

Kemp, Cllr A 01/10/2023

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Dear All,

Here are my objections to the new proposals in the Local Plan Consultation, for you to place before HM Planning Inspectors and this is my request to make representations in person at the Local Plan Hearings. Could you please acknowledge receipt and place my response on the Local Plan Portal.

Many thanks.

County Councillor Alexandra Kemp
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County Councillor Objections to King's Lynn Local Plan

1.WEST WINCH TOPIC PAPER F51

West Winch Policy E.1.2 – Objection to Major Modification

1.As the Local County Councillor, I object to the risk that the Borough Council's proposed main modification for Policy E2.1, will let major development come forward before the West Winch Housing Access Road is completed, or never in fact built, and before the introduction of necessary capacity improvements at the congestion and accident blackspot at the Hardwick Interchange. This would be totally unacceptable, unsustainable and against national planning policy for sustainable transport strategy in new development, and would massively worsen the poor residential amenity of residents living on the A10 and the estate roads in the village of West Winch.

THE FORECAST SCENARIO IS UNACCEPTABLE NETWORK PERFORMANCE, IF THE WEST WINCH GROWTH AREA COMES FORWARD, BUT THE WEST WINCH HOUSING ACCESS ROAD DOES NOT.

So it is outrageous for the Council to propose “ up to 300 houses with access to the A10 without further strategic intervention” in the same breath and paragraph, as saying “ to ensure traffic impacts remain within a tolerable level”.

The A10 in West Winch cannot take any more traffic.

The transport modelling does not reflect residents' lived experience, the danger of turning onto key junctions in a high risk accident road, to the noise, congestion, hostile environment for walking and cycling, and the extent of residential disamenity from the delays and congestion.

The Failure of Sustainability of Recent Development at the Winch

If we don't learn the lessons of history, we are doomed to repeat them. This is amply illustrated by the unsustainability of the recent two small housing developments next to the Winch on the A10 : 20 houses on Lemuel Burt Way, and 19 residential static caravans for older people, at East View Park Homes. Residents experience severance and severe residential disamenity, from the congestion on the A10, difficulty turning out of the estate entrances, the noise from the A10 day and night, and no safe crossing to and from the bus stop opposite. They are heavily car-dependent. This development is environmentally unsustainable.

Residents, many of whom moved in during lockdown or from other counties, now wish they hadn't.

MAKE THE A10 A SAFE SPACE FIRST

The 300 homes opposite this very location at the Winch, that the Council thinks could come before the bypass, would necessarily experience the same severe absence of residential amenity, unless and until the traffic is removed by the bypass, so the A10 becomes a safe space for pedestrians, cyclists and bus passengers.

When you travel South from the Hardwick to Lemuel Burt Way, it is often unsafe to make a right-hand turn into the site, with a long queue of fast-moving oncoming cars on the other side, streaming round the blind bend.

Rear end shunts are a key accident risk on the A10. I often have to make a mile-long detour to Chapel Lane to turn round and return on the A10, to access the site safely, from the left-hand side of the A10.

The Major Modification needs to state clearly that the prerequisite to development, is the delivery in full of the West Winch Housing Access Road.

Appendix A to the Transport Note predicts a 23.4% growth in vehicles on the road by 2039 with the expected development of 11,473 new dwellings in the Borough. (Page 10) This includes LGV Growth of 33.9% and HGV growth of 10.5%.

This is nearly a 25% increase in traffic on the network. The A10 will only become incrementally more congested as time moves on. So Highways improvements must precede development.

NO HEADROOM

The Transport Note does not state the impact on the A10 of 300 houses. This is put into a separate Appendix 4 called headroom that, in my opinion, underestimates the likely trips from the new homes. There is no headroom.

Because West Winch Neighbourhood Plan found that West Winch already has the highest number of homes in the Borough with second, third and fourth cars. This illustrates the extent and impact current severance of West Winch from King's Lynn.

The vehicular trip generation in the Technical Note Appendix 4 page 5 does not inspire confidence and looks like gross underestimation, as it predicts a total of just 150 vehicles leaving and returning to the estate at both daily peak times.

