particular for the land around the church, this included a high level of harm. The HIA does not provide appropriate/sufficient recommendations with sufficient detail for mitigation and enhancement.	Not Specified	No	Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a].	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Historic England	Para 61-74	<p>Historic England's Advice Note Site Allocations in Local Plans (referenced in Planning Practice Guidance Paragraph: 045 Reference ID: 61-045-20190315 Revision date: 15 03 2019) makes it clear that assessment should consider maximising enhancements and avoiding harm through (amongst other things) identifying design requirements including open space, landscaping, protection of key views, design, layout etc.</p> <p>The advice note also states that allocation policy 'should be detailed enough to provide information on what is expected...Mitigation and enhancement measures identified as part of the site selection process and evidence gathering are best set out within the policy to ensure that these are implemented'.</p> <p>It is Historic England's view that the HIA is insufficient and the policy wording not detailed enough to provide sufficient protection for the historic environment.</p>	Not Specified	No	Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a].	No change
	Historic England	Para 73-74	<p>We consider that the policy is not justified by an appropriate, sufficient proportionate evidence base, and the wording is not effective in securing sufficient protection for the historic environment and so is not consistent with the NPPF.</p> <p>We understand that there has been no additional evidence work, such as refinement of recommendations in the HIA or revised policy wording in relation to heritage since the hearings</p>	Not Specified	No	Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a].	No change
	Historic England	Para 73-74	<p>Whilst we acknowledge that the proposed main modifications set out in our SOCG with the Council represent an improvement on the previous wording for the policy in relation to heritage, they do not fully address our concerns as expressed at the Examination in Public.</p> <p>At EiP Historic England highlighted our concerns in relation to the HIA and also set out our suggestions in relation to appropriate heritage mitigation that should be included in the policy.</p>	Not Specified	No	Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a].	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Historic England	Para 73-74	<p>we explored the need for there to be an area protected from development around the church and the moated site and that this should be identified in the Local Plan</p> <p>At EiP we also recommended the following heritage mitigation measures, in part based on some of the recommendations in the HIA at paragraphs 4.15,4.16 and 4.18 of the HIA but also based on site visits, and our own professional judgement.</p> <ul style="list-style-type: none"> • Heritage buffer around the church and moated site (leaving the field to the east of the church, south west of church and east and south of the moat open and in pasture or informal open space). Strengthen landscaping along the eastern field boundary. • Maintaining key views of the church and mill from the site • Careful lower density design and planting in the area around the mill • Careful siting and buffering of new development around the Old Dairy Farmhouse. • Heritage interpretation • Conserve and enhance Green Dyke <p>We maintain our position and continue to advise that these requirements should be included in the policy wording for the site at criterion 7.</p> <p>The HIA also identified the moated site at Fincham’s Manor to the south of the church to be of potentially schedulable quality and so should be treated as such. Therefore, we recommended to the Council that they put this site forward for assessment for scheduling. However, to date Historic England has not received an application. We continue to advise that this is undertaken to clarify the status of the moated site ahead of more detailed masterplanning and development.</p>	Not Specified	No	<p>Noted. Representations received broadly represent repetition of Historic England’s outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a].</p> <p>Recommendations regarding the designation of scheduled monuments is not the function of the Local Plan. Historic England is able to assess the site and schedule the monument should it wish to do so.</p>	No change
PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART B CRITERION 7							
PROPOSED MAIN MODIFICATIONS TO SUPPORTING TEXT 9.3.1.59 TO 9.3.1.60							
ECOLOGY AND BIODIVERSITY							
PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART A CRITERION 14							
PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART B CRITERION 5							
	Norfolk CC (Ecology)	Para 84 – Part B: Criterion 5, 6 and 14, and Modification 5	The proposed main modifications relating to Ecology and Biodiversity appear broadly acceptable, including (in Part B Criterion 5) reference to the requirement for the development to achieve a minimum 10% net gain in biodiversity as set out in the Environment Act 2021.	None	n/a	Supporting comments noted	n/a

