

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:	Ben
Last Name:	Colson
Job Title (where relevant):	n/a
Organisation (where relevant):	n/a
Address:	████████████████████ ██████████ ██████████ ██████████
Postcode:	██████
Telephone:	██████████
Email:	██████████

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	Transport evidence	All

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.

- 1 These comments relates to the content of Appendices A and B.

Appendix A – KLTS and KLTM modelling technical note

- 2 F48 states of the King’s Lynn Transport Model (KLTM) “In summary, the range of observed data which has been used to validate the KLTM is considered to be comprehensive and therefore demonstrates it forms a suitable base from which future forecasts can be derived.” But that is not so, because:
 - a. The model defines peak traffic times as 8am to 9am and 5pm to 6pm, which is not the case in King’s Lynn. In their A10 West Winch Headroom study (paper F51) the same consultants found the peak flow on A10 to be 7.30am to 8.30am and 4.30pm to 5.30pm. Thus their KLTS modelling, as well as the developers’ own Transport Assessments (TAs) understate peak traffic flow by excluding 7.30am to 8am but including the quieter 8.30am to 9am, and similarly in the peak afternoon traffic time. This is similar to the Woottons and Knights Hill development TAs, an inconsistency brought to the Borough’s attention at the time.
 - b. Hopkins Homes, in the TA for their Hardwick Green development, assumes no parental car traffic to and from King’s Lynn High Schools. Because some new homes would be located just under 3 miles from the closest high school, they assume students will

cycle along wholly unsuitable roads. Those students from further out, over 3 miles, they have concluded will be bussed to and from school. The failure to recognise the reality of parental concern means that peak traffic flows are seriously understated.

- c. This is compounded by NCC's wrong interpretation of historic data. Historic data modelled by NCC's education department shows projected demand for primary and then high school places emanating from the WWGA. Divided to get new students per year it shows that numbers drop so that primary school take up is higher than at secondary level. Had they scrutinised it further, they would have found there to be very specific reasons for this which will not be repeated. Therefore both the provision of high school places and traffic generated are both understated.
- d. Nationally-derived traffic growth forecasts are used in KLTM. It may, or may not, reflect local reality; anecdotally it is understated for the area. Taking all classes of traffic together it shows growth from 2018 to 2039 of 23.4%. However, this is not the same as the amount of road space required: since 1990 cars have grown in size by about 0.75% per annum. Adjusted, the additional road space required by 2039 is in the order of 8% more at about 27%, which has been omitted from calculations.

3 For all these reasons the peak hour traffic flow on the A10 from West Winch approaching Hardwick Interchange is understated and will result in congestion and tailbacks leading to environmental and economic disbenefits for the community. *I therefore ask the Inspectors to note the inconsistency in peak times used, to determine that the Local Plan Review does not accord with Sustainable Transport policy section 9 in the NPPF, to strike out the adoption of KLTS, and to require a new approach to highway and transport planning in West Norfolk.*

4 There is a broader issue concerning high school location. The developments at the Woottons and West Winch are being levied to provide additional high school spaces at the town's three high schools yet it is known there is no available capacity for any of the new build development, per an email from NCC education department to Borough planning department, January 2019. In the case of West Winch the levy is some £12.5m, so including The Woottons some £16m in total. A new High School should be built

instead at WWGA to serve the growth area, also drawing students from adjacent villages to avoid them travelling into the town, providing complementary community facilities, importantly reducing congestion and reducing CO2 emissions at Gaywood, the worst area for air quality in Norfolk and one of the worst in the country. Instead the planned outcome is to assuredly make it worse – not just for new residents’ children – but for all. *I therefore ask the Inspectors to require the County and Borough Councils to jointly investigate the building of a relocated High School from the town centre area to the West Winch Growth Area and to calculate the full range of benefits associated with it, including the addition of community use facilities and the reduction in CO2 emissions in King’s Lynn’s three AQMAs.*

5 F48 states “it is considered that if a trip generation exercise were to be conducted for the West Winch development masterplan, including taking account of.....potential to shift to more sustainable modes of travel, trip generation would be lower.” The words “if a trip generation exercise.” indicates one hasn’t been done so it is pure conjecture. And what is meant by “sustainable modes of travel” are chosen by residents? *I therefore ask the Inspectors to require these to be modelled so that the claims are evidence-based rather than speculative comment and for them to only accept the point as valid if empirical evidence indicates it is.*

6 KLTM included area-wide traffic generation from new developments in the wider area, especially in South Wootton and Knights Hill. However, traffic generated in that part of the town is also understated because new housing figures were taken from Neighbourhood and Local Plans whereas, following intervention by the Inspector examining the 2016 SADMP, the actual figure is approximately double that. The Borough Council also advised that seven local developments (not listed so cannot be checked) and those out of Borough, which includes 950 new homes at Fakenham should be ignored in the calculations. *I therefore ask the Inspectors to require Norfolk County Council to provide an evidence base of where traffic will be over-capacity in King’s Lynn and the immediately adjacent area, and for appropriate mitigation measures to be approved – aligned to NPPF section 9 – before accepting any assurances that this is so.*