The fact is that there is unacceptable network performance in the A10 now. Residents cannot turn out of their driverways, or out of the estate road junctions, into the constant flow of traffic on the blind bends on the A10. Not enough buses run at peak times to be a viable, reliable alternative to car travel to places of work.

There are no traffic lights at any of the junctions at Lemuel Burt Way, Rectory Lane, Chapel Lane, Long Lane, Chequers Lane, Gravel Hill Lane, Setch Lane, St Germans Road and Garage Lane.

600 cars trying to exit another junction opposite the Winch will bring network disaster.

1. Development, even of 300 houses, would grind the A10 to a halt at peak times. The A47 is much wider and capacious than the A10 and does not have the congestion of the A10 in West Winch and Setchey. Development should more logically start on the A47 side.
2. The full impact of the school run has not been taken into account in the SATURN modelling. It would not be taken into account by manual traffic counts, or by automated number plate recognition, as the 300 homes do not yet exist..
3. Neither has the holiday traffic. There is no mention of the Summer congestion in the Technical Transport Note or Headroom Appendix.
4. The baseline for the traffic modelling was taken in October, at the wrong time of the year. The Government Guidelines requiring traffic counts and models to reflect a neutral month mean the model does not reflect reality of the seasonal standstill on the A10 in Summer months. **The traffic modelling cannot and does not reflect local conditions.** It does not take account of fact that the A10 is the main route to the coast, and to Sandringham Estate Park, which now stages national entertainment events, that recently brought the whole highway network to a standstill.
5. The growing intensity of congestion, in the holiday season over the Summer, from July to September, on the A10 through West Winch, and the queuing all along the A149 to the B1145 roundabout and up to Knight's Hill, appears to have completely passed this Transport Study by.
6. The King's Lynn Transport Model's **projections for the congestion in 2039 from the 4,000 homes on the wider strategic highway network, describes the situation now**, including the overcapacity on the B1145, so, ipso facto, completely underestimates the future scenario. This is of great concern.
7. There is also no evaluation in the Transport Model scenarios, of the specific impact of 300 homes opposite the Winch, on the queuing and congestion on the A10, in the years after they are delivered, only the projection for 2039.

Risk of Future Disaster Scenario

The Transport Technical Note's Modelled Scenario 1 (at Page 12) - **all 4,000 homes, but no Bypass, shows all the 4,000 homes accessing onto the A10**, opposite the Winch, at Rectory Lane, at Watering Lane, and at Gravel Hill.

All the houses are shown as accessing the A10. Why is this?

Allowing this traffic disaster would equate to maladministration.

The Transport Modelling in this no-bypass scenario, shows notable increases at peak times, leading to overcapacity in traffic flow on the A10 in both directions, and overcapacity on the new road approach to the A47, with traffic taking dangerous detours to avoid the congestion, through Saddlebow, Rectory Lane and Setch Road. There is increased chronic congestion on the A10 and saturation of the network. In some cases, with saturation of over 100 %. There is a impact on North Runcton, as traffic re - routes through Rectory Lane, in a desperate attempt to avoid gridlock.

This is the major route to the coast and the entry to King's Lynn from the South and a corridor for freight

Development without the Bypass first will bring West Norfolk to a standstill.

Transport Evidence Document F48

The paper says the strategic modelling shows no significant impediments to the Local Plan's spatial distribution but that " the only proviso is the WWHAR is AN ESSENTIAL PREREQUISITE for the 4,000 houses. (paragraph 7).The scheme is to support housing, mitigate the impacts of development on the wider network and ease current capacity issues in the current A10. However, the Transport Study forecasts "**unacceptable network performance if the WWHAR does not come forward, but the West Winch Growth Area does**".

Even with the Bypass, there will be 98% capacity at the A10 approach to the Hardwick Roundabout. The area-wide modelling shows the A149 experiencing significant delays in 2039. This situation already happens now.

Where are the safeguards that the WWHAR must definitely be delivered ? They are absent from the policy and from the Council's Main Modification.

So the Major Modification Needs to state that the delivery of WWHAR is the prerequisite to development.

Prerequisite means " that which is required before'. The West Winch Housing Access Road is "required before".

