

Borough Council of  
**King's Lynn &  
West Norfolk**



# **Regeneration and Development Panel**

## **Agenda**

**Tuesday, 10th January, 2023**  
at 4.30 pm

in the

**Council Chamber, Town Hall, King's Lynn**  
**and available for the public to view on**

**[WestNorfolkBC on You Tube](#)**



**King's Court, Chapel Street, King's Lynn, Norfolk, PE30 1EX**  
**Telephone: 01553 616200**

Friday 23 December 2022

Dear Member

**Regeneration and Development Panel**

You are invited to attend a meeting of the above-mentioned Panel which will be held on **Tuesday, 10th January, 2023 at 4.30 pm** in the **Council Chamber, Town Hall, Saturday Market Place, King's Lynn PE30 5DQ** to discuss the business shown below.

Yours sincerely

Chief Executive

**AGENDA**

**1. Apologies for absence**

To receive any apologies for absence.

**2. Minutes (Pages 5 - 12)**

To approve the minutes of the previous meeting.

**3. Declarations of Interest**

Please indicate if there are any interests which should be declared. A declaration of interest should indicate the nature of the interest (if not already declared on the Register of Interests) and the agenda item to which it relates. If a disclosable pecuniary interest is declared, the Member should withdraw from the room whilst the matter is discussed.

Those declarations apply to all Members present, whether the Member is part of the meeting, attending to speak as a local Member on an item or simply observing the meeting from the public seating area.

**4. Urgent Business**

To consider any business which, by reason of special circumstances, the Chair proposes to accept as urgent under Section 100(b)(4)(b) of the Local Government Act, 1972.

**5. Members Present Pursuant to Standing Order 34**

Members wishing to speak pursuant to Standing Order 34 should inform the Chair of their intention to do so and what items they wish to be heard before a decision on that item is taken.

**6. Chair's Correspondence**

If any.

**7. Update on the Countywide Local Cycling and Walking Infrastructure Plan (30 minutes)** (Pages 13 - 14)

Representatives from Norfolk County Council will be attending the meeting for this item.

**8. Cabinet Report - West Winch Framework Masterplan (25 minutes)** (Pages 15 - 220)

To consider the report and make any appropriate recommendations to Cabinet.

**9. Guildhall project - Overview of Budget (10 minutes)** (To Follow)

As requested by the Panel at the previous meeting.

**10. Town Deal Projects Update (20 minutes)** (Pages 221 - 223)

As requested by the Panel at the previous meeting.

**11. Verbal Update on Painting of the Railway Gates (5 minutes)** (Verbal Report)

The Panel to receive a verbal update following a request from the Panel at the previous meeting.

**12. Work Programme and Forward Decision List** (Pages 224 - 232)

**13. Date of the next meeting**

To note that the next meeting of the Regeneration & Development Panel is scheduled to take place on 1<sup>st</sup> February 2023 at 4.30pm in the Town Hall, King's Lynn.

**14. Cabinet Report - Parkway Development Update (30 minutes)** (Pages 233 - 254)

To consider the report and make any appropriate recommendations to Cabinet.

Please note that some of the Appendices are exempt and the Panel will need to move to closed session if required for consideration of that part of the report.

**15. Exclusion of Press and Public**

To consider passing the following resolution:

“That under Section 100(A)(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraphs 1, 2 or 3 of Part 1 of Schedule 12A to the Act”.

**16. EXEMPT Cabinet Report - Parkway Development Update - consideration of Exempt Appendices (Pages 255 - 317)**

To:

**Regeneration and Development Panel:** P Beal, F Bone, C Bower, Mrs J Collingham (Chair), C J Crofts, M de Whalley, P Gidney (Vice-Chair), B Jones, C Manning, C Morley, C Rose and D Whitby

**Portfolio Holders:**

Councillor R Blunt – Portfolio Holder for Regeneration and Development

Councillor G Middleton – Portfolio Holder for Business, Culture and Heritage

Councillor S Sandell – Portfolio Holder for People and Communities

**Officers**

Jemma Curtis – Regeneration Programmes Manager

Duncan Hall – Assistant Director

Geoff Hall – Executive Director

Nikki Patton – Housing Strategy Officer

David Ousby – Assistant Director

Mike Auger – Project Manager, Guildhall Project

**By Invitation:**

Representatives from Norfolk County Council

**BOROUGH COUNCIL OF KING'S LYNN & WEST NORFOLK**

**REGENERATION AND DEVELOPMENT PANEL**

**Minutes from the Meeting of the Regeneration and Development Panel held on Tuesday, 8th November, 2022 at 4.30 pm in the Council Chamber, Town Hall, Saturday Market Place, King's Lynn PE30 5DQ**

**PRESENT:** Councillors J Collingham (Chair), P Beal, F Bone, C Bower, C J Crofts, P Gidney, B Jones, C Manning, C Morley, C Rose and D Whitby.

**PRESENT UNDER STANDING ORDER 34:** Councillor J Moriarty

**PORTFOLIO HOLDER:** Councillor G Middleton, Portfolio Holder for Business, Heritage and Culture.

**OFFICERS:**

Duncan Hall – Assistant Director

Lorraine Gore – Chief Executive

Jemma Curtis – Regeneration Programmes Manager

Mike Auger – Senior Project Manager – Guildhall and Creative Hub

Tim Fitzhigham – Cultural Officer

**RD56: APOLOGIES FOR ABSENCE**

An apology for absence was received from Councillor de Whalley.

**RD56: APOLOGIES FOR ABSENCE**

An apology for absence was received from Councillor de Whalley.

**RD57: MINUTES**

**RESOLVED:** The minutes from the previous meeting were agreed as a correct record and signed by the Chair.

**RD58: DECLARATIONS OF INTEREST**

There was none.

**RD59: URGENT BUSINESS**

There was none.

**RD60: MEMBERS PRESENT PURSUANT TO STANDING ORDER 34**

Councillor Moriarty.

**RD61: CHAIR'S CORRESPONDENCE**

There was none.

**RD62: ESTABLISHMENT OF A TOURISM INFORMAL WORKING GROUP**

[Click here to view the recording of this item on You Tube.](#)

The report proposed the establishment of a Tourism Informal Working Group to deal with the number of Tourism related issues scheduled on the Work Programme and previously discussed at meetings of the Regeneration and Development Panel and Environment and Community Panel.

The Chair invited questions and comments from the Panel as summarised below.

Councillor Bower supported the Informal Working Group and indicated that she would like to be involved in its work, however she was happy to let other Members take the role of Core Members.

Councillor Beal indicated that he would like to sit on the Informal Working Group and provided the Panel with detail of the issues he would like to bring to the Group relating to Hunstanton, including car parking, events, an area for campervans and attractions.

Councillor Crofts commented that he would like to see the Informal Working Group investigate attracting coach trips to King's Lynn and West Norfolk.

Councillor Bone indicated that he would like to sit on the Informal Working Group and asked about the frequency and timing of meetings. The Chair explained that the Group would have the flexibility to meet remotely or as a hybrid and that she would sort arrangements with officers to get the Group established and arrange the first meeting. She also reminded Members that it was proposed that there would be six Core Members on the Group, however it was anticipated that a wide range of Councillors would be invited to input into the work of the Group through brainstorming and workshop sessions.

Councillor Rose explained that he used to work for England Tourist Board and would be willing to help out as required.

Councillor Jones also indicated that he would like to be involved in the Group.

Councillor Moriarty addressed the Panel under Standing Order 34 and hoped that a Member of the Informal Working Group would come from

a Rural Ward and that issues relating to rural tourism would be addressed.

The Chief Executive explained that once the Group had created a Work Programme they would be able to ensure that the relevant Councillors were asked for input at the right time.

The Chair explained that the proposal was for the Informal Working Group to be Chaired by an external facilitator which would be good for allowing all Councillors involved to make contributions. She also commented that it was important for Rural Wards to be represented.

The Panel indicated their support for the establishment of the Informal Working Group and the Chair explained that she would meet with the relevant officers to take arrangements forward and keep the Panel updated via email as appropriate.

The Chair invited the Panel to put forward their initial thoughts for the Informal Working Group to consider as listed below:

- Parking for coaches and visitors.
- Rural bus Services.
- Village Halls.
- Mini Guides for West Norfolk areas.
- Encouraging coach trips including liaising with tour operators.
- Improved signage and being more welcoming to visitors.
- The negative impact tourism can have on rural areas.
- Ensuring the right facilities were available for visitors.
- Seaside attractions and water sports.
- Promotion of historic houses.
- Staffing and resources.
- Events
- Creation of itineraries and packages that could be used to promote the area.
- Promoting the history of West Norfolk to encourage tourism.
- Fishing and maritime activities and events.
- Sailing opportunities and linking up with other sailing destinations.
- International marketing and links with the Hanseatic League.
- Imaginative offerings for children and young people.
- Review of the Destination Management Strategy and build on the Tourism Development Plan.

The Portfolio Holder for Business, Culture and Heritage informed the Panel that the Council did have a Full Time Tourism Officer and an Apprentice and once the Informal Working Group had looked at what they would like to achieve through a high level tourism strategy, then resources could be looked at.

**RESOLVED:** That the Informal Working Group be established as per the below arrangements.

1. The Terms of Reference for the Informal Working Group would be:

1. To assist with the formation of a high-level strategy and action plan for Tourism in West Norfolk.
2. To address the tourism related Notices of Motion referred to the Panel from Full Council and report back to the Panel on their findings.
3. The Informal Working Group to comprise of six core members, be Chaired by an independent facilitator and draw in input from a range of Members as required.
4. The Informal Working Group can meet in person or remotely.
5. The Informal Working Group to report back their initial findings to the Regeneration and Development Panel in April 2023 and after that upon request from the panel.
6. The Informal Working Group will remain established until such time the Regeneration and Development Panel see fit, so that the Informal Working Group can conduct post evaluation reviews as required.

2. Membership of the Informal Working Group would comprise:

- Representatives from the Regeneration and Development Panel.
- Representatives from the Environment and Community Panel.
- A Ward Member from the King's Lynn, Hunstanton and Downham Market areas.
- A Ward Member from a Rural Ward that has a tourism offer or a coastal area.

It is proposed that there are six core members of the Informal Working Group, with the Informal Working Group drawing on different groups of Members for workshop sessions and input as appropriate.

3. The Informal Working Group be facilitated by an independent expert. This will allow all Members of the Informal Working Group to get involved in workshop and brainstorming sessions.

4. The Informal Working Group to present an initial report back to the Panel in April 2023. It is proposed that the Informal Working Group will remain constituted beyond this date so that they can conduct reviews of any work carried out. The Informal Working Group to report back to the Regeneration and Development Panel as appropriate.

RD63: **HLF GUILDHALL APPLICATIONS AND NEXT STEPS**

[Click here to view the recording of this item on You Tube.](#)

The Senior Project Manager for the Guildhall Project provided the Panel with an update following the unsuccessful National Lottery Heritage Fund (NHLF) Application to support the St George's Guildhall and Cultural Hub project and project next steps.

The Senior Project Manager provided feedback from the NHLF which included the ambitiousness of the project, associated risks and tight



timescales for delivery. It was also noted that local objections to the proposals had been factored into their decision. The Panel was informed that the NHLF were still interested in maintaining dialogue with the Council and it was possible that smaller future bids could be submitted for different elements of the overall project.

It was confirmed that Town Deal Funding had been secured and it was important to continue to the next stage of the process. RIBA Stage 3 completion was due in September 2023 and at this stage the project would be reviewed and brought back to Cabinet for consideration on the way forward. The Activity Plan was also in the process of being reviewed and other funding sources were being looked at.

The Guildhall and Creative Hub Task Group had recently met to consider the CIO's Constitution and would also meet to consider the Governing Documents.

The Chair thanked the Senior Project Manager for the information and invited questions and comments from the Panel, as summarised below.

In response to questions from Councillor Bone, it was explained that the setting up of the CIO was a long process and it could take up to twelve months to go through the Charity Commission processes. The Panel was reminded that the CIO had three founding Members who were working on the submission to the Charities Commission. The Guildhall and Creative Hub Task Group would be involved in establishing processes for the recruitment of longer standing Trustees in due course.

Councillor Morley asked for clarification on if the Town Deal Funding had been secured. It was explained that the first payment had been received for this financial year and as long as the Council kept up momentum of the project in accordance with the business case programme and financial profile the other tranches of funding would be released annually as programmed.

The Portfolio Holder for Business, Culture and Heritage explained that regular updates would be made available to the Task Group and Panel as appropriate and the Cabinet Report due in September 2023 would be brought through the Regeneration and Development Panel for consideration.

The Chair sympathised with officers who had worked so hard on the NHLF bid and commented that she was disappointed that local objections had been a factor. She asked officers to bring details of the budget of the project to the Panel's next meeting. The Panel was advised that the budget had not changed from that which had been included in the Business Case and officers would bring this to the next Panel meeting in January.

Councillor Moriarty addressed the Panel under Standing Order 34 and encouraged Members to read the minutes from the Guildhall and Creative Hub Task Group meetings. He also asked about the role of the Town Deal Board going forward and referred to meeting of the Advisory Board, for which there were no recent published minutes. The Assistant Director confirmed that the role of the Project Board would be looked at including structures going forward and advised that the Advisory Group was not a decision making body.

The Chair commented that transparency was important and minutes of meetings needed to be available.

**RESOLVED:** 1. The report was noted.  
2. Officer to bring details of the projects budget to the next meeting of the Regeneration and Development Panel.

RD64: **VICE CHAIR DISCUSSION ITEM - CLIMATE CHANGE AND FUTURE DEVELOPMENT**

[Click here to view the recording of this item on You Tube.](#)

The Vice Chair, Councillor Gidney has requested this discussion item for the Panel and presented the Panel with information on Climate Change and reaching Net Zero. He explained that it was important to look at Building Control and Planning to ensure that there was a joined up approach to addressing issues.

A copy of his presentation is attached.

The Chair invited questions and comments from the Panel, as summarised below.

The Vice Chair responded to questions explaining that timber was a sustainable material for development as it could be reused and recycled. There was however, issues with the cost of materials.

Councillor Bone commented that the actions of decades past needed to be reversed and there needed to be a change in attitudes.

The Panel discussed wind, photo voltaic panels and solar farms.

Councillor Jones referred to the Solar Together project and commented that the cost made it preventative to many and that there needed to be schemes to help with upfront payments of installation.

Councillor Morley referred to Hydrogen power and that there needed to be a collective will to solve issues.

Councillor Gidney explained that tree planting was an easy win and the Chair further commented that it was also important to have better protection of existing trees.

The Chair commented that best practice needed to be incorporated into future planning regulations and conditions and that there needed to be more cohesion between Planning and Building Control.

The Chair commented that this was an important issue that the Panel should not lose sight of and she would be discussing ways for the Panel to take this forward with officers at the next Sifting meeting.

**RD65: PORTFOLIO HOLDER QUESTION AND ANSWER SESSION**

[Click here to view the recording of this item on You Tube.](#)

There were no Portfolio Holders present at the meeting for this item, however the Vice Chair, Councillor Gidney raised concern at the condition of some of the Railway Gates in King's Lynn including the one near the Retreat Pub and near the Docks. The Panel concurred that the gates had a negative impact on routes into the town centre.

The Assistant Director agreed to liaise with Norfolk County Council colleagues on this issue and report back to the Panel as appropriate.

**RESOLVED:** An update be presented to the Panel at its next meeting

**RD66: WORK PROGRAMME AND FORWARD DECISION LIST**

[Click here to view the recording of this item on You Tube.](#)

The following items were identified for consideration by the Panel:

- Guildhall project costs and budget – January 2023
- Tourism Informal Working Group – updates to be emailed to the Panel as appropriate.
- Town Deal Board Projects Update – January 2023.

**RESOLVED:** The Panel's Work Programme was noted.

**RD67: DATE OF THE NEXT MEETING**

The next meeting of the Regeneration and Development Panel would be held on Tuesday 10<sup>th</sup> January 2023 at 4.30pm in the Town Hall.

**The meeting closed at 6.28 pm**



**POLICY REVIEW AND DEVELOPMENT PANEL REPORT**

REPORT TO:	Regeneration and Development Panel		
DATE:	10 <sup>th</sup> January 2023		
TITLE:	Countywide Local Cycling and Walking Infrastructure Plan		
TYPE OF REPORT:	Update		
PORTFOLIO(S):	People and Communities & Regeneration and Development		
REPORT AUTHOR:	Andrew Hollis, Norfolk County Council		
OPEN/EXEMPT	Open	WILL BE SUBJECT TO A FUTURE CABINET REPORT:	No

**REPORT SUMMARY/COVER PAGE**

PURPOSE OF REPORT/SUMMARY:
An update in relation to the emerging Countywide Local Cycling and Walking Infrastructure Plan (LCWIP) ahead of public engagement in Quarter 1 2023.
RECOMMENDATIONS:
To note the update.
REASONS FOR RECOMMENDATIONS:
To ensure the Panel are kept up to date with progress.

**REPORT DETAIL****Overview**

Norfolk County Council (NCC) has secured a revenue grant from the Department of Transport to support the development of a Local Cycling and Walking Infrastructure Plan (LCWIP) for Norfolk.

The purpose of the Countywide LCWIP is to help identify and prioritise short, medium and long term active travel infrastructure schemes which will enable increased levels of cycling, walking and wheeling in the county.

Increased levels of cycling and walking can provide many benefits such as improving air quality, reducing congestion, addressing inequalities, improving physical and mental health.

LCWIP's support the Government's ambition for 50% of all journeys in towns and cities to be walked or cycled by 2030 as outlined in the Department for Transport Gear Change paper.<sup>1</sup>

LCWIP's have already been produced for Kings Lynn, Greater Norwich and Great Yarmouth. The Countywide LCWIP will build on these plans.

The NCC Active Travel team will present an overview of the emerging plans which will be included with the Countywide LCWIP and focus on proposals located within the King's Lynn and West Norfolk district.

Specifically, the presentation will include an overview of indicative active travel network proposals for Hunstanton & Heacham and Downham Market as well as wider connectivity proposals which build on and connect with existing trails and cycling networks across the county.

NCC intend to hold a 6-week period of public engagement commencing in Quarter 1 2023 which will include an online survey and a limited number of public events. One of the public events will be held in Hunstanton.

The public engagement will include network proposals for a total of 20 towns across Norfolk, including Hunstanton & Heacham and Downham Market, as well as broader strategic network schemes which connect rural communities with key services and is intended to help identify the priority routes in preparation for future funding opportunities.

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<sup>i</sup> <https://www.gov.uk/government/publications/cycling-and-walking-plan-for-england>

**POLICY REVIEW AND DEVELOPMENT PANEL REPORT**

REPORT TO:	Regeneration and Development Panel		
DATE:	10 <sup>th</sup> January 2023		
TITLE:	West Winch Framework Masterplan		
TYPE OF REPORT:	Cabinet Report		
PORTFOLIO(S):	Development		
REPORT AUTHOR:	Claire May, Planning Policy Manager		
OPEN/EXEMPT	Open	WILL BE SUBJECT TO A FUTURE CABINET REPORT:	Yes

**REPORT SUMMARY/COVER PAGE**

<b>PURPOSE OF REPORT/SUMMARY:</b>
The Cabinet report seeks authorisation to adopt the West Winch Growth Area Framework Masterplan Supplementary Planning Document.
<b>KEY ISSUES:</b>
Members are directed to the attached Cabinet report for full details of the key issues.
<b>OPTIONS CONSIDERED:</b>
Members are directed to the attached Cabinet report for full details of the options.
<b>RECOMMENDATIONS:</b>
That the Panel consider the report and make any appropriate recommendations to Cabinet.
<b>REASONS FOR RECOMMENDATIONS:</b>
To scrutinise recommendations being made for an executive decision.

## REPORT TO CABINET

<b>Open</b>		Would any decisions proposed :			
<b>Any especially affected Wards</b>	Mandatory/	Be entirely within Cabinet's powers to decide		NO	
	Discretionary /	Need to be recommendations to Council		YES	
<b>West Winch</b>	Operational	Is it a Key Decision		YES	
Lead Member: Cllr Richard Blunt E-mail: cllr.Richard.Blunt@West-Norfolk.gov.uk			Other Cabinet Members consulted:		
			Other Members consulted:		
Lead Officer: Claire May E-mail: Claire.may@west-norfolk.gov.uk Direct Dial:			Other Officers consulted: Stuart Ashworth Nikki Patton, Karl Patterson, Hannah Wood-Handy		
Financial Implications NO	Policy/ Personnel Implications NO	Statutory Implications YES	Equal Impact Assessment YES at pre- screening	Risk Management Implications Yes	Environmental Considerations No

Date of meeting: 17 JANUARY 2023

### ADOPTION OF WEST WINCH GROWTH AREA FRAMEWORK MASTERPLAN SUPPLEMENTARY PLANNING DOCUMENT (SPD)

#### **Summary**

This report seeks authorisation to adopt the West Winch Growth Area Framework Masterplan Supplementary Planning Document

#### **Recommendations:**

That the:

- Cabinet notes the contents of this report and recommends to Council that the West Winch Growth Area Framework Masterplan SPD (Appendix 3) be adopted and used as a material consideration in the determination of planning applications;

#### **Reason for Decision**

Adoption of the West Winch Growth Area Framework Masterplan SPD will provide guidance to assist in the determination of planning applications that fall within the West Winch Growth Area. The adoption of the SPD will ensure general conformity with the policies contained in the Council's Core Strategy (2011), the Site Allocations and Development Management Policies (2016) which are being carried forward into the Local Plan Review.

## **1. Background**

- 1.1 Supplementary Planning Documents (SPDs) do not form part of the development plan for the area so they cannot introduce new planning policies into the development plan. However, an adopted SPD is a material consideration in decision making.



- 1.2 The West Winch Growth Area Framework Masterplan Supplementary Planning Document (SPD) builds upon and provides more detailed advice and guidance on policies in the adopted Core Strategy (2011), the Site Allocations and Development Management Policies (2016) relating to the West Winch Growth Area which are being carried forward into the Local Plan Review and the North Runcton & West Winch Neighbourhood Plan (2018).
- 1.3 The SPD sets out the expectations on design, house mix, sustainability and green credentials, as well as the need to consider the impact on heritage assets and biodiversity. The SPD sets out at a very high level, the location of the new housing access road, where development is considered suitable, ensuring that there is a degree of separation from the development and the village of North Runcton, while integrating with existing development and facilities in West Winch.
- 1.4 The SPD has been subject to a statutory consultation and responses have been considered and subsequent amendments have been made to the SPD. It is now for the Council to consider adopting the SPD to be used as a material consideration in the determination of planning applications in the West Winch Growth Area.

## 2.0 Consultation

- 2.1 Consultation on the Draft SPD followed the statutory process for the preparation and adoption of SPDs, including consultation in accordance with the Council's adopted Statement of Community Involvement (SCI). The consultation strategy for the Draft SPD was published for comment as follows:
- Published on the Council's web site
  - Press notice
  - Council's social media
  - Emails sent to consultees on the Local Plan database, who have indicated they are interested in Planning Policy consultations
  - Consultation Events (10<sup>th</sup> August and 5<sup>th</sup> September at West Winch Village Hall)
  - Parish Council's web sites
- 2.2 The consultation took place between 5 August 2022 and 27 September 2022, a period of 7 ½ weeks<sup>1</sup>.
- 2.3 Officers worked with the Communications Team to ensure the consultation was publicised as widely as possible and the Consultation Statement at Appendix 2 details how this was undertaken. The resulting amendments to the SPD are shown as tracked changes in Table 1 below and the final draft can be seen in Appendix 3. In

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<sup>1</sup> Statutory consultation period of 6 weeks extended for 10 days in recognition of the national period of mourning following the sad passing of HM The Queen.

accordance with the requirements of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council will publish a consultation statement (Appendix 2) explaining how issues raised in representations have been addressed in the SPD.

### **3. Key Issues Raised**

- 3.1 The representations received to the consultation can be found in Appendix 1.

#### Principle of Development

- 3.2 Several representations received objected to the allocation on the West Winch Growth Area which was not subject to the consultation. The principle of development in the West Winch Growth Area has been established through the Site Allocations and Development Management Policies Development Plan Document which was subject to extensive consultation and an independent examination by the Secretary of State.

#### Traffic and West Winch Access Road

- 3.3 Many representations related to the existing traffic issues on the A10 and expressed concern about the increase in traffic. Several representations suggested that the West Winch Access Road should be in place before any development takes place.
- 3.4 It should be remembered that it will take a number of years for development to take place. Norfolk County Council as the Highway Authority indicate that up to 300 houses can be built on the northern part of the site (Hopkins application) with the provision of an access roundabout on the A10 without the provision of a housing access road to the east of West Winch connecting the A47 with the existing A10.
- 3.5 The phasing plan submitted with the outline application indicates that around 300 dwellings will be delivered between 2024-2029 which equates to an average of 60 dwellings per year. In practice, occupation of these dwellings will also be gradual so the impact on the traffic will not be immediate on the A10.
- 3.6 The WWHAR's delivery is dependent on the delivery of the Growth area as a whole. The WWHAR should not be considered as a 'by-pass' to deal with the existing traffic on the A10 – it is an access road for the new growth area, in combination with a number of traffic calming measures through West Winch it will help relieve the existing traffic issues on the A10.
- 3.7 Norfolk County Council (NCC) are in the process of securing Major Road Network funding from the Department for Transport (DfT). The first stage of this process, a Strategic Outline Business Case submitted in March 2021, has been concluded and work on of the next stage of the funding process, an Outline Business Case (OBC), is ongoing between NCC and DfT. If successful, NCC, working with the Borough Council, would then complete the detailed design of the road and procure its construction at the earliest opportunity.

- 3.8 It is anticipated that, subject to MRN OBC approval and other statutory approvals, works on the WWHAR could commence in 2025 with approximately a 2 year build out period. Therefore, it is likely that the WWHAR will be in place by 2027 at which point approximately 180 dwellings would have been completed in the northern part of the site.
- 3.9 Consultation on the WWHAR started on Monday 14 November and will run for a period of 8 weeks to midnight on 8 January 2023. Details of the consultation will be available on Norfolk County Council’s web site at [www.norfolk.gov.uk/WestWinchA10](http://www.norfolk.gov.uk/WestWinchA10) .

Flooding

- 3.10 Several representations received were about the existing issues of flooding within West Winch and raised concerns that development in the Growth Area would exasperate the problem.
- 3.11 National policy requires plans and developments to ensure new development does not increase flood risk elsewhere. The SPD on page 19 under the heading ‘Sustainable Urban Drainage Systems (SUDS)’ sets out the requirements for the provision of SUDS, attenuation ponds etc. Development proposals will also have to be accompanied by site specific flood risk assessments and satisfy the Lead Local Flood Authority’s requirements.

**4. Amendments to SPD in response to representations received**

- 4.1 In response to comments received, amendments have been proposed to the draft SPD as shown in Table 1.

