

**Borough Council of King's Lynn
and West Norfolk Local Plan
2021-2039**

Borough Council of
**King's Lynn &
West Norfolk**



Representation Form

Consultation on additional evidence base documents, September 2023

Closing date for submitting representations: **11:59pm, Friday, 20th October 2023**

Part A

Section 1: Personal Details

Title:	
First Name:	
Last Name:	
Job Title (where relevant):	
Organisation (where relevant):	Bennett Homes
Address:	c/o Agent
Postcode:	
Telephone:	
Email:	

Section 2: Agent Details (if applicable)

Please supply the details below of any agent you have working on your behalf.

Agent name:	James Alflatt
Address:	Bidwells LLP 16 Upper King Street Norwich
Postcode:	NR3 1HA
Telephone number:	[REDACTED]
Email:	[REDACTED]

Part B

Please fill in a separate form for each document

Section 3: Representations

Which Document are you responding on?

Examination Library ref	Document name	Paragraph No(s)
F51	West Winch Growth Area Topic Paper	Various (as referenced below)

Summary of Comments:

Please be as precise as possible as to why you support or object to the evidence and/or any suggested main modifications to the Plan contained in the document, providing the relevant paragraph and/or policy number for each point.

Para 124

This part of the topic paper notes that with the Growth in place, increases in NO₂ in the existing designated Air Quality Management Area near junctions of Railway Road and London Road will result in a moderate adverse impact. Increases in deteriorating air quality in what is already an AQMA will be exacerbated by the proposed growth. This evidence emphasises the negative effects arising from the road based focus of the West Winch Growth Area. As raised in previous examination hearing sessions, the additional road traffic arising from the growth area will be seeking to navigate the town centre gyratory of Railway Road and London Road where these increases are going to be exacerbated, and the status of the AQMA worsened. For this reason, based on this evidence, the continued strategy to promote such large-scale road transport biased growth in this plan remains unsound.

Para 129-130

The Council acknowledges how 'integral' the DfT funding decision is for the West Winch Housing Access Road to the successful development of the growth area. However, currently this funding remains uncertain, with outline business cases still needing to be submitted. In the current economic scenarios, there is no guarantee the outline or full business cases will be supported by Government, which will stifle delivery of the growth area. Questions over deliverability are demonstrated by the fact that Policy CS09 of the current adopted Core Strategy identified at least 1600 new homes to be delivered from this site during the Plan period upto 2026. Noting we are currently less than 3 years away from the end of the current plan period, no dwellings at the time of this statement have been either consented or delivered on site. This does question the

deliverability of a much larger growth area in the next plan period, given the delays in delivery of the existing plan allocations that are already apparent.

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. It is acknowledged by the Council that it will be car dependent 'and the ambition is to make it 'less car dependent' is outlined, but this can't be guaranteed.

Please note you should cover succinctly all the information, evidence and supporting information necessary to support/justify your comments.

Section 4: Examination Hearings

This consultation may be followed by further Examination Hearing sessions, at the discretion of the Planning Inspectors. Do you consider it necessary to participate in Examination Hearing sessions? (Please select one answer)

No, I do not wish to participate at the Examination Hearing

Yes, I wish to participate at the examination hearing

Section 5: Data Protection

Do you wish to be notified further about the Local Plan Examination process, at any of the following stages?

Schedule of Main Modifications stage (following hearings)

Yes

No

Publication of Inspector's Report

Yes

No

Adoption of Local Plan


Yes

No

In complying with the General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, King's Lynn and West Norfolk Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to this consultation on the Borough Council's website. However, it should be noted that all personal information (except for names and organisation name, where appropriate) will not be published.

When you give consent for us to process data, you have the right to withdraw that consent at any time. If you wish to withdraw your consent, you must notify us at lpr@west-norfolk.gov.uk or 01553 616200.

Section 6: Signature and Date of Representation

Please sign and date below:	
Signature: (electronic signatures are acceptable)	
Date:	20 October 2023

Please note that, to be considered, your representation will need to be received by **11:59pm on Friday, 20th October 2023**.