

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:	Michele
Last Name:	Summers
Job Title (where relevant):	Vice Chair
Organisation (where relevant):	West Winch Parish Council
Address:	Parish Clerk West Winch Parish Council [REDACTED] [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:	
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)
F47	Spatial Strategy and Settlement Hierarchy	

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.

2. Strategic Growth Corridor.

Para 3 West Winch Parish Council support the notion that the growth corridor as previously proposed is not supported by the evidence.

However West Winch Parish Council (WWPC) believes the notion of a strategic growth corridor should be replaced by an approach which identifies strategic growth areas supported by sustainable travel options to include areas supported by access to the railway line such as Watlington and Downham Market.

Para 3. The limited growth proposed for Watlington is explained away as a lack of infrastructure but this is not expanded on. All development sites lack infrastructure as this is part of the development.

The West Winch Growth Area (WWGA) is agricultural land, grassland and woodland. which presently also lack infrastructure so by the same criteria should be allocated for limited growth.

Para 4 Downham Market limited growth proposals are explained as being due to the fact that it already had a few hundred houses built so cannot have any more.

If having a few hundred houses built in an area is a reason to stop development this should apply uniformly across the Borough including the WWGA.

Both Watlington and Downham Market have infrastructure not available in the WWGA

They have access to the railway network, which the Borough Council of King's Lynn and West Norfolk (BCKLWN) previously seemed to value.

The National Planning Policy Framework (NPPF) gives considerable weight to the consideration of transport infrastructure and development of sites where *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated; so that strategies and investments for supporting sustainable transport and development patterns are aligned;*

The NPPF asks councils to *identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;*

Now that the Ely rail junction expansion plans (Ely Area Capacity Enhancement programme) have been promised funding, it is even more important to make use of the improving connectivity. The Ely project is also envisaged to double passenger services on the Ely-Kings Lynn route.

WWPC requests that the same criteria should apply uniformly across the borough when considering areas for development.

3. The Spatial Strategy for the Rural area.

D21 BCKLWN document **Consideration of the Settlement Hierarchy** introduces the concept of the settlement strategy as

- 1. 1.1 The settlement hierarchy is an established tier system, based to a large extent on the existing pattern of growth and the availability of services and facilities .*

Para 27 referencing Appendix 2 Justification for changes

BCKLWN propose splitting the WWGA from the village of West Winch so that the area consisting mainly of fields in the West Winch Growth Area is redesignated as part of King's Lynn Sub Regional Centre.

Appendix 2

The location and status of the West Winch Growth Area is the main focus for growth, and it is considered necessary to specifically reference it within Tier 1 as it is an urban extension to King's Lynn.

West Winch Growth Area is not a settlement. Without the village it is just some fields, not an urban area and therefore should not appear in a settlement hierarchy at all.

WWPC supports that West Winch Village has been recognised as a village, however it remains in Tier 3 as a settlement adjacent to Kings Lynn.

The Hardwick Ward of the Parish of North Runcton with housing, a pub and fuel station, part of the Hardwick industrial estate and a major road interchange is between Kings Lynn and West Winch.

West Winch village is adjacent to North Runcton, not Kings Lynn.

West Winch Village more closely fits the criteria for a Key Rural Service centre and WWPC requests it should be designated as such. (There could be a note saying that the existing village will be obliterated by the development of the proposed growth area.)

Marham

It is unclear why Marham has been dropped from consideration as an area for future development as although it is acknowledged as not being in the previous growth corridor, its characteristics remain unchanged.

Wisbech

It is unclear from this, despite the Wisbech topic paper where the area adjacent to Wisbech now features in the overall development plan. Wisbech continues to improve its connectivity with the Wisbech Access Strategy and would seem an ideal area for further new housing.

The proposed modification of Policy LP01

Introduction

In line with National Planning Policy, the spatial strategy for Kings Lynn and West Norfolk seeks to distribute majority of growth within the most sustainable locations of Kings Lynn, Downham Market and Hunstanton, to continue to support their roles as established large settlements.

This policy is stating that, Downham Market, Kings Lynn and Hunstanton will be the area where the majority of growth is distributed..

Whereas in para 4 of the topic paper it states *Limited new growth is proposed at Downham Market in the submitted Plan to reflect the fact that in recent years the town has experienced significant development in accordance with the policies and proposals of the King's Lynn and West Norfolk Core Strategy and the SADMP .*

WWPC requests that this is clarified.

The introduction further states Para 3

Whilst supporting the continued sustainability of existing settlements, the Plan seeks to promote the establishment of a major sustainable growth area to the south-east of Kings Lynn. As the most significant site allocation over the longer term, the West Winch Growth Area is a focal point for development within the Borough, contributing to supporting housing delivery, increasing the productivity of the local economy, reducing out-commuting, increasing the number and quality of better paid jobs in the Borough and improving accessibility to services for the rural communities.

