

**Borough Council of King's Lynn
and West Norfolk Local Plan
2021-2039**



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:	Ivan
Last Name:	Jordan
Job Title (where relevant):	Parish Council Chairman
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Section 2: Agent Details (if applicable)

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

Agent name:	
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)
F47	Topic Paper Spatial Strategy and Settlement Hierarchy	
F48	Update on Technical Note on Transport Evidence	
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.

Dear Inspectors

The three Parish Councils of South Wootton North Wootton and Castle Rising are grateful to be consulted on the proposed Local Plan Review.

As parishes, we have been working hard to ensure an extra 1200 homes can be delivered in the Wootton area in a sustainable manner. Sadly, Parish Councils have been ignored and not heard on important issues. Whilst we accept new homes are needed it should not be at any cost to the local Community. The majority of the 1200 homes are bolted on to Village Boundaries on arable and greenfield sites. Amongst these is a 575 development at Knights Hill. Planning was granted in 2019 on the understanding 3 major Traffic Mitigation measures were adopted.

Subsequently, one of these vital measures, an on-site B`us service into the town centre, was cancelled by Norfolk County Council Public Transport team. Of the three, this was the only one designed to reduce car dependency, the other two were to manage the flow from this and other developments more efficiently. This important sustainability measure was cut without any consultation with the Parish Councils or referring back to the Borough's Planning Committee. We therefore do not believe the development is NPPF compliant. We have been battling ever since to reinstate this mitigation, a measure which the developer is supporting and is being required to fund even if it is not procured and supplied.

Why do we mention this experience? Firstly, we do not believe the NCC Highways and Public Transport team based in Norwich are fit for purpose as far as West Norfolk is concerned. Secondly, we see a repeat performance developing at West Winch where to a large extent the Parish voice and concerns have also been ignored.

The allocation of up to 4,000 homes in one area is highly questionable. The knock-on effects will be felt throughout the area. In West Winch there are already major connectivity problems for safe active travel to the Town Centre and Secondary Schools. The A10 and A149 routes are regularly

operating at over capacity. Our Secondary Schools cannot cope with this level of extra demand, in addition Medical provision and Dental care are in short supply.

Large Planning Applications should not be imposed on Parish Councils. They should be worked on in conjunction with the PCs. Early meaningful consultation is needed as required by the NPPF. There exists a vast pool of local knowledge and experience which the Borough and County Councils should use; this would save so much time and lead to improved outcomes.

For a number of years our three Parishes have had the benefit and pleasure of working with Ben Colson. Our three parishes fully support and endorse Ben's Local Plan submission which we commend to you.

Topic paper F47 – Spatial Strategy and Settlement Hierarchy

- 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 most appropriate to separate 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 dominant 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 a 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 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 1175 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 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 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 this anomaly in the proposal to split what is to be ostensibly one community into two different points in the settlement hierarchy with the Borough Council, and require the County Council to re-evaluate its traffic flow modelling, using the now DfT approved “decide and provide” technique rather than the historic “predict and provide” method, 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 those 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.*

Topic paper F48 – Update on technical note on transport evidence

- 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.*

Topic Paper F51 – West Winch Growth Area (WWGA) issues

- 1 Topic paper F51 brings together a number of matters, mostly in appendices, which simply repeat or cross-over with Papers 47 and 48. I have therefore repeated comments from those papers in this composite where they relate to WWGA.

From topic paper F47

- 2 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 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).
- 3 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 WWGA Masterplan appears to consider AKLMT infrastructure or less, as in 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 divides West Winch 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 this anomaly in the proposal to split what is to be ostensibly one community into two different points in the settlement hierarchy with the Borough Council, 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” method, 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.*

- 4 In March 2023, to overcome some of the Inspectors’ concerns, KLWNBC Cabinet changed the status of WWGA from being a strategic corridor to a Growth Area. But that does not change the basis or validity of those 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.*

From topic paper F48

- 5 Of the King’s Lynn Transport Model (KLTM) it is stated “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 the 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 KLTS modelling, as well as the developers' Transport Assessments (TAs) understates 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.
- 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 modelled by NCC's education department, showing 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 the need for high school places and traffic generated are both understated.

