



**Representation Form**

Consultation on additional evidence base documents, September 2023

Closing date for submitting representations: **11:59pm, Friday, 20<sup>th</sup> October 2023**

**Part A**

**Section 1: Personal Details**

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

**Section 2: Agent Details (if applicable)**

Please supply the details below of any agent you have working on your behalf.

<b>Agent name:</b>	n/a
<b>Address:</b>	n/a
<b>Postcode:</b>	n/a

<b>Telephone number:</b>	n/a
<b>Email:</b>	n/a

## 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	Settlement Hierarchy etc	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 Outside King's Lynn and the main towns, the Settlement Hierarchy is determined on a criteria and points scoring basis. Applied objectively, and if appropriate criteria are chosen, this is probably the best way to separate out the different development characteristics for those settlements adjacent to King's Lynn and the main towns (AKLMT) , Key Rural Settlement Centres (KRSC), Rural Villages (RV) and Small Villages and Hamlets (SVH). I believe, however, there are flaws in the selection of criteria used and some of the factual detail.
- 2 Criteria selection is based – largely – on what were historically valid facilities being provided, such as a doctor surgery. Nowadays many rural surgeries provide primarily telephone and online appointments only, therefore rendering accessibility to these facilities less important than would have then been the case. In public health policy, conversely, community pharmacies are expected to provide more walk-in services, and are therefore more relevant, yet do not feature on the list of criteria. NHS dentist services, in severe shortage in the Borough, are also not featured in the list. My criticism of the selection of criteria is not limited to only these, they are illustrative, and *I ask the Inspectors to not accept the detail of which community is in which level in the hierarchy until an objective view of today's criteria requirements – and those foreseeable to still*

*be relevant at the end of the Local Plan period – are incorporated and settlements scored again.*

3 For one facility only, the score is quality-based, rather than binary (it either exists or does not) base. This is for the local bus service. Yet the scoring throws up perverse outcomes because it is based on the frequency at which the bus service is provided rather than the facility it offers residents as a result. A good example of this is Castle Rising, scored three points for an hourly bus service, yet it only runs from 10am to 4pm (approx.) thus not providing for journeys to work, apprenticeship etc. The national charity Bus Users UK did desk-based research into accessibility in West Norfolk following considerable degradation of the bus service in 2018; it found that, despite route frequency notionally not being much changed, the ability to access the Sixth Form College and employment zones in King's Lynn from the surrounding rural areas – including some KRSC – had fallen by up to 15% of settlements and nearer 20% of potential resident users. Even this year, surveys of industrialists in the Hardwick area and of job-seekers visiting the Job Centre, found that lack of transport facilities was, for both, the key reason why people are out of work whilst there are significant job vacancies. Also, some of the scores are factually wrong as service frequencies have been increased or decreased in recent time. *I ask the Inspectors therefore to require scoring of this criteria be reworked to ensure that access to facilities by residents (outcomes) is the focus of the criteria and not just how often the bus runs (outputs).*

4 The proposal to merge policies LP01 and LP02 appears to be to make it administratively easier to manage. If that were so, then fair enough, but in doing so there are some significant policy changes as well. One is that KRSC and RV are now considered better for sustainable development than the higher level AKLMT. The rationale is neither explained nor evidenced, but in terms of transport sustainability it is patently not the case. It guarantees that people have to travel further to access essential goods and services only found in King's Lynn and the Main Towns, neither good for air quality nor household financial pressures. Indeed, an FOI request by South Wootton Parish Council in 2020 revealed that the County and Borough did not communicate with each other about air quality

issues, despite King's Lynn and its suburb Gaywood having more AQMA per head of population than the average in the whole Transport East area, and some of the poorest air quality in Norfolk. *I ask the Inspectors, therefore, to strike out all policy changes associated with the amalgamation of LP01 and LP02 unless they are separately justified and evidence-based.*