How WWGA specifically above other areas, will be increasing productivity, reducing out-commuting (whatever that is) and increasing the number and quality of better paid jobs and improving accessibility to services for rural communities is not evidenced.

NPF 79. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

Providing more growth opportunity for Watlington would fulfil the desire to improve rural services as the surrounding villages would benefit.

P43 *The distribution of growth has been informed by the settlement hierarchy.*

1. Creation of a Settlement Hierarchy

The settlement hierarchy provides a framework to enable the distribution of the Borough's growth in accordance with the spatial strategy. Each tier of the hierarchy reflects the settlement/ area's role, including:

- *the range of services present;*
- *proximity and functional relationships between settlements;*
- *their accessibility by public transport;*
- *their infrastructure capacity; and*
- *their ability to expand sustainably to accommodate the needs generated by new development.*

These five points are presented as ways of defining a settlement but it is unclear from supporting documents that these were in fact the criteria used when deciding where each place now fits within the hierarchy.

Previously Para 12 implied that it does not apply to rural settlements as they have been classified according to Desired attributes set out in Para 13 table 2

WWPC requests clarification.

Tier 1 Kings Lynn sub regional centre

Growth will be delivered through the West Winch Growth Area, housing commitments and land allocations in/ around the urban area. Totalling at least 2,937 dwellings, with a further 1,980 dwellings at West Winch anticipated to come forward beyond 2039. In addition, Approximately, 55.8ha of employment land will be delivered in these locations in/ around King's Lynn .

This wording is ambiguous as it includes the WWGA and other allocations in and around Kings Lynn town. (the urban area?)

It totals close to 5000 houses without specifying where.

West Winch Parish Council asks that it is made clear how many houses are proposed for the WWGA. And how many for King's Lynn town.

Tier 2 Main towns

We note the small contribution of Downham Market despite the introduction to this policy stating it was one of the most sustainable locations for growth.

Tier 3: Settlements adjacent to King's Lynn and the main towns

Although separate villages, the settlements of North Wootton, South Wootton, West Winch and West Lynn are in close proximity to Kings Lynn urban area or the main towns. Their relationship with these larger settlements is different to other villages due to their close proximity. This provides unique benefits in terms of enhanced accessibility and the ability to access a good range of services.

These settlements will accommodate at least 1,339 dwellings through housing commitments and Site Allocations to support their needs, but other nearby large allocations or urban extensions within or adjacent to the larger settlements will be the focus for growth within these areas .

It is unclear how accommodating large numbers of houses within the villages will "support their needs".

It is also unclear how much each village is contributing to the total of 1339.

WWPC requests clarification.

Omissions

West Winch Parish Council objects to the omission of Watlington and Marham as growth centres.

Policy LP01 Spatial Strategy and Settlement Strategy (page 49)

1. Table showing Kings Lynn regional centre Allocation 2570
2. Another table showing KL existing urban area allocation 550 and WWGA allocation 2020

With a proviso allowing unlimited future growth

There may also be the delivery of additional growth through windfall development via planning applications and/or allocations in Neighbourhood Plans (Policy XX) over the plan period.

WWPC presume the allocation is the Hopkins plus the Metacre applications.

WWPC note that these are different figures to Tier one in the introduction above.

We also note that most of the supporting documents and appendix documents for this and the other topic papers reference 4000 houses proposed for the area so feel that quoting other numbers in allocation tables is disingenuous.

West Winch Parish Council strongly believe there should be a limit on future growth in the WWGA as each plan review and planning application seeks to further extend the numbers gradually way beyond the initial amount of 1600 envisaged in the Core Strategy. Even if you double the 1600 that would be 3200.

Tier 2 Main towns

As previously stated the policy regarding Downham Market is contradictory.

Tier 3 Settlements adjacent to Kings Lynn

While WWPC do not agree that West Winch village should be categorised as Tier 3 it is omitted from the list and does not appear in the list of Tier 4 either, so has entirely disappeared.

WWPC request it is reinstated.

The justification for the relative proposed distribution of Housing growth including WWGA, Downham Market and Watlington now appears to be where they have been placed in the Settlement Hierarchy rather than being evidenced for sustainability in terms of transport, facilities, infrastructure and the needs of the local population.

WWPC requests that more consideration is given to the fact that West Norfolk is a large rural area and development should be evenly distributed with regard to social progress, economic well-being and environmental protection rather than historic allocations.

(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

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)	M. Summers
Date:	19th October 2023

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