

## **Examination of the King's Lynn and West Norfolk Local Plan Review**

### **CONTRIBUTION TO RESPONSES TO INSPECTORS' ADDITIONAL QUESTIONS (AQ20 and AQ21)**

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For Borough Council of King's Lynn and West Norfolk

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By Jon Etchells Consulting

6 March 2024



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## 1. Introduction

- 1.1 The Borough Council of King's Lynn and West Norfolk (BCKLWN) asked Jon Etchells Consulting (JEC) to carry out a Landscape and Visual Appraisal (LVA) in connection with the proposed allocation of the West Winch Growth Area (WWGA) for an eventual total of up to 4,000 new dwellings, as part of the King's Lynn and West Norfolk Local Plan Review. The WWGA is an area of 192ha extending to the south from just to the south of the Hardwick Roundabout, to the south west of the A47 and the east of the A10, with some smaller areas also to the west of the A10, and links the existing settlement of West Winch with some smaller scattered areas of development alongside the A10 to its north.
- 1.2 The LVA was requested as part of BCKLWN's response to a request from the Inspectors carrying out the examination of the new Local Plan for further evidence on a number of topics, including the WWGA. The LVA was prepared in April 2023, and has now been considered by the Inspectors as part of the package of further evidence. As a result of that consideration, the Inspectors have issued a number of Additional Questions, (AQs), of which AQs 13 to 32 relate to the WWGA, and AQ20 and 21 relate to the LVA in particular. This note has been prepared to assist BCKLWN with their response to those AQs.

## 2. AQ20

- 2.1 AQ20 is as follows::

**AQ20. Is the assessment in paragraphs 5.11 and 5.12 of the Landscape and Visual Appraisal (LVA) [F51e], that, overall, the WWGA development would have a slight to moderate adverse impact on the local landscape, reducing to slight adverse after 10-15 years as planting and open space becomes established, reasonable and justified by the evidence?**

### ***Generally***

- 2.2 Paragraphs 5.11 and 5.12 are reproduced below for ease of reference:

*'5.11 The anticipated overall effects on the local landscape would therefore be slight to moderate adverse. This is because the proposals would cover a wide area, but their overall extent would not be visible from any one point, and also because where visible, the development would not appear intrusive or out of place in the context of the existing (and proposed, as part of the two applications) residential and other urban land uses around it. There would be some loss of or*

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*alteration to existing landscape features or elements, mainly in the form of the loss of the open fields which make up most of the area to be developed, though some of the open land would be retained as extensive areas of new open space as part of the development, and that provision of open space and the layout of the overall development within separate, coherent neighbourhoods would also help to limit the significance of the landscape effects.*

5.12 *These effects would be soon after completion, and would be expected to decrease over time as the proposed planting and extensive areas of open space become established and help to screen and integrate the areas of built development. The general effects on the local landscape would therefore become slight adverse only after around 10 to 15 years.'*

2.3 In general terms, the assessment set out in the LVA was (as stated in paragraph 1.1.6) undertaken by Jon Etchells, who is a director of JEC, with extensive experience of landscape and visual assessment. That experience includes presentation of evidence in respect of landscape and visual matters at more than 80 appeals, most of them determined by Public Inquiries, acting on behalf of both appellants proposing new developments and local planning authorities opposing them.

2.4 As also set out in the LVA (section 1.3), the assessment was undertaken in accordance with the recognised methodology for such work, the 'Guidelines for Landscape and Visual Impact Assessment', produced jointly by the Institute of Environmental Management and Assessment and the Landscape Institute ('the GLVIA', 1995, revised 2002 and again in 2013). The full and detailed methodology for the assessment is set out in Appendix A of the LVA.

2.5 Jon Etchells' aim, whether in preparing evidence for appeals or Local Plan examinations, or preparing LVAs to accompany planning applications, is to make the assessments reasonable, justifiable and transparent.

***Specifically***

2.6 The rationale for the level of assessment (i.e. that the overall effects on the local landscape would be slight to moderate adverse, reducing to slight adverse after around 10 to 15 years) is summarised within paragraphs 5.11 and 5.12, but reference should also be made to the preceding paragraphs which summarise the various stages of the assessment (chiefly establishing the level of sensitivity of the local landscape and the overall degree of change, which taken together enable judgements as to the level of effects to be made) - the assessment is set out in more detail in section 4.2 of the LVA.

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2.7 It is also important to note in this case that the assessment in paragraphs 5.11 and 5.12 is of the proposed additional dwellings within the WWGA, i.e. the further 2,390 dwellings envisaged by the new Local Plan in addition to the 1,610 dwellings which would be provided by the current applications and which have been taken to be part of the baseline situation, as summarised in paragraphs 5.3 to 5.5 and discussed in detail in sections 2.1 to 2.3.

2.8 In response to AQ20, the assessment summarised in paragraphs 5.11 and 5.12 of the LVA is based on a detailed methodology and process as set out in the LVA, has been carried out by an experienced landscape professional, and is considered to be reasonable and justified.

### 3. AQ21

3.1 AQ21 is as follows:

**AQ21. Do the suggested MMs to Criterion 14 of Part A of Policy E2.1 adequately reflect the recommendations of the LVA, particularly in respect of the early establishment of planting and open space?**

3.2 The currently proposed changes to Criterion 14 reflect the recommendations of the LVA in part - the recommendation in paragraph 4.5.1 a) of the LVA as to retention of existing vegetation has been included, but there is at the moment no reference to recommendation b), the early establishment of planting.

3.3 This could be remedied by the addition of some suitable text as a further modification, with the following as a suggestion:

Wherever possible, consideration should be given to the establishment of new areas of planting and open space at an early date, and in advance of the adjacent areas of development where achievable. Proposals should set out how this will be achieved, with target dates, or if there are specific reasons why it cannot be achieved in some cases, those reasons should be set out.

Jon Etchells Consulting, 6 March 2024  
693-JEC Inputs to AQ20 and AQ21