

Kings Lynn & West Norfolk Local Plan Review Examination

Hearing statement relating to Matter 2 : Issue Spatial strategy and Settlement Hierarchy. Questions AQ3 – AQ8 inclusive

Date of Hearing: 26th March 2024

Submitted by J R Maxey, Maxey Grounds & Co

Spatial Strategy

1. AQ3a - The Councils approach to modification of the Spatial Strategy by removal of the Strategic Growth Corridor, as we set out in detail in our objection document, completely misses the points of concern as to soundness raised by ourselves previous and taken on by the Inspectors and leading to the halting of the original Hearings.
2. The point the Council were asked to address was not that the strategy, to align growth along a corridor with the optimum transport routes including the only rail line, was unsound, but that the policies for allocation of developing did not follow this strategy, with limited growth allocated to those settlements (Watlington and Downham Market, with rail stations, and the large allocation at West Winch wholly dependent upon road based transport.
3. The Council has failed to do this, instead proposing that this strategy is withdrawn and effectively leaving the plan without a strategic direction, heavily reliant on the growth of West Winch with significant doubt about the ability and timescale for delivery, and failing to take advantage of the sustainable transport links available. The Plan thus becomes an allocation led document with the majority of development expanding Kings Lynn and its periphery and almost entirely road transport led.
4. As such the proposed amendments to the plan do not address the Inspectors (our) concerns
5. We therefore remain of the view that the Plan without its SGC is unsound, the SGC should be retained, and the scale of growth of both Downham Market and Watlington, as the two settlements with sustainable transport options within that SGC should be increased, with additional allocations utilizing some of the additional housing numbers that come from rolling the plan forwards by 2 years (Questions AQ117 and AQ1)

Settlement Hierarchy

6. AQ3b - On this basis we believe the status of Watlington and a Growth KRSC is warranted and should be maintained and the village identified for additional growth reflecting that status. The Council in their response document J2, acknowledge that the village has suitable facilities but (apart from the Main Line rail station) nothing to justify its Growth status. We submit it is precisely the rail station that provides the

additional justification for a greater scale of growth because the village is unique, as a village in having such a facility. If this point is considered then there needs to be a revisit to proposed allocations at Watlington, so that the allocation policies match this strategy, and not propose a level of growth that is all commitments and smaller than many KRSC settlements.

7. AQ4 - At the hearing sessions prior to adjournment we sought hard to understand the rationale for amendment of some Villages of their place within the Settlement Hierarchy. The Council were unable to produce at that stage any documentation recording the debate and reasons for changes. They now present a fresh scoring assessment which we understand was prepared in 2023 to seek to justify the decisions made previously. However it provides no information as to the criteria adopted for considering a group of villages as a linked settlement, the response refers back to a 2016 LPTG meeting, minutes of which refer briefly to the merits of linking West Walton and Walton Highway, with one comment contrary and a deferral of the decision until further consultation with the 2 Parish Councils (there is actually one PC covering the whole area). No note of the outcome of that consultation is given and we are not referred to a subsequent meeting for the decision.
8. The scoring system is not transparent in terms of defining the area considered for facilities. The actual scores are not recorded accurately and housing commitments in the joint villages are incorrectly recorded in Table 5 of LP02 (page 56) with most commitments in Walton Highway. The decision making process on whether villages are linked appears ad hoc and the document prepared is littered with errors. The pointing out of these errors is ignored in the summary and response document.
9. As a joint settlement which is how West Walton and Walton Highway function, with a single Parish Council, primary and secondary schools centrally positioned to, and serving both, the scoring criteria for KRSC is comfortably met and with the additional of one of only three village high schools in the borough as an additional facility and a reason for targeting additional development in a sustainable location, the linked villages status and KRSC designation should be maintained. Our objection lists the detailed points we have raised for reference.
10. We support the Change of Wisbech Fringe to part of the Main towns
11. We do not agree with adding West Winch to Kings Lynn. It is geographically separate (as a result of the obstacle of Hardwick Roundabout which is difficult to negotiate on foot) and a functionally separate settlement.
12. AQ6 - We support the principle of additional growth in Downham Market because of the services and infrastructure, its status as the second largest settlement, the availability of rail transport, with or without the SGC. Given the additional housing numbers required under the proposed roll forward of the Plan to 2041 we would suggest that an additional 500 within the SGC could be accommodated, with the remaining numbers (approx. 700) allocated across the borough in settlements where the proposed allocations are already built out before the plan is adopted
13. AQ7 - The proposed deletion of the SGC and the downgrading of settlements with access to rail transport would be contrary to national policy encouraging use of

sustainable transport options. West Winch growth is entirely dependent of road based transport and road improvements of which there remains significant doubt about deliverability on the basis of funding.

14. AQ9 and AQ10 – We have indicated that we consider a strategic scale of growth for all settlements in the local plan is essential, and not just designated neighbourhood plan areas or deferring scale of growth to neighbourhood plans, most of which seem to seek to restrict growth by their policies
15. AQ11 – We are supportive of the principle of a policy of windfall development within criteria on the periphery of settlements. Our representations on this policy were not recorded with J2 summary and response but were that LP02 as amended was an improvement on LP31 but still required further amendment to the revised policy, including Growth KRSC villages in the up to 10 scale for each windfall site in para 2b, that the separation of settlements envisages in para 1F is not relevant within linked settlements, para 2A should not be a barrier where available sites will not cumulatively meet the assessed need for that settlement, and in the context of this policy sites now viewed in the trajectory as commitments (ie with consent and started) should be included in the Development Boundary plans. We consider the above changes necessary to make the plan sound and are disappointed that the Council failed to even record or respond to these comments.

JRM

Date 05/03/2024