*Table 1: Issues raised during the consultation of the West Winch Growth Area SPD and changes proposed in response to issues raised*

Issues raised	Changes proposed	Location of change in SPD
Recognising the character of West Winch as separate and different to that of King’s Lynn itself, the name of the SPD should be amended to reflect this aspiration	Rename the document and area as the West Winch Growth Area rather than South East King’s Lynn Growth Area.	Front cover Section 6 Page 14 2 <sup>nd</sup> paragraph Section 11 Delivery 2 <sup>nd</sup> paragraph under Viability
The status of the SPD in relation to the development plan is unclear. Text should clarify that the current adopted Local Plan, the Site Allocation and Development Management Policies (SADMP) will be superseded by the emerging Local Plan once adopted.	<p>The relevant policy framework for the site is set by:</p> <p><u>The development plan for the site currently consists of the following policy documents that development proposals will have to take into consideration:</u></p> <ul style="list-style-type: none"> <li>• King’s Lynn &amp; West Norfolk Core Strategy (2011) King’s Lynn &amp; West Norfolk Site Allocations and Development Management Policies (2016)</li> <li>• King’s Lynn &amp; West Norfolk Local Plan review*</li> <li>• North Runcton &amp; West Winch Neighbourhood Plan (2018)</li> <li>• Norfolk Core Strategy and Minerals and Waste Development Management</li> </ul>	Section 5 Planning Policy Page 12

	<p>Policies (2011)</p> <p><u>* Once adopted this will replace the Core Strategy and Site Allocations &amp; Development Management Policies</u></p>	
Education requirements need to be clarified	<p><del>New primary school &amp; nursery provision</del>  <del>x2 West Winch Primary school extension</del>  <u>Two new primary schools (with nursery provision) and expansion of the existing West Winch Primary School</u></p>	Section 6 Page 14 bullet point 1 under Education
	<p>Add title – Indicative Connectivity Plan  Show area labelled f on attached plan as open space  Key:  ‘Proposed School’ to be changed to ‘proposed Primary Schools’</p>	Connectivity Masterplan Page 21
	<p>Add title – Framework Masterplan showing indicative land uses</p> <p>Show area labelled F on attached plan as open space</p> <p>Key  ‘Proposed School’ to be changed to ‘proposed Primary Schools’</p>	Masterplan Page 17
Many comments related to the detail within the indicative masterplan. There is a need to clarify that this masterplan is indicative of the land uses. Final details will be determined at the planning application stage	<p>The Growth Area boundaries were defined within the SADAMP allocation. In identifying these boundaries consideration was paid to maintaining a degree of separation between the village of North Runcton and the new neighbourhoods, and good integration with the existing development and facilities in West Winch.</p> <p><u>Additional wording - The Framework Masterplan provides indicative locations for land uses, the exact locations of development will be determined at the detailed application stage. The Framework masterplan also includes some additional land to be included in the growth area which maintain the objectives set out above.</u></p>	Section 7 Page 16
A number of comments related to climate change which should be addressed	<p>The scale, form, character, design and mix of development densities should reflect the local character and proximity to the growth area centres and take into account the local topography, setting and natural assets of the site. <u>Locally sourced materials to reinforce the local vernacular would be encouraged.</u></p>	Section 8 Page 18 under Design and Density – 1 <sup>st</sup> paragraph
	<p>The development should seek to meet high standards of sustainable construction and design in terms of energy efficiency, water resources, recycled and reclaimed materials and renewable or low-carbon energy. <u>From 2025 development proposals will need to meet the Future Homes Standard. Link to <a href="http://www.gov.uk">The Future Buildings Standard – GOV.UK (www.gov.uk)</a></u></p>	Section 8 Page 18 second paragraph under Climate Change

	<p>The development <del>should</del> <b>must</b> make the most of opportunities to create or improve habitats. <b><u>This includes the Retention retention</u></b> of hedgerows and mature trees, use of native species in landscaping, installation of bird and bat boxes and design of lighting schemes to encourage habitat creation and enhancement.</p>	<p>Section 8 Page 19 1<sup>st</sup> paragraph under Biodiversity</p>
	<p><b><u>Sewage &amp; Drainage Sewage and Sustainable Urban Drainage Systems (SuDS)</u></b></p>	<p>Section 6 Page 14 Page 14 bullet point 3 under Utilities</p>
	<p>The development <del>should</del> <b>must</b> incorporate SUDS <b><u>in accordance with national and local policies</u></b> to <del>reduce</del> <b><u>minimize</u></b> any increases in surface water <del>drainage</del> <b><u>runoff and flooding</u></b></p>	<p>Section 8 Page 19 Sustainable Drainage Systems – first paragraph</p>
	<p>The details of these will be dealt with in future detail design and the evolution of the <del>Framework Masterplan</del> <b><u>growth area</u></b>, as well as any <b><u>current and/or</u></b> subsequent planning applications for parcels of land that may come forward in the future. <b><u>The Lead Local Flood Authority's Developers Guidance contains practical advice on SuDs. Link: <a href="#">Information for developers – Norfolk County Council</a></u></b></p>	<p>Section 8 Page 19 Sustainable Drainage Systems – Last paragraph</p>
	<p>Connectivity is vital to <del>in</del> <b><u>achieving wider</u></b> accessibility, <del>integration</del> <b><u>integrating</u></b> for new residents and businesses and <del>it</del> <b><u>contributes</u></b> to a healthy community.</p>	<p>Section 9 Connectivity and Transport Page 20 1<sup>st</sup> paragraph under Connectivity</p>
	<p>The Growth Area should be well connected with surrounding communities by walking, cycling and public transport. The whole area should be better linked to local centres, places of work, education, the town centre and the countryside linking into King's Lynn Active Travel Network, as defined by the King's Lynn Local <b><u>Walking and Cycling Infrastructure Plan</u></b>. <del>Which can be found here: (<a href="#">shorturl.at/abc45</a>)</del> <b><u>which can be viewed at: <a href="#">Local Cycling and Walking Infrastructure Plans – Norfolk County Council</a></u></b></p>	<p>Section 9 Connectivity and Transport Page 20 second paragraph under Connectivity</p>
	<p>The layout of the new development should <del>contribute</del> <b><u>support active travel</u></b> by creating new frontages and public open spaces that link the new neighbourhoods and their immediate surroundings.</p>	<p>Section 9 Connectivity and Transport Page 20 3<sup>rd</sup> paragraph under Connectivity</p>
	<p>To improve integration and permeability and to promote maximum usage, a <del>network of safe and easy to use pedestrian and cycle routes along desire lines should connect the new homes with facilities in the new</del></p>	<p>Section 9 Connectivity &amp; Transport Page 20 1<sup>st</sup> paragraph under Pedestrian &amp; Cycle Access</p>

	<p><del>neighbourhoods and link the new development to existing facilities in West Winch and King's Lynn.</del></p> <p><u>Increasing cycling and walking in the West Winch Growth Area will help tackle some of the most challenging issues around air quality, health and well-being and congestion on the roads. A network of safe and easy-to-use pedestrian and cycle routes will connect the new and existing homes with facilities and services within the Growth Area, with the potential to extend the connectivity further to King's Lynn and West Winch.</u></p>	
<p>A number of responses relayed comments about heritage assets which also needed to be addressed more clearly. To ensure HIAs submitted with planning applications meet requirements and take account of the West Winch Heritage Impact Assessment</p>	<p>Change title of paragraph from 'Heritage' to 'Built Heritage and Archaeology'</p>	<p>Section 8 Page 19 Heritage</p>
	<p>Whilst there are no designated heritage assets within the growth site, there are a number of listed buildings nearby including the Grade I listed Church of All Saints in North Runcton and Grade II* listed Church of St Mary in West Winch. <u>The Old Windmill, the War Memorial, the Old Rectory, the Gables and The Old Dairy Farmhouse listed at Grade II.</u></p> <p>Development proposals will need to be accompanied by a detailed Heritage Impact Assessment that follows best practice procedure produced by Historic England and meet the requirements of planning policy contained in the National Planning Policy Framework. Submitted Heritage Impact Assessments will also need to <u>consider the findings of the Heritage Impact Assessment for West Winch. An archaeological assessment will also need to be submitted where needed.</u></p>	<p>Section 8 page 19 under Heritage</p>
<p>Some responses indicated that traffic calming measures were not clear. There is a need to make sure traffic calming measures relate to the A10 through West Winch and to indicate what measures may be included</p>	<p><u>Traffic calming West Winch (A10) (may include speed bumps, reduced speed limits, pavement build outs etc)</u></p>	<p>Section 6 Page 14 bullet point 3 under Transport</p>
<p>Some responses queried the location of the Sports Centre mentioned on page14, this could consist of improvements to existing facilities at West Winch.</p>	<p><u>Sports Centre (could involve financial contribution towards existing sports facilities in West Winch)</u></p>	<p>Section 6 Page 14 bullet point 2 under Community</p>

## 5 Policy Implications

- 5.1 Although the SPD is not a development plan document it will, on adoption, be a material consideration in the determination of planning applications.

## **6 Financial Implications**

- 6.1 The cost of the preparation and consultation on the Draft SPD was within the Planning Policy budget and the West Winch Growth Area Revenue Budget. There are no further costs required for adoption of the SPD.

## **7 Personnel Implications**

- 7.1 None

## **8 Environmental Considerations**

- 8.1 Sustainability appraisals for supplementary planning documents are only required in exceptional circumstances, but the Council must still consider whether there is a requirement for strategic environmental assessment (SEA).
- 8.2 In this case, the policies within the Core Strategy (2011), the Site Allocations & Development Management Policies (2016) and the Local Plan Review related to the Growth Area were subject to a Sustainability Appraisal.

## **9 Statutory Considerations**

- 9.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) states that, if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.
- 9.2 The Town and Country Planning (Local Planning) (England) Regulations 2012 provide guidance on the preparation and adoption of supplementary planning documents.
- 9.3 The Council is required by law to consult on the SPD and to take into account all consultation responses received before adopting the SPD. As soon as reasonably practicable after adopting an SPD, the Council must (i) make available the SPD and an adoption statement and (ii) send a copy of the adoption statement to any person who asked to be notified of the adoption of the SPD.

## **10 Equality Impact Assessment (EIA)**

- 10.1 Pre-screening EIA is attached.

## **11 Risk Management Implications**



- 11.1 Non-compliance with regulatory requirements of the preparation of the SPD could leave it open to challenge, or lessen the weight attributed to it.

**12 Declarations of Interest / Dispensations Granted**  
None

**13 Background Papers**

- 13.1 Cabinet Report West Winch Framework Masterplan for Consultation 2 August 2022 ([Public Pack](#))[Agenda Document for Cabinet, 02/08/2022 15:30 \(west-norfolk.gov.uk\)](#) (Pages 90 to 121)

**APPENDICES**

**APPENDIX 1:** Consultation Responses

**APPENDIX 2:** Statement of Consultation

**APPENDIX 3:** The West Winch Growth Area Framework Masterplan  
Supplementary Planning Document

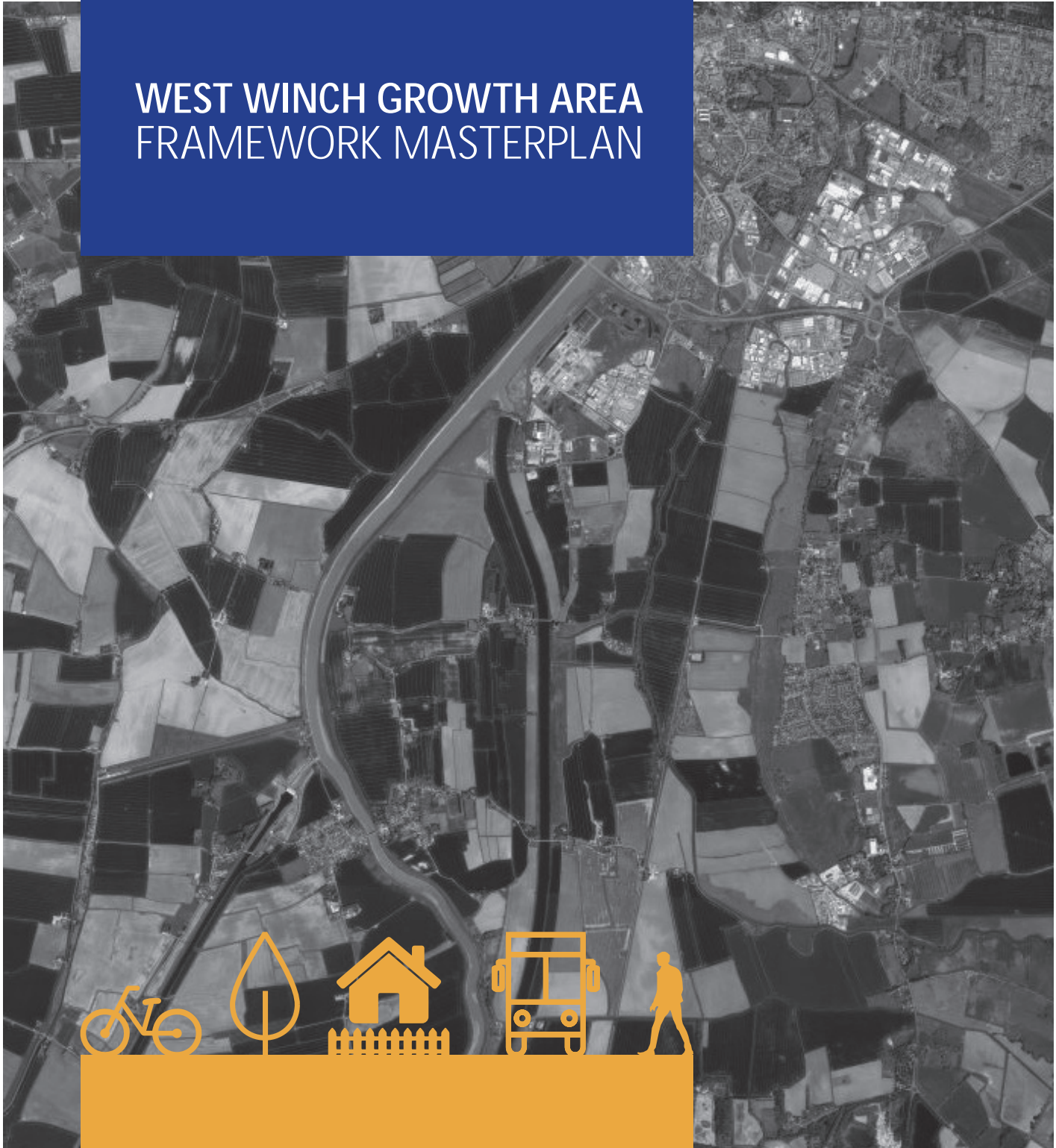


Name of policy/service/function	The Draft West Winch Growth Area Framework Masterplan Supplementary Planning Document (SPD)				
Is this a new or existing policy/service/function?	Existing				
Brief summary/description of the main aims of the policy/service/function being screened.  Please state if this policy/service is rigidly constrained by statutory obligations	The West Winch Growth Area Framework Masterplan Supplementary Planning Document (SPD) builds upon and provides more detailed advice and guidance on policies in the adopted Core Strategy (2011), the Site Allocations and Development Management Policies (2016) relating to the West Winch Growth Area which are being carried forward into the Local Plan Review.				
<b>Question</b>	<b>Answer</b>				
<p>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups <b>according to their different protected characteristic</b>, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>		Positive	Negative	Neutral	Unsure
	Age			x	
	Disability			x	
	Gender			x	
	Gender Re-assignment			x	
	Marriage/civil partnership			x	
	Pregnancy & maternity			x	
	Race			x	
	Religion or belief			x	
	Sexual orientation			x	
Other (eg low income)			x		





# WEST WINCH GROWTH AREA FRAMEWORK MASTERPLAN



**SUPPLEMENTARY PLANNING DOCUMENT**  
Updated 23 November 2022

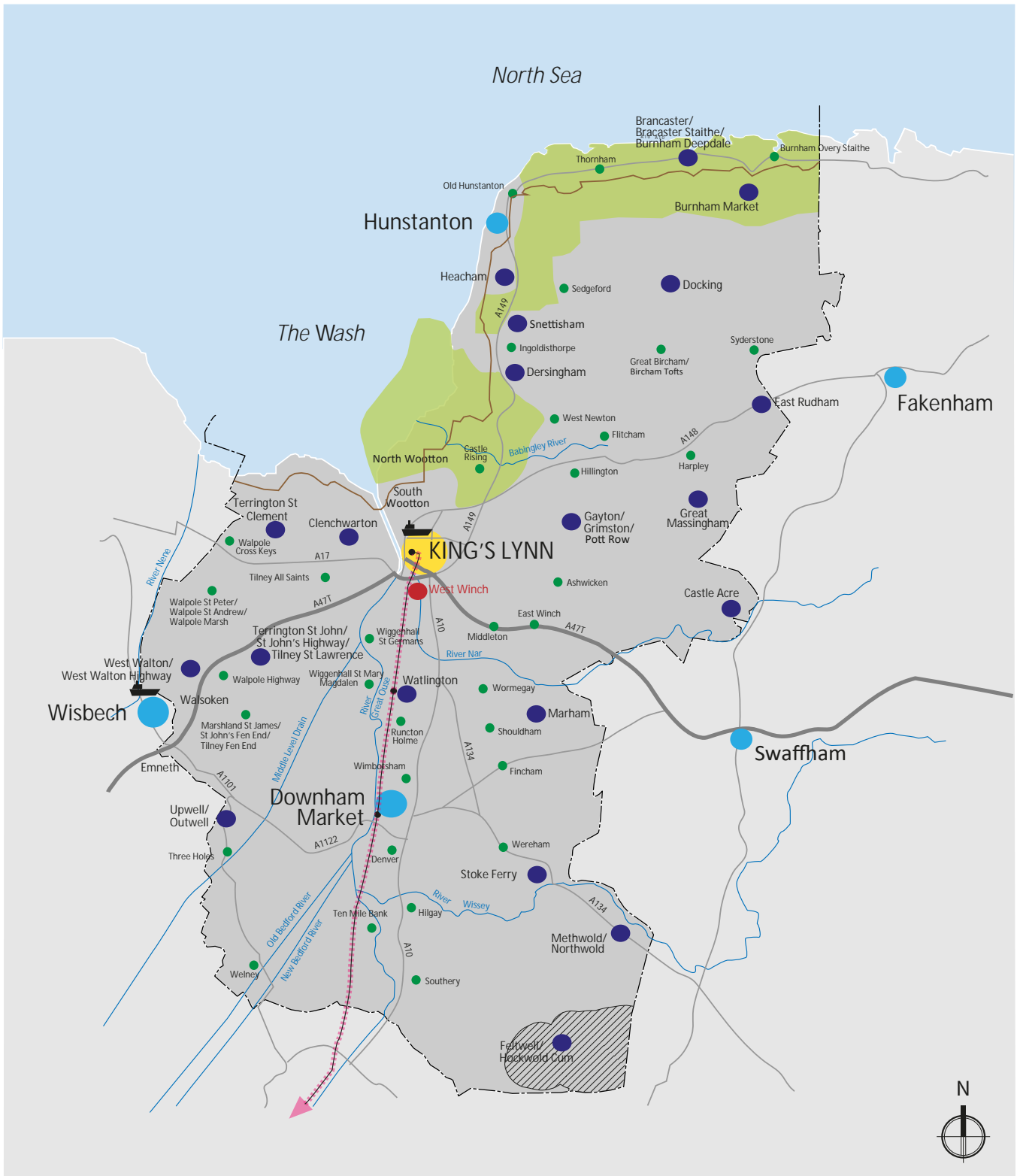




Red Line denotes Site Allocation E2.1 extents














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## BOROUGH CONTEXT PLAN

### KEY:

- |   |                          |   |                                  |   |                            |
|---|--------------------------|---|----------------------------------|---|----------------------------|
|  | Sub Regional Centre      |  | Borough Boundary                 |  | AONB                       |
|  | Main Towns               |  | Main Roads                       |  | Stone Curlew Zone          |
|  | Key Rural Service Centre |  | Coastal Zone (subject to change) |  | Railway Network & Stations |
|  | Rural Village            |  | Rivers                           |  | Enhanced Rail Service      |
|   |                          |  | Port                             |   |                            |

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# 01 ROLE OF FRAMEWORK MASTERPLAN

**This document is a consultation draft Supplementary Planning Document. When adopted, the SPD will be used by applicants, Planning Officers and other Council departments in the planning decision-making process.**

The Core Strategy (2011) (CS) and the Site Allocations and Development Management Policies Plan (2016) (SADMP) allocated the West Winch Growth Area as a strategic 'urban expansion' area around King's Lynn to meet most of the Borough's need for housing over the plan period in a sustainable manner with the appropriate level of supporting facilities. This strategic allocation has been carried forward into the Local Plan Review which will replace the CS and SADMP.

It is envisaged that the West Winch Growth Area will deliver **2,500 new homes** in the Local Plan period to 2038 and up to 4000 new homes in the fullness of time, together with its supporting infrastructure.

A number of actions have been undertaken in recent years to support the development; these include:

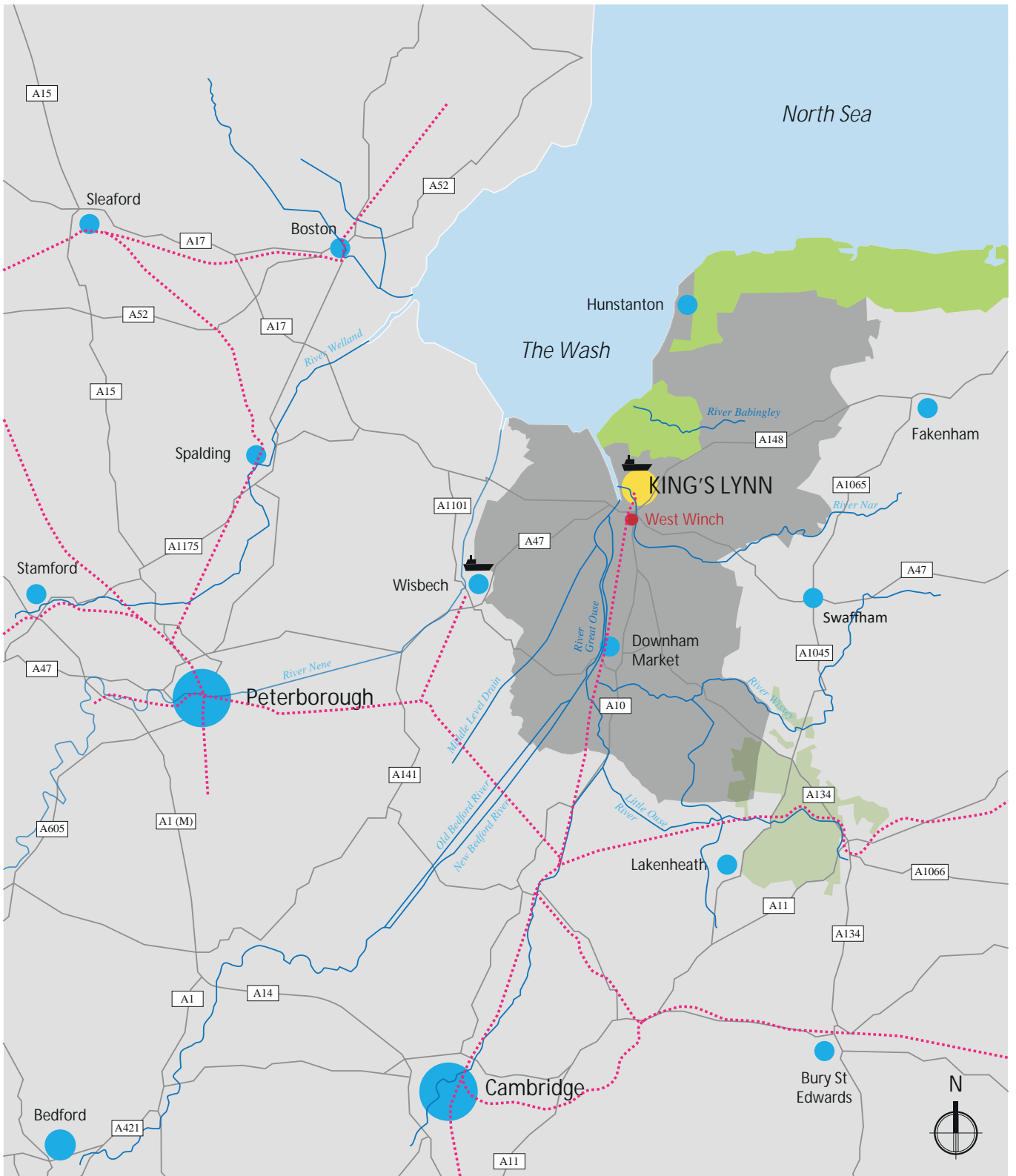
- Detailed allocation provisions in the SADMP (2016)
- Preparation of a Neighbourhood Plan for the parishes of West Winch and North Runcton (2016) which gives detailed requirements for the Growth Area
- An Infrastructure Delivery Plan (2018) to ensure the viability of the overall project is understood and translates to a reasonable set of planning obligations and landowner agreements.

It is apparent that there are different types and levels of documents giving types of 'advice' to developers. The Borough Council considers that it will aid clarity and effectiveness if there was one source for: viability; infrastructure requirements, importantly including the West Winch Housing Access Road) and; planning policy requirements. We will be able to have clear references to it in the various Section 106 agreements and landowner agreements.

This Framework Masterplan is intended to fulfil that function. It also has the advantage of being able to provide updated information, and a more detailed focus on practical implementation and a design framework, all of which is informed by public consultation.


Part B of Policy E2.1 of the SADMP makes various requirements for what can loosely be called 'co-ordination' of infrastructure, with phasing/ timetabling etc. It highlights the need for a clear statement bringing these aspects together. The Borough Council through this Framework Masterplan is addressing that 'co-ordination' requirement.





## WIDER CONTEXT PLAN

### KEY:

 Sub Regional Centre

 Main Towns

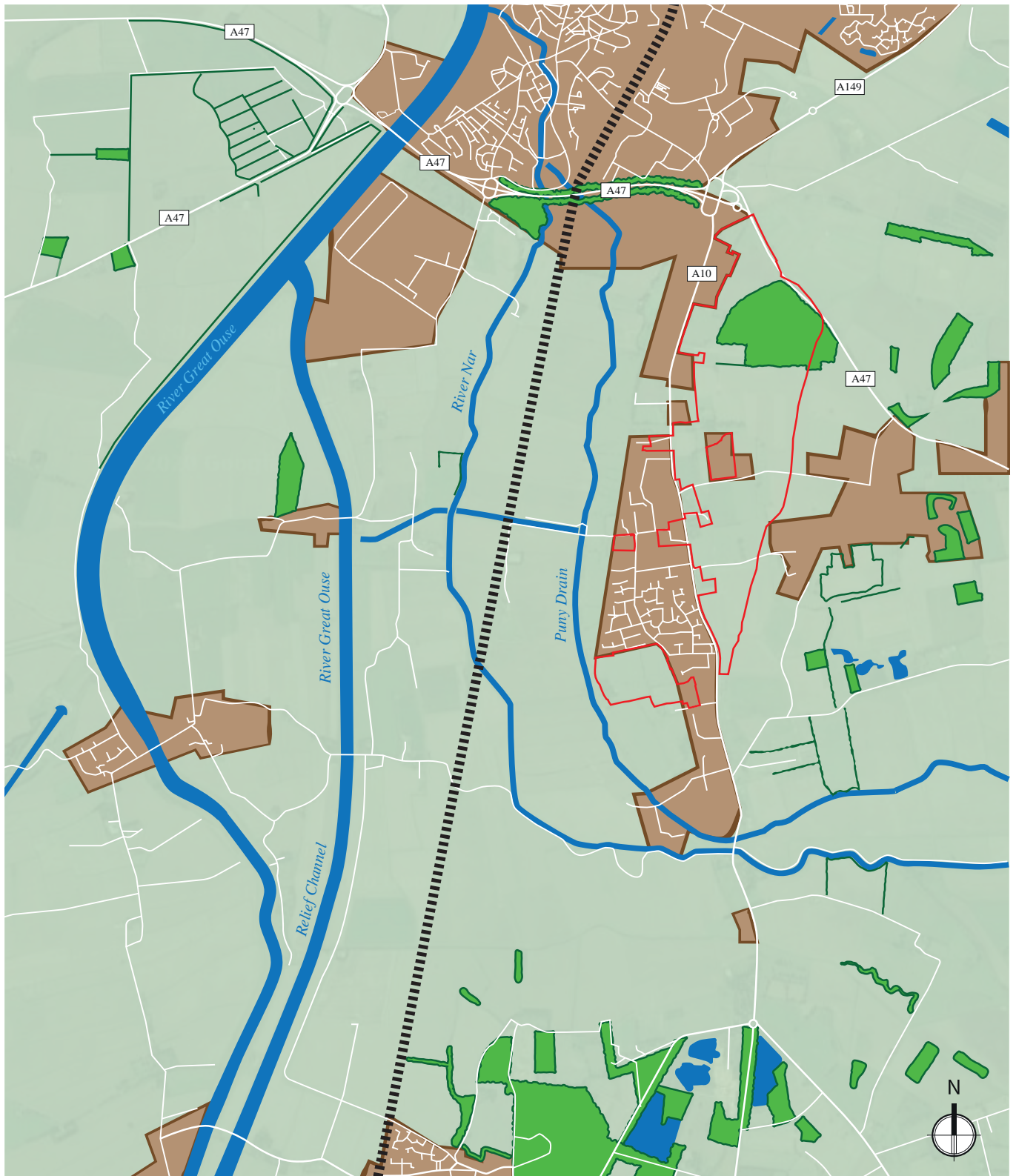
 Main Roads

 Rivers

 Port








 AONB

 Railway Network



## SITE CONTEXT PLAN

### KEY:

	Existing Settlements		Significant Woodland Blocks		Rivers + Water Bodies
	Road Network		Predominantly Rural/Agricultural Land		Rail Network
					Masterplan Boundary

---

## 02 WHAT THE SPD CONTAINS

As will be seen in the contents list this Framework Masterplan contains a mixture of specified infrastructure (including the West Winch Housing Access Road (WWHAR)); considerations of viability; phasing.

**In design terms it addresses the appropriate locations for land uses, but also the broad design parameters for those uses (block layouts etc).**

The SPD also considers the arrangements that have been put in place with landowners/ developers in the Growth Area. This includes the governance arrangements, and the ways in which the various bodies (public and private) are involved.

The Borough Council has prepared (through consultants Mott MacDonald and Gerald Eve) an Infrastructure Delivery Plan (IDP). The Framework Masterplan gives expression to the content of this IDP.

A public consultation on the SPD, in line with statutory requirements, took place between 5th August 2022 and 27th September 2022 including 2 consultation events at West Winch Village Hall. Full details of the consultation can be found in the Statement of Consultation.

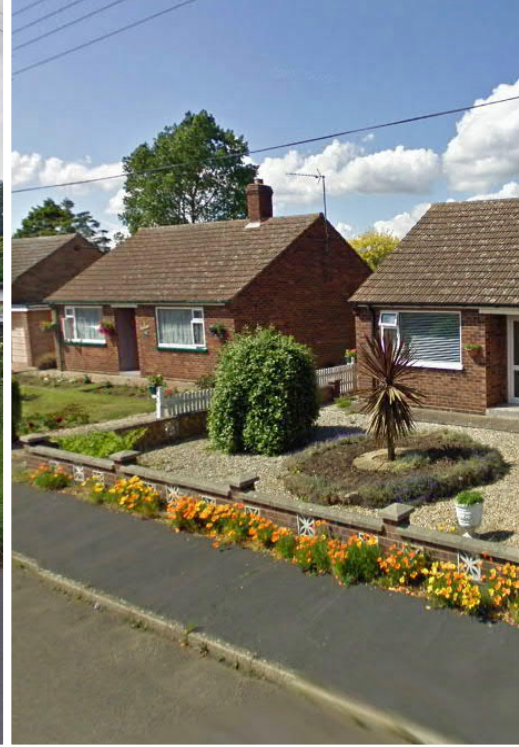
This is appropriate so that significant weight can be given to the final document in considering individual planning applications on the site. It will be a primary document referred to when Section 106 agreements are prepared.

Significant work is being undertaken with landowners and developers to ensure the delivery of development on the site, the Framework Masterplan will be the manifestation of the written policies and aspirations of the interested parties in the Growth Area.

The West Winch Growth Area is founded on the principles of comprehensive development of the site together with provision of the infrastructure set out in the Infrastructure Delivery Plan (IDP). Contributions to and provision of infrastructure will be secured through a Framework Section 106 Agreement. To assist the development management process, the Council will adopt this Framework Masterplan which shows the broad distribution of land uses and infrastructure and would be included in the Framework Section 106 Agreement.

The Framework Masterplan reflects the emerging masterplans for the **Hopkins (planning ref 13/01615/OM)** and **Metacre (planning ref 18/02289/OM)** applications as well as the design, location and infrastructure associated with the **West Winch Housing Access Road (“WWHAR”)**.

The Growth Area has the best potential to be delivered if it is considered as a *whole*, in a comprehensive and consistent manner.



---

## 03 PLANNING HISTORY

Involving the community and representatives of the Borough Council, The Princes Foundation for the Built Environment facilitated community design workshops to explore options for development within West Winch and North Runcton from 2010 through to 2013.

These workshops created the basis for the concept of creating new distinctive neighbourhoods dominated by large swathes of green infrastructure which specifically arose from the no-build zones of the two high pressure gas pipelines that run through the parishes. These design works resulted in an indicative masterplan demonstrating how development could come forward within the growth area.

**In 2013, Hopkins Homes submitted an Outline planning application for change of use from agricultural/undeveloped land to a new development of housing and associated facilities; comprising a mix of up to 1110 residential units; primary school, local centre, public open space, landscaping and highway access on the A47 and A10 (Ref 13/01615/ OM).**

The application, located between the northernmost pipeline and the A47 amounts to a third of the growth area and provides essential infrastructure such as first part of the WWHAR, school and neighbourhood centre. The application was submitted with an Environmental Statement as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (now 2017).

The application through its lifetime has been through significant design review with the support of Homes England and has adapted along the way in terms of the requirements specified within the SADMP 2016, the Local Plan Review and the North Runcton and West Winch Neighbourhood Plan (NRWWNP) (2017).

In December 2018, Metacre Ltd submitted an Outline planning application for up to 500 homes with a neighbourhood centre, associated landscaping, parking and supporting infrastructure in the Rectory Lane, West Winch area through to Chequers Lane at its southernmost point. The development straddles either side of the A10 in that location surrounding the existing shop and Grade II Listed St Mary's Church.

Again, the application responds to the policies within the SADMP and the NRWWNP. The application was originally consulted upon but it was determined by the Secretary of State that the development in combination with the Hopkins Homes site required an Environmental Statement to be submitted and thus remained invalid until its submission in February 2022. The application is now live and applicant is currently responding to consultation comments.

Both applicants have consistently worked with the Borough Council, Homes England and other stakeholders throughout the lifetime of the growth area and whilst seeking to promote their own developments recognise the need to provide a comprehensive response across the Framework Masterplan Area.