So I am asking HM Planning Inspectorate to modify the Council so **housing development on the A10 will not start until the West Winch Housing Access Road is fully built out**. The housing development cannot come forward without the new highway infrastructure, supported by sustainable transport improvements, that mitigate the impact and help alleviate the current chronic congestion on the A10 through West Winch and Setchey. **The Major Modification should also say Hopkins must provide a fully-traffic-lit pedestrian crossing at the Winch before commencement of development, so that existing residents at the Winch are not put in a worse position.**

Proposal for Revised MAJOR MODIFICATION TO WEST WINCH **POLICY 2.1** **TO ENSURE THAT TRAFFIC IMPACTS**

REMAIN WITHIN A TOLERABLE LEVEL:

1. NO NEW DEVELOPMENT ONTO THE CURRENT A10 or A47 BEFORE THE WEST WINCH HOUSING ACCESS ROAD IS BUILT OUT IN FULL.

2. HOPKINS HOMES TO DELIVER AN AUDIBLE TRAFFIC-LIT CROSSING AT THE WINCH, PRIOR TO OCCUPATION OF THE FIRST HOUSE.

3. LAND SHALL BE SAFEGUARDED IN THE LOCAL PLAN TO ENABLE THE FUTURE LINKING OF THE WEST WINCH HOUSING ACCESS ROAD TO THE A134 ROUNDABOUT TO TAKE THROUGH-TRAFFIC OUT OF SETCHEY AND OPEN UP LAND FOR DEVELOPMENT

4. REMOVE ALLOCATION WEST OF GRAVEL HILL LANE DUE TO FLOOD RISK

- Vague timelines drawn up by the Council, showing that only 12 homes will be occupied before the WWHAR is open, give no comfort or certainty and need to be translated into firm planning conditions.
- The Highway Authority says that 1,100 homes will only come forward, if Hopkins decides to build part of the WWHAR to connect to the A47, before it is built in its entirety. But Hopkins have not agreed to build this short access road.
- This means that there is no current plan for the complete build-out of the West Winch Housing Access Road. Hopkins are relying on the public sector's delivery of the WWHAR, to unlock the 800 additional homes.
- The Highway Authority's Planning Condition that prior to the occupation of the 301st house, that Hopkins should construct a link road to the A47, would provide no protection that the bypass in West Winch is ever built, if Government does not grant the Major Route Network funding.
- It implies that West Winch could be left with the traffic from 300 homes on the A10, potentially over 600 cars a day, and no bypass. This is unsustainable.

Case for the West Winch Housing Access Road

The need for West Winch Housing Access Road to come first, to take the traffic out of the village, for the development to be sustainable, underpins the funding case for the road itself.

Norfolk County Council's most compelling case to HM Government to provide Major Route Network Funding immediately for the West Winch Housing Access Road, is that the development will not be sustainable unless the traffic is taken off the A10 and out of the village.

- The existing severe capacity issues on the A10 already cause a hostile environment for walking and cycling, and any more traffic from development will increase reliance on the private car.
- The A10 carries 20,000 vehicles a day, at least 11% of them HGV's and has a high accident rate, as the A10 has wide bends with poor sightlines, that lead to rear-end shunt accidents. There are 800 lorry movements a day of maximum HGV sugar beet lorries from Wisington, causing noise and congestion. Residents living along the A10 cannot get out of their driveways or the estate roads safely.

- The A10, as a corridor of movement, cannot function properly now, and additional delay to freight lorries, congestion and uncertain arrival times would represent an even greater productivity cost to business and a deterrent to trade and commerce and to the prosperity of King's Lynn and West Norfolk.
- The A10 in West Winch and Setchey cannot function as a Major Route Network, and is sub-standard in its design. Allowing any more development without the WWHAR first in place, will represent a cost to local business and amenity, prosperity and will lead to dangerous detours on narrow side roads, as people seek to avoid the A10 during peak times.
- There would be no school onsite, till after delivery of 300 homes, so people will drive infants to school at peak times south on the A10 to West Winch Primary, adding to pressure on the A10.
- Walking along the A10 on narrow pavements close to juggernauts, which create a backdraft of turbulence that make one feel about to be blown back into the hedge, is a frightening experience for grown adults, let alone small children. **It is not a safe route to school.** Parents will not let their infants walk a mile and a half from the Winch all the way to West Winch Primary.