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	Norfolk CC (Ecology)	Para 84 – Part B: Criterion 5, 6 and 14, and Modification 5	<p>Part B Modification 5 appears to overly rely upon, and emphasise, the predicted losses of sensitive habitats and the need for mitigation and compensation; it is instead advised that a greater emphasis is placed upon utilising the BNG requirement to avoid impacts in the first instance, thereby potentially avoiding the need for more costly habitat creation and/ or restoration options.</p> <p>The insertion of a clearly stated reference to strict adherence to the ecological mitigation hierarchy is therefore suggested. It is important to note that, in addition to the Local Wildlife Sites, the area of scrub, grassland and woodland mosaic habitats which form a significant area of valuable (but undesignated) habitat within the north-east of the proposed allocation are likely to provide one of the most significant existing ecological resources in the local area.</p>	Not Specified	No	<p>Noted. The requirements of Biodiversity Net Gain (BNG) will almost certainly be in force once applications for later development phases (although not the Hopkins Homes/ Metacre applications, which are currently pending).</p> <p>Suggested Main Modifications have already been put forward regarding BNG. The Borough Council's response to the Matters, Issues and Questions (Q388) already proposes modifications to Policy LP19 and supporting text [H47].</p>	No change
PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART B CRITERION 6							
	Norfolk CC (Ecology)	Para 84 – Part B: Criterion 5, 6 and 14, and Modification 5	Further modifications proposed in Part B Criterion 6 and Criterion 14 in relation to ecology and biodiversity appear appropriate.	None	n/a	Supporting comments noted	n/a
	Hopkins Homes plc	Para 84	We generally support the proposed modifications resulting from the Ecology and Biodiversity Assessment.	None	n/a	Supporting representation noted	No Change
FLOOD RISK AND DRAINAGE ASSESSMENT							
	Kemp (Cllr A) – Norfolk CC	Flood Risk & Drainage Assessment (para 89-94)	<p>Surface Water Flood Prevention – Missing offsite Flood Risk Survey The Developer has failed to undertake an offsite Flood Risk Survey. Lemuel Burt Way, in, West Winch downstream of the site has just been flooded with water from the A10 during extreme rainfall event in September. Water ran off the highway and down the slope, flooding two garages, and entering the airbricks of a home.</p> <p>West Winch is still awaiting the Local Lead Flood Authority's flood investigation report into the flooding on Hall Lane in August 2022, when 5 bungalows were flooded.</p>	Not Specified	Yes	<p>The Hopkins planning application is not subject of this consultation. It is understood that an offsite drainage strategy has now been prepared.</p> <p>The West Winch Topic Paper sets out the findings and recommendations of the Flood Risk Assessment and Surface Water Drainage Strategy for the Growth Area at paragraphs 89 – 93 and proposes main modifications to reflect those recommendations at paragraph 94.</p> <p>It is acknowledged that there have been surface water drainage issues outside the Growth Area in the village of West Winch and that this is being investigated separately by the Lead Local Flood Authority.</p>	No change
	Norfolk CC (LLFA)	Para 91	Informative - bullet point one indicates the number of catchments that discharge to the west. However, it is not clear how this was identified and defined such as using a Lidar assessment or another approach? Further work has been conducted over the last year by the developers and risk management authorities and it confirmed that one catchment falls to the north-east to Pierpoint.	<p>Links/ references to background information/ evidence regarding the No of catchments</p> <p>Bullet point three, please add an additional site constraint of offsite connectivity.</p>	No	Noted. Catchments/ overland flows specified at para 91 were identified with reference to site contours/ the prevailing overall slope of the site; i.e. discharge in the direction of the main watercourse (River Nar) and Puny Drain.	No change

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	Norfolk CC (LLFA)	Para 93 (bullet point 1)	Informative - we support this approach and remind the LPA that strategic drainage masterplan should be developed for the remaining growth area. Ideally each site should deal with its own surface water runoff (subject to levels and connectivity). In general, SuDS should be located at the lowest regions of the site within open space and residential uses located on high ground.	Not Specified	No	Noted	No change
	Norfolk CC (LLFA)	Para 93 (bullet point 2)	Comment – should read “confirm the baseline risk of fluvial and pluvial flooding posed to the Site.”	Suggested wording change	No	Bullet point 2 at Para 93 reflects the wording in Appendix 7 Flood Risk Assessment and Surface Water Drainage accurately. Specific detailed comments regarding surface water drainage are matters that will be addressed at the detailed planning (development management) stages.	No change
	Norfolk CC (LLFA)	Para 93 (bullet point 3)	Comment – we support this text. Although we confirm this is a watercourse which is relatively very deep in places. We remind the LPA that a 3.5m maintenance strip will need to be retained along both side of this watercourse. There is a second small flow path aligned with Watering Lane and the application of the same principles is required.	Not Specified	No	Noted.	No change
	Norfolk CC (LLFA)	Para 93 (bullet point 5)	Comment – these site control features should be above ground features and must be designed to be multi-functional in accordance with the four pillars of sustainable drainage. Early discussions with potential adoptees should govern design principles for the features. Site control features should be above ground features and must be designed to be multi-functional	Not Specified	No	Noted. Specific detailed comments regarding surface water drainage are matters that will be addressed at the detailed planning (development management) stages.	No change
	Norfolk CC (LLFA)	Para 93 (bullet point 9)	Comment – we strongly recommend that opportunities for blue/green corridors align with existing blue corridors.	Not Specified	No	Noted. The importance of blue/ green corridors represents a significant aspect of the illustrative layout (Masterplan SPD, p17: https://www.west-norfolk.gov.uk/download/downloads/id/7257/west_winch_growth_area_framework_masterplan_spd.pdf).	No change
	Norfolk CC (LLFA)	Para 93 (bullet point 10)	Comment – the year for the Flood and Water Management Act should read 2010.	Not Specified	No	Noted.	No changes necessary at this stage