# 04 PLANNING POLICY

The development plan for the site currently consists of the following policy documents that development proposals will have to take into consideration:

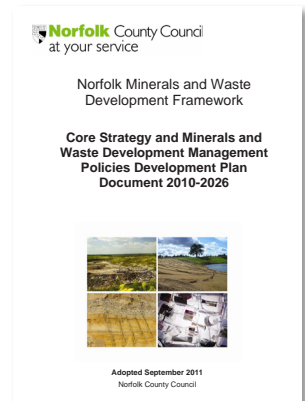
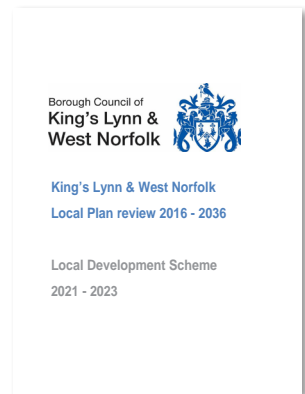
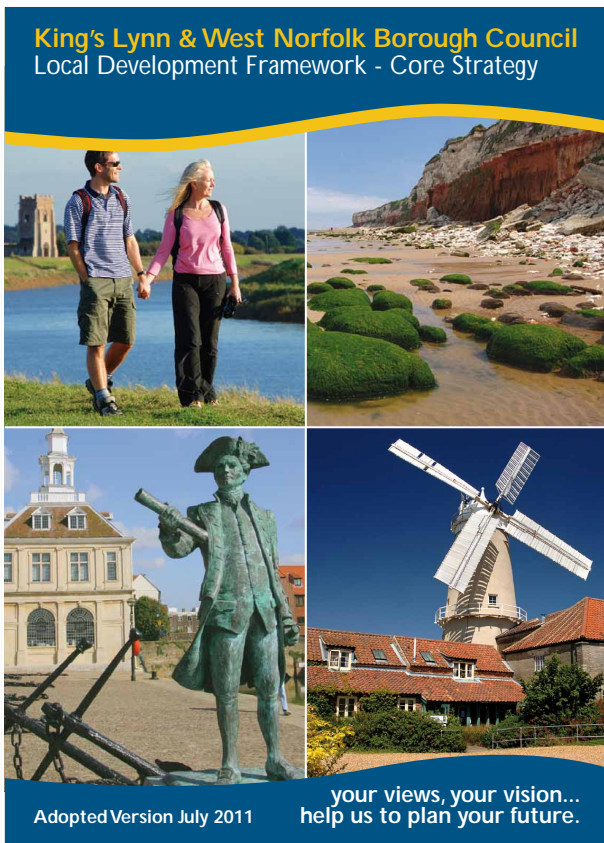
- King’s Lynn & West Norfolk Core Strategy (2011)
- King’s Lynn & West Norfolk Site Allocations and Development Management Policies (2016)
- King’s Lynn & West Norfolk Local Plan review\*
- North Runcton & West Winch Neighbourhood Plan (2018)
- Norfolk Core Strategy and Minerals and Waste Development Management Policies (2011)

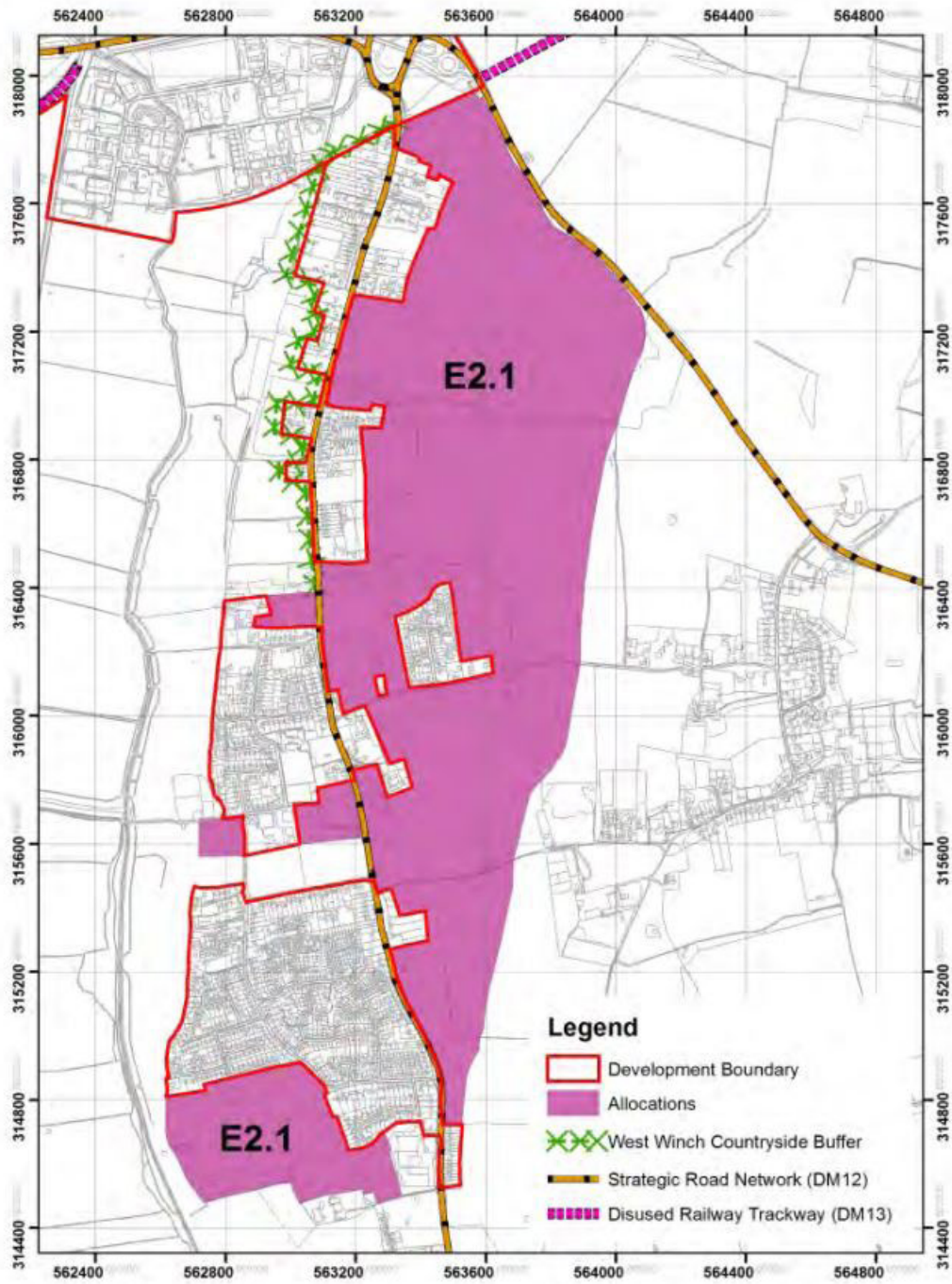
The West Winch Growth Area Strategic Policy in the Site Allocations and Development Management Policies and in the Local Plan review set out the key strategic outcomes for the area. The full text of the relevant policy documents are available on the Council’s website:

[www.west-norfolk.gov.uk/homepage/19/planning\\_policy\\_and\\_local\\_plan](http://www.west-norfolk.gov.uk/homepage/19/planning_policy_and_local_plan)

National planning policy and guidance should also be taken into consideration in the preparation of development proposals.

\* Once adopted this will replace the *Core Strategy* and *Site Allocations & Development Management Policies*





Inset E2 West Winch

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Ordnance Survey 100024314





## 05 INFRASTRUCTURE DELIVERY PLAN

To ensure that West Winch Growth Area is successfully provided with the requisite physical, social and community infrastructure, we expect that all applications will provide a co-ordinated programme of works linked to the delivery of a specific number of houses.

The Infrastructure Delivery Plan (IDP) for the West Winch Growth Area (also known as the SEKLSGA) was adopted in November 2018 and sets out the key strategic infrastructure that is required to support the housing and identifies where and at what time that infrastructure is required. The IDP essentially acts as a high-level reference and guide, setting out the agreed principles, processes and delivery mechanisms that will be updated as and when planning applications are progressed.



The IDP can be viewed in full at:

[www.west-norfolk.gov.uk/info/20000/planning\\_and\\_development/906/progress\\_to\\_date](http://www.west-norfolk.gov.uk/info/20000/planning_and_development/906/progress_to_date)

The IDP will be translated into a legal S.106 Framework Agreement between the Borough Council and landowners and developers to formalise the provision of infrastructure.

The infrastructure requirements consist of the following:

### Transport

- Housing Access Road Roundabouts
- Dualling on A47 east of Hardwick
- Traffic calming in West Winch A10 (may include speed bumps, reduced speed limits, pavement build outs etc.)
- Local Roads & Streets
- Sustainable Transport including, Bus Strategy, Cycle & Shared use pathways

### Education

- Two new primary schools (with nursery provision) and expansion of the existing West Winch Primary School
- High School capacity increase
- Sixth Form capacity increase

### Utilities

- Electricity/Gas connection & capacity increases Telecommunications
- Mains Water Distribution
- Sewage & Sustainable Urban Drainage Systems (SuDS)

### Community

- Community Centre(s)
- Sports Centre (could involve financial contribution towards existing sports facilities in West Winch)
- Health Centre
- 3no. shops
- Multi use games area
- Library contributions

### Green Infrastructure

- Outdoor sports facilities
- Play areas
- Green Space & Corridors
- Habitat creation
- Allotments



## 06 THE FRAMEWORK MASTERPLAN

















**The Framework Masterplan provides a template against which the Council will assess all individual planning applications.**

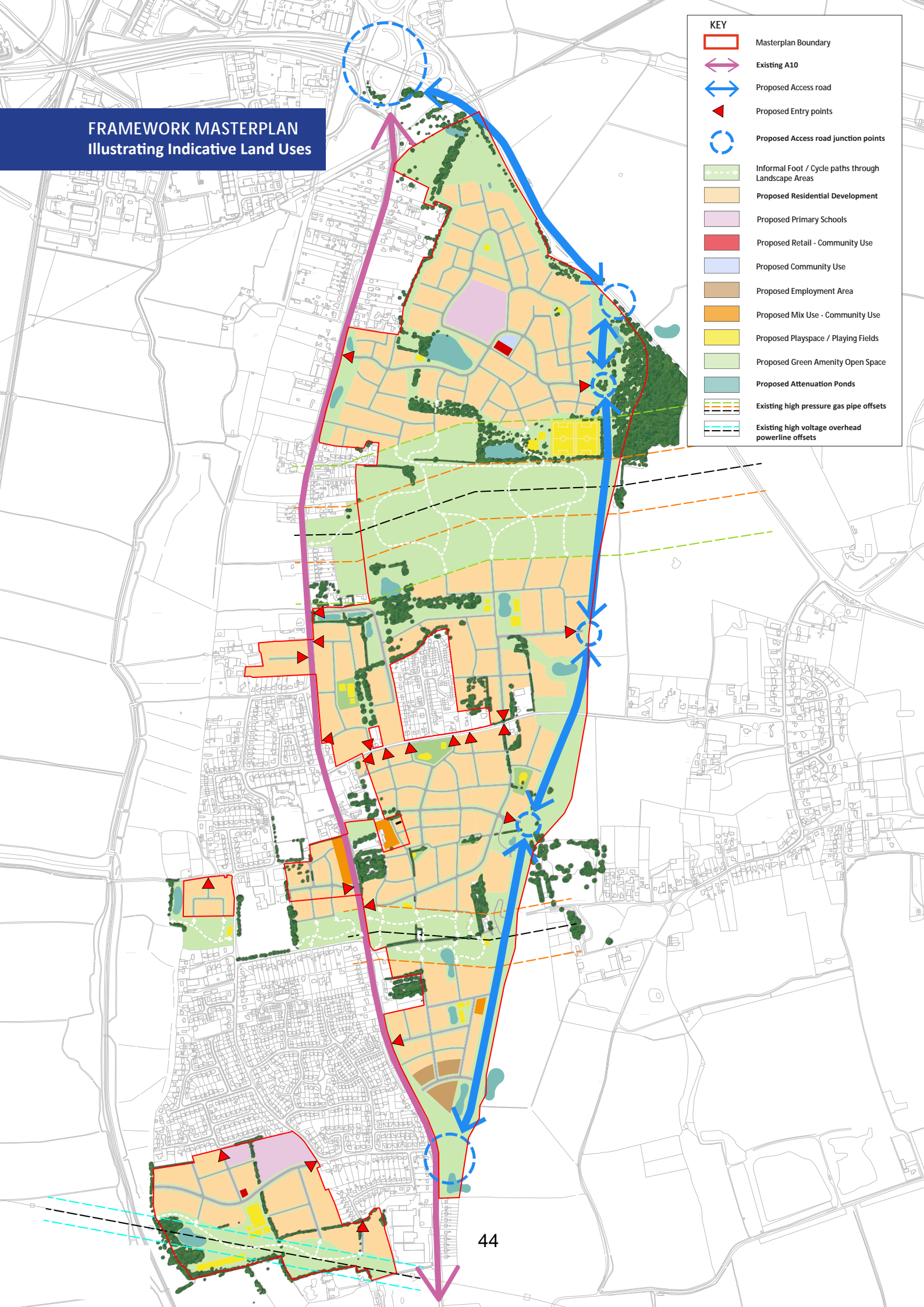
The Growth Area boundaries define where development is considered suitable. In identifying these boundaries consideration was paid to maintaining a degree of separation between the village of North Runcton and the new neighbourhoods, and good integration with the existing development and facilities in West Winch.

The Framework Masterplan provides indicative locations for land uses, the exact locations of development will be determined at the detailed application stage. The Framework masterplan also includes some additional land to complement the growth area which maintain the objectives set out above.



# FRAMEWORK MASTERPLAN Illustrating Indicative Land Uses

KEY	
	Masterplan Boundary
	Existing A10
	Proposed Access road
	Proposed Entry points
	Proposed Access road junction points
	Informal Foot / Cycle paths through Landscape Areas
	Proposed Residential Development
	Proposed Primary Schools
	Proposed Retail - Community Use
	Proposed Community Use
	Proposed Employment Area
	Proposed Mix Use - Community Use
	Proposed Playspace / Playing Fields
	Proposed Green Amenity Open Space
	Proposed Attenuation Ponds
	Existing high pressure gas pipe offsets
	Existing high voltage overhead powerline offsets



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# 07 DESIGN + DEVELOPMENT EXPECTATIONS

## Neighbourhood Centres

Within the Growth Area three local neighbourhood centres are planned, each giving a focus to a neighbourhood area. One would be a new centre in the northern section; the two remaining centres will be delivered through enhancements to existing centres of West Winch.

The intention of the three centred approach is to create a sustainable layout that would enable residents (both new and existing) to walk or cycle to the local amenities to satisfy their daily needs and facilitating the development of neighbourhood identity.

New shops and related uses on a small scale should be located in these neighbourhood centres and will help ensure that the new neighbourhoods are successful and sustainable and enhance the facilities available to the residents of the nearby existing villages of West Winch and North Runcton.

## Housing Mix + Type

The Borough Council seeks mixed communities and expects to see a range of housing types, styles and tenures across the Growth Area and most individual developments within it. These will be expected to respond to the Borough Council's current Housing Market Assessments and policies on affordable housing at the time of planning applications being made.

## Design + Density

The scale, form, character, design and mix of development densities must reflect the local character and proximity to the growth area centres and take into account the local topography, setting and natural assets of the site. Locally sourced materials to reinforce the local vernacular would be encouraged.

Development should consider the effect of the site slopes on the heights of buildings; the relationship between heights of proposed and existing buildings; and the visual impact of buildings when viewed from streets and properties.

The hedgerows and mature trees, combined with the surrounding countryside and topography create the natural features around the growth area. The development must make the most of these assets to create a sense of place by reflecting and where possible incorporating them into the development.

The network of streets and open spaces will play a key role in determining how the new development works and how it relates to the surrounding areas. The development should incorporate a network of streets and spaces that link to and through the area, providing a choice of direct, safe and attractive connections and encouraging walking and cycling. There could be a street hierarchy comprising, for example, a primary street and residential streets. The development and pattern of routes must also be 'legible' – easy to understand and navigate.

Active frontages should be incorporated in the new development by orienting buildings so that the main entrances and principal windows face the street (or streets) and open spaces. This helps to improve the sense of security of public and communal areas (sometimes known as Secured by Design principles), maximises the proportion of activity that takes place in the public realm and makes it easier for people to find their way around.

## Climate Change

There is an opportunity to create a new distinct but integrated development and to apply best practice to make efficient use of resources and meet energy efficiency and low-carbon targets.

The development should seek to meet high standards of sustainable construction and design in terms of energy efficiency, water resources, recycled and reclaimed materials and renewable or low-carbon energy. From 2025 development proposals will need to meet the [Future Homes Standard - gov.uk/government/consultations/the-future-buildings-standard](https://www.gov.uk/government/consultations/the-future-buildings-standard)

Where practicable, streets and buildings should be orientated to get maximum benefit from sunlight. To make the most of sunlight (and shade), the layout, design and orientation of streets and buildings

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should take into account the slope of the site and the solar path. The development should maximise the use of south-facing elevations.

### **Sustainable Urban Drainage Systems (SUDS)**

The development must incorporate SUDS in accordance with national and local policies to minimise any increases in surface water runoff and flooding.

Public and private areas of hard-standing should be permeable wherever possible. SUDS may be combined with a system to help regulate water flows from roofs to the drainage system and grey water recycling.

Installation of green roofs, where soil and plant material are attached to create a living surface, can also reduce water run-off as well as providing insulation and creating a habitat for wildlife.

Attenuation basins and ponds will need to be distributed across the site and sensitively integrated to maximise on the position of topography, existing waterways and ditches.

The details of these will be dealt with in future detail design and the evolution of the growth area, as well as any current and/or subsequent planning applications for parcels of land that may come forward in the future. The Lead Local Flood Authority's [Developers Guidance](#) contains practical advice on SuDs - [Norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers](https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers)

### **Built Heritage + Archaeology**

Whilst there are no designated heritage assets within the growth site, there are a number of listed buildings nearby including the Grade I listed Church of All Saints in North Runcton and Grade II\* listed Church of St Mary in West Winch. The Old Windmill, the War Memorial, The Old Rectory, The Gables and The Old Dairy Farmhouse listed at Grade II.

Development proposals will need to be accompanied by a detailed Heritage Impact Assessment that follows best practice procedure produced by Historic England and meet the requirements of planning policy contained in the National Planning Policy Framework. Submitted Heritage Impact Assessments will also need to consider the findings of the Heritage Impact Assessment for West Winch. An archaeological assessment will also need to be submitted where needed.

### **Biodiversity**

The development must make the most of opportunities to create or improve habitats. This includes the retention of hedgerows and mature trees, use of native species in landscaping, installation of bird and bat boxes and design of lighting schemes to encourage habitat creation and enhancement.

**Requirements for Biodiversity Net Gain (BNG) will come into effect in 2023. Any development of the Framework Masterplan or any future planning applications will need to address the requirements to mitigate and enhance the biodiversity of the site.**

### **Green Infrastructure**

The Framework Masterplan indicates that there will be significant areas of Open Space which are expected to be connected to one another by a network of green corridors. Together, this substantial area of Green Infrastructure provides for a range of formal and informal activities as well as providing pedestrian and cycle connections.

Development will also be expected to contribute towards enhanced biodiversity with parts of the Green Infrastructure being identified for uses/activities; these will need to be maintained at an appropriate level to meet these objectives.

# 08 CONNECTIVITY + TRANSPORT

## Connectivity

Connectivity is vital in achieving wider accessibility, integrating new residents and businesses and it contributes to a healthy community.

The Growth Area should be well connected with surrounding communities by walking, cycling and public transport. The whole area should be better linked to local centres, places of work, education, the town centre and the countryside linking into King’s Lynn Active Travel Network, as defined by the [King’s Lynn Local Walking and Cycling Infrastructure Plan](#), which can be viewed at the link above.

The layout of the new development should support active travel by creating new frontages and public open spaces that link the new neighbourhoods and their immediate surroundings.

## Better Bus Service

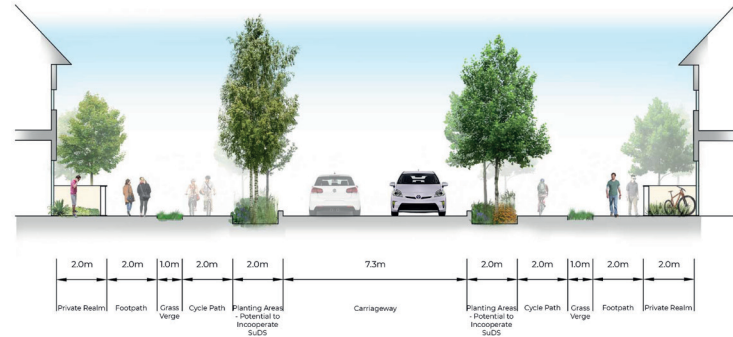
The need to improve the existing bus connectivity was identified in responses to earlier consultations. Development layouts should allow for a revised or new bus service connecting the growth area to King’s Lynn. Further work is required to establish how the increased housing numbers can help deliver an improved service. The developers should provide subsidies for the new service.

## Pedestrian + Cycling Access

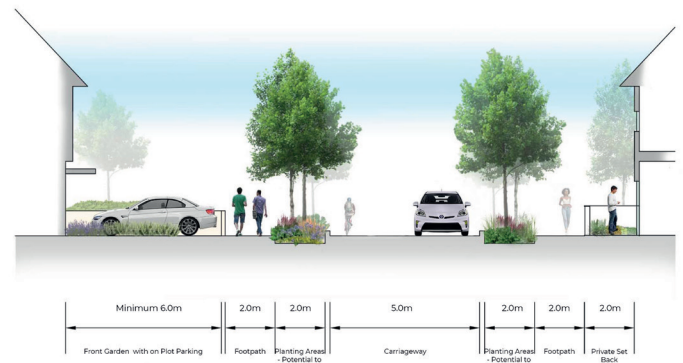
Increasing cycling and walking in the West Winch Growth Area will help tackle some of the most challenging issues around air quality, health and well-being and congestion on the roads. A network of safe and easy-to-use pedestrian and cycle routes will connect the new and existing homes with facilities and services within the Growth Area, with the potential to extend the connectivity further to King’s Lynn and West Winch.

There is potential to enhance and develop linear green corridors or links through the sites, making connections within the new development and with neighbouring communities and the open countryside.

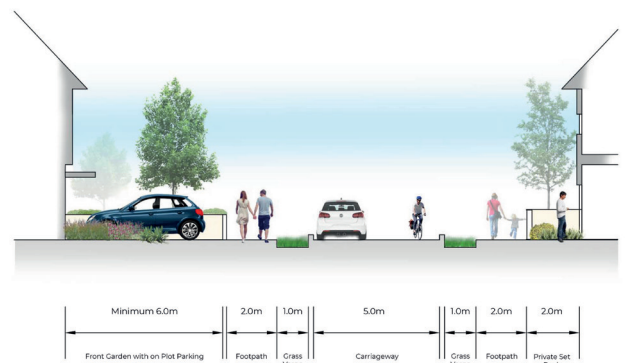
As well as allowing movement, the green links also offer opportunities for recreation and amenity space; ecological enhancement; Sustainable Drainage; and the creation of a transition from the built environment to open countryside.



Indicative Primary Corridor



Indicative Secondary Corridor



Indicative Tertiary Corridor

# INDICATIVE CONNECTIVITY PLAN

New walking and cycle crossing on Beveridge Way arm will complete provision of controlled facilities across arms at Hardwick roundabout on the desire line between new housing area and nearby employment and retail areas

Hardwick Narrows Industrial Estate

ESSO

The Winch

Existing A10

Oriental Palace  
West Winch Primary School

Retail Mix  
West Winch Village Stores

William Burt Social Club and Village Hall

St Mary's Church

Cool-Stak

48

At-grade pedestrian crossing between Hopkins' site and Sheep's Course Wood

New Rectory Lane (north) and Chequers Lane (south) bridges will maintain active travel connections between West Winch and North Runcton

Kings Lynn Caravan & Camping Park

North Runcton Cricket Club

All Saints' Church North Runcton

Buttercup's Pre-school

- KEY**
- Proposed Access Road
  - Proposed Access Road Junction Points
  - Primary Corridors (Separated Footway + Cycleway - LTN 1/20 compliant)
  - Secondary Corridors (Separated Footway + Cycleway on carriage)
  - Tertiary Corridors
  - Potential Bus Link into Development for consideration
  - Existing A10 Corridor. (Includes Bus route, Footway, Cycleway & future traffic calming measures)
  - Shared-Use Spine Footway / Cycleway alongside new housing access road LTN 1/20 compliant
  - Existing Pedestrian Crossing Points
  - Indicative Crossing Point Locations
  - Existing Schools
  - Existing Bus Stops
  - Indicative Foot / Cycle paths through Landscape Areas
  - Existing Public Footpaths, Bridleways & Restricted Byways
  - Proposed Residential Development
  - Proposed Play space & Playing Fields
  - Proposed Primary Schools
  - Proposed Community Use
  - Proposed Employment Area
  - Proposed Retail - Community Use
  - Proposed Mix Use - Community Use
  - Proposed Green Amenity Open Space



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## 09 WEST WINCH HOUSING ACCESS ROAD

### West Winch Housing Access Road (WWHAR)

Provision of a new housing access road scheme is planned for West Winch. This will serve the growth area which will see up to 4,000 new homes built, and make sure traffic from the new development has a minimal impact on the existing A10 as it passes through the village. The West Winch Housing Access Road will also address existing traffic problems on the A10 by providing an alternative route around the village that conforms to Major Road Network standards.

The West Winch Housing Access Road (WWHAR) scheme will be designated as the new A10 and comprises the following essential elements:

- A housing access road to the east of West Winch connecting the A47 with the existing A10
- Intermediate junctions to the development
- Sustainable transport measures (public transport, walking and cycling)
- Modifications to the Hardwick Interchange to accommodate additional housing traffic and the rerouted A10
- Dualling of the existing A47 between Hardwick Interchange roundabout and the housing access road
- A new signalised roundabout on the A47.

The Borough Council of King's Lynn and West Norfolk and Norfolk County Council are working in partnership on this project with Norfolk County Council leading on delivering the transport infrastructure and the Borough Council of King's Lynn and West Norfolk leading on enabling the housing element.

The Framework Masterplan sets the basic outline for the housing access road element of the overall West Winch Housing Access Road scheme.

**Norfolk County Council (NCC) are in the process of securing Major Road Network funding from the Department for Transport (DfT). The first stage of this process, a Strategic Outline Business Case submitted in March 2021, has been concluded and work on of the next stage of the funding process, an Outline Business Case (OBC), is ongoing between NCC and DfT.**

**If successful, NCC, working with the Borough Council, would then complete the detailed design of the road and procure its construction at the earliest opportunity. Framework S.106 Agreements with Developers will require the payment of contributions towards the cost of the WWHAR as housing developments come forward and the sites are built out.**

**A consultation process for the WWHAR is planned for later in 2022.**

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# 10 DELIVERY

## Land Ownership

The Growth Area is made up of seventeen different ownerships, these can be split into two groups:

### 1. Land promoters/developers

There are 2 land promoters/developers with control over land within the Growth Area, Hopkins Homes and ZAL/Metacre. Hopkins Homes have submitted an outline application for 1100 homes in the northern portion of the growth area. This is currently being considered by the Local Planning Authority

Zal/Metacre control circa 53.4 ha of land in the southern portion of the growth area. An outline application has been submitted for 500 homes on part of this land. It is anticipated that planning applications on the remaining ZAL/Metacre land will come forward over a period of time.

### 2. Domestic and Agricultural land owners

The remainder of the Growth Area is controlled by numerous individual land owners including both Norfolk County Council and the Borough Council.

In order to facilitate a comprehensive development of the whole site the Borough Council is working with the majority of the remaining landowners to enter into a Collaboration Agreement. The Collaboration Agreement, centres upon an equalised approach to land value which provides a fair and equitable value to landowners which takes account of the infrastructure requirements regardless of what is being developed on the land, e.g. housing units or open space. It is envisaged all the land identified in the Framework Masterplan will be needed to deliver a comprehensive development. Land use distribution as shown on the Framework Masterplan is indicative and will require comprehensive delivery.

In addition to the Collaboration Agreement, an overarching S106 Legal Agreement, referred to as a Framework Agreement, has been prepared that sets out all the strategic infrastructure identified in the Infrastructure Delivery Plan. Sitting underneath this will be site specific S106 Legal Agreements that will secure the necessary infrastructure on a site by site basis.

## Phasing

Work is being undertaken to facilitate early delivery of the West Winch Housing Access Road to enable delivery of the Growth Area. However, it is expected that an element of delivery could come forward during the next 2-5 years prior to completion of the WWHAR, some of which will be prior to the completion of the WWHAR.

The completion of the WWHAR will enable the remainder of the Growth Area to be delivered. It is anticipated that multiple sites within different parts of the Growth Area could be delivered simultaneously by different developers. This could result in delivery of anywhere between 60 to 200 homes a year over a 15-20 year period. This will be determined by market conditions.

## Viability

A viability assessment of the Infrastructure Delivery Plan has been undertaken to consider whether the proposed infrastructure is deliverable and viable.

**On review, having regard to the timescales assumed, information available at the time, and sensitivity testing around the assumptions applied, the viability assessment concludes that the overall proposed development is potentially capable of being viable while delivering the infrastructure and section 106 costs identified. This has been demonstrated through stress testing the base viability assumptions through sensitivity analysis and also via various scenario tests.**

It is recognised that the assessment is a reflection of overall proposed housing delivery for West Winch, and that individual elements of the proposed scheme will need to be considered on a site specific basis. That said the West Winch Growth Area has the best potential to be delivered if it is considered as a whole and in a consistent manner.

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# 11 GOVERNANCE

The Borough Council of King’s Lynn and West Norfolk working in partnership with Norfolk County Council has a key role in enabling the delivery of the West Winch Strategic Growth Area.

Given the significant transport infrastructure that is necessary across the whole area, it’s important that we enable the site to be brought to a position where:

- detailed applications for individual developments can be made (which comply with strategic requirements), and
- a mechanism to secure payments for these is in place.

The main enabling role of the Borough Council is to ensure that the necessary collaboration amongst landowners is secured to allow the growth area to come forward.

Overseeing the delivery of the activities connected to the West Winch Strategic Growth Area there is an Officer project board and a project team.

## **West Winch Growth Area Officer Project Board**

The purpose of the Board is to oversee and coordinate the Borough Council’s input into the implementation of the West Winch growth area and to ensure there is a clear, robust and transparent project and programme management process in place.

This Board reports to the Borough Councils Member Major Projects Board — a sub-committee of the Councils Cabinet made up of elected members to monitor delivery of the councils major projects.

## **West Winch Project Team**

The purpose of this operational project team is to oversee and coordinate the implementation of the West Winch Growth Area including:

- Related option agreements
- Landowner agreements
- Provision of comprehensive and consistent planning advice for planning applications#

There are other important stakeholders, including Norfolk County Council, West Winch Growth Area Local Stakeholder Group and West Winch Growth Area Delivery Group.