Until the heavy traffic is taken out of the current A10 and it is traffic-calmed to a village road, the new development would be severed from the rest of the village and the additional noise, congestion from traffic from homes on the new turning opposite the Winch, would increase the hostility of the environment for walking and cycling and new residents will just get into their cars to access amenities.

Hardwick Green would be a desert island, stranded in the middle of the A10 and A47, not a proper community, until it is connected to the village via a traffic-calmed A10. With 2 large supermarkets and out of town retail site north of the Hardwick Roundabout, there will be little incentive for businesses to set up retail outlets on Hardwick Green. Leading to more car dependency, unless active travel is incentivised by the creation of a safe highway environment.

The Northstowe Situation

Development without the WWHAR, is inconsistent with the Strategic Growth Corridor Policy, as Growth will be hampered by the deficiency of the strategic transport network.

People will not want to live in Hardwick Green, or come to the town to do business with us, because of the malfunctioning of the A10 Corridor of Movement.

This situation occurred at Northstowe, the families new town near Cambridge, which still has a lack of infrastructure and amenities, residents have no shops on site and wish they had never moved there. The new town is unsustainable. Residents have to get into their cars and drive off-site to purchase a pint of milk.

This failure of planning can't be allowed to happen in West Norfolk.

SUSTAINABILITY

Traffic Calming on the current A10 Cannot Work Until Heavy Traffic Routed out of Village by WWHAR

The Local Plan at E2.1 says that within 12 months of the start of development, traffic calming measure on the A10 must be installed. I believe the measures should include:

the West Winch Housing Access Road first
 speed limits lowered to 30/20 mph along the A10
 a 7.5 tonne weight limit

narrowing of the carriageway

widening of the cycle path and pedestrian pathway, segregated audible pedestrian crossings at the Winch, Chapel Lane, Long Lane, Gravel Hill Lane and Setchey

more frequent buses at peak times, so people can rely on them to go to work.

audible crossings on the Hardwick Roundabout

Bus priority measure

a **transport hub** on the A10 with secure cycle parking

a **bus lane** on the A10

a **railway station** in West Winch on the Strategic Growth Corridor mainline

a **tram system**

- a **walking and cycling underpass** under the A149 along the disused railway route

a **segregated cycle route** round the Hardwick Roundabout and along Hardwick Road

Missing Funding for Walking and Cycling LCWIP Schemes

The Technical Transport Note says at page 36 that the Active Travel Network Improvement Schemes have been priority funded. Could the Inspector ask the Council what schemes these are, as there has been no funding from Active Travel funding, allocated to improve the cycle paths along the A10, necessary for linking the new development in to the community. A granddad from Lemuel Burt Way at the Winch said when he tried to walk his grandchildren to school one day this Summer, but they were late as they could not cross the side roads and there was no continuous footpath.

Surface Water Flood Prevention – Missing offsite Flood Risk Survey

The Developer has failed to undertake an offsite Flood Risk Survey.

Lemuel Burt Way, in, West Winch downstream of the site has just been flooded with water from the A10 during extreme rainfall event in September.

Water ran off the highway and down the slope, flooding two garages, and entering the airbricks of a home.

West Winch is still awaiting the Local Lead Flood Authority's flood investigation report into the flooding on Hall Lane in August 2022, when 5 bungalows were flooded.

WEST WINCH

Objection to Spatial Strategy Document F47 – Borough Council proposed classification of Hardwick Green as part of Sub-Regional Centre of King's Lynn to Tier 3 Village

Hardwick Green will be part of the community of West Winch and therefore should be part of the village and should not be classified as part of King's Lynn, from which it will be severed by spaghetti junction at the Hardwick Interchange.

WEST LYNN

Objection to Spatial Strategy Document **F47** – Borough Council proposed reclassification of West Lynn, from part of Sub-Regional Centre of King's Lynn, to Tier 3 Village

As County Councillor and Borough Councillor for West Lynn, I strongly object to the Borough Council's proposal to reclassify West Lynn, from part of the Regional Centre of King's Lynn, to a Tier 3 Village as it this change is geographically and historically illiterate and not in the interests of West Lynn or of King's Lynn.