	Norfolk CC (LLFA)	Para 94	Comment – we recommend a Criterion about provision for access to maintain all existing watercourses / ditches / dykes throughout the Growth Area such as the infrastructure management plan.	Not Specified	No	Noted. Can be considered as part of the planning application process.	No change
	Norfolk CC (LLFA)	Para 94	Comment – we recommend updating the text	“Incorporation of above ground multifunctional sustainable drainage systems (SuDS) to address additional surface water runoff, managing offsite flood risk, biodiversity, and the avoidance of groundwater pollution and provision of amenity through applying best practise and the four pillars of SuDS.”	No	Noted	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Norfolk CC (LLFA)	Para 94 (criterion 10)	Comment – we recommend including Criterion 10.	“Seek opportunities for flood reduction or relief to the existing community through offsite betterment where possible. This could be achieved either through a reduction in site surface water discharge rates to being below the existing greenfield runoff rates where possible.	No	Noted	No change
	Anglian Water	Para 92-94	Anglian Water supports the preparation of the Flood Risk and Surface Water Drainage Strategy and the series of recommendations to manage surface water run-off within and surrounding the site, particularly the focus on sustainable drainage systems (SuDS) and utilising the hierarchy for surface water discharge, which avoids connection to our network.	None	n/a	Supporting representation noted	n/a
PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART A CRITERION 15							
	Anglian Water	Part A Criterion 15	Suggested amendments in blue text	Incorporation of Sustainable Drainage Systems (SuDS) to address surface water run-off, flood risk, biodiversity, and the avoidance of groundwater pollution, and opportunities for integrated water management measures...	No	Noted. Further suggested Main Modifications will be considered through the forthcoming Matter 8 (Environment) hearings.	No change
PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART A CRITERION 16							
	Anglian Water	Part A Criterion 16	<p>Whilst we welcome the aim of the New Criterion within which states: "buildings adaptable to climate change, to minimise impacts on people and property" we consider this is ambiguous and does not provide a sufficient policy test to promote more ambitious levels of water efficiency and opportunities for reuse - e.g. non-potable water supplies for flushing toilets and irrigation of gardens/green spaces.</p> <p>As the largest allocation within the new Local Plan, we suggest that water efficiency measures are more ambitious and should as a minimum meet 100 l/p/d with integrated water management measures such as rainwater/stormwater harvesting, and reuse linked to SuDS so that even greater efficiencies for potable water use can be realised across the development.</p>	Not specified	No	<p>Noted. The Plan recognises that climate change (as an issue) is vast and multi-faceted. A significant part of this is the reduction in resource usage.</p> <p>The Plan, as submitted, already recommends a water efficiency standard of 110 litres/ person/ day (paras 6.4.16-6.4.17/ Policy LP18(3)(g)). This requirement will apply to West Winch, as it applies to all new development.</p>	No change
PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART B CRITERION 6							

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART B CRITERION 9							
COMMUNITY INFRASTRUCTURE							
	Kemp (Cllr A) – Norfolk CC	Para 95-100	<p>The Northstowe Situation</p> <p>Development without the WWHAR , is inconsistent with the Strategic Growth Corridor Policy, as Growth will be hampered by the deficiency of the strategic transport network.</p> <p>People will not want to live in Hardwick Green, or come to the town to do business with us, because of the malfunctioning of the A10 Corridor of Movement.</p> <p>This situation occurred at Northstowe, the families new town near Cambridge, which still has a lack of infrastructure and amenities, residents have no shops on site and wish they had never moved there. The new town is unsustainable. Residents have to get into their cars and drive off-site to purchase a pint of milk.</p> <p>This failure of planning can't be allowed to happen in West Norfolk.</p>	Not Specified	Yes	<p>The Topic Paper Spatial Strategy and Settlement Hierarchy proposes the removal of the reference to a notional strategic growth corridor to address the Inspectors concerns that it does not reflect the growth set out in the submitted Plan which is concentrated in King's Lynn and West Winch.</p> <p>The Update on Technical Note on Transport Evidence sets out the strategic transport modelling work carried out by Norfolk County Council to inform the King's Lynn transport strategy, and subsequent modelling work on specific transport interventions like the WWHAR, and has satisfied Norfolk County Council, that there are no significant transport impediments to the proposed spatial distribution of the Local Plan allocations. The only proviso is that the WWHAR is an essential prerequisite for the 4,000 homes in the WWGA, and there is a clear delivery mechanism for this intervention with DfT Major Road Network (MRN) funding support.</p> <p>The West Winch Growth Area will have three neighbourhood areas and community facilities and shops.</p>	No change
NOISE							
PROPOSED MAIN MODIFICATIONS TO POLICY E2.1 PART B NEW CRITERION							
AIR QUALITY							
	Bennett Homes	Para 124	This part of the topic paper notes that with the Growth in place, increases in NO ₂ in the existing designated Air Quality Management Area near junctions of Railway Road and London Road will result in a moderate adverse impact.	Not Specified	Yes	The impact of air quality has been considered and recommendations have been made within the report to suggest how these impacts can be mitigated through the design of the development.	No Change.
