

Planning Policy Team
Borough Council of Kings Lynn and West Norfolk

20/10/2023

Kings Lynn and West Norfolk Local Plan Examination: West Winch Topic Paper Response to consultation

This letter is submitted in response to the West Winch Topic Consultation being undertaken by Kings Lynn and West Norfolk Council ('BCKLWN') as part of the emerging Local Plan Examination. Our comments are made on behalf of Metacre Limited, who has submitted an application for outline planning permission for up to 500 homes with flexible commercial floorspace, associated landscaping, parking and supporting infrastructure on land at West Winch (18/02289/OM).

West Winch Topic Paper (F51)

We continue to fully support the delivery of the West Winch Growth Area and the Council's aspirations for the area as a whole and Metacre Limited reiterates its desire to see the site delivered with the aspiration of the outline application being approved in 2024. We support the preparation of the West Winch Topic Paper and most of the Main Modifications proposed Policy E2.1 to ensure the policy is robust in justifying the evidence for the delivery of 4,000 dwellings in the growth area. Comments are however, raised in relation to the additional evidence issued in relation to highways impacts and the subsequent threshold for the delivery of dwellings prior to the West Winch Housing Access Road ('WWHAR').

Paragraph 46 of the West Winch Topic Paper (F51) introduces the following Main Modification under Part A of Policy E2.1 (following criterion 4).

To ensure that traffic impacts remain within a tolerable range development will be subject to the following thresholds:

- *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.*

We agree that the traffic impacts should be considered to understand how many dwellings and in which location can come forward prior to the delivery of the WWHAR; however, we object to the current proposed wording of the Main Modification. The proposed wording relates to the delivery of one site referred to as the Hopkins Homes site. Furthermore, it does not allow for any additional/future assessments of capacity to be undertaken which could enable the dwelling thresholds to be delivered prior to the WWHAR to be increased or, reduced subject to the results of the assessments.

Response to Highways Technical note – Submission Document F51d (Appendix 4 A10 Headroom West Winch)

From reviewing the West Winch A10 Headroom Analysis Technical Note produced by WSP, we would make the following observations:

The Headroom Analysis Technical Note suggests that there is available capacity for up to 350 dwellings, however, the proposed modifications to Policy E2.1 in Document F51 (Paragraph 46) caps the number of dwellings that can come forward ahead of the WWHAR to 300. It is considered that the number of units that could come forward ahead of the WWHAR should be based on the technical analysis undertaken rather than local opinion not supported by technical evidence.

Given the proximity of development sites within the West Winch Growth Area, it is considered that any headroom capacity on the A10, (prior to the WWHAR or completion of a new link between the A10 and A47), should be available to other developments within the West Winch Growth Area and shouldn't be tied explicitly to the Hopkins Homes development.

The Technical Note refers to using data from collection point ATC 5 to inform the link capacity assessments and the calculation of the headroom capacity on the A10. Figure 1 within the Technical Note shows ATC 5 being located on the A47 and not on the A10 and should be clarified.

The traffic flows from the October 2022 surveys used within the Headroom Capacity Assessment are significantly higher than data previously collected or shared by WSP from 2018. Previous 2018 flows provided by WSP for the A10 showed a peak of 845 vehicle northbound in the AM Peak and 1,068 southbound in the PM Peak.

It is noted that there were a number rail strikes in October 2022 that may have impacted the baseline traffic data used within the headroom assessment. Clarification should be provided as to whether the data used within the headroom assessment is likely to have been impacted by the rail strikes. Traffic flows on or around rail strikes could be expected to be higher than normal.

Given the sensitivities of the headroom assessment to changes in baseline traffic flows, (which are widely accepted to vary as much as 10% per day), could a more representative figure for baseline traffic flows be calculated from the data collected rather than simply using the peak traffic flows in each direction on the A10 from across the month. It is common that 85% percentile figures are used in transport assessments opposed to simply a daily peak figure.

It is unclear whether the new traffic surveys undertaken in October 2022 and used in the Headroom Capacity Assessment, have been used in other transport assessments in support of the West Winch Housing Access Road (WWHAR). Information provided within other Local Plan Review supporting information (Documents F48 and F48a) use data from 2018 which is argued by WSP and BCKLWN as demonstrating a reliable representation of existing traffic conditions.

It is acknowledged that a significant amount of junction and network modelling has been undertaken to support the development of the West Winch Housing Access Road (WWHAR) and supporting studies. We would question whether the results from these assessments support the findings from the headroom analysis undertaken.

Proposed amendment to Main Modification

Based on the evidence set out above, we are of the view the proposed Main Modification proposed to Policy E2.1 relating to the development thresholds prior to the WWHAR is not sound. As such, the following amendments are proposed to the Main Modification.

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:**

- 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.

We look forward to receiving confirmation that our representations have been considered and the proposed wording to the Main Modification has been updated.

Yours sincerely



Matt Hill
Planning Director

