

**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>	Mrs
<b>First Name:</b>	Michele
<b>Last Name:</b>	Summers
<b>Job Title (where relevant):</b>	Vice Chair
<b>Organisation (where relevant):</b>	West Winch Parish Council
<b>Address:</b>	Parish Clerk West Winch Parish Council [REDACTED] [REDACTED]
<b>Postcode:</b>	[REDACTED]
<b>Telephone:</b>	[REDACTED]
<b>Email:</b>	[REDACTED]

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

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

<b>Agent name:</b>	
<b>Address:</b>	
<b>Postcode:</b>	
<b>Telephone number:</b>	

<b>Email:</b>	
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## 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)
F51	West Winch Topic Paper	

#### **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.

#### **General observations**

The Borough Council still seem to be adopting a Predict and provide way of working which comes up with a conclusion and retro fits studies to try to support that.

WWPC would prefer to see a more proactive positive approach incorporating Decide and Provide thinking.

#### **History**

2

*Kings Lynn town was awarded growth point status which meant in 2008 that planned development had to be near the town.*

4

*West Winch area was chosen as it was the only realistic location for major expansion of Kings Lynn town and it's flood zone 1 classification.*

We note that the growth point status is no longer relevant, and even when it was, the West Winch area was the least worst option.

6

Identified growth of at least 1600 houses.

10

*At paragraph E2.6 of the SADMP it is suggested that between 3,000 to 3,500 dwellings could be accommodated in the fullness of time, based on the sites that were put forward and work commissioned by a landowner and undertaken by the Prince's Foundation for the Built Environment*

Housing numbers were based on work commissioned by a land owner!

Even a land owner (multi million pound company) funded study to find out how many houses they could profitably develop on their land, didn't come up with 4000.

14.

*As can be seen from the table below it was shown that the growth area could potentially accommodate up to 4992 dwellings .*

The table does not show the figure 4992.

15. *The inspector of the SADMP concluded he was satisfied .....*

The inspector noted several things which were promised including .

*It is also a policy requirement that a comprehensive strategic transportation plan for the area be prepared.*

WWPC has never seen one.

*19 Hopkins Homes submitted an updated Environment Statement and Transport Assessment in December 2021 which was subject to a 30-day consultation with stakeholders. No objection has been raised by Norfolk County Council Highways nor National Highways. Final outstanding matters in so far as off-site drainage are actively being resolved by the applicant in consultation with the LLFA and IDB along with negotiation on S106 matters. Planning Committee dates to determine the application have been identified for Summer/early Autumn 2023. (13/01615/OM).*

At the time of writing in October 2023 the drainage issues remain unresolved.

### **Transport Impacts**

*21. A strategic transport model of the King's Lynn area has been built using the SATURN suite of programs based on traffic survey data and using mobile phone network data to determine origin and destinations. This strategic model includes all of the allocations and future developments set out in the extant Local Plan and beyond. As such, it takes account of all the anticipated growth and predicted traffic increases in the King's Lynn area .*

This data was collected 5 years ago in 2018. Norfolk County Council (NCC) have more recent data from October 2022.

*25. This strategic modelling work carried out by the HA to inform the King's Lynn transport strategy, and subsequent modelling work on specific transport interventions like the WWHAR, has satisfied the HA, Norfolk County Council, that there are no significant transport impediments to the proposed spatial distribution of the Local Plan allocations.*

*The only proviso is that the WWHAR is an essential prerequisite for the **4,000** homes in the WWGA, and there is a clear delivery mechanism for this intervention.*

The Kings Lynn Transport study is not relevant to WWGA as that document para 3.5.2 states WWGA is a separate study. ....*for the separate study of the West Winch development proposals which are being assessed separately from this study.*“

*26. The LPA has commissioned the HA’s consultants WSP to prepare a Transport Technical note that details modelling work which shows the impacts of the development proposed in the Plan and at the WWGA which is included as Appendix 3*

The Technical note in Appendix 3 demonstrates in Table 5 that based on the 2018/19 baseline figures many areas of the transport network have capacity issues. As these are baseline figures they do not take into account the sugar beet campaign which massively increases the number of HGV’s on the network or the holiday traffic which already results in queues of many miles and long delays.

All these issues should be addressed alongside the provision of the WWHAR

The note does not address the impact of development on the A10 south of Gravel Hill Lane where the WWHAR is planned to start. This leaves the West Winch and Setchey residents with the prospect of increased traffic along a narrow section of the A10 where no relief is planned.

We note that the Transport technical note is using data from 2018 despite a large amount of data being collected in October 2022 by NCC in support of the WWHAR. The headroom study uses the more up to date data.

## **Proposed modification**

*New Criterion (Part A following criterion 4)*

*To ensure that traffic impacts remain within a tolerable range development will be subject to the following thresholds:*

- *up to 300 dwellings with access to the A10 without further strategic intervention;*
- *for anything above 300 dwellings, completion of a link to the A47 will be required;*

*and*

- *for more than 1,100 dwellings on site, completion of the West Winch Access Road in full will be required.*

The issue of the new road has been very contentious locally. Despite the consultation sessions there is still confusion amongst local people.

The October 2013 Transport Assessment which accompanied the Hopkins initial application stated 5.9. Proposed West Winch Link Road

*... which would form the basis of a wider link road between the A10 and A47. This would allow vehicles to leave the A10 at Setchey and route through the growth area to connect to the A47 avoiding the existing A10 route through West Winch.*

SADMP 2015 confirmed the link road.

Part A Outcomes Para 4 *A new road linking the A10 and A47.*

Policy E2.2 of the SADMP stated no significant development will be permitted to obtain access to the A10 in advance of the new West Winch Link Road opening. This was understood to be the link road from Gravel Hill Lane.

Local people therefore believed that the “link road” in the SADMP is the “link road” referred to in the proviso that only 300 houses could be built.

But Hopkins had also called their new road through their estate a link road.

This has been compounded by council briefings stating they expect to have the new WWHAR road open long before 300 houses are built.

The Local Plan link road was more recently named the WWHAR for the purposes of the transport grant application. It remains designated the Link road in the SADMP, while the other road has been named the link road.

WWPC requests that all references to link roads are renamed.

Generally locally there is a realisation that new housing is need but local residents think they have been misled about the relationship between the WWHAR and the housing development.

It has been requested that WWPC via a resolution at a public Parish Council meeting clearly represent the view of local people. The resolution states  
'The Borough Council's Main Modification to the Local Plan should say that the West Winch Housing Access Road and a traffic-lit crossing at the Winch, should be fully in place before commencement of the Hopkins Development and of any other Development in the West Winch Growth Area on the A10.'

The local residents have the lived experience of the A10 being extremely congested and common sense tells them that putting a roundabout on the A10 where the housing estate traffic will have priority over northbound A10 traffic must result in longer northbound queues.

The message from the Borough council is that no more than 1100 houses can be built before the WWHAR is completed but once that road is built you have to then accept at least 4000 houses with no upper limit to continued development in WWGA.

WWPC requests that there is a stated upper realistic limit to the number of houses which can be built in the WWGA utilising a more proactive integrated approach across the whole borough..

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

<b>Please sign and date below:</b>	
<b>Signature: (electronic signatures are acceptable)</b>	<b>M. Summers</b>
<b>Date:</b>	<b>19<sup>th</sup> October 2023</b>

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