APPENDICES							
APPENDIX 1 BCKLWN CORE STRATEGY ISSUE STATEMENT NO.13							
APPENDIX 2 BCKLWN CORE STRATEGY ISSUE STATEMENT NO.12							
APPENDIX 3 TRANSPORT TECHNICAL NOTE							
	Kemp (Cllr A) – Norfolk CC	Page 10/ Appendix A - Glossary	<p>Appendix A to the Transport Note predicts a 23.4% growth in vehicles on the road by 2039 with the expected development of 11,473 new dwellings in the Borough. (Page 10) This includes LGV Growth of 33.9% and HGV growth of 10.5%.</p> <p>This is nearly a 25% increase in traffic on the network. The A10 will only become incrementally more congested as time moves on.</p>	Highways improvements must precede development.	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. 	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Kemp (Cllr A) – Norfolk CC	Appendix 3 (whole document)	<p>NO HEADROOM</p> <p>The Transport Note does not state the impact on the A10 of 300 houses. This is put into a separate Appendix 4 called headroom that, in my opinion, underestimates the likely trips from the new homes. There is no headroom.</p> <p>Because West Winch Neighbourhood Plan found that West Winch already has the highest number of homes in the Borough with second, third and fourth cars. This illustrates the extent and impact current severance of West Winch from King’s Lynn.</p> <p>The vehicular trip generation in the Technical Note Appendix 4 page 5 does not inspire confidence and looks like gross underestimation, as it predicts a total of just 150 vehicles leaving and returning to the estate at both daily peak times.</p> <p>The fact is that there is unacceptable network performance in the A10 now. Residents cannot turn out of their driverways, or out of the estate road junctions, into the constant flow of traffic on the blind bends on the A10. Not enough buses run at peak times to be a viable, reliable alternative to car travel to places of work.</p> <p>There are no traffic lights at any of the junctions at Lemuel Burt Way, Rectory Lane, Chapel Lane, Long Lane, Chequers Lane, Gravel Hill Lane, Setch Lane, St Germans Road and Garage Lane.</p>	Include reference to A10 headroom in Appendix 3	Yes	<p>Appendix 4 A10 Headroom West Winch sets out the capacity analysis of the A10. Appendix 3 is the Transport Technical Note that details modelling work which shows the impacts of the development proposed in the Local Plan and at West Winch.</p> <p>Noted.</p> <p>Page 4 of the Appendix sets out the sensitivity testing done in relation to the trip rates and is considered robust.</p> <p>It is accepted that there are issues on the A10 but the evidence shows that there is capacity on the A10 for an additional 300 dwellings.</p> <p>Noted. Not subject to this consultation.</p>	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Kemp (Cllr A) – Norfolk CC	Appendix 3: V/C percentages / SATURN modelling	<p>600 cars trying to exit another junction opposite the Winch will bring network disaster.</p> <ol style="list-style-type: none"> 1. Development, even of 300 houses, would grind the A10 to a halt at peak times. The A47 is much wider and capacious than the A10 and does not have the congestion of the A10 in West Winch and Setchey. Development should more logically start on the A47 side. 2. The full impact of the school run has not been taken into account in the SATURN modelling. It would not be taken into account by manual traffic counts, or by automated number plate recognition, as the 300 homes do not yet exist. 3. Neither has the holiday traffic. There is no mention of the Summer congestion in the Technical Transport Note or Headroom Appendix. 4. The baseline for the traffic modelling was taken in October, at the wrong time of the year. The Government Guidelines requiring traffic counts and models to reflect a neutral month mean the model does not reflect reality of the seasonal standstill on the A10 in Summer months. The traffic modelling cannot and does not reflect local conditions. It does not take account of fact that the A10 is the main route to the coast, and to Sandringham Estate Park, which now stages national entertainment events, that recently brought the whole highway network to a standstill. 5. The growing intensity of congestion, in the holiday season over the Summer, from July to September, on the A10 through West Winch, and the queuing all along the A149 to the B1145 roundabout and up to Knight's Hill, appears to have completely passed this Transport Study by. 6. The King's Lynn Transport Model's projections for the congestion in 2039 from the 4,000 homes on the wider strategic highway network, describes the situation now, including the overcapacity on the B1145, so, ipso facto, completely underestimates the future scenario. This is of great concern. 7. There is also no evaluation in the Transport Model scenarios, of the specific impact of 300 homes opposite the Winch, on the queuing and congestion on the A10, in the years after they are delivered, only the projection for 2039. 	Modelling to reflect local conditions and not underestimate future scenarios	Yes	Appendix 4 of the Topic Paper (A10 Headroom West Winch) sets out the capacity analysis of the A10 and concludes that there is capacity for 300 houses. The methodology used in the nationally recognised standard for transport assessment and undertaken by the Highway Authority.	No change

Rep ID	Respondent	Paragraph/Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Kemp (Cllr A) – Norfolk CC	Appendix 3: Page 12 (West Winch Growth Area Scenario 1)	<p>Risk of Future Disaster Scenario The Transport Technical Note’s Modelled Scenario 1 (at Page 12) - all 4,000 homes, but no Bypass, shows all the 4,000 homes accessing onto the A10, opposite the Winch, at Rectory Lane, at Watering Lane, and at Gravel Hill. All the houses are shown as accessing the A10. Why is this? Allowing this traffic disaster would equate to maladministration.</p> <p>The Transport Modelling in this no-bypass scenario, shows notable increases at peak times, leading to overcapacity in traffic flow on the A10 in both directions, and overcapacity on the new road approach to the A47, with traffic taking dangerous detours to avoid the congestion, through Saddlebow, Rectory Lane and Setch Road. There is increased chronic congestion on the A10 and saturation of the network. In some cases, with saturation of over 100 %. There is a impact on North Runcton, as traffic re - routes through Rectory Lane, in a desperate attempt to avoid gridlock.