## **Norfolk County Council**

Norfolk County Council are leading on the delivery of the West Winch Housing Access Road. Supported by the Borough Council, Norfolk County Council, is working through a business case process with the Department for Transport with the ultimate aim of securing approximately £50m Government funding towards the West Winch Housing Access Road. In addition to this £13.5m will be provided in developer contributions towards the costs of the road and traffic calming measures through West Winch village as set out in the IDP.

## **West Winch Growth Area Local Stakeholder Group**

This includes parish councils, landowner and developer representatives, the Neighbourhood Plan Group, and local ward members. The group is chaired by the portfolio holder for regeneration.

The purpose of the group is to:

- provide a local community perspective in relation to the West Winch Strategic Growth Area, and
- give local stakeholders and landowners opportunities to make meaningful comment and contributions on all aspects of the development, and the delivery of proposals for the growth area.

## **West Winch Growth Area – Delivery Group**

This includes landowner and developer representatives, borough council and county council representatives, and Homes England.

The purpose of the group is to:

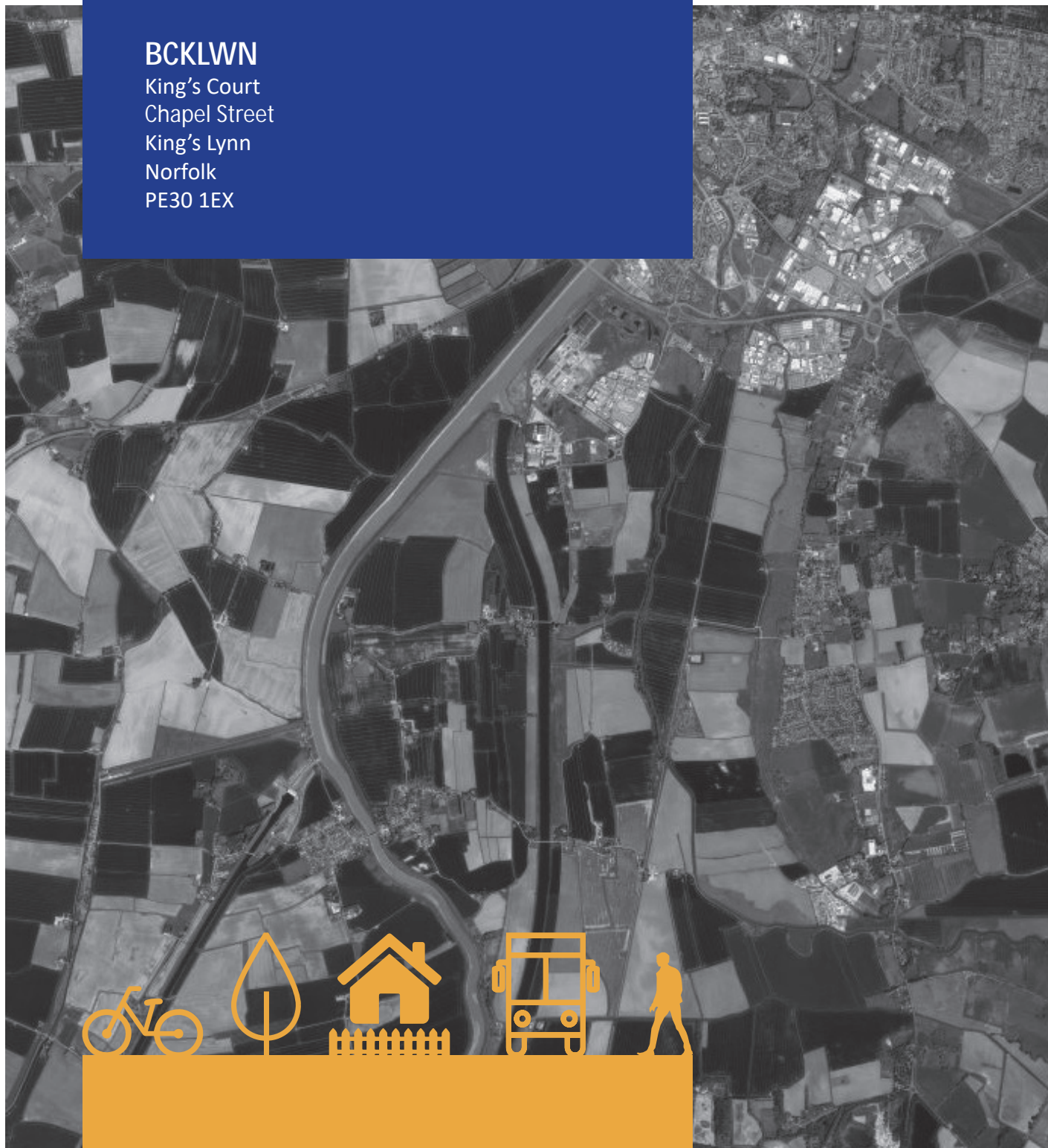
- facilitate the delivery of the West Winch Strategic Growth Area
- coordinate the development and delivery of a comprehensive development of the entire area, and
- consider associated processes for the whole growth area.



Red Line denotes Site Allocation E2.1 extents

**BCKLWN**

King's Court  
Chapel Street  
King's Lynn  
Norfolk  
PE30 1EX



REP ID/ORGANISATION	SUMMARY REPRESENTATION
<p>Castle Rising Parish Council North Wootton Parish Council South Wootton Parish Council</p> <p>54</p>	<p>Section 1 of the draft Masterplan states that:</p> <ul style="list-style-type: none"> <li>• “When adopted [it] will be used by applicants, Planning Officers and other council departments in the planning decision-making process.” The problem here is that it is written in the future tense whereas outline applications for 1600+ of the 2500 homes for delivery during the plan period have already been submitted and do not, because they could not, accord with a framework that hadn’t then been written. This order of events is contrary to the clear intentions in SADMP.</li> </ul> <p>Section 1 continues:</p> <ul style="list-style-type: none"> <li>• That the Growth Area is “...a strategic urban expansion area around King’s Lynn to meet most of the Borough’s need for housing over the plan period in a sustainable manner with the appropriate level of supporting facilities.”</li> <li>• It is intended to deliver 2500 homes in the plan period up to 2038 and 4000 in “the fullness of time” “with supporting infrastructure”. The key issues are (a) what is meant by ‘in a sustainable manner’, ‘appropriate level of supporting facilities’ (later referenced as infrastructure) and that it is intended to deliver most of the Borough’s need for housing over the plan period. Despite being a framework, the document doesn’t generally set out what is required to be sustainable, or where it does obliquely imply it, it provides no supporting evidence, as if the requirement is plucked from the air. This applies regards to healthcare services, on which not one word is written, and access to education after primary age. The document is light throughout on the delivery of sustainable transport services. It makes much of the need to connect to active travel networks, although there has to be considerable doubt how many of the new residents will consider cycling around or across the Hardwick Interchange to access King’s Lynn town centre to be a realistic option, without doubt opting instead for the unsustainable single use of private car. This is all the more likely because, in contrast to that for the West Winch Housing Relief Road (WWHAR), of the failure to work up any detail on the provision of, or funding for, an attractive public transport alternative. It is clear that for those unable to walk or cycle, whether by virtue of youth or older age, or mobility issues, being proportionately more reliant on public transport than the population at large, there is no intention to ensure their inclusion in the community. Yet sustainable transport is key to decarbonising transport as recognised in government policies developed during 2020 and 2021. It is possible that this failure contravenes the Equalities Act 2010.</li> </ul>
<p>West Winch Parish Council North Runcton Parish Council</p>	<p>For clarity, at page 5, third paragraph, West Winch and North Runcton Parish Councils worked to produce the Neighbourhood Plan in order to try to <u>mitigate</u> the impact of the proposed development, not to ‘support’ it.</p> <p>As noted above – we don’t think this document achieves the stated goals stated in the last three paragraphs of page 5.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
Metacre	It is noted that within Page 8 of the Framework SPD it refers to the Masterplan showing a 'broad distribution of land uses', but this is not made clear on the Masterplan itself. It is also noted that later in the SPD at page 19 it refers to SUDS being dealt with through the evolution of the Framework Masterplan, so it is clear the Masterplan is not fixed. We, therefore, suggest that reference is made in the document to the fact that the detail and location of proposed land uses will be dealt with via individual planning applications.
Castle Rising Parish Council North Wootton Parish Council South Wootton Parish Council	Section 4 of the draft Masterplan refers to the Hopkins Home outline application for 1,100 homes to the North of the Growth Area and Metacre's outline application for 500 homes in what may be called the central part of it. The total 1,600 homes, almost two thirds of the homes proposed to be built in the current plan period, had outline applications submitted (without matters that were likely to be covered in a strategic framework masterplan being reserved) <i>before</i> the Framework Masterplan was produced for consultation, let alone adoption. The Framework Masterplan has therefore been written around developers' pre-existing applications rather than their applications fitting with a pre-existing Masterplan. It strains credibility to believe that the Masterplan has not been written very specifically to fit the developers' wishes, rather than those of the local population, and this is evidenced by the considerable lack of detail in the document and failure to even address SADMP para E2.60.
West Winch Parish Council North Runcton Parish Council	The 'Planning History' at page 10 should probably make it clear that the Princes Foundation were first employed to promote development of this site by Zurich Assurance, one of the main landowners. Residents have largely remained sceptical throughout.  Regarding the two 'live' planning applications, we are sceptical that there has been much 'response to consultation'. We were told recently that the Hopkins Homes scheme had been altered after 'community input' – but the only alterations we are aware of resulted from requirements from Highways England and NCC. In essence the Hopkins scheme is the same one first promoted in 2012. BCKLWN have themselves previously stated the Metacre scheme is 'premature' (even though the IDP phasing plan shows parts of it completed early).

REP ID/ORGANISATION	SUMMARY REPRESENTATION
<p>Castle Rising Parish Council North Wootton Parish Council South Wootton Parish Council</p>	<p>Section 5 of the draft Masterplan details the adopted policies around which the development has been set. The list omits the Core Strategy, although relevant. The SADMP, has very clear site allocation and development policies for the Growth Area including:</p> <ul style="list-style-type: none"> <li>• Paragraph E2.5 states that the Growth Area is an urban extension, and therefore it follows that urban policies should apply, not those adopted for rural areas. This has relevance to the standards to meet an attractive public transport service.</li> <li>• Policy DM1 states “When considering development proposals the Council will take a positive approach in favour of sustainable development contained in the National Planning Policy Framework (NPPF)....” The latest published NPPF (March 2021) states at paragraph 3 that “The Framework should be read as a whole....” and yet this has not been so in respect of the NPPF’s section 9 on Promoting Sustainable Transport. Indeed, the Masterplan fails to meet multiple paragraphs, including 104 (c) and (d), 105, 107, 110 (a) to (d) and 112 (a) to (c). It fails the fundamental test of sustainability, its definition at paragraph 7 of NPPF’s section on Achieving Sustainable Development, and its definition of sustainable transport in Annexe 2.</li> <li>• Policy DM17 sets out standards for car parking space at new developments. It mitigates this by stating “reductions in car parking requirements may be considered for.....urban locations where it can be shown that the location and the availability of a range of sustainable transport links is likely to lead to a reduction in car ownership....” This is an iterative process: by setting the baseline figure in advance is contrary to paragraph 107 of the NPPF’s section 9 on Promoting Sustainable Transport. That is written so that the local parking standards policy should follow the development not the reverse and especially as the draft Framework states that more work is still to be done on the provision of bus services. The greater the volume of housing, then, the greater the land-take from agriculture and damage to food security, the more unsustainable the development really is.</li> <li>• It is evident that whilst the SADMP may align with NPPF requirements, actual development control does not. Nowhere is this currently more evident than in the Knights Hill 600-home development at South Wootton and the Growth Area Framework Masterplan gives no confidence that this area will be any different.</li> </ul>
<p>REDACTED</p>	<p>Page 14 suggests the provision of 3 shops – for 4,000 houses?! Even if the ‘fullness of time’ mentioned on page 5 doesn’t happen, 2,500 are already planned – which is a large village. On page 18, under ‘Neighbourhood Centres’, it says it would ‘create a sustainable layout that would enable residents (both new and existing) to walk or cycle to the local amenities to satisfy their daily needs and facilitating the development of neighbourhood identity’. Given that this development is effectively the size of Swaffham, it might be worth thinking about how many shops <u>they</u> have and whether 3 shops (plus the handful in West Winch) will satisfy the daily needs of so many people. This all of course ignores the fact that places like Swaffham (in fact 3,250 households according to Wikipedia) have developed into rounded, useful, workable towns over a period of hundreds of years. This new development in West Winch is neither a town that has developed over the years nor a planned New Town – what it looks like is satellite housing for King’s Lynn, and yet it is such a large development.</p> <p>Page 14 also has ‘library contributions’ – I have no idea what this means but would like to think it means a library facility might be provided. I feel that this is highly unlikely though, given the cavalier way our county council is currently behaving towards our library in King’s Lynn.</p>



REP ID/ORGANISATION	SUMMARY REPRESENTATION
Norfolk County Council	<p>Education</p> <p>The education infrastructure requirement as set out on page 14 should explicitly state the requirement for two new primary schools (with nursery provision) and the need for expansion of the existing West Winch primary school. The current text states 'New primary school &amp; nursery provision x2 West Winch Primary school extension' is considered too vague.</p> <p>Lead Local Flood Authority</p> <p>The Lead Local Flood Authority (LLFA) reviewed the draft SPD and noted in section 6 (Infrastructure Delivery Plan) of the SPD that there was no mention of the inclusion of sustainable drainage systems. While in section 8 of the SPD a small sub section titled "Sustainable Urban Drainage Systems (SuDS)" was included. The SPD seems to infer the inclusion of sustainable drainage systems is optional. This approach is not in accordance with National Planning Policy Framework (NPPF), which in paragraph 167 and 169 both refer to incorporating sustainable drainage systems in particular on major developments. The LLFA, supported by NPPF, requires the inclusion of sustainable drainage systems for the management of surface water runoff.</p>
West Winch Parish Council North Runcton Parish Council	At page 14 - a 'Sports Centre' first appeared in the IDP document costing in 2018 – but where this facility might be located and what it might include has never been ascertained.
REDACTED	Too extensive. North Runcton in danger of losing village identity. too much Greenfield land would be lost forever.
REDACTED	I cannot see any reference to the A10 which regularly gets long hold ups with cars turning in and out of West Winch
REDACTED	Too many houses for that road and just going to cause carnage to the A10
REDACTED	There has been no provision for the Urban Centre originally promised and one retail offering is pathetic for a development of this size. The green spaces and play areas are in the wrong area.... More needs to go in by where the new houses are going. I don't have an issue in principle but the A10 is a major pinch point and this MUST be addressed to improve the traffic flow before anything else is done. My fear is that it will be done piecemeal and we will never get everything we have been promised.
REDACTED	<p>Plan showing access points to development is a major improvement on previous proposals particularly removing 350 properties from exiting via Watering Lane past existing school, however these must be developed after WWHAR is constructed to avoid further congestion to existing A10.</p> <p>With regard to development area E2.1 access via Hall Lane is acceptable route but access shown off Chestnut Ave / Elm tree Grove should be pedestrian only. Estate roads in this area with tight turning hammerheads are unsuitable for access to this site. School development should cater for parking /offloading within its boundaries avoiding road parking at drop off &amp; pick up times.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	There is a lack of retail and community space infrastructure to support the amount of housing. Cf. e.g. the ratios of such space to housing in Downham Market or Swaffham. This must be increased including in particular a dentist and a pharmacy.
REDACTED	The masterplan indicates a vast swathe of countryside that will be taken in to fulfil this proposal. This area includes woodland, ponds and many other natural features which support a diverse range of bird and wildlife. The area is currently enjoyed by the public with public access / footpaths in the area. The negative impacts of this plan far outweigh the benefits to the local area. What are the the benefits by the way? Funny how we are not asked to comment on Section 9, wonder why?
REDACTED	<p>I know there is general unease as to why this is being built (apart from to satisfy government targets) when there is plenty of other housing developments in and around King's Lynn. This development seems to be linked to the A10 Cambridge corridor but is being located halfway between two railway stations with no provision for a railway station close by. Who is the development being targeted at - Cambridge / Ely overspill for people who can't afford Cambridge / Ely prices or for genuine local growth?</p> <p>I am concerned it is not binding on the planners and the developers. As guidance it will be far too easy for it to be ignored should pressure mount due to costs etc to for example increase housing densities, not develop the green areas, delays in the building of schools.</p> <p>There should be a process in place that ensures public communication / time for true consultation when any planning proposals etc conflict with the master framework or neighbourhood plans.</p> <p>There are also too many access points onto Rectory Lane - Most estates are designed to be fairly self contained with limited access points (2 or 3).</p> <p>There also needs to be safe cycling access from North Runcton to the West Winch community centres to allow people to use these without needing a car.</p>
REDACTED	I am not apposed to the new houses but west winch needs the new road FIRST. I live on the A10 and I am scared daily to pull off my drive way, the noise pollution and the traffic which is damaging my cottage which is over 100 years old is shocking. Please please build the by road first
REDACTED	<p>In the northeast of the proposed area is North Runcton Conservation area. (I forget the full name). The fully wooded eastern part is off the zoned suggestion, but I am unsure how far west it goes, as there is no distinct boundary on the west side, it 'morphing' into the scrubland immediately west. Perhaps (going out there many times for peace) I have been trespassing, as I also walk often in the more open western part. (Infact, on the recent 'far too hot Tuesday' I was there with a picnic and a book).</p> <p>Could not a larger area of this corner be preserved as park/open land? There is a 'green amenity/open space' marked on the map about halfway up, but it seems a bit silly to carve up an existing natural scrubland to plant a different one further along which will have to be grown from ploughed fields.</p> <p>Anyway, thanks for your time ref. this small matter.</p>
REDACTED	Obviously sections 1 to 6 cannot be commented on or changed. Unfortunately particularly section 6 IDP is crucial regarding impact on West Winch residents.

REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	<p>Looking at the plan I see that one of the entry/exit points into Rectory Lane is directly opposite my cottage which means I will have night time traffic lighting up my house all through the night. This exit point could be made opposite Coronation Avenue meaning that the headlights of exiting cars would light up a road instead of my house. With the amount of cars leaving and entering this new estate I can see huge difficulties for not only myself but also my neighbours in Rectory Lane getting in and out of their respective drives. This is extremely bad planning and can only lead to even heavier traffic along Rectory Lane than there is now. The name is explicit -is a Lane and not a major road and is completely unsuitable for the amount of traffic you are intending to load onto it.</p>
CPRE Norfolk	<p>CPRE Norfolk is against the unnecessary development of greenfield sites when there are available brownfield sites for development. However, it is accepted that to keep pace with unrealistically and unnecessarily high housing targets imposed by central government, along with the relative paucity of brownfield sites in the Borough, and the need to maintain a steady supply of delivery of housing, sites which are allocated within the adopted Local Plan will result in their development.</p> <p>This having been stated, there is still a need and responsibility for these allocated sites, particularly those such as the West Winch Strategic Growth Area, given its size and consequences for the Borough and its residents in social, economic and environmental terms, to be delivered in such a way as to minimise harms whilst maximising gains.</p> <p>Two crucial issues should be addressed by the Framework Masterplan, as it is not clear from the documentation whether this will happen.</p> <p>Firstly, CPRE Norfolk has major concerns that the Framework does not provide strong enough requirements for the design and layout of the new housing which is to form three separate neighbourhoods. Such requirements are necessary to avoid the new housing being large, suburbanised development with little real sense of place, community or how it will meet the relevant policies of the North Runcton and West Winch Neighbourhood Plan.</p> <p>Secondly, it is not clear from the Framework, possibly partly due to the scope of the Masterplan Boundary, how the transport options will be delivered, as well as there being a lack of options which should be part of such a major development, given the need for it to be truly sustainable. This will be discussed in more detail below under Section 9. At this point it is important to call for direct linkage of the new developments to the railway line, preferably by the addition of a new station immediately to the west of West Winch. For what is in effect a new town, it is important that a full range of public transport options are provided, to improve sustainability by making the new housing less car- dependent, to help meeting net-zero targets and to improve connectivity for residents. Given the small amount of employment land in the Masterplan area, it is clear that the vast majority of new residents will need to travel out of the Masterplan area to work.</p> <p>Related to the second issue, it is important that all aspects of the Masterplan and its associated developments should clearly demonstrate how it will address climate change and specifically meet relevant net-zero targets.</p>
REDACTED	<p>Page 17 the map shows two 'proposed access road junction points' (see below) – but not onto any current roads. So does that mean more new roads, not just this one access road? If so, where are they going?</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
Norfolk County Council	<p>The accompanying key to the Map (Page 17) – the reference to a “proposed school” needs to clarify that the locations are for “two new ‘primary schools”.</p> <p>The County Council expects the delivery for the expansion of the existing primary school, high school, sixth form sectors, and the two new primary schools to be met through developer funding.</p> <p>The overall positioning of the two new school sites in relation to the developments appears reasonable.</p> <p>Both seem well placed in terms of being community facing and with a good highway network for access. This would also potentially support sustainable travel in that many of the cohort should be within a short walk. But further negotiation is required regarding the detailed location of the new school sites with Children’s Services and the Highway Authority.</p> <p>The Northern School site should be a 2FE school (site size approximately 2ha). The Southern School site should be a 3FE school (site size approximately 2.8-3ha).</p> <p>As the West Winch housing development(s) come forward Children’s Services plan would be to first expand the existing West Winch Primary School from a 1FE to a 2FE primary school, then deliver the first new primary school, in the Northern Site, and finally deliver the second new primary school with the final phases of the development.</p>

<p>Historic England</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">61</p>	<p>We welcome the large area of green open space shown to the east of the grade II listed Mill. The Mill, which was in use until 1937 dates from around 1821. Built of tarred brick in English bond, the mill has been converted into a private residence.</p> <p>The grade II listed Old Dairy Farmhouse lies just to the west of a small portion of the site which lies on the west of the A10. Development in this area has the potential to harm the significance of the heritage asset. The farmhouse derives part of its significance from the surrounding farmland. It will be important that the character, form and scale any development in this area respects the character and scale of this former agricultural context and that connection is maintained with the farmland.</p> <p>The grade II* Church of St Mary and the adjacent grade II listed War Memorial lie just to the west of the site on the A10.</p> <p>The church stands in a large churchyard and faces open countryside to its east side. Immediately south is Manor Farm, an historic farmstead containing a group of traditional farm buildings. South of this is a substantial moat which the Heritage Assessment accompanying the application states is medieval in origin and for which there is evidence of a building formerly on the platform. The three sites create an interesting group with the church relating to the historic farmstead and the moat being a possible manorial site contemporary with St Mary's. All three heritage assets have a long-standing relationship to agricultural land which contributes to an understanding of them as buildings in a rural community. In addition, the church is a landmark building in this rural setting, emphasising its pre-eminent status in the community.</p> <p>We note that it is proposed to have an area of open space and landscaping to the south of the church which is welcomed. We also note that some new community use is proposed to the south east of the church. Is this a church hall? We suggest that this new community building should reflect the architectural style of the church and so enhance the significance of the church.</p> <p>We also suggest that key views from within the site to the church should be protected and maintained. Such views can act as important landmarks and way markers within a new development and help to give the new development a sense of place and anchor it to its historical context.</p> <p>We note that built development comes quite close to the eastern end of the church in the masterplan. You will have seen from our comments in February 2022 on Application 18/02289/OM that we have objected to this application on heritage grounds unless development is removed from the northern part of this application site to the east of the church.</p> <p>The relationship of the church and manor with the farmland has survived despite the extensive modern development on the west side of the main road. The proposed masterplan would introduce modern housing to the east of the church, building beyond the established historic pattern of development and separating the church from the fields at this point. This would result in harm to the historic significance of the parish church by diminishing the quality of its setting that contributes to that significance. The farm and moat would also be separated from the fields by housing on their east and south sides.</p> <p>In our letter of February 2019 on this application we included a record of the consistent objections we have raised to development of the fields east of the church in 2011, 2013 and 2015. These objections were repeated in our February 2022 letter. We therefore remain of the view that to develop these fields, which form the northern part of the site in application 18/02289/OM, would be harmful to the historic significance of the grade II* listed church.</p> <p>We therefore strongly recommend the removal of some built development in this area of the masterplan. We would suggest that there is an area of open space and set back to the east of the church to provide some breathing space for the heritage asset and to enhance the significance of the asset.</p>
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REP ID/ORGANISATION	SUMMARY REPRESENTATION
	<p>The grade II listed Old Rectory, North Runcton, lies to the east of the site. The significance of the asset is most likely to be affected by the proposed access road that runs along the eastern boundary of the development site. We suggest that careful landscaping should be required along the access road to minimise the impact on the Old Rectory.</p> <p>Finally, the grade I Church of All Saints in North Runcton lies to the east of the site. Although at a distance from the site, any key views of the church from within the site should be identified in the SPD and protected and maintained in the masterplan.</p>
<p>West Winch Parish Council North Runcton Parish Council</p>	<p>We are not clear why the Framework Masterplan is represented twice at page 17 and page 21. They essentially seem to be the same plan.</p>
<p>Hopkins Homes</p>	<p>We support the boundaries of the masterplan and development areas identified. These follow the design principles first established by the Princes Foundation exercise and the Hopkins Homes planning application (which has been the subject to 3 rounds of consultation as the design has evolved in response to public and statutory consultee comments). We also support the level of detail provided which provides a flexible but clear framework for individual developments (providing different and complementary character areas) to come forward. Finally, it will be important to reconcile the Infrastructure Delivery Plan requirements with the Framework Masterplan. For example the community facilities being funded include a sports centre, but it is not clear where this will be located in the Framework Masterplan at this time.</p>
<p>REDACTED</p>	<p>I would not expect Agricultural, Greenfield/Brownfield land to be built upon. Period! Uk needs more self-sufficiency in food production. Drainage, Electricity &amp; Power infrastructure needs major improvement before development commences. Expect Doctors Sugery if built to full extent.</p>
<p>REDACTED</p>	<p>The current plan of North to South development would be better placed as a West to East encompassing North Runcton. The current plan is merely a massive housing estate.</p>
<p>REDACTED</p>	<p>With regard to drainage West Winch current drainage systems are overloaded with off-line storage tanks holding back storm flows, Property flooding &amp; foul discharges occur in village. Whilst larger areas of development east of A10 can be designed to have new separated drainage systems independent of existing network, large blocks of proposed development within existing village could not be served by existing sewer network potentially causing increased frequency of overloading &amp; discharges.</p>
<p>REDACTED</p>	<p>The requirements on low carbon are too weak - e.g. using words like 'where practicable'. No permissions for development should be granted unless the proposed housing meets full 0-carbon standards.</p>
<p>REDACTED</p>	<p>The biodiversity and green infrastructure proposals are laughable, with all the land and natural habitat that will be destroyed under this proposal. yet it talks of improved habitats (how?) and a few open spaces with green corridors, how is that considered as an improvement on what we already have?</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	<p>Integral Solar Panels and best practice to minimise environmental impact should be used by all builders.</p> <p>Ensuring there are a range of styles and estates are developed to look and feel like a place people want to live - the complete opposite to King's Reach for example.</p> <p>Also there is an expectation of two new schools and a new health centre which will need to attract good professionals into the area at a time when filling existing vacancies is proving incredibly difficult. Professionals tend to not want to come to rural or semi rural places that appear to be on a limb as King'S Lynn is. Where is the effort being made by the borough council to attract people here?</p>
REDACTED	We need the road building before any more homes are built
REDACTED	<p>At the consultation presentation I asked what type of houses would be built (namely eco and with sustainable materials etc) your reps said it would be up to the developer. Section 8 spells out under Climate Change what is expected. I want it noted that the developers MUST adhere to these requirements and I shall be watching when detailed plans are put forward.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
<p>CPRE Norfolk</p> <p>64</p>	<p>It will be very important to ensure early and comprehensive delivery of shops and other local (community) facilities in each of the new neighbourhood centres. While this will help to improve the sustainability of these neighbourhoods, further services and infrastructure will be essential both in or easily accessible from these areas.</p> <p>We support the expectation for mixed communities with a range of housing types, styles and tenures across the Growth Area. It will be particularly important to ensure that the full expected percentage (20%) of housing is affordable housing.</p> <p>We also draw attention to and support Policy GA01: Creating neighbourhoods, in the North Runcton and West Winch Neighbourhood Plan. By following this policy, it is expected that our concerns regarding the nature of the new housing developments outlined in Section 7 will be avoided.</p> <p>Consideration of climate change should extend to ensuring that all new housing of all tenures is designed and built to include features to help the development to be carbon neutral, e.g. solar panels, air-source heat pumps, and grey- water harvesting, as well as meeting building regulations with regard to electric-vehicle charging points, insulation, building materials etc.</p> <p>While the statement regarding biodiversity in the consultation document is welcome, it will be essential to include mechanisms to ensure any planting and projects such as bat and bird boxes are maintained in the long term. The only mention of lighting in the whole consultation is in this section, where it is stated that the ..."design of lighting schemes can...encourage habitat creation and enhancement." Whereas the North Runcton and West Winch Neighbourhood Plan includes in Policy WA07, design to protect and enhance local character, "night lighting should be restricted to essential public spaces, corridors and road junctions. All street lighting and other external building and space lighting should be designed to minimise light spillage and energy wastage." While we appreciate these details would not usually be apparent until the planning application stage, we feel it is important to include clear reference to the importance of protecting the rural dark skies of the immediate area, which would go some way to maintaining a separation from the Hardwick Industrial Estate and King's Lynn. At the moment the West Winch Growth Area documentation is aspirational and vague, rather than providing a clear requirement with regard to controlling external night lighting in the Growth Area.</p> <p>We support plans for significant amounts of green infrastructure in the West Winch Growth Area, including the separation of the new neighbourhoods, and to maintain separation from King's Lynn, to enable the continuation of West Winch as a distinct settlement which can continue to be characterised by its predominantly rural setting.</p>
<p>REDACTED</p>	<p>Page 18 'Climate change' doesn't seem to lay down any rules about e.g. having PV on every roof; using air-source heat pumps; setting above the minimum requirements for building regs; passive solar gain etc etc. Saying it 'should seek to meet high standards of sustainable construction and design in terms of ...' is waffle – both 'should' and 'seek' don't lay down any rules. Developers will aim to provide the lowest quality they can get away with for the greatest possible profit unless their hands are held to the fire with rules that force them to address changing needs in terms of moving away from fossil fuels, working towards passive house status, etc.</p>



