



KING'S LYNN CIVIC SOCIETY

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October 19th 2023

Geoff Hall
Executive Director, Development and Regeneration Services
Borough Council of King's Lynn & West Norfolk
King's Court
King's Lynn
PE30 1HX

Dear Mr Hall

Re BCKLWN Consultation – Local Plan Review Examination -October 2023

King's Lynn Civic Society have previously submitted comments regarding the Local Plan Review and have read over some of the key topic papers now submitted by BCKLWN in response to queries raised by the examiners.

Paper F47 – Spatial Strategy and Settlement

A fundamental goal of planning new settlement for coming decades must be to provide future communities with the ability to live 'low carbon' lifestyles. Well-constructed buildings that feature low embodied energy and need minimal energy to operate and maintain is an obvious example. Creating settlement patterns that reduce the need for high energy travel is another obvious example.

KLCS felt that there was some sense in the proposed 'strategic growth corridor' along the main line railway. It made sense to consider focussing development near existing railway stations. It is disappointing therefore that BCKLWN have proposed to drop this strategy – largely it would seem as they have failed to allocate sufficient land for development in the strategically relevant locations.

The definition of the West Winch growth area as an 'urban extension of Kings Lynn' establishes the fundamental problem with this very large housing allocation, which is that it will be a large residential enclave wholly dependent on the town and other amenities beyond easy active travel catchments. This will necessitate large amounts of vehicular travel for the most basic needs – and the design plans coming forward mean that this will largely be through private car travel.

West Norfolk is in any case a large Borough with sparsely populated areas where reducing private car use and associated congestion, pollution and energy use is going to be very challenging. Making the single largest housing allocation in the Borough extremely car dependent, when the site lies adjacent to roads that are already at or near capacity must be seen as poor and unsustainable planning policy.

Papers F48 / F51c / F51d

KLCS do not feel well qualified to comment on this additional traffic evidence. We have read representations being put forward by others in relation to these papers and note that there is considerable ‘flexibility’ in how the parameters for these assessments are set and interpreted and that the assessment of future traffic needs in all development is undertaking something of a revolution in methodology at present. The fact is that ‘traditional’ approaches need review and we are not convinced of the any of the transport planning evidence we have ever seen for the Local Plan or Local Plan Review. Meanwhile all of the anecdotal evidence has been that traffic congestion around the town is worsening.

F51e – West Winch LVA

It is very pleasing to see this report has been commissioned, albeit at a rather late point in the planning process for the proposed ‘Growth Area’. We believe it is the first time that BCKLWN have commissioned an LVA to appraise a proposed allocation site.

It is a helpful summary of the situation but specifically omits consideration of the proposed relief road – a road that is expected to eventually take 20-30,000 vehicles a day and to feature a road bridge at Rectory Lane and a pedestrian bridge at Chequers Lane, two major junctions on the A10, another on the A47 as well as related roadworks (a dualled section of the A47). Clearly the roadworks will be some of the largest and most visually intrusive elements of the whole WWGA scheme. They will also greatly affect perceptions of the area for road users travelling to Lynn. We think this is a major omission of this report.

Regarding the ‘ZVI’ plan, whilst accepting it is indicative only (as a lot of the development proposals are not yet developed), it is clearly inadequate in its assessment of the likely extent of the effects to landscape and visual receptors to the north and south. The proposed Hopkins housing will be prominent on the ridge at Constitution Hill when viewed from the A149, and the proposed southern end of the development will be prominent in views from the south-east (which will include the Nar Valley Way long distance footpath).

F51f West Winch Biodiversity

This is another useful addition to the impact assessment work for the WWGA. However, we feel that in some respects it has raised pertinent issues and then not followed them through. The matter of wildlife movement through the area has been identified but it is not clear how disruption to this will be mitigated. Local evidence suggests that the land proposed for the development is an important corridor between the Nar Valley to the south and the Middleton valley and Bawsey to the north, possibly further facilitated by the North Runcton commons and the large area of semi-natural habitat at Constitution Hill (which will be lost). How will this movement be re-directed?

The report notes the likely loss of farmland species such as skylark – but could equally well note grey partridge, brown hare and barn owl and impacts to other species such as snipe and woodcock that seasonally frequent the Hopkins site.

We are pleased to see the assessment considers off-site mitigation would be necessary to balance these impacts – but we know of no such plans.

F51g – West Winch Drainage

Plans have been made that could help to resolve some of the drainage concerns that have been raised by local residents for many years. However, it is not clear whether sufficient work has been undertaken to ascertain that these plans are technically feasible and cost viable. An example

would be the proposed piping of flood water to the Puny Drain to the west – which will involve cooperation of multiple landowners and technically challenging levels which could be complicated by other factors in times of high rainfall.

Whilst we are aware that all the matters outlined above may be beyond the scope of the examiners to investigate further, they do call into question the value of the additional topic paper evidence. Just in the examples we cite above there would appear to be many assumptions and judgements that may not eventually be proven to be sound. It is our view that the papers are not therefore especially helpful in determining whether the Local Plan and in particular the West Winch Growth Area allocation is sound and capable of delivering sustainable growth in West Norfolk for the next 30 years.

Yours sincerely

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