</p> <p>This is the major route to the coast and the entry to King's Lynn from the South and a corridor for freight</p> <p>Development without the Bypass first will bring West Norfolk to a standstill.</p>	Not Specified	Yes	<p>The modelled scenario where there is no WWHAR assumes access onto the A10 because the WWHAR would not be in place in this instance.</p> <p>Agreed.</p> <p>As set out in the proposed main modifications to Policy E2.1 to ensure that traffic impacts remain within a tolerable range development will be subject to the following thresholds:</p> <ul style="list-style-type: none"> • up to 300 dwellings with access to the A10 without further strategic intervention; • for anything above 300 dwellings, completion of a link to the A47 will be required; and • for more than 1,100 dwellings on site, completion of the West Winch Access Road in full will be required. 	No change
	Murray, Andrew	Appendix 3 (whole document)	The new documents detailing the work done do not adequately address these requests and will not do so unless the Masterplan for the whole West Winch Development is thoroughly revised. The Masterplan was drawn up in such a manner that car dependency was virtually guaranteed, bus routes cycle paths and footpaths appear to have been added as afterthoughts.	Not Specified	Yes	<p>Noted. 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 the subject of this consultation.</p>	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	Braybrook, Jane	Technical note Appendix 3 F51c page 10	<p>According to the NPPF para 111 "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe."</p> <p>I draw your attention to some of the recent RTAs in the wider area before an additional predicted vehicle increase to 2039 of 23.4% according to modelling data</p> <p>8/9/23 A17 at Terrington St Clement closed -2 vehicle collision 16/9/23 A17 blocked at Terrington St Clement collision 25/9/23 2 vehicle collision on Hardwick interchange King's Lynn 25/9/23 2 vehicle collision on A10 at Stow Bardolph 29/9/23 Motorcyclist hospitalised following collision on A149 Queen Elizabeth hospital roundabout 8/10/23 4 vehicle accident A149 between QE hospital and Knights Hill roundabout 10/10/23 3 vehicle collision on A148 Grimston Road approaching Knights Hill roundabout 16/10/23 3 hospitalised following 2 vehicle collision on Hardwick Road (Information King's Lynn Police)</p>	Not Specified	No	Noted. All available evidence has been used to inform the Technical note.	No change
	Braybrook, Jane	Appendix 3, p10	<p>The modelling undertaken forecasts 11,473 dwellings up to 2039, (page 8) 4,000 of which will be in the West Winch Growth Area (WWGA)</p> <p>Modelling also suggests that the West Winch Housing Access Road which will serve the 4,000 dwellings in addition to all through traffic, will mitigate congestion (summary page 23) on the wider network. It does not anticipate congestion on the WWHAR itself, despite there being 4 roundabouts to negotiate, and traffic joining through traffic from access points at those roundabouts. There is the further challenge of backed up/slow moving vehicles joining the A47 from the WWHAR already identified as being congested on the approach to the Hardwick interchange. (page 22)</p> <p>The proposed WWHAR is a single carriageway road of 1.5 miles. To suggest that "the scheme is able to mitigate the impacts of this development (4,000 houses) on the wider highway network" is difficult to comprehend.</p>	Not Specified	No	Noted. All available evidence has been used to inform the Technical note.	No change
	Braybrook, Jane	Appendix 3, Table 5, p34	<p>In fact, in Table 5, page 34, the summary shows key roads in the King's Lynn and West Norfolk area close to, at or over capacity in 2039. Measures to mitigate these issues are by no means guaranteed. Solutions such as "a shift to sustainable modes of transport", "potential improvements", "proposed mitigation solutions are being considered" are not solid proposals. The STARS scheme might go some way to alleviating congestion towards the town centre, but bottlenecks will invariably persist because of the nature of the town centre roads. The conclusion is optimistic rather than realistic.</p> <p>I object to the construction of the WWHAR as a means to enable the bringing forward of 4,000 houses in the WWGA.</p>	Not Specified	No	<p>Noted. All available evidence has been used to inform the Technical note.</p> <p>The Transport Technical Note F48 concludes that the WWHAR is necessary to deliver the 4000 dwellings at the WWHAR.</p>	No change


Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	West Winch PC	Appendix 3 (whole document)	<p>Representing the words of our residents.</p> <p>This note should take into account the amount of tonnage that comes from Lincolnshire and Cambridgeshire by way of sugar beet.</p> <p>Regards sugar beet factories that come to mind that have been shut are Spalding, Peterborough and King's Lynn, most of this extra tonnage now comes around the Hardwick roundabout and down the A10 to Wislington. British Sugar, their slice rate is <u>around 15-20</u> thousand tonnes in a 24 hour period with a the average HGV carrying say 29 tonnes a load this is circa 620+ lorries to and then from the factory alone.</p> <p>It's a massive area now since they shut those factories and developed the supersize ones like Wislington and Bury St Edmunds, the catchment area is all this side of Peterborough through to Spalding and beyond plus a lot of Norfolk, predominately most of this funnels through the A10 corridor. What people forget is though then there is all the empty returning lorries plus when it's all refined a percentage comes back this way either in bagged granular form or as liquid sugar in tankers for the food industry.</p>	Not Specified	Yes	Noted. The A10/ A149 is a significant north/ south strategic road corridor. The technical work takes account of existing HGV travel along this route.	No change
