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:	MR
First Name:	DAVID
Last Name:	GODDARD
Job Title (where relevant):	DIRECTOR
Organisation (where relevant):	GEORGE GODDARD LTD.
Address:	[redacted]
Postcode:	
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:	
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)
F50 F51	UPDATED HOUSING LAND SUPPLY WEST WINCH TOPIC PAPER	

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.
See attached letter
(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.

Dear inspectors

Following your request at the last hearing, where the Borough planners were asked to produce evidence in relation to delivery of homes at Bankside West Lynn E1.15 and if these are likely to meet the envisaged housing trajectory of 2028/29.

At that hearing we expressed these doubts. We note the Borough have now dropped the Bankside E1.15 from their revised local plan which is now under consideration. Sadly, the time that has elapsed has starved West Lynn of housing expansion. Not only has this site failed to deliver this is the second occasion as a former proposed site known as Dredging Construction was withdrawn from the last plan.

You are aware West Lynn does not have a parish council and up to now has been considered part of King's Lynn for expansion of housing. At the last hearing West Lynn had a total of 169 homes allocated over two sites E1.15 120 homes and E1.14 St. Peter's Road 49 homes. The removal of the larger site leaves West Lynn with a shortfall of 120 properties and deprived a community of much needed housing and the economic benefits such homes produce.

We mentioned at the last hearing West Lynn is ideal for growth; having probably the best connectivity to the nearby town centre and employment areas. Walking, cycling, use of the ferry, an excellent road for public transport and cars result in good access options. Compare this with the delay and overcapacity on other routes heading to the town centre and this should favour West Lynn for housing expansion.

As you know George Goddard Ltd has a 5 acres site between Clenchwarton Road and Orchard Grove. One acre is subject to contract in the process of being acquired by Priors the local butcher. Priors have received planning to relocate and expand their meat and general food offer. On the remaining 4 acres of this site, we are granting an option and working with a developer to bring forward an affordable housing scheme for 50 homes, these could be delivered within the 5 year option period.

The scoping shows our Clenchwarton Road site is in the same flood risk category as E1.15 along with most of West Lynn homes. Our site when compared for housing would be over 500m metres from the river and is protected by 2 banks, a parcel of arable land and a drainage ditch. It was not flooded in the great flood of 1953. We are reliably informed that properties can be built on our site to meet flood risk requirements. Indeed, in a call for sites in 2015 we placed a full planning application in 2016 which complied with flood risk requirements. The refusal notice was misleading on flood risk, but we were too late as the call for sites had been fulfilled. Sadly, that negative decision deprived West Lynn of 50 fine homes attractively designed which would have tidied up and enhanced the main village corridor.

We cannot understand the Councils thinking behind relegating West Lynn from the Tier 1 category to Tier 3 unless this is designed to favour the Boroughs own sites at Boal Quay and South Quay.

If this were the case, we believe the thinking is flawed. Both Boal Quay (not projected to come forward until 2032) and South Quay are on the opposite side of the river. Both are again very close to the water with limited protection; not dissimilar to Bankside E1.15. We therefore question the viability and deliverability of these sites and whether flooding can be prevented. It would appear our site is being discriminated against leaving West Lynn without essential housing that should have been delivered in the current plan period.

When you study the map of West Lynn it is an anomaly not to include the land between Clenchwarton Road and Orchard Grove as a development zone. This is opposite commercial buildings on the West and adjoins housing to the North and East. With the advent of a comprehensive butchery and food offering on 1 acre towards the south of our site; the remaining 4 acres presents an opportunity to extend the development boundary. The existing plan needs revisiting to include the Clenchwarton Road within this boundary.

The Environmental Agency flood risk places the West Lynn village under the same classification as our site. When compared with others and those on the opposite side of the river our site is far less exposed to flood risk. Hence, we state the need for each site to be judged on its own merit through the undertaking of a full flood risk assessment. We also believe it is not appropriate to state in the sequential tests there are no suitable alternatives in West Lynn.

Please can we request through the inspectorate that the development boundary be extended to include our Clenchwarton Road site. The opportunity to provide development and the economic benefits to the community of West Lynn would be welcomed.

We previously mentioned there is no parish council in West Lynn to promote the wellbeing of the area. However, the 2 elected borough councillors Charles Joyce and Alexandra Kemp (who is also a county councillor) have been very supportive with the proposals to bring much needed development to our West Lynn site.

One of the major problems with the proposed local plan is the intensity and reliance on the very large development proposed and concentrated around West Winch. This village already experiences major overcapacity on the A10. We believe good connectivity is being compromised and the mitigation measures are insufficient. We would like to see such pressure points reduced by promoting smaller numbers spread over the borough where good connectivity is evidenced. This policy also would massage a greater number of local economies.

Yours faithfully,

David Goddard DL

Director

George Goddard Ltd

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)	[redacted]
Date:	Oct 17th /23

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