

**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:	Mrs
First Name:	Lynn
Last Name:	Devereux
Job Title (where relevant):	Chair
Organisation (where relevant):	
Address:	Type [REDACTED]
Postcode:	[REDACTED]
Telephone:	[REDACTED]
Email:	[REDACTED]

Section 2: Agent Details (if applicable)

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

Agent name:	N/A
Address:	
Postcode:	
Telephone number:	
Email:	

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)
F48 and F51d	Update on technical note on transport evidence + Appendices and A10 Headroom West Winch	

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.

Please see attached

(Continue on a separate sheet if necessary.)

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 YES

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	<input checked="" type="checkbox"/> Yes	No	<input type="checkbox"/>
Publication of Inspector's Report	Yes	<input checked="" type="checkbox"/> Yes	No	<input type="checkbox"/>
Adoption of Local Plan	Yes	<input checked="" type="checkbox"/> Yes	No	<input type="checkbox"/>

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 Oct 2023

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

1 F48 Update on Technical Note on Transport Evidence (April 2023), Appendices F48a and F48b plus link to F51d Dependent Headroom

1.1.1 This Technical Note presents the results of modelling work undertaken to assess the transport impacts of the Local Plan development proposals. Papers F48a: Transport Technical Note and F48b: Sustainable Transport Strategy Narrative are an integral part of this and are covered by the comments below. Reference is also made to F51d Headroom dependent Development.

1.1.2 The results presented are focused on the West Winch Housing Access Road (WWHAR), which is proposed to support the lion's share of Borough housing allocations which represent around one-third of all dwellings proposed during the Plan period.

1.1.3 The transport scheme is intended to serve the West Winch Growth Area (WWGA) – a 3500-4000 strong expansion of the existing 1000 dwelling settlement which straddles the A10. The transport assessment forms the basis of a Strategic Outline Business Case for DfT funding.

1.1.4 Three transport scenarios are presented : (1) WWGA without WWHAR (2) WWGA with WWHAR (3) Area-Wide Modelling for the Borough – without WWHAR but with A47 Junction.

1.1.5 Impacts are assessed for am and pm peak periods for a forecast year of 2039. The area covered by the modelling for Scenarios 1 and 2 appears to be very limited and extends northwards only as far as castle Rising and south to just beyond Watlington / A134 junction.

1.1.6 The results for Scenarios 1 and 2 show that the Access Road is a pre-requisite to avoid unacceptable levels of congestion on the A10 and local road network. Scenario 2 removes congestion from the A10 but there are increased levels of congestion on the A47 and eastern arm of the Hardwick Interchange - these are deemed by the Consultant to be acceptable. The results also indicate that the A149 and junctions between the Hardwick Interchange and the A1076 would be close to capacity.

1.1.7 With respect to Scenario 3 the paper concludes that despite significant areas of congestion in the network, the proposed Borough-wide growth in the Local Plan can be accommodated.

1.1.8 No multi-modal modelling has been carried out and therefore the position with respect to the demand for rail travel is unknown.

2 Comments and Questions Arising

2.1.1 The Inspectors have asked the Council to summarise the results and findings of traffic and transport modelling undertaken to assess the impacts of the development proposed in the Plan and at the WWGA over the Plan period and beyond on the strategic and local transport network in the Borough.

2.1.2 A number of aspects of the Technical Note and the accompanying appendices are unclear, particularly in relation to Borough-wide transport impacts and this makes it difficult to interpret the findings:

- i) For Scenarios 1 and 2, what assumptions have been made about the spatial distribution of windfall housing across the Borough? The total number of homes from windfall sources (4186) is similar to the scale of the allocation at West Winch and has the potential for significant impacts on the transport network, including possible cumulative impacts associated with WWGA. This needs to be explained.
- ii) What is the fall-back position if the Business Case for the WWHAR is not supported by DfT? The approach followed in F51d TN01 appears to be relevant to this (see below).
- iii) The assumptions underlying Scenario 3 are not clearly specified, notably with respect to the amount and spatial distribution of all housing growth and the inclusion (or otherwise) of road improvements. How realistic is it to include only sites with planning permission and to treat all other development as background growth?
- iv) What assumptions have been made about the destination of trips for different purposes generated by the new development at WWGA? Of particular relevance, where will the new residents work and how is the assumed growth in employment (types of jobs) related to the growth in new homes and working population? The sustainable transport strategy appendix places considerable emphasis on accessibility to the Hardwick employment areas but:
 - How many new jobs will be created at Hardwick (the Plan is proposing to limit the development of retail employment at this site in order to reduce competition with the town centre)?
 - Is it realistic to assume that the new residents will look to Hardwick for their employment (will the new jobs match the skills of the new residents at WW)?
 - What proportion of new residents will need to find jobs outside the area?
 - How many will be attracted to jobs in the Cambridge-London Corridor which has the potential to support rail travel? Kings Lynn-London rail services have been greatly improved in recent years and train capacities significantly improved and this has been accompanied by a noticeable increase in rail commuting.
 - For journeys to work from WWGA, the cycle times estimated for access to Watlington and Kings Lynn railway stations in combination with the routes would surely be unattractive for all but the keenest cyclists (25 minutes and 16 minutes). Should the sustainable transport strategy make provision for commuter / shuttle bus services linking WWGA to Watlington and Kings Lynn)?
 - Will the proposed bus services be viable with the projected increase of only 1% in mode share? What level of growth is needed to support them?

2.1.3 The models appear to exclude the very substantial impacts of development-related visitor traffic pressures. Of particular relevance, the A149 coast road is at times very heavily congested with visitor traffic (it is one of the County's most congested and dangerous roads).

- i) Will the A149 cope with the additional traffic generated by West Winch and the remaining Borough-wide growth in housing?
- ii) What impacts will the development in the Hunstanton area have on the transport network – including the major new development at Ken Hill?
- iii) How are second home-owners and the additional traffic that they generate represented in the analysis – are they included in the NTEM assumptions of growth (11 655 households and 5 152 jobs 2018-2039) ?

2.1.4 A sensitivity test should be undertaken for all scenarios to demonstrate that the transport network, particularly the A149 (which is already one of the most congested routes in the County) can accommodate the additional coast-bound visitor traffic generated during holiday periods.

3 F51d TN01 WWHAR Dependent Headroom

3.1.1 This analysis follows the approach for the new settlement at Waterbeach further south in the A10 / Rail Corridor north of Cambridge. It attempts to establish the amount of traffic that could be “sustainably tolerated” on the A10 before strategic improvements to capacity are required.

3.1.2 The analysis is based on survey data collected in October 2022 and then takes the transport assessment figures used to support the approved Hopkins development of 300-350 homes at the WWGA site.

3.1.3 Based on 2011 Census Journey to Work data this assumes a 70:30 split of trips generated by the development North:South-bound. The resulting trips are then split by mode using TRICS data for representative developments elsewhere.

3.1.4 Taking account of mode choices, the results indicate a 16% reduction in traffic on the A10 compared to the assumption that all trips are made by road.

3.1.5 This approach has merit when considering the early phases of the WWGA and it would be helpful to see the estimated shares for journeys by rail. However there are some caveats which affect the confidence that can be attached to the results:

- i) The use of journey patterns based on the existing settlement at WW is questionable given the anticipated changes in household profiles / mix in the WWGA.
- ii) Journey patterns will have changed considerably since the 2011 Census – not least to reflect the improvements in the frequency and capacity of rail services in the Corridor which clearly has influenced travel patterns in the A10 Corridor.
- iii) As data are based on October observations, the sensitivity of the results to seasonal variations in holiday traffic needs to be considered.

4 Conclusions

4.1.1 In conclusion, the analysis indicates that without the WWHAR residents would find further growth in congestion unacceptable (and this presumably would apply to other road users). Rail travel has not been included in the analysis. This is considered to be a shortcoming.

4.1.2 The Area-Wide modelling suggests that the impacts of proposed growth on the transport network are acceptable. However, the assumptions require explanation.

4.1.3 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.