	West Winch PC	Appendix 3 (whole document)	<p>How much extra weight was introduced onto the A10 from raw materials into the paper mill and finished product out. Most of what comes into and goes out of the paper mill is via the A10 and the A47.</p> <p>The paper mills figures they have published over the years state a production output of 400,000 tonnes of finished goods, with the average artic legally carrying 29 tonnes this is circa 14.000+ HGV movements and that's just the finished product out, how much actual waste does it take to get that much finished product I wonder?</p> <p>It's amazing there aren't more accidents really that's without taking into account all the other day to day haulage that goes on.</p>	Not Specified	Yes	Noted. The A10/ A149 is a significant north/ south strategic road corridor. The technical work takes account of existing HGV travel along this route.	No change
	West Winch PC	Appendix 3 (whole document)	<p>The local major pharmaceutical suppling company I work for employs around 500 people, we rely on getting raw materials in and finished goods out efficiently, this is becoming ever harder and with a bottleneck being created on the A10 this will not exactly help matters. Its employees very often struggle to get to and from work as the peak times <u>between 07.00 to 09.00 and 17.00 to 18.30</u> are horrendous already on the A10. If there were to be an extra round about especially the type where there are two lanes filtering into one I can't imagine how far back the queues would be either way.</p> <p>Take the A149 Sainsbury's (Jubilee) round about on the A149. Before this was created we only had queues on the Hardwick now there are queues regularly from the Hardwick roundabout over the Sainsbury's roundabout and sometimes up to the Queen Elizabeth Hospital roundabout.</p>	Not Specified	Yes	Noted. The A10/ A149 is a significant north/ south strategic road corridor. The technical work takes account of existing HGV travel along this route.	No change

APPENDIX 4 A10 HEADROOM WEST WINCH

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	Appendix 4 (whole document)	Capacity on the A10 has been assessed by reference to the varying widths of the road. It is at its narrowest by West Winch Church, and this plus junctions, is the constraint on maximum capacity. The morning peak was measured from 8am to 9am whereas empirical evidence found it to be 7.30am to 8.30am (and similarly half an hour earlier in the afternoon peak than was modelled). It was found that the road can accommodate 1185 vehicles per hour in a single lane (and 1365 where it is wider to North and South of the Church and away from junctions). Actual flow measurements on 11 October 2022 were 1244 Northbound in the morning busiest hour, and on 19 th October 1223 Southbound in that busiest hour but under-reported due to misleadingly using inappropriate time-bands. Using the actual peak traffic flow hour, the road is already over-capacity.	Not Specified	Yes	Noted. The Highway Authority (Norfolk CC) has had extensive professional input into the process. The Highway Authority has the professional expertise to consider the evidence base presented by third parties. As the responsible statutory body, the Highway Authority has considered the additional supporting evidence [F48a/ F48b] and is satisfied that this meets its requirements.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Appendix 4 (whole document)	Data is skewed by using the Department for Transport's standard times for peak traffic flow (8am to 9am and 5pm to 6pm) which is how the County's consultants, and those commissioned by Hopkins Homes, have concluded that the road is able to take the traffic that will be generated by 300 new homes already approved for build before WWHAR is open. Table 2 of this section of F51, drawn from Hopkins' TA shows an estimate of 95 vehicles emanating from the new housing, yet this is unrealistic as it assumes no parental cars used to take children to High School. I ask the Inspectors to require Norfolk County Council to re-calculate the A10 headroom analysis based on empirical data from the real peak traffic flow hour and including a realistic assessment of parental school traffic originating in the 300 home part of Hardwick Green already approved for development. Further, if it shows that the A10 will be over-capacity, for these homes to not be permitted to be occupied until the WWHAR is open to traffic.	Not Specified	Yes	Noted. The Highway Authority (Norfolk CC) has had extensive professional input into the process. The Highway Authority has the professional expertise to consider the evidence base presented by third parties. As the responsible statutory body, the Highway Authority has considered the additional supporting evidence [F48a/ F48b] and is satisfied that this meets its requirements. The methodology used in the nationally recognised standard for transport assessments and undertaken by the Highway Authority.	No change
	South Wootton, North Wootton, Castle Rising Parish Councils Colson, Ben	Appendix 4 (whole document)	It is clear that the author of Paper 51's A10 Headroom Analysis appendix is concerned about public acceptability. On page 5 it notes "It is clear that local residents are concerned about the existing capacity of the A10 corridor and the Hardwick Interchange, and there is sensitivity to bringing forward significant additional development in the A10 corridor prior to WWHAR would not be palatable to existing residents." On page 6, in their summary and conclusions it says "However, it is clear from public consultation feedback obtained by KLWNBC in July 2022 in relation to the masterplan that there is concern from local residents regarding additional development in West Winch due to existing capacity issues on A10 and increased pressure on Hardwick Interchange. It is recommended that the lower bound total of 300 dwellings should be used as a robust trigger for strategic intervention within the King's Lynn and West Norfolk Local Plan." <i>I therefore commend these local views to the Inspector and that they take note of the lived experience of local West Norfolk residents compared with County Council and developer procured modelling which is clearly deficient, resulting in negative environmental, social and economic consequences for local populations.