- 7 Despite all this under-calculation, KLTS found a number of points in the network where flow will be over-capacity. As regards one of them, A149 Queen Elizabeth Way, F48 states “Norfolk County Council are currently considering the scope of a study of the A149 corridor which will determine improvements and opportunities for linkages to complementary area-wide sustainable transport improvements”. The Norfolk Strategic Planning Framework, adopted in 2017, noted that the A149 was one of two significantly congested roads in the County (the other was the A146), and one of two with high accident rates (the other was a part of the A47 East of Norwich), yet six years later we are told that the Council is considering the scope of such a study. It is difficult to have confidence in this process. *I therefore ask the Inspectors to not accept this assurance of future improvements until the study has been completed and evidence deduced rather than just an assurance of a study being scoped.*
- 8 Of the town centre traffic over-capacity issues, F48 states “The King’s Lynn town centre gyratory forms part of the Sustainable Transport and Regeneration Scheme (STARS)... [which] will be transformative in terms of increased bus and active travel provision and will result in the reconfiguration of the existing gyratory system.” Encouraging that may be, but evidence of Norfolk County Council’s approach lies in its refusal to include a sustainable traffic mitigation measure, funded by the developer, at the Knights Hill development as recommended in the TA. Against this refusal, relying on STARS – “jam tomorrow” – is insufficient until the detail is known. *I therefore ask the Inspectors to not accept this until the STARS proposals for the greater King’s Lynn area have been released and scrutinised.*
- 9 In summarising KLTM area-wide modelling F48 states “In summary...[it] is considered to demonstrate that the highway traffic growth associated with the developments within the KLWN Local Plan can be accommodated.” The considerable under-inclusion of known traffic flow clearly shows that that is not the case, neither in West Winch nor the Woottons. *From all of the above, I would ask the Inspectors to reach a different conclusion and determine that the highway traffic growth associated with the Local Plan cannot be accommodated.*

Appendix B – Sustainable travel narrative in West Winch Growth Area

- 10 The WWGA Masterplan was adopted in July 2022 after two outline planning applications had been submitted by Hopkins and Metacre. Thus, instead of setting the area’s strategic infrastructure, the Masterplan sought to weave it into and around the proposed developments, contrary to NPPF policy. This includes the bus only road link, which for a length parallels the West Winch Housing Access Road, taking it away from the new housing it purports to serve. That part of the proposed development will become car-dependent, contrary to NPPF, not so much by design but by Borough Council allowing development applications to run ahead of essential infrastructure planning. *I therefore ask the Inspectors to require that consideration of all new housing development applications to be paused and for them to be resubmitted with essential infrastructure planned in first and the development around it, as per the NPPF.*
- 11 Modal split data from the 2011 census draws conclusion that maximum walking distance to work is 2km and cycling is 5km. Within these radii are, apparently, 30K and 35.4k jobs respectively. But it is questionable whether this is really within walking and cycling distance, especially comparing active travel journey to work data for the King’s Lynn urban area with existing West Winch residents. In stakeholder interviews, West Winch residents say that the A10 and Hardwick Interchange in particular are significant barriers to travel by active modes, contrasting with the developer’s TA assumptions, see 2b above. *I therefore ask the Inspectors to reflect the views of local residents as expressed in stakeholder interviews and determine that modelling should be based on real-life experience rather than desk-based exercises.*
- 12 The section in Appendix B headed “Existing public transport provision” is misleading and in places factually wrong. It is alright to state “bus services operate....connecting residential areas to major employment sites” if they do so at appropriate times of the day, but the evidence, including interviews in 2023 with both industrialists at Hardwick and job seekers, is that they do not. *I therefore ask the Inspectors to note this obviously misleading inconsistency.*
- 13 Appendix B includes answers to a number of issues raised by, and questions to, stakeholders and local residents. This indicates that if there is to be modal shift away from car dependency, there has to

be a significant and radical re-design of the local bus network to take people to the destinations they want at the times they want, otherwise car-dependency will become hardwired into the WWGA development. There is no evidence of any appetite by Borough, NCC, local bus operators, or, in their TAs the developers, to consider such an approach and therefore the only rational conclusion is that WWGA will not meet NPPF criteria for sustainable transport provision. *I therefore ask the Inspectors to reject all claims of transport sustainability in the WWGA proposals and to require the Borough and County Councils to plan from the outset in line with the views of existing residents, and to model new residents travel patterns and aspirations on Decide and Provide, rather than Predict and Provide principles.*

(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)	
Date:	

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