Sandra Homcenko

From: Annette Feeney
Sent: 10 March 2024 18:22
To: Sandra Homcenko
Subject: FW: Position Statement for Local Plan Hearing King's Lynn and West Norfolk

To HM Planning Inspectorate,

Major Modification West Winch F51K – Strategic Infrastructure

1. As the Local County Councillor for West Winch, it is absolutely essential that HM Inspectors should not allow the current unacceptable impacts of congestion on the A10, to be worsened by an access for major development , in this case opposite the Winch for 1100 homes, until the West Winch Access Road is fully built out.
   ADVERSE ACCIDENT IMPACTS FROM DEVELOPMENT
2. Norfolk County Council's Strategic Outline Business Case for the West Winch Bypass (see Appendix 1 below) calculated that there will be an **adverse accident impact** over the appraisal period of the development, because of the impacts at junctions. This shows that no more development is safe on the A10, before the bypass can take the traffic out of the village. The A10 is already a high-risk road for accidents.
   HEAVILY CAR DEPENDENT
3. The Technical Transport Note for West Winch does not take fully into account the number of cars likely from a 300-home development. It is not an exact science. But it is reasonable to assume, that homes on the Hardwick Green development, are likely to occupied by a dual-income household, both working to support a mortgage; both may drive to work, given that buses are not early enough or frequent enough. If they have small children, they will be highly likely to drive them to school down the A10 to West Winch Primary due to time pressure and the hostility of the junction environment. There will be no on-site Primary School until after 300 houses are built. Parents may also drive their secondary school children to school, as the secondary schools are in Gaywood, within 3 miles so the Local Authority will not provide a free bus pass, but there is no safe walking and cycling environment along the A149 bypass and no buses along the A149. Parents could make multiple journeys along the A10 at peak times to schools and work.
4. So, given the pressure and accidents on the A10 now, **cars from 300 more homes on the A10 will not be within a tolerable range.** The development will be heavily car dependent until the A10 is traffic-calmed, which cannot happen until the Relief Road takes the heavy traffic off the A10.
   TRAFFIC COUNTS DO NOT GIVE THE FULL PICTURE
5. The Government metrics for the Technical Transport Note F48 did not allow WSP's traffic counts for the A10, to take into account the busy periods in the Summer, or the busy traffic before 8 am. The traffic counts had to be undertaken in a " neutral period" in October or November. The stats cannot be fully relied upon.

NO FUNDING AVAILABLE FOR WEST WINCH RELIEF ROAD

6. There is still no funding from Govt for the £84 millon Relief Road, as the DfT has not yet granted the second stage approval, for the Outline Business Case. The Inspectors cannot assume the Govt will grant the funding. This would leave West Winch with 300 homes, then the rest of the 1100 homs, with no strategic infrastructure.
7. I would therefore ask HM Planning Inspectors to amend the F51K Major Modification for West Winch to "**the Relief Road funding should be confirmed by Government and that the Bypass should be fully built out, before the Hopkins Development can go ahead"** The Council's proposed Major Modification is clearly wrong to allow " up to 300 dwellings with access to the A10 without further strategic intervention". Allowing a development to be heavily car dependent and incur onto an already unacceptably congested highway is against the National Policy Planning Framework and against Climate Change Strategy for Net Zero.
   The traffic calming measure on the A10, that Policy 2.1 stipulates within 12 months of commencement developing, will not work or even be possible, until the traffic is diverted out of the village.
8. In the Alternative, because the Major Modification is so loosely drafted that it could allow all 1100 homes before the Bypass is built, I ask HM Inspectors will amend " for anything above 300 dwellings, completion of

a link to the A47 will be required" to " **completion of the West Winch Housing Access Road will be required".** However, this would still bring unacceptable traffic impacts to West Winch, so I would ask that HM Inspectors follow the first amendment.

Appendix 1
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Strategic Outline Business Case

.1. The safety benefits of the scheme were calculated by comparing the cost of accidents over the 60-year appraisal period between Scenario P and R. The results of this are presented in Table 3-19. Table 3-20 then shows the disaggregation of these results into impacts on links and those at junctions. This adverse accident impact is driven by the scenarios being compared within the appraisal, that is comparing Scenario P with no dependent development and no scheme to Scenario R which includes all dependent development and the transport scheme. The additional development traffic on the local network in Scenario R will result in an adverse accident impact. It is noted that Level 1 impacts would usually be considered under fixed land use i.e., no change in demand between scenarios, and therefore if these scenarios were compared here the impacts wouldn't be of the same magnitude.

Table 3-19 – Accident Impacts

	£m, 2010 PV over appraisal period
Accident impact	-11.94

Table 3-20 – Accident Impact Breakdown

	£m, 2010 PV over appraisal period		
	Links	Junctions	Total
Accident impact	11.74	-23.68	-11.94

.2. As illustrated in Table 3-20, the main contributors to the negative output of the accident assessment are the impacts at junctions. The spatial distribution of the accident impacts of the scheme is discussed within the Place-Based Analysis in Section 3.8. These areas would be considered further as part of detailed design going forwards.

.3. The AMAT focuses on impacts associated with modal shift away from cars and taxis to walking and cycling. This is based on a reduction in distance travelled by motorised transport and the impact on accidents from lower car usage. Over the 20-year appraisal for the scheme, a reduction in accidents from modal shift is estimated at approximately £0.05m (2010 PV). These impacts are not considered to double count those estimated in COBA-LT as the KLTM does not account for modal shift to active modes, and the wider impacts of this.

.4. Overall, the assessment of accidents as a result of the scheme results in a disbenefit of -£11.89m (2010 PV), which is driven by the increase in traffic on the road network as a result of the development coming forward. It is noted that the summary breakdown of links and junctions shows a positive effect on accidents on links that are outweighed by larger negative effects on accidents and costs at junctions.

County Councillor Alexandra Kemp

County Division: Clenchwarton and King's Lynn South

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