</i>	Not Specified	Yes	Noted. The Highway Authority (Norfolk CC) has had extensive professional input into the process. The Highway Authority has the professional expertise to consider the evidence base presented by third parties. As the responsible statutory body, the Highway Authority has considered the additional supporting evidence [F48a/ F48b] and is satisfied that this meets its requirements. Appendix 4 of the Topic Paper (A10 Headroom West Winch) sets out the capacity analysis of the A10 and concludes that there is capacity for 300 houses. The methodology used in the nationally recognised standard for transport assessment and undertaken by the Highway Authority. As set out in the proposed main modifications to Policy E2.1 to ensure that traffic impacts remain within a tolerable range development will be subject to the following thresholds: <ul style="list-style-type: none"> • up to 300 dwellings with access to the A10 without further strategic intervention; • for anything above 300 dwellings, completion of a link to the A47 will be required; and • for more than 1,100 dwellings on site, completion of the West Winch Access Road in full will be required. 	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	King's Lynn Civic Society	Appendix 4 (whole document)	Considers the Transport Evidence to not lead to any real solution on a worsening traffic problem around Kings Lynn.	Not Specified	No	<p>The Council have removed the reference to the A10 Strategic Growth Corridor in response to the Inspectors concerns about the strategy. The concerns around the A10 Strategic Growth Corridor related to the sustainability credentials of this part of the strategy.</p> <p>The evidence prepared for the development at West Winch is considered high-level and deals with the strategic issues identified through initial assessment. The evidence identifies the need for some mitigation to be delivered for particular issues on and surrounding the site. This level of detail is appropriate for the purpose of plan-making. The mitigation requirements can then be identified through relevant planning policies and Infrastructure Delivery Plans.</p> <p>Some of these issues may require further investigation through more detailed work undertaken as part of any masterplanning work and/ or through planning applications.</p>	No Change
	Holme Next The Sea Parish Council	Appendix 4 (whole document)	<p>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. This is considered to be a shortcoming.</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> <p>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.</p>	Not specified	Yes	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.	No Change
APPENDIX 5 LANDSCAPE AND VISUAL APPRAISAL APRIL 2023							
	King's Lynn Civic Society	Appendix 5 (whole document)	<p>It is very pleasing to see this report has been commissioned, albeit at a rather late point in the planning process for the proposed 'Growth Area'. We believe it is the first time that BCKLWN have commissioned an LVA to appraise a proposed allocation site.</p> <p>It is a helpful summary of the situation but specifically omits consideration of the proposed relief road – a road that is expected to eventually take 20-30,000 vehicles a day and to feature a road bridge at Rectory Lane and a pedestrian bridge at Chequers Lane, two major junctions on the A10, another on the A47 as well as related roadworks (a dualled section of the A47). Clearly the roadworks will be some of the largest and most visually intrusive elements of the whole WWGA scheme. They will also greatly affect perceptions of the area for road users travelling to Lynn. We think this is a major omission of this report.</p> <p>Regarding the 'ZVI' plan, whilst accepting it is indicative only (as a lot of the development proposals are not yet developed), it is clearly inadequate in its assessment of the likely extent of the effects to landscape and visual receptors to the north and south. The proposed Hopkins housing will be prominent on the ridge at Constitution Hill when viewed from the A149, and the proposed southern end of the development will be prominent in views from the south-east (which will include the Nar Valley Way long distance footpath).</p>	Not Specified	No	<p>Noted.</p> <p>The evidence prepared for the development at West Winch is considered high-level and deals with the strategic issues identified through initial assessment. The evidence identifies the need for some mitigation to be delivered for particular issues on and surrounding the site. This level of detail is appropriate for the purpose of plan-making. The mitigation requirements can then be identified through relevant planning policies and Infrastructure Delivery Plans.</p> <p>Some of these issues may require further investigation through more detailed work undertaken as part of any masterplanning work and/ or through planning applications, including that for the WWHAR.</p>	No Change
APPENDIX 6 ECOLOGY & BIODIVERSITY ASSESSMENT MARCH 2023							

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	King's Lynn Civic Society	Appendix 6 (whole document)	The matter of wildlife movement through the area has been identified but it is not clear how disruption to this will be mitigated. Fear for the loss of local wildlife and impacts to other surrounding areas.	Not Specified	No	F51f Ecology and Biodiversity Assessment sets out the mitigation requirements at section 5.15 to 5.37. This level of detail is appropriate for the purpose of plan-making. The mitigation requirements can then be identified through relevant planning policies and Infrastructure Delivery Plans.	No Change
APPENDIX 7 FLOOD RISK ASSESSMENT AND SURFACE WATER DRAINAGE STRATEGY							
	Anglian Water	Appendix 7 (whole document)	It is noted that Anglian Water is referenced in the strategy in terms of adoption and maintenance of surface water drainage and SuDS features. We have clear guidance on the design and adoption of SuDS on our website https://www.anglianwater.co.uk/developing/drainage-services/sustainable-drainage-systems/ .	Not Specified	No	Noted	No change