West Lynn has been part of the ancient borough of King's Lynn since its foundation in Medieval times and forms part of the ward of South and West Lynn.

Like South Lynn and the town wards, West Lynn is unparished and therefore forms part of the town, informs its strategy and local plan.

West Lynn and the Ferry are part of KLATS, the King's Lynn Transport Strategy.

Access to the Ferry, and encouraging visitors from across the river from West Lynn, is part of the Town Deal Plan Guildhall Project Plan.

The Planning Inspector of the Core Strategy in 2011 said that connectivity needs to be improved between West Lynn and King's Lynn.

The Spatial Strategy Assessment commits a factually incorrect misdescription, in attempting to reclassify West Lynn as a "Tier 3 Settlement adjacent to King's Lynn and the Main Towns", as West Lynn is part of King's Lynn, not adjacent to it.

Strategic Planning in the town needs to take account of West Lynn and this reclassification would be an impediment.

Thirdly, there is no methodology shown, as to why West Lynn should be a tier 3 settlement, when Hardwick, that has no allocated housing sites, is placed in Tier 1.

West Lynn is a key employment centre in King's Lynn as it has the East Coast Business Park, and a major distribution centre on the Clenchwarton Road and has a wide range of services and shops and transport links.

HM Planning Inspectorate advised this Council that the West Lynn Ferry should be part of the Town Centre Policy. This is what should happen.

3.Objection to Document **F50 Appendices B and C – Updated Housing Land Supply – Deliverability and Survey Responses:**
South Lynn – Non-Deliverability of Site Allocation E.1.10 Hardings Way and Hardings Pits Land North of Wisbech Road

There is a serious error in the Policy E1.10 Wisbech Road, which encompasses the principal and only green space of Hardings Pits along Hardings Way that serves the most urban and deprived areas of South Lynn and also the town centre Friars Area, as an Active Travel zone, for Recreation, Health and Wellbeing.

The Allocation for 50 houses needs to be removed completely from the Plan. It is not sufficient for the Council to shrink the site to the area north of the coachworks.

The site is undeliverable, contrary to Appendix C at page 19 of 139.

It is in the rapid inundation zone.

The risk of flooding is so high that the Environment Agency conditioned that homes should not have any ground floor living accommodation. Norfolk is at the 10th highest risk of flooding in the country, coastal area and this area saw a tidal surge that flooded Lynn in the Great Floods of 1953. The site was also flooded in the 1970's when there was a traveller encampment. This site is clearly unsustainable in the time of Climate Change

Increasing Active Travel and opportunities for exercise is important to increase health equity. There is a lower life expectancy in wards experiencing the highest levels of deprivation, like South Lynn.

Furthermore, the Council has agreed to protect Hardings Pits as a Village Green and Biodiversity Site in perpetuity and is taking steps to bring this about.

South Lynn suffers from poor scores for Income, Health Inequalities and the Environment, at Lower Level Super Output Area ward level, as set out in the Indices of Deprivation Indicators, on the Norfolk County Council Norfolk Insight website.

King's Lynn was found to be 26 hectares short of green space in the West Norfolk Green Infrastructure Plan of 2010.

Hardings Way is the bus and cycle only Lane running through the Greenspace of Hardings Pits.

Placing 50 houses on the site north of the Coach works would risk motorised access for private cars onto Hardings Bus Lane, despoiling and detracting from the safe and quiet nature of Hardings Pits and Hardings Way as safe walking route to school, for family walks, Active Travel and improving health Inequalities, healthy life expectancy and the longevity gap.

Hardings Way encourages the use of bus travel by speeding up journeys into town.

Keeping Hardings Way as a bus and cycle-only Lane, accords with the Lynn Transport Plan (KLATS) aim of reducing short car journeys into Lynn.

Placing of accesses for private cars on Hardings Way would place Active Travel, health and sustainability at risk.

The community of South Lynn has held 7 peaceful protests in favour of Hardings Way Bus and Cycle Lane remaining traffic-free. This should be respected.

I am asking the Planning Inspectorate to remove the site allocation for 50 houses on Policy E1.10 from the Local Plan.

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