REP ID/ORGANISATION	SUMMARY REPRESENTATION
<p>Anglian Water</p>	<p>Anglian Water strongly supports the design and development ambitions of the framework, particularly in relation to <a href="#">climate change</a>, <a href="#">SuDS {Sustainable Drainage Systems}</a>, <a href="#">biodiversity</a>, and <a href="#">green infrastructure</a>. Together these elements are inherently interdependent and align with our strategic ambitions. We suggest that integrated water management is embedded into the masterplan framework as a comprehensive approach that reinforces the framework set out in the draft SPD but provides the key links between these four elements. A focus on water quality and management will deliver a sustainable community with an enhanced environment that is resilient to the impacts of climate change.</p> <p>Whilst the framework masterplan has been shaped by a green infrastructure-led approach arising from no-build zones, it provides a fundamental structure to implementing nature-based solutions for SuDS, incorporating elements such as rainwater harvesting that can be utilised for non-potable water use and help to reduce demand for potable water. Such technologies have been used effectively to assist with delivering ambitious water efficiency measures and <a href="#">water smart communities</a> within the Anglian Water region. When designed in from the start, integrated water management delivers more resource efficient homes which also serves to reduce utility bills for new residents. We are currently working with partners on an Ofwat funded innovation project' <a href="#">Enabling Water Smart Communities</a>' to address how new developments can adapt in a sustainable way to three key impacts of climate change -flood risk, water scarcity and risk to water quality.</p> <p>We support the higher optional water efficiency standard of 110 litres per person per day, which is set out in the new King's Lynn and West Norfolk Local Plan. However, given the scale of development being delivered at West Winch, we propose that more ambitious water efficiency measures could be sought, that has the added benefit of saving energy and reducing carbon emissions. This approach will also assist in reducing capital (embedded) and operational carbon, both through the development and the infrastructure required to support the delivery of new homes and employment.</p> <p>We welcome the statement regarding the Biodiversity Net Gain (BNG) requirement when it comes into effect from 2023. Anglian Water has a voluntary business plan commitment to deliver a biodiversity net gain of 10% against the measured losses of habitats measured by area on all Anglian Water-owned land. It is also important to recognise that Anglian Water through landholdings and</p> <p>1 Consultation on our draft WRMP24 is due to commence on 6th October 2022 . Projects as well as other conservation bodies, can support the development of landscape scale BNG and linked habitats which support climate change adaptation and species resilience. We would also encourage a nature-based solutions focus for SuDS design to suitably contribute towards helping to deliver the BNG requirements of the development.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
Norfolk Wildlife Trust	<p>Thank you for consulting us on the East Lynn (West Winch) Masterplan. We have the following comments to make.</p> <p>We have previously been consulted on the two planning applications which make up the masterplan area. We note that both applications are still being discussed, and that a key area of information sought by Natural England is the extent, quality and delivery of green infrastructure space, and the contribution that this will make to the avoidance of adverse effects on a number of legally protected wildlife sites in the surrounding area, some of which are also Norfolk Wildlife Trust Reserves (for example Roydon Common). We also draw attention to the presence of the West Winch Common County Wildlife Site near to the two development proposals, which will also benefit indirectly from the creation of high quality greenspace within the development as a means of reducing visitor pressure impacts.</p> <p>With reference to this, we are happy that there will be a Masterplan SPD to co-ordinate the design and delivery of green infrastructure. Experience with similar large scale development proposals elsewhere in Norfolk has demonstrated that masterplans are an important means of ensuring that collective landscape and green infrastructure requirements are not lost between different individual planning applications.</p> <p>Given there is still outstanding information required for both applications regarding the exact design of green infrastructure and visitor pressure mitigation, we would be happy to discuss these elements further with the Council and the applicants if there is anything that we can constructively help with. Please do not hesitate to contact us to discuss this further if that would be useful.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
<p data-bbox="107 180 383 209">Norfolk County Council</p> <p data-bbox="96 730 129 770" style="writing-mode: vertical-rl; transform: rotate(180deg);">67</p>	<p data-bbox="488 180 741 209">Natural Environment</p> <p data-bbox="488 228 651 256">Arboriculture:</p> <p data-bbox="488 276 2123 363">The retention of the area of open space with scattered trees to the west of Sheeps Course Wood would be preferable in the design of the residential layout, rather than creating areas of new open space on former agricultural land. However, it is appreciated that the agricultural land designated as proposed open space cannot be developed due to the presence of high pressure gas pipes.</p> <p data-bbox="488 383 2123 504">Particular care should be taken to amend the design to retain ancient and veteran trees and other mature trees designated as Category A (in accordance with BS5837:2012 Trees in relation to design, demolition and construction) which would be identified in the pre-development Arboricultural Impact Assessment. The current design will result in the loss of a considerable number of trees for the access road, access points and residential development in the northern part of the growth area.</p> <p data-bbox="488 523 2123 611">The overall tree loss across the growth area will require substantial tree and hedge planting to mitigate for the habitat loss and must take account of the requirement of net gain from 2023. The landscape plans should demonstrate that sufficient space is provided to plant trees of a large mature stature (greater than 25m in height) as well as smaller ornamental trees within the housing areas.</p> <p data-bbox="488 630 1715 659">Reference should be made to <a href="#">Norfolk County Council's Environmental Policy</a> and Pollinator Action Plan.</p> <p data-bbox="488 678 2007 735">Should you have any queries with the above comments please contact REDACTED (Senior Arboriculture and Woodland Officer) REDACTED</p> <p data-bbox="488 754 595 783">Ecology:</p> <p data-bbox="488 802 2123 890">The draft SPD incorporates or is immediately adjacent to a number of Local Wildlife Sites including Sheep's Course Wood County Wildlife Site (CWS), Brook Watering Meadow CWS, Rush Meadow CWS and West Winch Common CWS. It will therefore be essential that the masterplan is carefully designed to ensure these sites are fully protected and buffered from any development.</p> <p data-bbox="488 909 2123 1031">The area of semi-natural grassland/ scrub mosaic habitat located within the north-east of the plan area, adjacent to Sheep's Course Wood CWS, is likely to be of significant ecological value, and is expected to currently support a wide range of protected and priority habitats and species. It is therefore recommended that current draft proposals to construct an access road and residential development on this habitat feature are revised to ensure this habitat is retained, protected, and enhanced as a valuable green infrastructure and biodiversity resource.</p> <p data-bbox="488 1050 2063 1137">Given the requirement set out in the Environment Act for all new development to achieve a minimum 10% net gain in biodiversity, it is advised that an Ecological Impact Assessment Report and associated Biodiversity Net Gain calculation (using the Defra Metric) is commissioned at the earliest opportunity to inform the framework masterplan going forwards.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
Norfolk County Council	<p>Lead Local Flood Authority</p> <p>The Lead Local Flood Authority (LLFA) reviewed the draft SPD and noted in section 6 (Infrastructure Delivery Plan) of the SPD that there was no mention of the inclusion of sustainable drainage systems. While in section 8 of the SPD a small sub section titled “Sustainable Urban Drainage Systems (SuDS)” was included. The SPD seems to infer the inclusion of sustainable drainage systems is optional. This approach is not in accordance with National Planning Policy Framework (NPPF), which in paragraph 167 and 169 both refer to incorporating sustainable drainage systems in particular on major developments. The LLFA, supported by NPPF, requires the inclusion of sustainable drainage systems for the management of surface water runoff.</p> <p>In addition, the LLFA in line with NPPF (Paragraph 169 (a)) will expect the promoters of the development parcels to apply the LLFA’s Developers Guidance. The LLFA’s Developers Guidance should be signposted within the SPD to ensure developers and the local planning authority make appropriate and timely reference to the LLFA’s guidance.</p> <p>The LLFA does acknowledge the proposed framework masterplan which identifies the proposed attenuation areas. However, the LLFA notes the attenuation areas shown in the corridor of the existing high pressure gas pipe offsets at the southern end of the development area, are different to those previously indicated in the outline planning submission 18/02289/OM (January 2022). In this planning submission, a series of cascading attenuation basins were proposed. While the masterplan is a high level plan, the LLFA was expect that features such as these attenuation basins would be included in the masterplan.</p>
REDACTED 68	<p>The plan will replace existing green spaces with concrete (houses and buildings) and metal (cars). The current benefit afforded by the existing openness provided by the recreation ground at the William Burt Centre will be destroyed. Instead of benefiting from green open fields either side of the William Burt Centre, users will have an outlook onto residential properties. This will without doubt change the character of the area.</p> <p>Overall, green spaces will be reduced. Green spaces will be replaced with houses and cars. The impact on the environment and existing habitat will be negative.</p> <p>The number of houses proposed is too many to retain a village identity.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
<p>Historic England</p> <p>69</p>	<p>Page 18 Design and Density - We welcome the reference to local character. We also suggest that reference should be made in the first paragraph to local vernacular and local materials such as Carrstone and flint to help promote the use of local materials and ensure the new development is well integrated within the environment. We also suggest the addition of the words 'and the historic environment' in the last sentence of the first paragraph.</p> <p>Page 19 Sustainable Drainage Systems -SuDS are a good and effective way to manage surface water drainage. However, in the design of SuDS we recommend that careful consideration is given to archaeology. We recommend consultation of the Historic Environment Record, consultation with Norfolk County Council and that some archaeological assessment may be required to inform the approach. This requirement should be included in the SPD.</p> <p>Page 19 Heritage We welcome the reference to heritage in the Supplementary Planning Document. Whilst there are no designated heritage assets within the site boundary, we welcome the identification of a number of designated heritage assets in the area. We suggest you also include the War Memorial and Old Rectory, both listed at grade II.</p> <p>There are a number buildings in the area identified as non-designated heritage assets through the Neighbourhood Plan. These assets should be identified and listed in the SPD. A map of designated and non-designated heritage assets would be useful to include in the SPD.</p> <p>There is no reference to archaeology and the need for archaeological assessment. We suggest that this is included in the SPD.</p> <p>Whilst we welcome a requirement for a detailed HIA to accompany any development proposals, it is important to emphasise that an HIA should also inform development proposals. A contextual approach to development will mean that an assessment and understanding of the historic environment should shape any proposals. This important distinction should be made in the SPD.</p> <p>In addition, this masterplan itself should be informed by an HIA which seeks to establish key principles for the development of site which seek to conserve and enhance the historic environment.</p> <p>We understand that Place Services have been commissioned KLWN to undertake an HIA for the Local Plan. The recommendations of that HIA should inform the policy wording of the emerging Local Plan and should also inform the design parameters for the protection of the historic environment set out in this masterplan/SPD. This might include areas of open space and landscaping to protect heritage assets, it might include recommendations in relation to materials and design, height etc. It might also identify key views that need to be protected through any development proposals. We will expect to see clear recommendations set out in the HIA that should then be incorporated in the Local Plan Policy and carried forward to this masterplan SPD.</p>
<p>West Winch Parish Council North Runcton Parish Council</p>	<p>Pages 18, 19 and 20 are the three pages of the SPD that cover design guidance that could extend and embellish existing policy. But the details are so thin that the original SADMP probably still offers more detail. The adopted Neighbourhood Plan (NP) certainly has more detail but isn't cross referenced at all. It is an adopted policy document.</p> <p>The section 'Design and Density' could reference NP policies WA01-WA15 and GA05. The SuDS section should reference NP policy WA04. The 'Heritage' section should reference the</p> <p>non-designated assets identified in NP policies WA01-WA03. The 'Green Infrastructure' section should reference NP policies WA05-WA07 and policy GA03. The 'Connectivity and Transport' section should reference NP policies GA04-GA08.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
Hopkins Homes	The framework provides sufficient detail to shape developments in a complementary way without providing onerous detail. The overall delivery of 4,000 homes is supported as it will improve the viability of the scheme to deliver the Infrastructure requirements.
REDACTED	Bus services need to be dramatically improved. Good to see cycle paths incorporated. Rail Station would be Beneficial.
REDACTED	Traffic is going to be a nightmare on my opinion
REDACTED	<p>4k extra homes at an average of 4 people per house meaning a potential 16000 extra people needing at access the A10 or transport. The current air quality is poor before you even factor this in and at present the Hardwick roundabout cannot process the traffic quick enough ( especially during holiday season) when traffic also queues up towards the coast road. This would worsen considerably with all the additional traffic. ( not withstanding construction traffic as well). The environmental impact of this is huge and I cannot find any reference to consistent and meaningful air quality surveys done.</p> <p>The proposed roundabout by Coolstak is too close to the village (the new traffic camera by Setch would indicate the issue is there!) so why not improve the existing roundabout at Oakwood Corner and take the link road from there to join the A47. Also there has been no consideration to put a staging stop for a train on the common to keep as much traffic away from the A10 and to avoid it going into town. It could be similar to Watlington with car parking facilities which would support commuters travelling to Lynn, Cambridge and London. If a cycle route ran from the station into town via Hardings Pits or similar it would alleviate congestion too.</p>
REDACTED	The Access Road needs to be built before even the first phase of housing. Traffic on the A10 is extremely high. Commuter times and holidays excessively long queues are common place
70 REDACTED	Priority must be given to full cycle routes physically separated from car traffic to rail stations in Kings Lynn & Watlington
REDACTED	<p>The existing and proposed transport infrastructure is not, and will not, be sufficient to support the proposal. As the transport infrastructure stands today, it is already a nightmare travelling north toward King's Lynn and the coast, particularly at weekends, during school holidays and periods of good weather. The Hardwick flyover was constructed some years ago as a means of easing this issue, but has little to no positive effect with, in my opinion, it being built in the wrong direction. Travelling north and navigating the Hardwick roundabout sees traffic tail backs and blocked entry/exit points, while little to no traffic on the flyover. The mini roundabout installed just north of the Hardwick roundabout exacerbates the issue by causing another bottleneck.</p> <p>Before any further development and growth of West Winch and surrounding areas, a by-pass and better infrastructure is a must. The impact of further homes and traffic that it brings will not only have a massive detrimental effect on West Winch and its residents, but also to any visitors and the local economy i.e. people will steer clear if they cannot access it.</p>
REDACTED	There are also plans to build a large Estate at Downham on the A10 which will add to this problem. Also any building of houses south of Lynn in Cambs for example will add to traffic through West Winch To build here is like strangulation of the A10 by traffic.

REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	<p>See my comments below re North Runcton connectivity to West Winch. North Runcton would appreciate being on a significantly more frequent bus route to King's Lynn running along Rectory Lane. Safe and enjoyable cycling and walking access to the green spaces in the WWDA would also encourage their use by local residents.</p> <p>Bus services to both King's Lynn and Watlington railway stations need to be provided that link with train times to help reduce the need for a car every time someone wants to leave the development (or North Runcton!).</p>
REDACTED	The A10 is hard to get out on to without the additional traffic a new development brings. The bypass needs to be completed 1st
REDACTED	Pulling off my drive onto the a10 really scares me, it can take upto 30 minutes to get off my drive every day
REDACTED	No building should be allowed until a proper bypass is built.
REDACTED	Looks reasonable but considering the size of the development I think a greater consideration for cyclists accessing the town should be undertaken, namely a truly dedicated cycle path utilising West Winch common or beside the railway line. Gaywood and the Woottons have a good cycle path network

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REP ID/ORGANISATION	SUMMARY REPRESENTATION
CPRE Norfolk	<p>As the consultation documentation highlights, “connectivity is vital to achieving accessibility, integration for new residents and businesses and can contribute to a healthy community”.</p> <p>To ensure this is achieved it is essential that the West Winch (Blue) Route as described in the King’s Lynn Local Cycling and Walking Infrastructure Plan (February 2022) is completed by the time of first occupation of new housing in the West Winch Growth Area.</p> <p>We have concerns about the lack of rail connectivity in the documentation, as this would help to meet climate change targets, make the development more sustainable and help to provide real choices for residents, particularly if they work further afield than King’s Lynn: this would help to reduce reliance on cars. To achieve a satisfactory level of rail connectivity, dedicated cycleways should be established all the way to King’s Lynn railway station and to Watlington railway station. An even better, if more costly, option would be to construct a new railway station immediately to the west of West Winch, serving the extended settlement, and to include a dedicated footpath/cycleway. It is disappointing that this option does not appear in the West Winch Growth Area proposals.</p> <p>Better bus services to and from the new neighbourhoods are also essential, in particular serving the Hardwick Industrial Estate and King’s Lynn. This is summarised in the “better bus service” section of the consultation document and in Policy GA08: provision for public transport in the North Runcton and West Winch Neighbourhood Plan.</p>



<p>Castle Rising Parish Council North Wootton Parish Council South Wootton Parish Council</p>	<p>Section 9 concerns connectivity and transport. It states that:</p> <ul style="list-style-type: none"> <li>• “The Growth Area should be well-connected with surrounding communities by walking, cycling and public transport. The whole area should be better linked to local centres, places of work, education, the town centre and the countryside linking in to King’s Lynn’s Active Travel Network.”</li> <li>• “The need to improve the existing bus connectivity was identified in responses to earlier consultations. Development layouts should allow for a revised or new bus service connecting the growth area to King’s Lynn. Further work is required to establish how the increased housing numbers can help deliver an improved service. The developers should provide subsidies for the new service.”</li> <li>• SADMP Policy E2.1 Part A “Outcomes” states (6) “Provision of (a) suitable arrangements for public transport to route through the wider site, and connectivity to main routes to encourage non-car modes.”</li> <li>• SADMP Policy E2.1 Part B “Process” states (d) [developers will] “Provide financial contributions towards the development of infrastructure...” and (e) [it will] “be accompanied by (1) a comprehensive strategic transportation plan for the area...” and “the Strategic Transportation Plan should expressly address the provision of and role in minimising car-based traffic of public transport across the wider allocation.”</li> <li>• SADMP paragraph E2.60 states that “The need to improve the existing bus connectivity was identified in responses to earlier consultations. Development layouts should allow for a revised or new bus service connecting the growth area to King’s Lynn. Further work is required to establish how the increased housing numbers can help deliver an improved service. The developers should provide subsidies for the new service.” This was adopted in 2016, so six years later the Borough is consulting on precisely the same wording (second bullet point above), showing that nothing has moved forward in this respect in the meantime, despite outline planning applications being submitted by two developers to cover some two-thirds of the homes to be built in the Plan Period. This is a woeful failure by both the County and Borough Councils.</li> <li>• In their Transport Assessments, Hopkins Homes (consistently), and Metacre (in later amendments) have proposed that public transport to the development must be financially self-sustaining. Contrary to SADMP policies and the Framework Masterplan they propose that one of the two existing bus routes divert through the development, neither of which are fit for urban extension populations or expectations, being at random and variable times. Leaving aside that this would worsen journey times and experience for existing passengers from further out, there is no evidence that this has been challenged. It is reasonable to deduce that Metacre’s later adoption of this is with the tacit or outright agreement (maybe encouragement) of County Council as highway and transportation authority. This does not accord with SADMP policy E2.1 Part B (d) and (e 1), nor with NCC LTP4 policies, nor SADMP para E2.60.</li> <li>• This failure by the Borough to set an example by following its own written policies enables developers to argue their case that they should not fund or ensure provision of adequate transport services. As transportation authority, much of the blame for this may lie with the County Council. Thus whilst NPPF paragraph 112 states “Applications should (a) give priority first to walking and cycle movements and second to “facilitating high quality public transport with layouts that maximise the catchment area for bus and other public transport services and appropriate facilities that encourage public transport use, (b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport, (c) create places that are secure, safe and attractive.....” developers are able to largely ignore it with impunity, blighting the development for future generations and failing the NPPF sustainability test.</li> <li>• The un-numbered map on page 21 of the draft Framework Masterplan shows a potential bus link into development “for consideration.” The proposed route does not accord with NPPF para 112 which states “...with layouts that maximise the catchment area for bus...” because it skirts around the edge of the Metacre site and does not adequately penetrate the Hopkins Home site to fulfil the para 112 requirement. Indeed by running alongside the WWHAR for much of the way, it guarantees to minimise the catchment area. It is clear that this has been drawn in after the outline applications were submitted by Hopkins Homes and Metacre without regard to either national or local policy. The route of this crucial piece of infrastructure should therefore be redrawn and, if necessary, so too the precise arrangements in the developers’ outline applications.</li> </ul>
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REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	Page 20 talks about 'Better Bus Service' to the growth area, but what about the already developed areas, i.e. West Winch and particularly North Runcton?
Norfolk County Council	<p>In a review of section 9, the LLFA observes the typical indicative primary, secondary and tertiary corridors cross sections have space potentially for SuDS. The LLFA welcomes this and seeks stronger commitment in the SPD to the inclusion of roadside sustainable drainage features.</p> <p>The LLFA would like to remind those preparing the SPD that all four pillars of SuDS (water quantity, water quality, biodiversity and amenity) must be demonstrated for the proposed solution to be considered as a sustainable drainage system.</p>
REDACTED	Access to North Runcton from West Winch via foot, cycle or disability scooter will be hazardous via proposed new Rectory Lane/Chequers Lane bridges.
Historic England	<p>P21 Connectivity and Transport Plan - We recommend the inclusion of more landscaping along the eastern access road, particularly in the area around the roundabout o the north of Rectory Lane to help protect and enhance the grade II listed Old Rectory at North Runcton. Landscaping along this eastern edge would also serve to screen and soften the development in the wider landscape.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
<p>West Winch Parish Council North Runcton Parish Council</p> <p>75</p>	<p>Regarding the masterplan and the cross sections on page 20, there only seems to be one 'primary corridor' and a couple of connections shown on the plan. Is this correct? What are the principles being illustrated by these sections? We support street tree planting – but is the design shown compatible with NCC adoptable road design policy and the easements required by service providers? We are doubtful. But if this is a clear design ambition, then this document needs to clearly state this.</p> <p>We are unconvinced that the 25m wide 'primary corridor' design, 21m wide 'secondary corridor' design, or 19m wide 'tertiary corridor' design can actually be delivered on the masterplans presently submitted by Hopkins and Metacre. Obviously, their plans are presently only outline application designs – but, judging by measuring at the relevant scales, they would not be able to work up these schemes into reserved matters design detail if these illustrative sections are the preferred road corridor layouts. So, are the sections in the draft SPD illustrating required design principles or not?</p> <p>In the tertiary corridor design, street tree planting is indicated a few metres from the dwellings, which is not best practice and unlikely to be acceptable on the clay soils underlying this site.</p> <p>We note the second proposed new primary school has now been located off Hall Lane. This is new and has not previously been consulted upon. West Winch PC will canvass residents to see how they feel about this. Including this area in the growth plan has already proved contentious and was strongly opposed by residents.</p> <p>None of the 'Relief Road' junctions have presently been offered in the current Metacre submission so that all traffic from their scheme would presently access the site from Rectory Lane and the A10. The IDP phasing plan indicates that both the Hopkins and Metacre scheme would complete initial phases before the Relief Road is complete. We object to this and do not agree that it will be acceptable or sustainable.</p> <p>The vehicular access road over the 'Relief Road' at Rectory Lane is an agreed requirement and we are concerned about the less than clear current BCKLWN stance on this. (Officers stated at the recent consultation event that it was a cycle/pedestrian access only). In our view this is a <u>red line</u> requirement.</p>
Metacre	Page 21 of the SPD refers to the provision of new Rectory Lane and Chequers Lane bridges over the proposed access road. Limited detail has been provided on these bridges and it is not clear how they are to be delivered. This should be expanded upon in the document.
REDACTED	Will bring too much Traffic and pollution to proposed residential areas and take up much quiet Rural area. Too close to North Runcton Village and will change the character of West winch and North Runcton.
REDACTED	This road HAS to be a dual carriageway. It is great that it has been identified that Dualling of the existing A47 between Hardwick Interchange roundabout and the housing access road is required, but this is a very heavy traffic route which requires at least two lanes each way.
REDACTED	The new road MUST be built before one property is built. The A10 and Hardwick is gridlocked going to the coast in the summer and shops at Christmas time. It would be foolhardy not to shop the commitment to relieve this issue before building houses.

REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	The proposed link road needs to be completed IN FULL before any building be commenced. Currently the A10 is a massive car park at peak times and at others just downright dangerous. From the top o f Lomg Lane the footpath to the shop and woefully inadequate and for a frail person or child ist is an accident waiting to happen.
REDACTED	The WWHAR is a game changer to any new development in West Winch & it is imperative construction is funded & undertaken prior to any major development taking place. Current traffic loading of A10 is untenable at times & any significant development exiting onto existing road will only increase problem. Indicated at presentation 300 properties from Hopkins site can exit via new roundabout near 'The Winch', Vehicles exiting this site would take priority over north bound A10 traffic, I believe this will cause further traffic delays at peak times heading to Hardwick roundabout & any new development should be limited prior to new road construction.

REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	This must be built before ANY housing is approved. It is the only way that the road will ever be built, otherwise the housing will be approved and built in small packets until it is nearly all built and no road. Don't approve ANY of the housing, not even 300, and this will put pressure on completing the new road.
REDACTED	The Access Road needs to be built before even the first phase of housing. Traffic on the A10 is extremely high. Commuter times and holidays excessively long queues are common place
REDACTED	The new road needs to be in place before the development is started . Th A10 is already very heavily congested with large vehicles so what will it be like when all the vehicles bringing materials arrive.
REDACTED	See above. In addition, the West Winch Housing Access Road will NOT address existing traffic problems on the A10 as detailed, why would anyone divert off the A10 to use a road that from the plan includes 4 roundabouts which will invariably become bottle necks?
REDACTED 77	<p>Living in North Runcton this will have the greatest impact, both in terms of visual change to the countryside around, but also to noise and connectivity. The key issues for us are ensuring the design minimises noise impact, ensuring that the noise levels in North Runcton are not adversely affected by the road and also limiting visibility. North Runcton is a rural village. We want it to remain so.</p> <p>Secondly ensuring that any natural habitats are preserved or replaced when it is built.</p> <p>Thirdly - accepting the proposals made in the Neighbourhood plan - namely Rectory Lane having a bridge over the access road to West Winch ideally with the whole road being 30mph with speed calming measures such as road narrowing and no heavy vehicles (but no speed bumps as these are noisy!). Rectory Lane needs to stop being a cut through where people ignore the speed limits (we have measured people doing 65mph along the road). Chequer Lane to be blocked (maybe at the common gate) except for pedestrians, cyclists and horse riders with an appropriate bridge over the access road with Manor Farm only access onto or off the access road.</p>
REDACTED	The bypass needs to be completed before starting. This will in turn help with access.
REDACTED	I am not apposed to the new houses but west winch needs the new road FIRST. I live on the A10 and I am scared daily to pull off my drive way, the noise pollution and the traffic which is damaging my cottage which is over 100 years old is shocking. Please please build the by road first
REDACTED	Completely inadequate and will not be used by the majority of vehicles. A proper bypass should be built starting at the Oakwood roundabout going to Constitution Hill as proposed and agreed 30 years ago. Then they can build as many houses as they like but it will ruin the character of the village.

REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	<p>There is no detail as to when this road will be built, within Section 6 Infrastructure Delivery Plan indeed it is implied that it is not a requirement before Hopkins or Metacre start building off the A10. Why have you not published the key infrastructure needs and at what point they will be required, this publication indicates that the road and other infrastructure requirements may not arrive causing an unacceptable level of disruption to West Winch residents and others using the A10. I have already objected to Metacre plans being adopted before the new road has been built.</p> <p>The A10 section through Setchey and West Winch is on record as being one of (if not) the busiest single carriageway A road in the UK and NCC Highways have always objected to planning applications that would impact on the this section of the road. The Borough Council also supported this stance I can see no reason to change that position in relation to the Metacre and Hopkins plans prior to building of this road.</p>
CPRE Norfolk	<p>A new "Relief Road" or 'West Winch Housing Access Road' (WWHAR) as described in policies GA03: ensuring transport infrastructure and GA04: design of 'relief road' in the North Runcton and West Winch Neighbourhood Plan, as well as in the consultation documentation is essential. This needs to be delivered before first occupation of any of the new housing in the West Winch Growth Area, to ensure there is good connectivity and less congestion for the new housing and for the existing settlement.</p> <p>Without secure funding for the WWHAR any other development within the West Winch Growth Area should not be permitted. If the WWHAR is not in place before first occupation of any new housing, it would lead to intolerable congestion and resulting road safety issues. In particular this would be an unreasonable burden for existing residents of West Winch and nearby settlements.</p>
REDACTED 78	<p>I would hope that the A10 Bypass would be in place before any of the housing developments start.</p> <p>A10 is a absolute nightmare in the mornings know.</p>
REDACTED	<p>Surely a loop road needs building that links the A10 from Tottenhill to go and join the A47 east of Middleton and west of the River Ouse thus removing the heavy traffic from the Hardwick roundabout and the road going over the River Ouse. In future the number of vehicles will only increase and so needs to be a dual carriageway.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
<p>004 written rep Castle Rising Parish Council North Wootton Parish Council South Wootton Parish Council</p>	<p>Sections 10 and 12 of the draft Framework Masterplan deal, respectively, with WWHAR and Governance. Section 10 states that the design will comprise the following “essential elements”:</p> <ul style="list-style-type: none"> <li>• (third bullet of six) “Sustainable transport measures (public transport, walking and cycling)”</li> <li>• Developer part-funding will be secured through Section 106 Agreements</li> <li>• Consultation process for WWHAR planned for later in 2022</li> </ul> <p>Section 12 gives a precise figure of £13.5m developer contribution to WWHAR and traffic calming in West Winch village, in stark contrast to the need, apparently still after six plus years, to do more work on the public transport element of the infrastructure notwithstanding developer resistance to its inclusion in the first schemes.</p> <p>It gives absolutely no confidence whatsoever that either the County or Borough Councils have any real intention to ensure that this element of the Masterplan is delivered, to the detriment not only of the new residents but existing local residents and those travelling from the rural area further out from King’s Lynn. It is a “lose lose” for all except the developers for whom such lack of action will be a considerable financial gain.</p>
<p>REDACTED 79</p>	<p>Page 21 map. Various queries:</p> <p>The orange and red bus route seems to deviate off the access road above and below Rectory Lane and then towards the A10 – is this another new road? For buses only? This is the first time that this road has been shown on maps as far as I can remember – when did this idea come in and why?</p> <p>The note re Rectory and Chequers Lanes suggests ‘will maintain active travel connections between West Winch and North Runcton’. Are we correct to take this to mean that the access on both will be pedestrian and cycle only with no vehicular access? I asked about this at the consultation and didn’t receive a definitive answer. If it is the case that they will be pedestrian/cycle access only, how will buses serve North Runcton? It’s a long walk from e.g. Cedar Grove to the bus route off the Access Road.</p> <p>The existing path from Hillingdon Lane up to Sheep’s Course Wood will be perilously close to the new road. Will anything separate them?</p>
<p>Anglian Water</p>	<p>The detailed design of the access road will need to take account of Anglian Water assets that may be affected by the proposed route, and the necessary measures that will need to be taken to ensure continuity of water supply and our recycling network.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
<p>West Winch Parish Council North Runcton Parish Council</p>	<p>At page 22 we note that the Relief Road junction with the A47 is now stated as a 'signalised roundabout'. We object to this and are surprised if Highways England regard this as acceptable. It would introduce a significant additional barrier to east-west movement on a trunk road and, we would expect, additional queues, pollution and increased journey time. We are already of the view that the Relief Road and associated roadworks will simply move existing congestion problems from one place to another and another major signalised junction less than 1km from Hardwick will ensure that.</p> <p>At page 22, the statement that the new road will "make sure traffic from the new development has a minimal impact on the exiting A10 as it passes through the village" and "it will provide an alternative route around the village" is false. Setch and the southern end of the settlement will still have the A10. Consultants working for Hopkins and Metacre have calculated that the first 1600 dwellings will generate nearly 10,000 additional vehicle journeys a day. Any residents that believe the new road will significantly reduce traffic congestion in the locality have been seriously misled</p> <p>We note the recent comments from the BCKLWN 'Environmental Quality' officer regarding the Metacre application, which seem to imply that only electrical vehicles will prevent significant air quality impacts from the cumulative development. But electric vehicles are still polluting and will still cause congestion.</p> <p>We are doubtful that the one new bus route indicated on the plan will provide optimal public transport coverage for the development and therefore comply with public transport design guidance.</p> <p>We note the one peripheral cycleway – but the key requirement for cycling is linkage to elsewhere (King's Lynn, the hospital, Middleton...). Without these links, cycling will not become a viable alternative to vehicular transport. We note the IDP costings specifically omit a figure for these links. The Town Plan project area included the WWGA, but little of that fund now appears to be proposed for 'active transport', and none of it is proposed to improve cycle links to West Winch.</p>
<p>08 Hopkins Homes</p>	<p>It is important this road is not over engineered and becomes a barrier to pedestrian and cycle connectivity with the surrounding area. The initial proposals (considered through the Princes Foundation consultation exercise) were for a 40 mph boulevard route with many crossing points. It will be important for this road to retain these characteristics in order to support wider community connections.</p>
<p>REDACTED</p>	<p>As noted in previous sections phasing is critical with low numbers of infill initially allowed with major development taking place following construction WWHAR.</p>
<p>REDACTED</p>	<p>No delivery until access road built</p>
<p>REDACTED</p>	<p>The noise during road construction will be considerable - especially from the reversing and H&amp;S signals made by vehicles. Hours need to be limited to minimise disturbance to the village between 6pm and 8am.</p>



REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	<p>Infrastructure Viability (Section 106) is still in question, so why are detailed plans from Metacre and Hopkins being considered. West Winch residents deserve a better deal and must not be put at undue disruption because infrastructure delivery can not be met before house building starts.</p> <p>Phasing indicates house building is anticipated 2-5 years before the new road is completed, this is not acceptable. Alternative access roads to new developments could be established off the A47 maybe (2013 plans enabled this why change causing undue problems on the A10?)</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
CPRE Norfolk	<p>As highlighted in section 10, it is essential that the West Winch Housing Access Road is delivered before any of the new housing is occupied. This is to ensure disruption and inconvenience from the new development for current residents is not made intolerable, in addition to the need to maintain traffic flows on the A47 and A10. It will also be important to ensure other infrastructure for the new development, and to support the existing settlement, is delivered in good time and not at the end of any housing construction, or worse not at all. This includes medical facilities, educational facilities, shops etc. This delivery needs to be secured and guaranteed by appropriate legal means</p> <p>e.g. S106 agreements. As noted in our comments for section 12, there is a worrying lack of detail about the range and type of this additional essential infrastructure and supporting development.</p>
REDACTED	<p>Page 23 'Phasing' says ' , it is expected that an element of delivery could come forward during the next 2-5 years prior to completion of the WWHAR, some of which will be prior to the completion of the WWHAR' which doesn't make sense in any way but seems to be saying that some of the houses could be built before the road, doesn't it? But how many? And how will the pressure on the A10 and A47 be mitigated in this time? Even if Hopkins only builds 200 houses before the road starts, it will put enormous pressure on an already overloaded system. And will the much-vaunted links to bus and cycle routes be in place before all these people move into the new houses? I highly doubt it!</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
<p>Environment Agency</p>	<p>Thank you for your letter dated 5 August 2022 notifying us of the consultation on the draft SPD. We welcome the opportunity to comment.</p> <p>The key issue of concern currently is water resources. The development proposed is within the area supplied by Anglian Water. We have identified in our 2015 Anglian River Basin Management Plan (RBMP) that current levels of water abstraction are causing, or risk causing, environmental damage in various river catchments across East Anglia. Therefore, we have recently (2021/22) reviewed abstraction licences including those held by the water companies to address risks of deterioration and allow waterbodies to recover.</p> <p>Any resultant loss in available water supplies from this review will need to be addressed in the Anglian Water's next WRMP (WRMP24). Replacement supplies are likely to require strategic supply options (for example reservoirs and long-distance transfers) that could have significant delivery times. The draft SPD envisages delivery of 2,500 new homes up to 2038, and the section on 'phasing' suggests this would be over a period of 15-20 years, with approximately 60-200 homes delivered yearly. We strongly recommend the Council checks with Anglian Water on the realistic availability of sustainable water supplies during this period, and to ensure the plans for phasing of the development match the delivery of water supply infrastructure. We would not be able to support development that results in increased rates of water abstraction from surface and groundwater bodies where it will cause deterioration in the environment or compromise the measures being taken to move to more sustainable levels of abstraction.</p> <p>The SPD refers to the Infrastructure Delivery Plan 2018; however, the Council appears to have a more recent version available dated 2022. Our concerns regarding water resources should also be considered for the IDP if not already. However, the WRMP24 draft consultations are not expected until October 2022.</p> <p>Under 'Design and Development Expectations' the SPD should endorse the use of water efficiency measures in the form of water efficient technology, fixtures and fittings, in line with the emerging Local Plan policy standards, to alleviate further demand on potable water supplies as much as possible. There is an opportunity here to be ambitious and to think of further ways the development could reduce water demands through water re-use, grey and black water systems and rainwater harvesting.</p> <p>Although there is sufficient capacity for wastewater at King's Lynn Water Recycling Centre, the SPD should reference the importance of phasing (in agreement with Anglian Water) to allow timely upgrades to the sewerage infrastructure, which will also protect the water environment.</p> <p>The parcel of land furthest south (site E2.1) is partially at risk from fluvial flooding from the river Nar and potentially further afield from the River Ouse. The SPD 'Design and Development Expectations' should be informed by the recommendations of the Council's Level 2 Strategic Flood Risk Assessment for these sites. This will help future applicants design the site to ensure safety from all forms of flood risk, taking climate change into account.</p> <p>We welcome the sections on Sustainable Drainage Systems, Biodiversity and Green Infrastructure. However, to maximise multiple environmental and social benefits there should be more cross-over between these design areas and ambition for integrated water management, habitat connectivity and improving water quality.</p> <p>We hope these comments are useful in preparing the final version of the SPD document. If you have any questions regarding our advice, please contact us.</p>

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REP ID/ORGANISATION	SUMMARY REPRESENTATION
84 Anglian Water	<p>Anglian Water commends the approach being taken by the Council to facilitate a Collaboration Agreement between the remaining landowners, that will assist in delivering the remainder of the growth area in a coordinated manner, not least in respect of infrastructure delivery. We agree with the statement that <i>"the Growth Area has the best potential to be delivered if it is considered as a whole and in a consistent manner"</i>. This would reflect our initial analysis of infrastructure requirements for the West Winch growth area in respect of the current development proposals by Hopkins and Metacre. As a result of the updated housing trajectory for West Winch (provided by the Council to the Inspector for the Local Plan examination) we recognise that the proposed delivery of the full quantum of 4,000 dwellings to 2048/49 will assist with our future investment requirements, in addition to developer contributions, over the long term.</p> <p>We note that the IDP (Infrastructure Delivery Plan) for the South East King's Lynn Strategic Growth Area includes estimates of costs for standard connections to water supply and the sewerage system, however, the IDP might require further revision given the updated <a href="#">trajectory</a> for delivery. Early engagement with our pre-development team in Developer Services can help to ensure that the necessary infrastructure is in place to address the capacity of the 4,000-home development to 2048/49. This will necessitate appropriate connections, and sufficient infrastructure to address the increased flows through our water recycling network. There is currently sufficient headroom at the King's Lynn Water Recycling Centre (WRC) to accommodate the proposed growth, however, our <a href="#">draft Drainage and Wastewater Management Plan</a> (DWMP) identifies a long-term strategy to 2050 of 'wait and see' which will monitor the performance of the WRC network and identify whether any further measures need to be taken in subsequent reviews of the DWMP.</p> <p>In terms of future water supply, the <a href="#">Water Resources Management Plan</a> (WRMP19) for the period 2020-2045, sets out how we intend to achieve a secure supply of water for our customers while protecting and enhancing the environment. Our current WRMP is addressing our supply-demand balance, which, if we took no action, would see our region experience significant water shortages within the next five years. We are now in the process of preparing WRMP24, with a draft to be submitted to Defra in October 2022. In line with statutory requirements, we will be holding a public consultation on this draft WRMP in the autumn.</p>
Norfolk County Council	<p>In section 11 regarding the delivery of the development, the LLFA notes there is very limited information available at present regarding the phasing of the development's delivery. The LLFA reminds both the local planning authority and the developers that the development must not increase flood risk during the lifetime of the development, which includes the different phases of construction. Therefore, a detailed phasing plan will be required to demonstrate that appropriate surface water management systems will be in place to ensure there is no change in flood risk.</p>
Hopkins Homes	<p>The framework is right to allow a degree of development prior to the completion of the WWHAR. Transport evidence demonstrates that development of c300 homes can be accommodated onto the existing network without significant adverse effect. The early delivery of homes would also allow financial contributions towards road, education and drainage infrastructure improvements to be captured quickly in the process. It would also provide housing in an area where housing supply is needed.</p>
REDACTED	<p>The West Winch Stakeholder group needs to be a real consultation group. Based on experience so far it feels like it is a one way communication of what is going to happen. Officers and councillors need to listen and try and adapt within the framework to address real concerns and issues. Also there needs to be proactive and regular communication to the public being honest about the reasons when decisions are being made.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
004 written rep Castle Rising Parish Council North Wootton Parish Council South Wootton Parish Council	<p>Sections 10 and 12 of the draft Framework Masterplan deal, respectively, with WWHAR and Governance. Section 10 states that the design will comprise the following “essential elements”:</p> <ul style="list-style-type: none"> <li>• (third bullet of six) “Sustainable transport measures (public transport, walking and cycling)”</li> <li>• Developer part-funding will be secured through Section 106 Agreements</li> <li>• Consultation process for WWHAR planned for later in 2022</li> </ul> <p>Section 12 gives a precise figure of £13.5m developer contribution to WWHAR and traffic calming in West Winch village, in stark contrast to the need, apparently still after six plus years, to do more work on the public transport element of the infrastructure notwithstanding developer resistance to its inclusion in the first schemes.</p> <p>It gives absolutely no confidence whatsoever that either the County or Borough Councils have any real intention to ensure that this element of the Masterplan is delivered, to the detriment not only of the new residents but existing local residents and those travelling from the rural area further out from King’s Lynn. It is a “lose lose” for all except the developers for whom such lack of action will be a considerable financial gain.</p>
West Winch Parish Council North Runcton Parish Council	<p>Lastly, we feel that the pages on ‘Delivery’ and ‘Governance’, aspects of which we take issue with, indicate that this document is really about promoting the scheme to third parties – possibly the Planning Inspectorate and Department of Transport? These pages would appear to have no place in a supplementary planning guidance document if it was focussed on assisting the delivery of high quality sustainable development.</p>
8 9 Hopkins Homes	<p>The establishment of a Project Board and Delivery Group is supported in principle, subject to further detail on representation and role.</p>
Metacre	<p>With regards to the proposed phasing as referenced at Page 23 of the SPD, we support the expectation that an element of delivery can come forward during the next 2-5 years prior to the completion of the Housing Access Road. Indeed, the Council will note that the evidence submitted with outline application (ref: 18/02289/OM) demonstrates the 500 units comprising Phase 1 can come forward prior to the Housing Access Road.</p>
REDACTED	<p>build oposite William Burt Centre towards common side will spoil quiet country lane and change views from center. where are the horses of West Winch Going? Can Kings Lynn Hospital cope will a build of this magnitude and population increase. Where are people going to work?</p>
REDACTED	<p>I cannot see any reference to the A10 which regularly gets long hold ups with cars turning in and out of West Winch            Also another 4000 homes would put pressure on the hospital that may even close if funding cannot be found for a new building.</p>
REDACTED	<p>Why do we need 4,000 extra houses? Just greedy and really going to affect people already living in the village</p>
REDACTED	<p>No provision made for the existing flood risk which are yet to be resolved. The extra 4k homes will place massive pressure on flood Risk which needs to be resolved in full before any progress made.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	West Winch is effectively 'land locked' with access & exit to the village only achievable from A10, this road historically has suffered from continual tail backs with any incident north or south of village. These occur with current property count circa 1400, increasing property count by 400% relies totally on WWHA being constructed at the earliest possible stage. Traffic calming existing A10 is essential as development progresses.
REDACTED	<p>If this is the only way to provide much-needed housing then I cannot argue against it. But I do not believe this is the only way. I have lived in central Kings Lynn since 1979, and am more and more conscious of the number of empty buildings in the centre of town. Empty dwellings above shops, empty floors in the old post office building, the old Debenhams, empty space above town centre offices, and spaces such as open car parks where extra floors could provide housing. And all using the existing services, shops and amenities without the need for cars in order to get in from out of town. I lived for four years on the Fairstead estate. I walked into town for work and to reach the railway station. But people are not walking much now. Those who will live in new housing at West Winch will want to drive into the town centre and thus exacerbate traffic problems.</p> <p>Housebuilders will naturally seek to find greenfield sites for developments, and there is only so much that councils can do to mitigate the resulting transport problems. I would like to be assured that the borough is constantly seeking ways the town can be developed so that brownfield sites are identified for new housing. I bought a derelict feedmill in King's Staithe Square for £5,300 in 1975. It provided a spacious home for me and my wife and two children. My wife died in 2009, by which time the children were living away. I converted my house into two flats. I live in one, and have sold the other one for £195,000. I am surrounded by other people in large houses that could also be converted into more living spaces. A campaign to tempt people to profit from making best use of their houses would not go amiss - making money for the principals, providing convenient town centre housing for more people, and reducing the impact of more cars on our roads.</p>
REDACTED	I back on to the field where there is a proposal to build another school near Elmtree Grove and properties . This area is very quiet and building a school here would make this area very busy and at present a lot of bungalows in that area. Why extend to this end of the village when there is already plans near the North Runcton site. West winch as a village will no longer exist !!
REDACTED	This whole plan stinks of greed. No thought for the existing community, countryside or local area in general.
REDACTED	There should be a display and meeting in Downham as before to discuss this with Mr Blunt. I hope the new P.M is our local M.P and this nonsense stopped and a new Hospital built so the thousands of over 65's in Downham can get to it.
REDACTED	<p>It is a good document that shares the desire of the council regarding this scheme.</p> <p>The viability of the scheme is questionable with all the issues of where will people come from to live here, how will the schools and health centres be staffed, being half way between Watlington and King's Lynn centre makes it a bit of an island meaning people will want to have and use cars.</p> <p>Can the development truly meet all the government requirements around sustainability?</p> <p>Finally - the consultation on the road when it comes needs to be open with the officers and councillors listening to peoples views and trying to truly take account of them.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	Our hospital is literally falling down and cannot cope with current residents. I have lived here 5 years and have never been able to get a NHS dental appt. How on earth can we take on up to 4000 homes. Roads and NHS infrastructure in King's Lynn needs to be dealt with first of all. The town cannot sustain this many additional properties!
REDACTED	<p>I attended the presentation at the William Burt Centre on 10th August why were the developers not present? Also why were there no Growth Area Masterplan folders available</p> <p>(only available on line 26 pages) not everyone has access to the Internet. Nobody I spoke to gave information on how to comment? This is a consultation process how will I know whether my comments are even looked at let alone acted upon?</p>
CPRE Norfolk	<p>There is far too little discussion of essential infrastructure in the consultation document. In particular, there is only one reference to health provision, which is almost certainly one of the main concerns of existing residents and of potential new residents.</p> <p>The consultation does not specifically ask for comments on Section 6, Infrastructure Delivery Plan, where certainty around these issues should be provided, to ensure that sufficient reassurance is given that essential services and facilities will be provided. If this certainty for provision of key infrastructure does not exist this would give CPRE Norfolk serious misgivings about the whole proposal. It is essential that appropriate health and dental services are provided within the settlement given the anticipated growth in population, and the need to avoid unnecessarily long journeys for residents. It is acknowledged there is some facility for making comments on the delivery of the scheme under section 11.</p> <p>As noted under Section 8 above, clearer requirements regarding external night lighting should be included.</p> <p>It is important that community stakeholders' views on necessary community facilities are listened to and then delivered through the development process.</p>
REDACTED	<p>The area is already overpopulated, the road network is already at breaking point, our local hospital is trying to collapse, our waste water/ effluent is having to be pumped into the sea, how bad do things need to get before you realise we already have too many people?</p> <p>Please stop building .</p>
REDACTED	<p>After looking at the master plans, I only have 1 major concern (LAND / STORM WATER).</p> <p>We have trouble know at the bottom of Willow Drive with land / storm water, Because the land owner in front of us has raised the land level and we live in a hole.</p> <p>The field behind Coolstak warehousing has a large dip in the field which fills up with storm water and goes into the concrete culvert and onto the common.</p> <p>But the land drain pipes which goes from the bottom of Willow Drive + The pipe from the field which runs side by side out onto the common cannot cope.</p> <p>The dike in the common of which the pipes go into has been cleaned for at least 30 years.</p> <p>I all of the dikes on the common behind Willow Drive has been cleaned for over 30 years.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
<p>REDACTED</p>	<p>I have just returned from observing the above at West Winch Village Hall this afternoon and was in discussion with a member of your staff to gather some information.</p> <p>I was told by one of your Housing Managers that the land in question was owned by a mixture of private owners, including developers, when I asked if the Council owned any land here, specifically farms, I was told no they did not.</p> <p>I understand that most of this land is valuable farm land, I came across this article of December 2021 (see link below) and am rather amazed that I was not told that the Council had indeed sold one of their important farms off to the developers. (Eight sites as written by the article!)</p> <p>In view of this, I wonder if you could let me know how much the council were given for this piece of valuable farming land, that is now lost and gone forever, from the developers and if the Council are prepared to replace the amount of land elsewhere to continue to grow food and crops.</p> <p>I also questioned the fact that Government were stipulating a while back that new development is favoured on brown field sites, rather than usable farming land and green field sites, of which there are many brown field sites in and around Kings Lynn. I was told that there just would not be enough land to sustain 4,000 new homes. However, seeing that this project will take 18 years there is certainly time to find and work on a huge project to find these brown field sites as land changes, especially in the light of councils selling their properties as more and more are working from home and offices are less needed. Town centres are becoming smaller leaving gaps of unused properties and brown field sites empty just ready for new development.</p> <p>I feel that there is lack of imagination here, it is so easy for the Council to sell off their land for a quick price without any consideration for the environment. The town of Kings Lynn is poorly managed and the town planning is non descript, leaving ugly houses abandoned which could be properly resourced and used and the creation of many roads becoming pathways only lined with trees, flowers and shrubs. So much could be done but I feel that Kings Lynn is abandoned to the get rich quick eagerness of the Council as they continue to sell off their land and farms, destroying local countryside, destroying local villages as they become eaten up with the Kings Lynn suburb and destroying farmland which could easily be farmed by many young people who wish to take this career forward.</p> <p><a href="https://www.edp24.co.uk/news/housing/west-winch-homes-farm-sale-controversy-8542568">https://www.edp24.co.uk/news/housing/west-winch-homes-farm-sale-controversy-8542568</a></p> <p>I am open to discussion as I realize the need for housing, although the real need for housing is for those who are unable to obtain a mortgage or have not the scale of earnings to devote a lifetime to such expensive repayment schemes. There are only 20% of these new houses allocated for housing association homes. Could not the council if they did sell off the farms allocate these areas specifically for housing for the association homes. Surely that would have been a fairer option as Councils are or should be, or were in the past there to provide housing, another responsibility which has been waived elsewhere to save Councils money.</p>

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REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	<p>I have already completed an online form REDACTED and would like to reinforce some comments I made.</p> <p>In particular you will realise I am totally against building work starting before the WWHAR West Winch Housing Access Road is built, which will become the newly aligned A10 bypassing the village.</p> <p>The proposed early start developments by Hopkins and Metacre of a combined 1600 homes will necessitate undue traffic on an already congested stretch of the A10 through West Winch causing problems for West Winch residents and all A10 road users.</p> <p>An Alternative way to provide access for builders and new residents while we wait for the Full WWHAR is as follows:- In Section 11 titled Delivery, in my on line form return XXCMVRWT I suggested an alternative access road from the A47. This would follow the proposed line of the eventual WWHAR with the exception that the major works at Hardwick Interchange and dualling as envisaged and link to the A10 at Setchey could wait until NCC and Central Government DFT agree the funding. In the meantime the developers would fund this element of the infrastructure build (which is the norm for major developments and not as you are proposing). Of course the council will have a difficult job persuading the developers to put up front much more money regarding Infrastructure costs than they are being asked to do under the current plans, put forward by these companies. The Section 106 could easily be written to cover this way of accessing the Growth Area.</p>

004 written rep  
 Castle Rising Parish Council  
 North Wootton Parish Council  
 South Wootton Parish Council  
 (see other comments above – section 1,4,5,9,10 & 12)

I am pleased to have the opportunity to comment on the above document and planning policy framework. Whilst I recognise that the document necessarily covers a range of topics to guide the West Winch area development, my observations are limited to how transportation, decarbonisation and access to services for new (and existing) residents. I would like this placed on the Borough’s planning portal without delay.

Summary and conclusion

The draft Growth Area Framework Masterplan fails to meet the Borough’s own policies in the Core Strategy and Site Allocations and Development Management Plan (SADMP) both adopted as recently as 2016. As a result it fails to meet the National Planning Policy Framework (NPPF) and National Design Guide (NDG). The SADMP in particular paved the way for a significant shift in the way development planning would be approached in the Borough but the evidence is that this has failed, and, in respect of sustainable transportation in particular, developer pressure, coupled with what may appear County Council indifference, has triumphed, so that the development looks and feels sustainable, but actually is not.

Documents studied for this submission

- The South East King’s Lynn Growth Area draft Framework Masterplan (being consulted on and to which this responds)
- The Local Plan Core Strategy
- The Site Allocation and Development Management Policies
- Norfolk County Council Local Transport Plans, LTP3 and LTP4
- Transport for the East’s draft strategy, January 2021
- The National Planning Policy Framework issued in 2019 with revisions in 2021
- The National Design Guide latest update January 2021

The importance of transport sustainability and decarbonisation

Transport sustainability is fundamentally important to this. Of carbon emissions in the UK economy as a whole, transportation is the most polluting sector accounting for 28% of carbon emitted (Decarbonising Transport, Setting the Agenda, Dept for Transport, March 2020) yet in the East of England that figure is 45% (Transport for the East draft strategy document, January 2021). Furthermore, whereas King’s Lynn urban area has 1.6% of Transport East area’s population it has 6.5% of its AQMA. Thus the East of England performs significantly worse than the UK as a whole on transportation pollution and King’s Lynn significantly worse than the East of England as a whole, making it amongst the worst areas in the UK. Within King’s Lynn, Gaywood has the worst air quality, just where high school students from the Growth Area would mainly be going to school as Springwood High has no spare places. Ensuring that the Growth Area meets transport sustainability criteria is therefore essential to air quality in the town more generally and to the new residents’ children as well. In respect of South Wootton developments, FOI requests by that Parish Council to both Borough and County Councils in Autumn 2020 showed that neither had conferred with the other, nor internally considered the air quality impacts of their decisions. There is little evidence that this has changed with respect to the Growth Area.

The NPPF defines sustainable development as “meeting the needs of the present without compromising the ability of future generations to meet their own needs.” (para 7) and sustainable transport modes as “Any efficient, safe and accessible means of transport, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport.” (Annexe 2, Glossary of terms). If the Growth Area meets these two definitions then it passes the NPPF sustainability test, at least in terms of transportation, but if not then it is not sustainable and the draft Framework Masterplan should not be adopted because “at the heart of the framework is a presumption in favour of sustainable development” (para 10). Paragraph 8 states “Achieving sustainable development means that the planning system has three over-arching objectives, which are interdependent.....” First is an economic objective which includes “identifying and co-ordinating the provision of infrastructure”. Second is a social objective which includes “with accessible services....that reflect current and future

needs". Third is an environmental objective which includes "mitigating and adapting to climate change, including moving to a low-carbon economy."

It is clear that the draft Framework Masterplan will not produce a development that meets the national definitions of sustainability nor those enshrined in local development plans. Nowhere is this more evident than in the access of existing and new residents to essential services. The High Schools are full – according to an internal County Council memo of January 2019 – and cannot take further students, which begs the question why funding is being put towards extra spaces at existing sites rather than building a new site at the Growth Area to channel post-primary students from communities South of Lynn and North of Downham Market. This would reduce traffic congestion and air quality breaches in Gaywood whereas by adding student numbers from the Growth Area it will significantly worsen.

The same can be said of access to primary and specialist healthcare facilities. None are proposed and indeed the draft Framework Masterplan makes absolutely no reference to this key aspect of infrastructure. Both the developers' Transport Assessments refer to dental and footcare clinics within walking or cycling distances but they too are silent on access to services that are fundamentally necessary to residents of the area. This is a massive failure of the Framework Masterplan and shows the inadequacy of the Borough's planning team.

#### Borough Council's draft Sustainability Assessment

Consultation has recently closed on the Borough's own assessment of the sustainability of its development policies and site proposals. It scores each policy and site from a series of objectives and features. Site sustainability factors include:

- Access to services – development providing supporting local services; availability of public transport to towns and similar major centres
- Community and social – development providing community facilities, housing type appropriate to local area and need, contributing to healthy lifestyles
- Highways and transport – "relationship of development to transport networks, especially public transport, free flow and efficiency of use of highway and other transport networks, transport infrastructure improvements and extensions .....and reduction of car use"

Despite no plan for access to healthcare or post-primary education, and despite no work done on developing sustainable public transport alternatives to the private car in accordance with its own policies and those of others, remarkably it concludes that the Growth Area residential allocations shows a positive score for highways and transport. This is because of the proposed WWHAR, which it describes as "to provide access and permeability to parts of the Growth Area, some of the submitted sites, due to their location, are detached from this 'fixed line' and/or Growth Area itself. This connectivity is vital to achieving links and integration between the new residents and businesses and can contribute to a healthy community" (sic).

It is difficult to understand what is meant, but the only possible conclusion is that the Borough views transport sustainability as coming from a new road for traffic to divert on to, irrespective of how much additional traffic is generated by the growth area. This is entirely contrary to national, county and its own policies indicated above. It illustrates the failure of the Borough Council to understand the wide range of issues that comprise sustainability or to take heed of central government policies, themselves based on the United Nation's 17 Global Goals of Sustainable Development, to which the UK government is a signatory.

#### Summary and conclusion

The draft Growth Area Framework Masterplan fails to meet the Borough's own policies in the Core Strategy and Site Allocations and Development Management Plan (SADMP) both adopted as recently as 2016. As a result it fails to meet the National Planning Policy Framework (NPPF) and National Design Guide (NDG). The SADMP in particular paved the way for a significant shift in the way development planning would be approached in the Borough but the evidence is that this has failed, and, in respect of sustainable transportation in particular, developer pressure, coupled with what may appear County Council indifference, has

REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	<p>In April 1974, my husband and I moved to West Winch (Archdale Close front facing A10) with 5 young children aged 2-8 years. Our concern was the closeness to the A10 but were assured that by 2 years there would be a bypass! Our solicitor had made appropriate enquiries on our behalf. It is now 48 years later and still no bypass but the open fields which we enjoyed have now been on increasing the traffic accessing the A10 to diabolical proportions. 3 roads – Chapel Lane, Long Lane, Gravel Hill Lane from West Winch and 1 road from North Runcton – Rectory Lane. My late mother lived in a cottage next to the Church Hall before a speed limit was installed. Her cottage and the church hall rattled and shook as heavy lorries sped past. She and I did a survey over 2 days documenting the number and type of vehicles passing up and down the A10. This was sent to Henry Bellingham (now Sir) who was instrumental in getting a speed limit of 40mph – not that it is always obeyed – I and some of my friends have had cars and motorbikes overtake us as we adhere to 40mph! More building must be put on hold until the A10 bypass is in situ and infrastructure us in place.</p> <p>Wherever these new homeowners will work they will have to travel either way on the A10 adding to the congestion and pollution of the air. The promise of infrastructure I wonder whether this will come to fruition? When the Bovis and Hopkins homes were built there was the promise of shops etc, and all that materialised was a private dentist and a few play areas! Promises, promises.</p> <p>West Winch was once a lovely village where there was a real community spirit but now that has gone as the village? Has grown out of all proportion and which out of town supermarkets and other shops the town itself is dying a death especially as there are no parking fees.</p>
<p>Castle Rising Parish Council</p> <p>92</p>	<p>There must be a complete review of the current mitigation measures to make sure this development does not become solely car dependant.</p> <p>We are deeply concerned after our experiences over the Knights Hill development where mitigation measures have been cut by County, the same cracks are appearing at West Winch particularly over the questionable delivery of the planned relief road and inadequate public transport provision.</p> <p>County and Borough choose not to understand or recognise major transport and highways implications and provide solutions to help us tackle the appalling over capacity and hence dangerous emissions levels. As neighbouring parish councils, we are all concerned the impact and knock-on effect the planned 4,000 home at West Winch will have on West Norfolk.</p> <p>We are keen to bring new homes to our wonderful area, on condition they are delivered in a fully sustainable and environmentally friendly manner.</p> <p>Planers must understand when pursuing large applications their desire to boost housing numbers must not override good mitigation measures.</p> <p>The number one priority to sustainable development is good planning, essential to avoid the negative and harmful impact poor infrastructure will have on both current and future residents. When trying to seek improvements Parishes and the local voice are very frustrated, although consulted, views and concerns are largely ignored.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
North Wootton Parish Council	<p>*** has been working with and advising the parishes of South Wootton, North Wootton and Castle Rising all of whom are deeply concerned at the lack of mitigation measures on the large developments at West Winch and South Wootton.</p> <p>These will result in making such developments car dependent and deeply impact on our already atrocious emissions record at a time when we should be seeking to improve the environment. Unfortunately Norfolk County Council have allowed not only the cancellation of public transport entering the Knights Hill site they have now suggested the major developments at West Winch commence without the planned relief road for which there is now no guarantee of funding. You will read from the attached, the developments are not now NPPF compliant. We must ensure the planners stop granting large applications by disregarding and cancelling original mitigation measures proposed by developers. This is all in an attempt to open the door to boost housing numbers with total disregard to the negative and harmful impact on current and new residents in West Norfolk.</p> <p>North Wootton PC fully endorses the content of ***s submission and I attach a copy here.</p>
South Wootton Parish Council	<p>*** has been working with and advising the Parishes of South Wootton, North Wootton and Castle Rising all of whom are deeply concerned at the lack of mitigation measures on the large developments at West Winch and South Wootton. South Wootton Parish Council fully endorse *** attached Masterplan submission and trust attention to these vital areas will</p> <p>be addressed to make future development fully NPPF compliant.</p> <p>There must be a complete review of the current mitigation measures to make sure this development does not become solely car dependant.</p> <p>We are deeply concerned after our experiences over the Knights Hill development where mitigation measures have been cut by County, the same cracks are appearing at West Winch particularly over the questionable delivery of the planned relief road and inadequate public transport provision.</p> <p>County and Borough choose not to understand or recognise major transport and highways implications and provide solutions to help us tackle the appalling over capacity and hence dangerous emissions levels. As neighbouring parish councils, we are all concerned the impact and knock-on effect the planned 4,000 home at West Winch will have on West Norfolk.</p> <p>We are keen to bring new homes to our wonderful area, on condition they are delivered in a fully sustainable and environmentally friendly manner.</p> <p>Planers must understand when pursuing large applications their desire to boost housing numbers must not override good mitigation measures.</p> <p>The number one priority to sustainable development is good planning, essential to avoid the negative and harmful impact poor infrastructure will have on</p> <p>both current and future residents. When trying to seek improvements Parishes and the local voice are very frustrated, although consulted, views and concerns are largely ignored.</p>

Anglian Water (See sections 8,10 & 11)

Anglian Water welcomes the opportunity to comment on the South East King's Lynn (West Winch) Growth Area Framework Masterplan (SPD), which will guide the development of up to 4,000 dwellings over the longer term.