	Anglian Water	Appendix 7 (whole document)	The strategy does not directly suggest or recommend that any surface water attenuated on site (as opportunities for infiltration are limited due to the ground/soil conditions) for reuse to enhance the sustainability of the West Winch Growth Area. As the proposed quantum of growth for West Winch may be built out over two decades, the impacts of climate change will continue to affect water resources and sensitive water environments. We consider that future proofing is essential and the opportunities a site of this scale presents in terms of rainwater/stormwater harvesting and reuse is considerable when linked to sustainable drainage systems proposed to manage surface water run-off across the site. We note the recommendations in the report (replicated in paragraph 93 of the Topic Paper) include seeking opportunities to incorporate SuDS source control features that offer complementary benefits including for water quantity and water quality.	Not Specified	No	Noted	No change
	Anglian Water	Appendix 7 (whole document)	Our Water Resources Management Plan 2025-2050 (revised draft WRMP24) plans for the supply of drinking water over the next 25 years, with an overarching aim to reduce the amount of public water supply in England per person by 20% by 2038, with an end goal of 110 litres per person per day (l/p/d) across the region. To attain this average means that new properties need to be built to deliver below 110 l/p/d - to at least 100 l/p/d and in some areas 80 l/p/d.	Not specified	No	Noted. The Plan recognises that climate change (as an issue) is vast and multi-faceted. A significant part of this is the reduction in resource usage. The Plan, as submitted, already recommends a water efficiency standard of 110 litres/ person/ day (paras 6.4.16-6.4.17/ Policy LP18(3)(g)). This requirement will apply to West Winch, as it applies to all new development.	No change
	Anglian Water	Appendix 7 (whole document)	We agree and support government plans and the calls from the Environment Agency and Natural England to reduce the amount of water taken from sensitive environments through abstraction. This therefore means that to have sufficient water we must first seek to reduce the amount of water new homes and businesses use. This reduction in demand is both in the operation/ use of developments and in the construction of the new buildings and infrastructure and services which support them. We therefore have an existing Joint Protocol in place with the Environment Agency and Natural England which supports Councils having a policy of 110 litres per day per person for new homes. Protocol is currently in the process of being updated to go to at least the 100 litres per person per day target for new homes announced in January 2023 by Government in the Environment Improvement Plan for water stressed areas, and supporting local planning authorities that seek to go further in their ambitions for water efficiency.	Not specified	No	Noted. The Plan recognises that climate change (as an issue) is vast and multi-faceted. A significant part of this is the reduction in resource usage. The Plan, as submitted, already recommends a water efficiency standard of 110 litres/ person/ day (paras 6.4.16-6.4.17/ Policy LP18(3)(g)). This requirement will apply to West Winch, as it applies to all new development.	No change

Rep ID	Respondent	Paragraph/ Section	Summary Representation	Changes sought	Request to be heard?	BCKLWN Response	Proposed changes (Main Modifications) to Plan
	King's Lynn Civic Society	Appendix 7 (whole document)	It is not clear whether sufficient work has been undertaken to ascertain that these plans are technically feasible and cost viable.	Not Specified	No	<p>The Council have removed the reference to the A10 Strategic Growth Corridor in response to the Inspectors concerns about the strategy. The concerns around the A10 Strategic Growth Corridor related to the sustainability credentials of this part of the strategy.</p> <p>The evidence prepared for the development at West Winch is considered high-level and deals with the strategic issues identified through initial assessment. The evidence identifies the need for some mitigation to be delivered for particular issues on and surrounding the site. This level of detail is appropriate for the purpose of plan-making. The mitigation requirements can then be identified through relevant planning policies and Infrastructure Delivery Plans.</p> <p>Some of these issues may require further investigation through more detailed work undertaken as part of any masterplanning work and/ or through planning applications.</p>	No Change
APPENDIX 8 ACOUSTICS TECHNICAL NOTE MARCH 2021							
APPENDIX 9 NOISE TECHNICAL NOTE APRIL 2023							
APPENDIX 10 AIR QUALITY ASSESSMENT MAY 2023							
APPENDIX 11 POLICY E2.1 WITH PROPOSED MAIN MODIFICATION							
	Norfolk CC (Transport)	Para 4	We fully support these proposed modifications. However, the first sentence of paragraph 4 only mentions the link between the A10 and A47. Through the West Winch Housing Access Road (WWHAR) we are going to build, this will additionally comprise; changes to the Hardwick junction, dualling of the A47 from the Hardwick junction to the housing access road element of the scheme, traffic calming on the A10 and a series of active travel improvements and some bus priority elements. All these elements are required to support the 4,000 homes.	Not Specified	Yes	Noted.	No change
	Historic England	Policy E2.1 with Proposed Main Modifications	As highlighted above in more detail, whilst we acknowledge that the proposed main modifications set out in our SOCG with the Council and in this document at criterion 7 on page 5 represent an improvement on the previous wording for the policy in relation to heritage, they do not fully address our concerns as expressed at the Examination in Public. We advise that heritage mitigation and enhancement measures should be included in the policy wording	Not Specified	No	Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a]	No change
	Historic England	Policy E2.1 with Proposed Main Modifications	<p>We have set out our recommendations for mitigation and enhancement above and continue to advise that these should be included in criterion 7. Inclusion of the diagram showing the heritage buffer in the Local Plan would also be beneficial.</p> 	Not Specified	No	<p>Noted. Representations received broadly represent repetition of Historic England's outstanding concerns regarding the scope of the Heritage Impact Assessment. These points are addressed through the Statement of Common Ground [F28a]</p> <p>Any buffer will be determined at the detailed planning application stage.</p>	No change