Thus 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.*

- 6 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, per an email from NCC education department to Borough planning department, January 2019, there is no capacity for

students from any of the new build development. In the case of West Winch the levy is some £12.5m, so including The Woottons, maybe some £17m in total. A new High School should be built instead at WWGA to serve the growth area, drawing students from surrounding villages rather than going into 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. As it stands, the planned outcome is to 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 High School in the West Winch Growth Area, to relocate one of the three central area High Schools, and to assess 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.*

7 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.*

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.*
- 10 The WWGA Masterplan was adopted in July 2022 after two outline planning applications had been submitted by Hopkins and Metacre. Thus, contrary to NPPF policy, instead of setting the area’s strategic infrastructure, the Masterplan sought to weave it into and around the proposed developments. 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 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 it is really so that people will walk and cycle, 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 active travel, contrasting with the developer’s TA assumptions, see 5b 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 entitled “Existing public transport provision” states “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 and that lack of transport links to employment zones is a major barrier to aligning vacancies with job seekers. *I therefore ask the Inspectors to note this obviously misleading inconsistency.*

- 13 There is an illuminating section summarising existing local residents’ views. It indicates that if there is to be a 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.*

Specific to topic paper F51 – West Winch A10 headroom analysis

- 14 Capacity on the A10 has been assessed by reference to the varying widths of the road. It is at its narrowest by West Winch Church, and this plus junctions, is the constraint on maximum capacity. The morning peak was measured from 8am to 9am whereas empirical evidence found it to be 7.30am to 8.30am (and similarly half an hour earlier in the afternoon peak than was modelled). It was found that the road can accommodate 1185 vehicles per hour in a single lane (and 1365 where it is wider to North and South of the Church and away from junctions). Actual flow measurements on 11 October 2022 were 1244 Northbound in the morning busiest hour, and on 19th October 1223 Southbound in that busiest hour but under-reported due to misleadingly using inappropriate time-bands. Using the actual peak traffic flow hour, the road is already over-capacity.
- 15 However, the data is skewed by using the Department for Transport’s standard times for peak traffic flow (8am to 9am and

5pm to 6pm) which is how the County's consultants, and those commissioned by Hopkins Homes, have concluded that the road is able to take the traffic that will be generated by 300 new homes already approved for build before WWHAR is open. Table 2 of this section of F51, drawn from Hopkins' TA shows an estimate of 95 vehicles emanating from the new housing, yet this is unrealistic as it assumes no parental cars used to take children to High School. *I therefore ask the Inspectors to require Norfolk County Council to recalculate the A10 headroom analysis based on empirical data from the real peak traffic flow hour and including a realistic assessment of parental school traffic originating in the 300 home part of Hardwick Green already approved for development. Further, if it shows that the A10 will be over-capacity, for these homes to not be permitted to be occupied until the WWHAR is open to traffic.*

- 16 It is clear that the author of Paper 51's A10 Headroom Analysis appendix is concerned about public acceptability. On page 5 it notes "It is clear that local residents are concerned about the existing capacity of the A10 corridor and the Hardwick Interchange, and there is sensitivity to bringing forward significant additional development in the A10 corridor prior to WWHAR would not be palatable to existing residents." On page 6, in their summary and conclusions it says "However, it is clear from public consultation feedback obtained by KLWNBC in July 2022 in relation to the masterplan that there is concern from local residents regarding additional development in West Winch due to existing capacity issues on A10 and increased pressure on Hardwick Interchange. Therefore it is recommended that the lower bound total of 300 dwellings should be used as a robust trigger for strategic intervention within the King's Lynn and West Norfolk Local Plan." *I therefore commend these local views to the Inspector and that they take note of the lived experience of local West Norfolk residents compared with County Council and developer procured modelling which is clearly deficient, resulting in negative environmental, social and economic consequences for local populations.*

(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 X00

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 or 01553 616200.

Section 6: Signature and Date of Representation

Please sign and date below:	
Signature: (electronic signatures are acceptable)	<i>Juan Jordan</i>
Date:	18th October 2023

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