Since privatisation, increased demand from population growth in the Anglian Water region has been met through demand management, including industry leading leakage reduction and metering programmes. This means we put in the same amount of water into supply as we did some 30 years ago. In the context of future levels of growth, environmental protection, and climate resilience we need to innovate further in demand management and rainwater harvesting and re use options while securing timely new supply and strategic distribution options, such as reservoirs and additional supplies through to provide further resilience by the mid-2030s.

Anglian Water is the sewage undertaker and water company for the borough. Anglian Water responds to Local Plan and other relevant planning consultations from the position that we are looking to support sustainable growth in the region. We welcome the approach taken in the SPD, which is set in the framework of emerging strong policy requirements in the Local Plan (currently at examination) aimed at future proofing water supply and water recycling capacity to enable and support growth while protecting the environment .

Our specific comments on the masterplan framework are as follows:

#### CONTEXT

Anglian Water recognises that West Winch is a long-standing allocation identified in the Core Strategy (2011) and SADM P (2016) We note that the West Winch Growth Area will deliver 2,500 new homes in relation to the new Local Plan period to 2038, and up to 4000 new homes overall, together with supporting infrastructure. We welcome the purpose of this framework to provide a clear statement to bring the co-ordination and the phasing of infrastructure together to enable the development to come forward.

Anglian Water considers that the Growth Area presents a real opportunity to deliver a sustainable and resilient community that will provide positive benefits for the people who live and work in the area, by addressing the current and future challenges of population growth, the impacts of climate change and environmental protection. These are the key challenges Anglian Water has identified in our Strategic Direction Statement and underpin our purpose and strategic ambitions, which are:

1. Make the East of England resilient to the risks of drought and flooding
2. Enable sustainable economic growth in the UK's fastest growing region
3. By 2030, be a net zero business and reduce the carbon in building and maintaining our assets by 70%
4. Work with others to achieve significant improvement in ecological quality across our catchments

In terms of water resources, Anglian Water is currently drafting the Water Resources Management Plan (WRMP24) for the period 2025-2050, which builds on the strategic supply options outlined in the current WRMP19 including our Strategic Pipeline Alliance and bringing forward options for two new reservoirs (one in Lincolnshire and another in The Fens). The strategic options in WRMP19 also include water reuse and river augmentation schemes in Kings Lynn.

King's Lynn is within the North Fenland Water Resource Zone (WRZ), which is one of only very few of our WRZs that is predicted to remain in surplus supply by 2045. Transfers utilising resource from the west of our region, and surplus from North Fenland WRZ will address sustainability reduction and drought impacts in discrete groundwater systems, where there are no other resource options available.

#### CONCLUSION

Anglian Water is supportive of the masterplan framework being developed for the South East King's Lynn Growth Area, subject to the amendments suggested, and considers it has the potential to deliver a successful new community that is resilient to the impacts of climate change.

National Grid  
(plan also provided)

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

Proposed development sites crossed or in close proximity to National Grid assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. Details of the sites affecting National Grid assets are provided below.

*Gas Transmission*

Development Plan Document Site Reference	Asset Description
E2.1 West Winch Growth Area	Gas Transmission Pipeline, route: BACTON TO WISBECH NENE WEST
	Gas Transmission Pipeline, route: BACTON TO WISBECH NENE WEST

Avison Young (UK) Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS

*Electricity Transmission*

Development Plan Document Site Reference	Asset Description
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E2.1 West Winch Growth Area	4VV ROUTE TWR (001 - 223): 400Kv Overhead Transmission Line route: NORWICH MAIN - WALPOLE 1
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#### Further Advice

National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets. We would be grateful if you could check that our details as shown below are included on your consultation database:

REDACTED Director	REDACTED Town Planner
REDACTED	REDACTED
Avison Young Central Square South Orchard Street Newcastle upon Tyne NE1 3AZ	National Grid National Grid House Warwick Technology Park Gallows Hill Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us. Yours faithfully,

Director

REDACTED REDACTED For and on behalf of Avison Young

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

#### Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>



REP ID/ORGANISATION	SUMMARY REPRESENTATION
97	<p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed.</p> <p>National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.</p> <p>National Grid's statutory safety clearances are detailed in their '<i>Guidelines when working near National Grid Electricity Transmission assets</i>', which can be downloaded here: <a href="http://www.nationalgridet.com/network-and-assets/working-near-our-assets">www.nationalgridet.com/network-and-assets/working-near-our-assets</a></p> <p><u>Gas assets</u></p> <p>High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.</p> <p>National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.</p> <p>National Grid's '<i>Guidelines when working near National Grid Gas assets</i>' can be downloaded here: <a href="http://www.nationalgridgas.com/land-and-assets/working-near-our-assets">www.nationalgridgas.com/land-and-assets/working-near-our-assets</a></p> <p><u>How to contact National Grid</u></p> <p>If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please visit the website: <a href="https://lsbud.co.uk/">https://lsbud.co.uk/</a></p> <p>For local planning policy queries, please contact: <a href="mailto:nationalgrid.uk@avisonyoung.com">nationalgrid.uk@avisonyoung.com</a></p>

County & Borough Councillor  
Alexandra Kemp

As the local County Councillor for West Winch, here is my response to the West Winch Masterplan and I also attach the 2014 North Runcton & West Winch Surface Water Management Strate Prepared by the Middle Level Commissioners for the East of Ouse, Polver and Nar Internal Drainage Board April 2014, for your urgent consideration. Can you please acknowledge receipt. Unfortunately, I have concluded that the Masterplan for 4,000 homes, in its current form, would be:

- a blight on West Winch, and increase the poor residential amenity from the heavy traffic through the village
  - a liability to the highway, due to the lack of necessary strategic road infrastructure with no bypass in place
  - an increase to the current risk of flooding to existing homes, because of the lack of competent flood prevention infrastructure which must be provided in advance of any development of the Growth Area.
- The Bypass must be built out in full and the A10 traffic-calmed to a village road, and a wholesale review and reconditioning of the drainage system through West Winch take place, before any development starts.

Flooding on Hall Lane and Eller Drive, West Winch June 2020

#### INCREASED FLOOD RISK TO WEST WINCH FROM 4,000 HOME DEVELOPMENT

- The Local Lead Flood Authority at NCC was wrong to remove its 7-year Flood Risk Holding Objection on the 4,000 home development in 2020, even though the developer had not completed an investigation into the capacity into the existing drain in West Winch to cope with the surface water run-off. The LLFA said the applicant had to try to trace the drainage from the site to the Puny Drain, but it is plain after 10 years that the land ownership is unclear and any such channels are likely to be in poor repair and there is missing infrastructure.
- Back in 2014, this is what the Drainage Board, with responsibility for the Puny Drain on West Winch Common, wrote about the 4,000 home proposal: "However the proposed development can be expected to greatly increase the impermeable land cover and this is likely to lead to a large increase in the speed and rate of runoff, potentially exacerbating the existing problem of flooding and potential flood risk within the existing village settlements and surrounding farm land."

North Runcton & West Winch Surface Water Management

Strategy Prepared by the Middle Level Commissioners for the East of Ouse, Polver and Nar Internal Drainage Board April 2014

Since 2014, Climate Change has increased and with it the risk of extreme surface drainage events.

So the Drainage Board report said the developers should conduct a detailed drainage report about the potential flood impact of the development on West Winch Village and later said that it is no reason not to do it because it costs money. They said the report should include:

- potential impact of run-off from higher areas to lower areas – especially where development in lower areas may already have inadequate surface water drainage provision.
- The capacity of the existing drainage system to cope with additional runoff especially at key 'pinch points' such as the Puny and Pierpoint drains.
- The natural constraints on drainage design options defined by the clay soils.

But there has still been no off-site flood report for the impact on flood-risk on West Winch downstream, which the Drainage Board requested in 2014. This report should be part of the Masterplan. You cannot approve a masterplan that does not get the basics right.

- The Drainage Board wrote in June 2021 The fact that an investigation costs money I feel is a poor excuse not to do it. The drainage condition proposed by the LLFA seems to be very focussed on the on-site drainage and I have no issue with the points in it. I do not consider though that it adequately deals with off-site drainage matters which are the main points of concern"

The 2014 Drainage Board report found -:

- a significant lack of data on the existing drainage infrastructure in West Winch particularly the storm water sewer network.
- a significant history of localised flooding
- a lack of clarity of maintenance responsibility
- poor sewer maintenance of piped and open channel drainage with a lack of fall and in some cases inadequate design
- an abundance of non-adopted sewers and the catchment is poorly-draining clay based
- a reliance on soakaway drainage

FLOODING JUNE 2020 in WEST WINCH – Hall Lane and Eller Drive

#### MISSING FLOOD DRAINAGE INFRASTRUCTURE

##### Speed and Rate of Run-off

- Four dwellings were flooded in August 2022 on Hall Lane, West Winch at the bottom of the slope down from the A10. Water reached a level of 10-12 inches and created an emergency situation which it took the Fire Service an hour to bail out. This show the current flood pressure points and vulnerability of West Winch village to surface water flooding, downstream from the proposed growth area above it.
- One of these bungalows on Hall Lane was flooded for the third time in twenty years.

##### Double Whammy

Water was directed into properties from Hall Lane from below the properties upwards, but also downwards from gardens above the properties. The pictures above show the flooding on Eller Drive and Hall Lane in 2020.

In 2013, Back Lane had a tsunami on the highway.

It is inexcusable that to date, crucial recommendations of the 2014 Flood Report for West Winch by the Drainage Board, commissioned by the West Winch and North Runcton Neighbourhood Plan, providing guidance at sub-catchment level, have not been followed.

##### Increased Risk of Surface Water Run-Off

The existing West Winch Village is built on a slope, that descends down from the A10. Most of the existing village of West Winch is much lower than the main 4,000- home Masterplan Development Site.

West Winch is a Fen-edge village based on poor-draining Kimmeridge Clay and is lower than North Runcton at 18-20 m AOD. The new development, which will be between both settlements between the A10 and the A17, is going to be on higher land than West Winch at 10-20 m AOD, on land associated with underlying clay that is not free draining and is therefore one of the poorest materials for infiltration or soakaway.

The law of gravity puts West Winch at risk of surface water run-off from the new development.

#### RISK OF FLOODING FROM POOR EXISTING DRAINAGE NETWORK

There is potential for increased risk of surface water runoff and of flash flooding on homes in the existing village of West Winch, if the network is not improved.

As the County Councillor, I have had 3 new flood prevention schemes installed in West Winch, on Chapel Lane, Watering Lane and Back Lane to improve surface water drainage. But more is needed to cushion West Winch from such intensive development.

I had a flood drainage engineering scheme on Back Lane in 2015 where a house had been flooded. But a further connection is needed to Common Close. We await funding.

The new Drainage Scheme at the top of Watering Lane in 2020 helps keeps water off the road. But this could not and did not stop a flood at the bottom of Watering Lane, due to a nexus of poor network drainage management issues involving Anglian Water, Cadent Gas and a private body, on Commons side near the Puny Drain, in 2021.

Residents see rainwater running down the roads off the A10, Chapel Lane, Long Lane, Watering Lane, Gravel Hill Lane.

A barrier had to be built by Anglian Water, to stop water running down Long Lane straight into the property in Hall Lane, at the bottom of Long Lane which runs horizontally from the A10 to Hall Lane.

The last major development in West Winch, on the higher ground, around Oak Avenue, in the centre of West Winch, produced flood problems for existing residents on Hall Lane.

Houses have since been flooded along Hall Lane.

A new house, at the bottom of Southfields Drive, was flooded.

The last developers built over a lake, which later opened up on pre-existing property on Hall Lane and caused a flood there.

Climate change increases the risk of heavy surface water-run off and extreme flash flooding events.

Norfolk County Council had to pay to put a culvert under Hall Lane from the last major development, in the Oak Avenue Bovis homes, because the developer did not put in adequate drainage.

These improvements are still not enough in the face of Climate Change and of more development.

**Water Table and Groundwater Flood Risk**

The water table in West Winch already is very high. The new development could raise the water table, and lead to increased risk of groundwater flooding for the most populated part, the Oak Avenue area, especially from the development of Site F.

But this increased flood risk has not been quantified in a report, as it should have been.

The proposed development of hundreds of homes on the watermeadow in the flood hazard zone at the bottom of Gravel Hill Lane, Site F, will raise the water table for homes higher up in Hall Lane, where there is already a flood problem.

On Elm Tree Grove, at the bottom of Gravel Hill Lane, drainage is already poor. Residents tell me they have had to hire a pump, to clear the water from their properties. Development on Site F adjacent is likely to raise the water table and risk groundwater and surface water flooding on Elm Tree Grove.

Residents are aware of the flood risk issues and collected 500 signatures to a petition against development on Site F. There was also another petition, which I presented to the Borough Council, when Nick Daubney was Leader.

The Masterplan is inadequate in including Site F, the Gravel Hill Lane Site

Site F should be taken out as it increases risk of flooding off-site and this against the National Policy Planning Framework.

Site F is in the flood hazard zone on the Common and is habitually flooded. The Masterplan does not address this because the right reports have not been done.

St Mary's Church on the A10 is at the highest point of the village on the east side of the A10, but the groundwater level is so high that double graves, dug in the winter, fill up with water.

If the water table is so high even at the top of the hill, the impermeable areas created at the bottom of the slope, will increase the risk of flooding for existing homes above, when thousands of acres of farmland become impermeable spaces on the new development.

A former Parish Clerk, living at the top of Long Lane just below the A10, reported that when they dug a hole in the garden, it immediately filled up with water.

Any development in Gravel Hill Lane at the foot of the hill, would create a flood risk on-site, and would also raise the high water table along Hall Lane and Gravel Hill Lane and increase flood risk for existing homes.

#### LACK OF AMENITIES – A Dormitory Town on the A10

- There is no provision for a Health Centre, a Doctors Surgery, a Dentists Surgery in the Masterplan. There is far too little retail space allocated, for what will be a town the size of Swaffham or Fakenham.
- The Masterplan is poorly designed like a dormitory town, with no proper centre or landmarks to bring a sense of place. But if the Growth Area is a home for people who will commute to Ely or Cambridge on the A10, this will place further pressure on the highway network.
- Even if residents take the train, they will have to drive on the A10 to Lynn or Watlington Railway Station.
- West Winch Primary School is at capacity now and local children cannot find a place.
- Sports England have placed a Holding Objection on the development, as it does not have enough places for on-site recreation and exercise and this will lead to people getting into their cars and driving off site for recreation.
- Noise Pollution Hopkins Report says the homes on to the A10 would be so noisy to live in that residents could not open their windows or live in outdoor open spaces.

#### Mistakes in the Masterplan and Suggested Improvements

Bypass Needed Before Development Starts - as A10 is at full capacity and maximum residential disamenity

- No Highway Capacity The Masterplan wrongly assumes highway capacity for 300 homes on the A10, before bypass is fully built out. There isn't. It assumes the bypass could be built piecemeal. It can't. The A10 functions too badly now and cannot be made worse.
- No Highway Assessment of Impact on West Winch Highways failed to ask the developer to do a Traffic Impact Assessment on the A10 and estate road junctions from the proposed 300 new homes, on the grounds all the traffic would be going north. This is not credible as some Residents would go south to drive children to West Winch Primary, to go work or go shopping in Downham Market, Ely or Cambridge, or to take the train from Watlington.
- Safety A10 in West Winch and Setchey is the worst performing section in the Mayor of Cambridgeshire's report, is an accident cluster site throughout, and has 20,000 vehicles a day, at least 11% HGV's, with 800 maximum-size HGV sugarbeet lorry movements a day from the Wislington for half the year. The lorries thunder over manholes, and cause damage and keep residents awake at night. There are rear-end shunt accidents as the poor sightlines as traffic does not expect vehicles to stop and turn on bends into driveways or estate roads. It is therefore essential to take the through traffic out and traffic calm the A10 to a village road before any more development
- Residents complain they cannot get out of their driveway or the estate roads on to the A10 safely now They have to leave extra time just to get out on the A10 and this is impossible in the Summer with the heavy holiday traffic. The constant stream of traffic and no traffic lights to turn in to the estate roads, makes the A10 a constant danger.
- Traffic on A10 worse since lockdown Residents who bought homes on the A10 during lockdown are kept at wake at night by the traffic and tell me they want to move.

- Residents can't cross the A10 safely now The traffic impact would certainly worsen for the new residential development of 30 homes opposite the Winch.
  - Residents cannot now cross the road, to get to the bus stop on the A10, and have asked me for a crossing.
  - Highways say it is too dangerous for a crossing at the Winch. If it is too dangerous for a crossing, Highways should have stopped the development in the first place, as it goes against the principle of Active and Sustainable Travel.
  - Setchey needs a crossing now Residents cannot safely cross the road as there is no pedestrian crossing at all.
  - Residents cannot now safely cross the A10 at any point. The loss of amenity from any more development will be too great. There is only one pedestrian crossing along the whole stretch of the A10 in West Winch and Setchey. But even then lorries do not always stop, so I had to fight to keep the School Crossing Patrol and have higher traffic heads put in at the crossing. More development along the A10 would make the situation worse. The Bypass needs to come first so West Winch Road can be traffic-calmed.
  - Bypass must include Setchey The Masterplan is inadequate as it starts the Bypass from Gravel Hill Lane, but the Bypass must start south of Setchey.
  - The Bypass is 50 years overdue. Resident campaigned for the bypass with the MP in 1974. The Government recognised the need for the Bypass and plans were drawn up for the routes in 1990, the funding was produced but was then withdrawn and the plans were put in the Norwich Record Office. Then there was a 300 home development in the middle of West Winch but no bypass. There is the issue of trust and the traffic is much worse now than in 1990, so there is no excuse not to complete the bypass first.
  - The Masterplan leaves West Winch in the lurch If development begins, there will be no guarantee the bypass will ever be built, either in part or completely.
  - Active Travel Deficit The A10 is unfriendly to walk along, because of fast moving lorries along a relatively narrow road which produce noise, pollution and a backdraft which is frightening for many, as you feel as if you are going to be blown into the hedge. It feels like walking along a motorway.
  - The Masterplan does not guarantee funding for the improvements to the walking and cycling routes needed for Active Travel along the A10.
  - Building on the A10 first is the wrong place it would be logical to start building on the much wider A47, which is not as busy as the A10 in West Winch and Setchey, instead of starting development on the A10 which is too pressured.
  - There needs to be investment in public transport on the A10 with more frequent, earlier and later buses West Winch Village has poor public transport, is poorly related to Lynn, being cut off by the inhospitable Hardwick Roundabout, and this isolation is evidenced by the fact that the Neighbourhood Plan initiative found that West Winch has the highest second, third and fourth car ownership per household in the Borough. Residents who do not drive says they are marooned in West Winch for 4 days over Bank Holiday weekends, when there are no buses.
- The Masterplan in its current form is not fit for purpose as it is missing vital highway and flood infrastructure that must be delivered before any development starts.
- Appendix 1 North Runcton & West Winch Surface Water Management Strategy Prepared by the Middle Level Commissioners for the East of Ouse, Polver and Nar Internal Drainage Board April 2014
- The Drainage Board conclusions in 2014 were:
- It is clear from our investigations that there is a significant lack of information available relating to the existing buried surface water infrastructure. It is also known that there have been historical reports of localised flooding due to inadequacies within this system and perhaps relating to its maintenance. It is therefore recommended that further comprehensive survey of the current drainage system be commissioned to allow a full analysis of the system and for recommendations to be made on where modification and improvements are

REP ID/ORGANISATION	SUMMARY REPRESENTATION
103	<p>required. An ongoing management and maintenance plan for all surface water drainage infrastructure should also be drawn up and agreed with the relevant authorities and land owners.</p> <ul style="list-style-type: none"> <li>• As stated above there needs to be full survey of the drainage ditch network with cross sections and asset condition information. This information will be vital to plan the works that need to be carried out on the drainage ditches to bring them back up to their full carrying and storage potential. We suggest that developers are required to undertake this survey and identify what on-site and off-site surface drainage improvements are required in order to integrate proposed development into the overall drainage strategy outlined in this report. Such planning should be carried out in liaison with Anglian Water and the County Council in their capacities as Lead Local Flood Authority and managers of the A10, and the local IDB bodies.</li> <li>• The solutions outlined in this report are the preferred options based on our initial analysis. It is, however, recognised that this strategic overview will not have identified all the constraints or the opportunities that future development might be able to deliver, and that development plans are not yet fixed. It is therefore expected that where proposals move away from those identified within this strategy the fundamental principles are retained.</li> <li>• Whilst infiltration drainage is not considered to be appropriate for the primary drainage design within the two parishes it is believed that site level SuDS techniques can and should be incorporated into the development designs. Whilst unlikely to be meaningfully utilized when the ground is saturated in the wettest winter months, they will have real value in taking up water in high intensity summer storms and can increase the diversity of soft landscaping features within the development zones.</li> <li>• The key to the long term success of surface water run-off management will be in the achievement of securing a long term maintenance strategy for the entire surface water infrastructure serving the developments. This would best be achieved through adoption of primary infrastructure by a statutory authority, with the appropriate payment of commuted sums to ensure that sufficient funds are available for this purpose.</li> <li>• Negotiations with land owners beyond the development areas identified in the master plan will be necessary to achieve the best outcome. This should include opening discussions with the East of Ouse Polver and Nar IDB to explore how the Puny Drain could be modified to accommodate un-attenuated discharges. This could be of particular value in providing alternatives where a 'ransom' situation might otherwise arise.</li> <li>• It is understood that the North Runcton and West Winch Neighbourhood Plan will refer to this strategy in policy relating to drainage and surface water management. The strategy will also ideally be adopted by BCKLWN as a preferred approach for addressing surface water management in the area and should be used to inform the planning process when considering all new when considering all new development proposals in the North Runcton and West Winch Neighbourhood Plan area.</li> <li>• The section of the Puny Drain that runs east-to-west south of Setchey and at the rear of the Garage Lane business area, is in poor condition and would ideally be improved with the assistance of funding generated from wider development. The optimum functioning of the Puny Drain will be essential for sustainable surface water management in the Neighbourhood Plan area and will also benefit the wider catchment. The East of Ouse, Polver and Nar IDB can advise further on this matter.</li> </ul>
REDACTED	i object to the plan and the proposed building of too many houses for the reasons stated above.

<p>104</p>	<p>Natural England</p> <p>SUMMARY OF NATURAL ENGLAND'S ADVICE</p> <p>FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES</p> <p>As submitted, the Supplementary Planning Document (SPD) and future associated planning applications within the Growth Area could have potential significant effects on the following designated sites:</p> <ul style="list-style-type: none"> <li>• The Wash Special Protection Area (SPA)</li> <li>• The Wash and North Norfolk Coast Special Area of Conservation (SAC)</li> <li>• The Wash Ramsar Site</li> <li>• North Norfolk Coast Special Protection Area (SPA)</li> <li>• North Norfolk Coast Special Area of Conservation (SAC)</li> <li>• North Norfolk Coast Ramsar Site</li> <li>• Norfolk Valley Fens Special Area of Conservation (SAC)</li> <li>• Breckland Special Protection Area (SPA)</li> <li>• Breckland Special Area of Conservation (SAC)</li> <li>• Roydon Common and Dersingham Bog Special Area of Conservation (SAC)</li> <li>• Roydon Common Ramsar Site</li> <li>• Dersingham Bog Ramsar Site</li> </ul> <p>Damage or destroy the interest features for following Sites of Special Scientific Interest (SSSIs) for the above European sites have been notified.</p> <ul style="list-style-type: none"> <li>• River Nare Site of Special Scientific Interest (SSSI)</li> <li>• The Wash Site of Special Scientific Interest (SSSI)</li> <li>• North Norfolk Coast Site of Special Scientific Interest (SSSI)</li> <li>• Breckland Farmland Site of Special Scientific Interest (SSSI)</li> </ul> <p>Breckland Forest Site of Special Scientific Interest (SSSI)</p> <ul style="list-style-type: none"> <li>• Roydon Common Site of Special Scientific Interest (SSSI)</li> <li>• Dersingham Bog Site of Special Scientific Interest (SSSI)</li> </ul> <p>Natural England advises that further information is required to determine the significance of these impacts and the scope for mitigation. The following information is required:</p> <ul style="list-style-type: none"> <li>• A Habitats Regulations Assessment, proceeding to Appropriate Assessment.</li> <li>• The HRA should consider potential water quality impacts on European sites from wastewater treatment, discharge, and surface water run-off. Potential impacts on the River Nare SSSI from this impact pathway should also be assessed, this could be through the HRA or a separate SSSI impact assessment.</li> <li>• The HRA should consider potential impacts from recreational disturbance on European sites, including mitigation measures such as a proportionate contribution to the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS), and Green Infrastructure (GI) requirements for developments within the growth area. Potential impacts on the River Nare SSSI from this impact pathway should also be assessed, this could be through the HRA or a separate SSSI Impact Assessment.</li> <li>• If required by the HRA and/or SSSI Impact Assessment, we advise that mitigation measures should be secured and detailed within the Supplementary Planning Document (SPD).</li> </ul>
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In addition to our advice on designated sites, Natural England also provides advice on the following issues below:

- Securing Biodiversity Net Gain (BNG)
- Best and Most Versatile Agricultural Land
- Sustainable Drainage Systems (SuDS)

Natural England's further advice on designated sites and advice on other issues is set out below.

#### NATURAL ENGLAND'S DETAILED ADVICE

##### 1. Advice under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended)

###### Habitats Regulations Assessment (HRA)

Despite the proximity of the application to European Sites, the consultation documents provided do not include information to demonstrate that the requirements of regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) have been considered by your authority, i.e., the consultation does not include a Habitats Regulations Assessment.

It is Natural England's advice that the proposal is not directly connected with or necessary for the management of the European site. Your authority should therefore determine whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out. Natural England must be consulted on any appropriate assessment your authority may decide to make.

Natural England advises that there is currently not enough information provided in the application to determine whether the likelihood of significant effects can be ruled out.

We recommend you obtain the following information to help you undertake a Habitats Regulations Assessment:

###### i. Water Quality

The proposals have the potential to affect the water quality of designated sites from wastewater treatment discharges and surface water runoff, due to the proximity of the River Nar SSSI which connects to The Wash and North Norfolk Coast Special Area of Conservation (SAC), The Wash Special Area of Protection (SPA) and The Wash Ramsar site, which are vulnerable to nutrient impacts.

When consulting Natural England on proposals with the potential to affect water quality resulting in nutrient impacts on European Sites, please ensure that a Habitats Regulations Assessment is included. Potential impacts on the River Nar SSSI from this impact pathway should also be assessed, this could be through the HRA or a separate SSSI impact assessment. Without this information Natural England will not be in a position to comment on the significance of the impacts. For large scale developments, Natural England may provide advice on a cost recovery basis through our [Discretionary advice service](#).

###### ii. Recreational Disturbance

Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) Norfolk Local Planning Authorities (LPAs) are working collaboratively to deliver a Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) to ensure that the cumulative impacts of additional visitors arising from new developments of housing and tourism, to European sites, will not result in any adverse effects which cannot be mitigated. All Norfolk LPAs are collecting a tariff of £185.93 per new dwelling towards the strategic mitigation package, at the time planning permission is approved.

Green Infrastructure (GI)

Developments of this scale should include provision of well-designed open space/green infrastructure, proportionate to its scale. Such provisions can help minimise any predicted increase in recreational pressure to the European sites by containing the majority of recreation within and around the development site boundary away from European sites.

The applicant may wish to consider the benchmark standards for accessible natural greenspace; the Town and Country Planning Association (TCPA) have published [Guides and Principles for Garden Communities](#), and Guide 7, Principal 9, references 40% green infrastructure as a target quantum.

We advise that the Suitable Accessible Natural Green Space (SANGS) guidance here can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. Please find SANGS guidance in our response email as a separate attachment. GI design should seek to achieve the Natural England Accessible Natural Greenspace Standards, detailed in [Nature Nearby](#), including the minimum standard of 2 ha informal open space within 300 m of everyone's home.

As a minimum, we advise that such provisions should include:

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km<sup>2</sup> within the site and/or with links to surrounding public rights of way (PRoW)
- Dedicated 'dogs-off-lead' areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- Long term maintenance and management of these provisions

The River Nar SSSI

The Growth Area is approximately 1.2km from River Nar SSSI. It is possible that additional access to the river and adjacent footpath, could lead to recreational disturbance impacts. We recommend that the Local Planning Authority considers these potential impacts either within the HRA, or in a separate SSSI impact assessment.

Site of Special Scientific Interest (SSSI)

Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence.

2) Other advice

i. Biodiversity Net Gain (BNG)

Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal.

We advise that there is an opportunity within this growth area to contribute towards securing >10% BNG by connecting biodiversity hotspots, creating chalk and acid grassland and insect rich habitats and wetlands designed within the on-site GI. Any sensitive habitat created to achieve BNG should be carefully managed to maintain its favourable condition.

Furthermore, we encourage the LPA to consider a policy of 15% or 20% BNG in the SPD. Strategic level viability assessments in [Kent](#) have concluded that this shift will not impact viability in most cases irrespective of onsite or offsite BNG delivery. This is because after the initial cost of securing the minimum 10% BNG, the cost of increase to 15 or 20% is much less and generally negligible.

Where onsite measures are not possible, you should consider off site measures. Opportunities for onsite enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

Natural England's [Biodiversity Metric 3.1](#) may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Biodiversity Metric 3.1](#) and is designed for use where certain criteria are met. It is available as a beta test version.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g., by sowing wildflower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g., coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Biodiversity Metric 3.1](#) and is available as a beta test version.