- 5 The new build housing required of parishes with approved Neighbourhood Plan amounts to 1668 homes, of which 270 (16%) are in the adjoining parishes of North and South Wootton. These parishes are in the process of taking 1150 new build homes against a 2011 Local Plan number of 650, amended in 2016 by the Inspector to more generally add the words "at least" in front of each proposed allocation. Local infrastructure has not kept up, nor does the Borough or County Councils intend that it should. For example, in January 2019 the County's Education department wrote to the Borough expressing its concern that the town's High Schools had sufficient places only for new homes then in build (mainly in the Lynnsport area) and that any new homes approved or to be approved could not be provided for. Yet despite this, new housing has been approved and is in build, it appears without reference to the physical ability of High Schools to be expanded to accommodate the extra students. Even if they are, access is mainly through the Gaywood suburb of King's Lynn with the highest levels of CO2 in the county, simply worsening the health outcomes on young people. *I ask the Inspectors therefore to strike out the additional housing allocations in North and South Wootton and to order an independent review of secondary age education provision in the immediate area, including West Winch (see 7 below).*

- 6 It is intended that new or revised traffic and transport criteria will be applied to amenity evaluation in Neighbourhood Plans. Summarised, these are:
- a. King's Lynn: "to maximise sustainable transport choices"
  - b. Main towns: "to maximise opportunities to sustainable transport choices"
  - c. AKLMT: have no transport sustainability criteria at all
  - d. KRSC: "enhance local service and public transport provision"

- e RV: have some public transport provision
- f SVH: few services and limited opportunity for sustainable development

However, The King's Lynn Transport Strategy adopted by both Borough and County in 2020, noted that AKLMT areas would produce the greatest growth in car use in the Borough. There is no evidence base for the new seemingly irrational proposal, leading, for example, to KRSC to have a higher emphasis on enhanced provision than AKLMT, where most of the 1668 new homes to be built in areas with approved Neighbourhood Plans are located, with all the air quality implications arising from it. *I ask the Inspectors, therefore, to instruct the Borough Council to specifically and closely align its policies with the Sustainable Transport provisions in section 9 of the NPPF.*

- 7 Appendix 2 refers to the West Winch Growth Area as being "an urban extension of King's Lynn" which means that infrastructure and facilities should be on a par with the town area. However they are not, and the Masterplan for the growth area appears to consider AKLMT infrastructure or less, as at the existing village, to be appropriate. This policy confusion is all the more relevant because the Masterplan idealises the merger of the old and new communities as one, by the removal of through traffic from the existing A10 which currently divides it into two. This leads to important, perverse, impacts. Traffic flow is modelled based on observed data from the existing village rather than that likely to emanate from a new, younger, more dynamic population with very different travel patterns. It is also evident in the modelling for school places, as the observed number of secondary age students per year group is less than for primary aged students. Enquiries revealed this is based on historic data from the existing West Winch village, ignoring the fact that a large number of secondary aged students were taken out of the state school system after the village was moved from one catchment area to another. *I ask the Inspector, therefore, to challenge the Borough Council on this anomaly in the proposal to split what is to be ostensibly one community into two different points in the settlement hierarchy, and require the County Council to re-*

*evaluate its traffic flow modelling, using the now DfT approved “decide and provide” methodology rather than the historic “predict and provide” one, and also to completely re-evaluate and justify its proposed lack of secondary age school provision in the area, such re-evaluation to take specific account also of air quality impacts of large numbers of students travelling distances to over-crowded schools to be housed in what will likely be temporary classrooms.*

- 8 In March 2023 KLWNBC Cabinet changed the status of the West Winch Growth Area from being a strategic corridor, to overcome some of the Inspectors’ concerns. It is now just a Growth Area. But that does not change the basis or validity of your concerns; it simply illustrates the Borough Council’s cynical approach. *I ask the Inspectors, therefore, to strike out this change of status and to continue their evaluation of the Growth Area as before.*

(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 <input type="checkbox"/>	No <input type="checkbox"/>
Publication of Inspector's Report	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Adoption of Local Plan	Yes <input type="checkbox"/>	No <input type="checkbox"/>

*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](mailto: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, 20<sup>th</sup> October 2023**.