#### ii. Best and Most Versatile Agricultural Land

The majority of the proposed Growth Area appears to be classified as Grade 2 under the provisional Agricultural Land Classification (ALC) and is therefore likely considered Best and Most Versatile Agricultural Land. Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 174 and 175). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#) Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and

landfilling separate guidance on soil protection for site restoration and aftercare is available on [Gov.uk](https://www.gov.uk) website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying [Good Practice Guide for Handling Soils in Mineral Workings](#).

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

### iii. SuDS

We support the inclusion of sustainable drainage systems (SuDS) to manage surface water disposal, these systems can be used to create wetland habitats for wildlife in an attractive aquatic setting. We advise that this is considered and incorporated into the design, the CIRIA guidance ([susdrain.org](https://www.susdrain.org)) provides useful information about integrating SuDS and biodiversity. The maintenance of SuDS should be provided for the lifetime of the projects within Growth Area.

Further general advice on consideration of protected species and other natural environment issues is provided at Annex A.

Should developers wish to discuss the detail of measures to mitigate the effects described above with Natural England, we recommend that they seek advice through our [Discretionary Advice Service](#).

We would be pleased to provide advice on the discharge of planning conditions or obligations attached to any planning permission to address the issues above.

Should the proposal change, please consult us again. Yours sincerely

Priyanka Adhikari Norfolk & Suffolk Team

ANNEX A – Additional advice

Natural England offers the following additional advice:

#### Landscape

Paragraph 174 of the [National Planning Policy Framework](#) (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry- stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

#### Protected Species

Natural England has produced [standing advice1](#) to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

#### Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their

REP ID/ORGANISATION	SUMMARY REPRESENTATION
109	<p>connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.</p> <p>Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found <a href="#">here</a><sup>2</sup>. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found <a href="#">here</a>.</p> <p>Ancient woodland, ancient and veteran trees</p> <p>You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland <a href="#">Inventory</a> which can help identify ancient woodland. Natural England and the Forestry Commission have produced <a href="#">standing advice</a> for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.</p> <p>Access and Recreation</p> <p>Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.</p> <p>1 <a href="https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals">https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals</a></p> <p>2<a href="http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx">http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</a></p> <p>Rights of Way, Access land, Coastal access, and National Trails</p> <p>Paragraphs 100 and 174 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website <a href="http://www.nationaltrail.co.uk">www.nationaltrail.co.uk</a> provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.</p> <p>Biodiversity duty</p> <p>Your authority has a <a href="#">duty</a> to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available <a href="#">here</a>.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
Historic England	Page 7 Site Context Plan - It would be helpful if listed buildings and other designated and non designated heritage assets were shown on this Site Context Plan.

<p>West Winch Parish Council North Runcton Parish Council</p> <p>← ← ←</p>	<p>Further to the consultation events held on August 10<sup>th</sup> and 5<sup>th</sup> September and in regard to the current consultation period, we provide the following comments and observations on the draft Supplementary Planning Document.</p> <p>As we understand it, a Supplementary Planning Document (SPD) is a non-statutory document that can be used to provide planning guidance and detail to support statutory documents and policy.</p> <p>In this case the statutory adopted documents are the Local Plan (Core Strategy and SADMP) and the Neighbourhood Plan. We feel that the detail already provided in both these documents goes further and provides more substantive guidance than this draft SPD and therefore to a large extent, the proposed SPD seems entirely superfluous.</p> <p>We note in the draft document that reference is made to the 'Local Plan Review' currently at examination. However, in relation to the West Winch Growth Area there is no substantial difference between the SADMP (2016) and the Local Plan Review document – except that:</p> <ul style="list-style-type: none"> <li>• the proposed settlement size has been upped by 500 to 4000 (a figure that we are doubtful can actually be achieved within the site at the proposed densities and with the other constraints and design goals as set out).</li> <li>• The Local Plan Review Policy E2.1 now includes an additional bullet point 10 - <i>The Borough Council will prepare a supplementary planning document 'Masterplan' to co-ordinate development provisions for the Strategic Growth Area.</i> In our view the draft SPD does <u>nothing</u> to help coordinate development provisions at all.</li> </ul> <p>The level of cross referencing between the draft SPD and the statutory documents is poor – especially in relation to the Neighbourhood Plan – which we feel is largely ignored.</p> <p>The contention at page 5 that the SPD will <i>aid clarity and effectiveness</i> (by providing) <i>one source for: viability; infrastructure requirements importantly including the West Winch Housing Access Road) and; planning policy requirements...</i> is simply not illustrated by this document.</p> <p>Particularly in relation to making a clear case for viability, the draft SPD offers nothing other than a statement (highlighted beige at page 23) stating the project is <i>'potentially capable of being viable'</i> – which seems risible.</p> <p>The amount of infrastructure required for this project has always made viability extremely questionable. This was the reason BCKLWN gave for not applying CIL to the area and why so much money was spent on delivering an 'Infrastructure Delivery Plan'. As only one example of where a changing economic context must now call the whole project into question, the roadwork was provisionally costed at £65Mn more than 5 years ago and since then Brexit, the pandemic, the Ukraine war and other factors have all contributed to massive cost inflation especially in construction works.</p> <p>We have reviewed the Sustainability Appraisal. We have no faith that this document provides a true and objective assessment of the sustainability of proposed development in the Local Plan until 2036. In particular we have no faith that a sustainable transport plan is proposed, especially in relation to the West Winch Growth Area. This SPD provides little or no further detail explaining how a multi-modal, low-carbon transport system can be created within the development. As we have maintained all along, the entire scheme will be heavily dependent on private vehicular transport resulting in thousands of additional local car journeys every day – a mode of transport widely understood to be the most carbon heavy and polluting part of the entire transport network.</p> <p>In summary this document appears to offer one thing – an illustrative sketch masterplan 'endorsed' by the Borough Council. As it has been brought forward so late, it has been largely designed to fit around two existing outline planning applications, neither of which appear to be able to accommodate improved local transport or a first-class cycle network.</p>
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REP ID/ORGANISATION	SUMMARY REPRESENTATION
112	<p>As an SPD is a non-statutory document, there is no requirement that any future building should or will come forward in this way. The SPD certainly does not achieve its stated goal highlighted blue at page 5, of providing ‘co-ordination’. It does nothing of the sort.</p> <p>A useful SPD planning guidance document for this development would set out best practice design principles, clear requirements on design styles and public realm elements and community infrastructure. It would significantly add to the existing information set out in the Local Plan and Neighbourhood Plan. It would require developers to work up revised schemes to ensure that high quality sustainable infrastructure can be accommodated.</p> <p>We note the South Cambridgeshire 180-page document setting this out for Waterbeach New Town and the 80-page document setting out requirements for land at Cherry Hinton.</p> <p><a href="http://scams.gov.uk/planning/local-plan-and-neighbourhood-planning/supplementary-planning-documents-spd">scams.gov.uk/planning/local-plan-and-neighbourhood-planning/supplementary-planning-documents-spd</a></p> <p>We also note that some local authorities have simply adopted national design guides as their own and made these into useful SPDS. For example, Uttlesford have adopted the very good ‘Building for a Healthy Life’ guidance developed by Homes England:</p> <p><a href="https://www.uttlesford.gov.uk/article/4974/Supplementary-Planning-Documents-and-other-planning-guidance">https://www.uttlesford.gov.uk/article/4974/Supplementary-Planning-Documents-and-other-planning-guidance</a></p> <p>If the Borough and County Councils wish to follow national planning policies, as well as their own statutory documents, then in our view this SPD needs to be withdrawn and replaced with a comprehensive document that <u>will</u> ensure sustainable development.</p> <p>We attach further specific comments on the BCKLWN draft SPD at Appendix 1.</p> <p>On the cover – rather than calling the area ‘South East King’s Lynn’ – why not refer to it as the ‘West Winch Growth Area’, which is what everyone has been referring to it as for more than a decade. Better still the ‘West Winch and North Runcton Growth Area’ – which is actually what it is.</p> <p>Each section and paragraph should be numbered for easy reference.</p> <p>We are not entirely clear that the three ‘site context’ plans are necessary or useful. They don’t appear to be referred to anywhere in the document text.</p> <p>We note that at page 7, the ‘Site Context Plan’ shows most of the Hopkins Homes development option site as a ‘Significant Woodland Block’. We tend to agree with this description. The site is presently a mosaic of woodland, scrub and grassland with significant biodiversity value and other environmental benefits. It is a shame that the proposed masterplan will largely remove it and we don’t see how this fits with the Local Plan claim (para E2.10) that one of the reasons for allocation of this site is that it limits ‘landscape impact’.</p> <p>It would be accurate to alter the Site Context Plan label ‘Urban Area’ to ‘Settlement’. Residents have long argued against ‘urbanisation’ of the villages. Referring to development as ‘urban’ also has implications for planning legislation.</p> <p>We question whether any of the supposed contents of the SPD as set out on page 7 are actually provided. Principally in our view it provides little or no additional detail to existing policy and is certainly not a document that can be given ‘significant weight’ in planning decisions.</p> <p>We are not clear of the relevance of all of the photographs at pages 11 and 15.</p>





REP ID/ORGANISATION	SUMMARY REPRESENTATION
Metacre	<p>These representations, submitted on behalf of Metacre Limited, comment on the Southeast King's Lynn Growth Area Masterplan Supplementary Planning Document ('SPD') consultation with the aim of supporting the general principles set out in the Masterplan, but providing comments on the detail contained in the document.</p> <p>As set out above, we support the production of the SPD to guide development within the Growth Area, but there are several comments we seek to make on the document before it can, in our view, be adopted.</p> <p>Comments on the draft SPD</p> <p>We note that with regards to the Framework Plan within the SPD, it is based upon a similar plan that was previously prepared by Metacre and shared with the Council. However, there has been several changes made to the Framework Plan from what was shared with the Council including the re-location of the school, which is supported, and the re-location of retail uses to the west of the A10. In addition, the location of the proposed junctions has changed, but limited detail has been provided towards the reasoning for this.</p> <p>It is also apparent that the Plan within the SPD reflects the superseded Masterplan for the Phase 1 outline planning application (ref: 18/02289/OM) and again shows the retail centre to the west of the A10. This retail centre has now been relocated to the east of the A10 and to the south of St Mary's Church and can be seen in the most up to date Masterplan that accompanies the outline application referred to above and is also attached to this letter. The Framework Plan in the SPD should, therefore, be updated to correlate with the outline Masterplan that is currently subject to determination.</p>
Metacre	<p>With regards to terminology, the SPD title refers to the South East King's Lynn Growth Area, but the document text refers to the West Winch Growth Area throughout. This should be revised for consistency.</p>

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REP ID/ORGANISATION	SUMMARY REPRESENTATION
<p>REDACTED</p>	<p>Will land set for green spaces stay in this category and if so, how many years into the future? Other previous allocated green spaces in the village have been developed.</p> <p>The proposed access roads junctions adjacent and opposite of 1 and 2 Rectory Lane cause hazards for parking and access as well as obscuring the junctions.</p> <p>There should be a rail station at West Winch to reduce vehicle movements.</p> <p>Completely surrounding two cottages with modern housing will look odd, de-value the existing cottages and make new adjacent properties less appealing.</p> <p>Access junctions to the WWHAR will make the existing roads into rat runs, the WWHAR should completely bypass West Winch to take traffic away and around. West winch traffic would then use the existing A10 traffic calmed road to the Hardwick roundabout.</p> <p>Trying to save money on the WWHAR by starting at Gravel Hill Lane instead of Oakwood Corner roundabout will not ease traffic going from the south of West Winch to the North or West Winch at all.</p> <p>Existing schools cannot cope with the increase in population, more people will be driving their children to other villages etc from the new West Winch developed locations. What type and size of school is proposed at the North end of the development?</p> <p>Who will be paying for fencing etc where roads, houses and green spaces are adjacent to existing properties?</p> <p>What are "mixed use/Community use" allocated areas going to be?</p>

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Sports England	<p>Sport England supports the development of a masterplan to cover this significant growth area within the King's Lynn area.</p> <p>The proposal is for an additional 2,500 new homes, this will generate demand for new sports facilities, with the potential for 4,000 new homes in the longer term.</p> <p>The proposed infrastructure includes provision for indoor sport and outdoor sport, and Sport England would wish to be involved in the development of this element of the project.</p> <p>The proposals include an indoor sports centre, multi use games areas and sports pitches for outdoor sport.</p> <p>I have received the following input from NGBs for sport:</p> <p><u>Football</u></p> <ul style="list-style-type: none"> <li>• The authority is lacking a Playing Pitch Strategy to provide a suitable evidence base as to current and future needs of residents, and therefore the impact of further development on opportunities to participate in football activities. We would request further information to understand how the infrastructure requirements listed have been decided upon, and the detail of what specifically is to be provided.</li> <li>• A PPS is currently in development. We would advocate and expect the PPS to anticipate planned growth within the authority and provide clarity to the appropriate priorities and facility mix aligned to the growth area.</li> <li>• A <a href="#">Local Football Facilities Plan (LFFP)</a> was developed for the borough by Knight, Kavanagh and Page (KKP) on behalf of the Football Foundation, and in partnership with the Borough Council of King's Lynn &amp; West Norfolk, Norfolk Football Association and others. Whilst the LFFP is not a detailed demand and supply analysis of all pitch provision, it does identify priorities/shortfalls for the borough, including: <ul style="list-style-type: none"> <li>• An anticipated significant existing shortfall of Artificial Grass Pitches (AGP).</li> <li>• Issues faced regarding poor grass pitch quality at some sites.</li> <li>• A need to improve/refurbish several changing pavilions.</li> <li>• The LFFP is based on current team numbers at the time of its production and didn't account for additional demand generated by an increased population. It is expected that challenges currently faced would be exacerbated by growth in the borough.</li> <li>• The Football Foundation and County FA are working on a project in West Winch at the William Burt Social Club, led by the Parish Council, for changing room and social space improvements. But current planned projects will not satisfy all priorities identified within the LFFP.</li> </ul> </li> </ul> <p><u>Hockey</u></p> <p>No specific comment other than the focus for hockey revolves around sustaining the two pitches at Lynn Sport so any new demand within in the area will be met by Pelicans Hockey Club.</p> <p><u>Rugby Union</u></p> <p>The West Winch development lies to the south of Kings Lynn, 5 miles from West Norfolk RUFC. With 2,500 homes delivered by 2038 and up to 4,000 in total. This will inevitably have an impact on a club already over capacity!</p> <p>The club already have plans to expand ancillary provision to try to meet the current demand, this is only further exacerbated by the future demand. The PPS is currently in process and nearing Stage C for Kings Lynn so we will be able to factor this into the report, to reflect the future demand and needs of the club to clearly outline any S106 contributions.</p> <p><u>Cricket</u> – no comments received.</p>
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REP ID/ORGANISATION	SUMMARY REPRESENTATION
	<p>Tennis – no comments received.</p> <p>Sport England would support the development of footpaths and cycleways to encourage people to be more physically active, in line with Active Design principles:<a href="#">Active Design   Sport England</a></p>
REDACTED	Connectivity is vital in achieving wider accessibility, integrating new residents and businesses and it contributes to a healthy community.
REDACTED	The layout of the new development should support active travel by creating new frontages and public open spaces that link the new neighbourhoods and their immediate surroundings.
REDACTED	Increasing cycling and walking in the West Winch Growth Area will help tackle some of the most challenging issues around air quality, health and well-being and congestion on the roads. A network of safe and easy-to-use pedestrian and cycle routes will connect the new and existing homes with facilities and services within the Growth Area, with the potential to extend the connectivity further to King's Lynn and Watlington.



## **Borough Council of King's Lynn and West Norfolk**

### **Consultation statement**

### **West Winch Framework Masterplan Supplementary Planning Document**

**18 November 2022**

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## 1. Introduction

The Borough of King’s Lynn and West Norfolk consulted on the Draft West Winch Masterplan Supplementary Planning Document (SPD) from 5 August 2022 and 27 September 2022, a period of 7 ½ weeks. This statement sets out the consultation strategy, the responses received, the main issues raised and how they have been addressed in the final version of the SPD. The statement has been prepared in accordance with the King’s Lynn and West Norfolk’s Statement of Community Involvement (SCI).

A wide range of individuals and groups have an interest in the future development of King’s Lynn and West Norfolk. At each consultation stage in the production of this SPD we aimed to engage as many of these people as possible. This is because we recognise the importance and value of community engagement throughout the plan production process. The comments received during each round of consultation were used to inform and refine the creation of the West Winch Masterplan Framework SPD.

### Background and context

The Strategic Planning Service has prepared a Supplementary Planning Document (SPD) that provides additional guidance and an indicative masterplan for the development of an allocated site at West Winch. The SPD supports the adopted Core Strategy (2011) (CS) and Site Allocations and Development Management Policies Plan (2016) (SADMP) and the emerging Local Plan 2036. The SPD has been prepared and will be adopted in accordance with the provisions in the Town and Country Planning (Local Planning) (England) Regulations 2012.

The CS and the SADMP allocated the West Winch Growth Area as a strategic ‘urban expansion’ area around King’s Lynn to meet most of the Borough’s need for housing over the plan period in a sustainable manner with the appropriate level of supporting facilities. This strategic allocation has been carried forward into the Local Plan Review which will replace the CS and SADMP.

Part B of Policy E2.1 of the SADMP makes various requirements for what can loosely be called ‘co-ordination’ of infrastructure, with phasing and timetabling. It highlights the need for a clear statement bringing these aspects together. The Borough Council through this Framework Masterplan is addressing that ‘co-ordination’ requirement.

The development of the masterplan’s strategies and principles has been led by planning consultants WSP with Council officers’ guidance and input. The SPD is to be adopted by the Council in January 2023.

The Masterplan Framework is focused on helping to ensure that West Winch will benefit from good growth, improved transport capacity and connectivity, it will be provided with social infrastructure alongside development and it will benefit from joined up development across different land ownership. The masterplan will allow a robust and deliverable framework for development to come forward which will address physical and social barriers and contribute toward the Council’s growth



priorities. It will also enable stakeholders, such as residents, Members, developers and officers, to better understand the area’s complexities and opportunities.

### Role of the consultation and engagement report

The SPD is subject to statutory preparation procedures under Regulations 11-16 of the Town and Country Planning (Local Development) (England) Regulations 2012. This Consultation and Engagement Report has been prepared to:

- provide an engagement framework that describes the main consultation methods that have been used and those that have been consulted in preparing the SPD;
- summarise the key issues raised by the community and stakeholders and;
- set out the Council’s response to representations received, and how they have helped shape the SPD.

## 2. Purpose of the SPD

The Council sets out its policies, which are the starting point for considering planning applications, in the Site Allocations and Development Management Policies Plan and the emerging Local Plan. The SPD builds upon and provides more detailed advice and guidance on policies in an adopted Core Strategy as per Paragraph 008 of the PPG<sup>1</sup> SPD’s are a material consideration in decision-making.

The draft Supplementary Planning Document (SPD) clarifies the relevant policies and their application to West Winch. It provides additional guidance for assessing planning applications focusing on themes. This guidance is not intended to eliminate or constrain other approaches for achieving the objectives of the Adopted or emerging Local Plans and SPD.

The purpose of the SPD is to:

- *promote high quality development*
- *provide a framework masterplan which provides an indicative land use layout*
- *ensure a coordinated approach to building form, land use and public realm proposals*
- *provide certainty in the planning and development process and facilitate redevelopment of key sites*
- *identify a number of public benefits that the development could deliver for the area that would be paid for by the developer contributions*

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<sup>1</sup> Reference ID: 61-008-20190315

### 3. Consultation strategy

The approach to consultation was developed in conformity with the Council’s Statement of Community Involvement (SCI).

#### Consultation

*How did the council engage?*

An engagement strategy was developed to set out how the public consultation will be conducted on the draft framework, meeting the requirements set out in the SCI and reaching as many parts of the community as possible.

Prior to the consultation, the Borough Council organised public drop-in sessions for engagement on 5 September and 10 August 2022. The structure of these events included a presentation from officers and the consultant team who produced the draft masterplan, followed by the opportunity to ask questions. The events were advertised on the website, on social media and via the notification email sent out to the consultation database.

The draft masterplan was uploaded onto the Borough Council’s website and the consultation website page was publicised through the Borough Council’s social media channels.

Emails and / or letters were sent to all contacts on the Local Plan Consultation Database, including:

- Environment Agency
- Historic England
- Natural England
- Norfolk LPAs
- Norfolk County Council
- Neighbouring LPA’s
- Residents
- All Councillors
- Parish Councillors
- Norfolk County Councillors
- RSPB
- Norfolk Wildlife Trust
- Anglican Water
- National Grid
- HBF
- Forestry Commission
- Coal Authority
- Sport England
- NHS
- Landowners/Developers/Agents
- Community Groups

The consultation was also advertised in a press notice for wider visibility, and Parish Councils also shared details about the engagement events and the opportunity of making representations to ensure that the members of their community can have their say.

## 4. Results

The consultation received responses from just under 70 people and organisations.

### How many people did we reach?

Consultation webpage

The page had 1,243 page views from 966 unique visitors.

The busiest day was on 08/08 when the page had 170 page views. There was also another spike in traffic on 02/09 with 87 page views.

News coverage

Three newspapers published about the consultation.

Lynn News on 30/09 - [Masterplan to transform travel routes in Southgates area of King's Lynn announced, with public consultation being launched \(lynnnews.co.uk\)](http://lynnnews.co.uk)

Your Local Paper on 30/09 - [new gateway to lynn unveiled - Your Local Paper](#)

EDP on 07/10 - [Revealed: Masterplan to regenerate King's Lynn's South Gate | Eastern Daily Press \(edp24.co.uk\)](http://edp24.co.uk)

Facebook and Instagram

Over 1k people were directed to the consultation event via Facebook. One said they were going and 12 were interested.

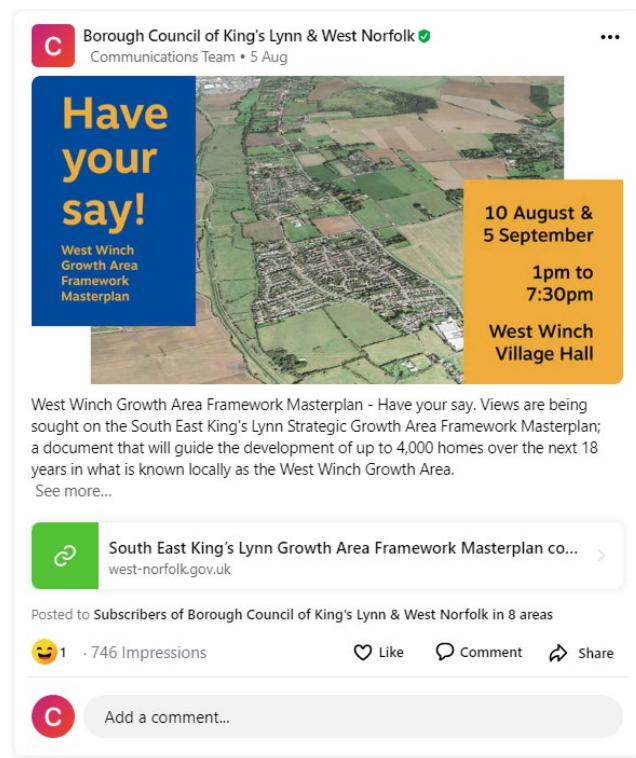
We boosted the post just before the event and this was seen by 7,222 Facebook or Instagram users.

Though there are elements of double counting as a result from the same people seeing the post more than once, it is clear the adverts reached a great number of people.

Next Door

We also advertised via NextDoor which was targeted only at people living in the West Winch ward. These posts reached 1,160 people living in this area.

*Figure 1: Advertisement via NextDoor targeted at people living in the West Winch area.*



## Consideration of responses and amendments to the plan

A summary of the key issues that were raised in the representations are detailed below.

## **PRINCIPLE OF DEVELOPMENT**

Several representations received objected to the allocation on the West Winch Growth Area which was not subject to the consultation. The principle of development in the West Winch Growth Area has been established through the Site Allocations and Development Management Policies Development Plan Document which was subject to extensive consultation and an independent examination by the Secretary of State.

## **TRAFFIC AND WEST WINCH ACCESS ROAD**

Many representations related to the existing traffic issues on the A10 and expressed concern about the increase in traffic. Several representations suggested that the West Winch Access Road should be in place before any development takes place.

It should be remembered that it will take a number of years for development to take place. Norfolk County Council as the Highway Authority indicate that up to 300 houses can be built on the northern part of the site (Hopkins application) with the provision of an access roundabout on the A10 without the provision of a housing access road to the east of West Winch connecting the A47 with the existing A10 (WWHAR).

The phasing plan submitted with the outline application indicates that around 300 dwellings will be delivered between 2024-2029 which equates to an average of 60 dwellings per year. In practice, occupation of these dwellings will also be gradual so the impact on the traffic will not be immediate on the A10.

The WWHAR is not a 'by-pass' to deal with the existing traffic on the A10 – it is an access road for the new growth area which, in combination of a number of traffic calming measures through West Winch village, which are to be delivered within 12 months of development commencing, will help relieve the existing traffic issues on the A10. The WWHAR's delivery is dependent on the delivery of the Growth area as a whole.

Norfolk County Council (NCC) are in the process of securing Major Road Network funding from the Department for Transport (DfT). The first stage of this process, a Strategic Outline Business Case submitted in March 2021, has been concluded and work on of the next stage of the funding process, an Outline Business Case (OBC), is ongoing between NCC and DfT. If successful, NCC, working with the Borough Council, would then complete the detailed design of the road and procure its construction at the earliest opportunity.

It is anticipated that, subject to MRN OBC approval and other statutory approvals, works on the WWHAR could commence in 2025 with approximately a 2 year build out period. Therefore, it is likely that the WWHAR will be in place by 2027 at which point approximately 180 dwellings would have been completed in the northern part of the site.

Consultation on the WWHAR started on Monday 14 November and will run for a period of 8 weeks to midnight on 8 January 2023. Details of the consultation will be available on Norfolk County Council's web site at [www.norfolk.gov.uk/WestWinchA10](http://www.norfolk.gov.uk/WestWinchA10) .

## FLOODING

Several representations received were about the existing issues of flooding within West Winch and raised concerns that development in the Growth Area would exasperate the problem.

National policy requires plans and developments to ensure new development does not increase flood risk elsewhere. The SPD on page 19 under the heading 'Sustainable Urban Drainage Systems (SUDS) sets out the requirements for the provision of SUDS, attenuation ponds etc. Development proposals will also have to be accompanied by site specific flood risk assessments and satisfy the Lead Local Flood Authority's requirements.

Subsequent changes to the SPD as a result of feedback

In response to comments received, amendments have been proposed to the draft SPD as shown in Table 1.

Table 1: Issues raised during the consultation of the West Winch Growth Area SPD and changes proposed in response to issues raised

Issues raised	Changes proposed	Location of change in SPD
Recognising the character of West Winch as separate and different to that of King's Lynn itself, the name of the SPD should be amended to reflect this aspiration	Rename the document and area as the West Winch Growth Area rather than South East King's Lynn Growth Area.	Front cover Section 6 Page 14 2 <sup>nd</sup> paragraph Section 11 Delivery 2 <sup>nd</sup> paragraph under Viability
The status of the SPD in relation to the development plan is unclear. Text should clarify that the current adopted Local Plan, the Site Allocation and Development Management Policies (SADMP) will be superseded by the emerging Local Plan once adopted.	<p><del>The relevant policy framework for the site is set by:</del></p> <p><u>The development plan for the site currently consists of the following policy documents that development proposals will have to take into consideration:</u></p> <ul style="list-style-type: none"> <li>• King's Lynn &amp; West Norfolk Core Strategy (2011) King's Lynn &amp; West Norfolk Site Allocations and Development Management Policies (2016)</li> <li>• King's Lynn &amp; West Norfolk Local Plan review*</li> <li>• North Runcton &amp; West Winch Neighbourhood Plan (2018)</li> </ul>	Section 5 Planning Policy Page 12

	<ul style="list-style-type: none"> <li>Norfolk Core Strategy and Minerals and Waste Development Management Policies (2011)</li> </ul> <p>* <u>Once adopted this will replace the Core Strategy and Site Allocations &amp; Development Management Policies</u></p>	
Education requirements need to be clarified	<p><del>New primary school &amp; nursery provision</del>  <del>x2 West Winch Primary school extension</del></p> <p><u>Two new primary schools (with nursery provision) and expansion of the existing West Winch Primary School</u></p>	Section 6 Page 14 bullet point 1 under Education
	<p>Add title – Indicative Connectivity Plan</p> <p>Show area labelled f on attached plan as open space</p> <p>Key:</p> <p>‘Proposed School’ to be changed to ‘proposed Primary Schools’</p>	Connectivity Masterplan Page 21
	<p>Add title – Framework Masterplan showing indicative land uses</p> <p>Show area labelled F on attached plan as open space</p> <p>Key</p> <p>‘Proposed School’ to be changed to ‘proposed Primary Schools’</p>	Masterplan Page 17
Many comments related to the detail within the indicative masterplan. There is a need to clarify that this masterplan is indicative of the land uses. Final details will be determined at the planning application stage	The Growth Area boundaries were defined within the SADAMP allocation. In identifying these boundaries consideration was paid to maintaining a degree of separation between the village of North Runcton and the new neighbourhoods, and good integration with the existing development and facilities in West Winch.	Section 7 Page 16

	<p><u>Additional wording -</u></p> <p><u>The Framework Masterplan provides indicative locations for land uses, the exact locations of development will be determined at the detailed application stage. The Framework masterplan also includes some additional land to be included in the growth area which maintain the objectives set out above.</u></p>	
A number of comments related to climate change which should be addressed	<p>The scale, form, character, design and mix of development densities should reflect the local character and proximity to the growth area centres and take into account the local topography, setting and natural assets of the site. <u>Locally sourced materials to reinforce the local vernacular would be encouraged.</u></p>	Section 8 Page 18 under Design and Density – 1 <sup>st</sup> paragraph
	<p>The development should seek to meet high standards of sustainable construction and design in terms of energy efficiency, water resources, recycled and reclaimed materials and renewable or low-carbon energy. <u>From 2025 development proposals will need to meet the Future Homes Standard. Link to The Future Buildings Standard – GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>)</u></p>	Section 8 Page 18 second paragraph under Climate Change
	<p>The development <del>should</del> <u>must</u> make the most of opportunities to create or improve habitats. <u>This includes the Retention retention of hedgerows and mature trees, use of native species in landscaping, installation of bird and bat boxes and design of lighting schemes to encourage habitat creation and enhancement.</u></p>	Section 8 Page 19 1 <sup>st</sup> paragraph under Biodiversity
	<p><b>Sewage &amp; Drainage</b></p> <p><u>Sewage and Sustainable Urban Drainage Systems (SuDS)</u></p>	Section 6 Page 14 Page 14 bullet point 3 under Utilities
	<p>The development <del>should</del> <u>must</u> incorporate SUDS <u>in accordance with national and local polices</u> to reduce any</p>	Section 8 Page 19 Sustainable

	<p>increases in surface water <del>drainage</del> <u>runoff and flooding</u></p>	<p>Drainage Systems – first paragraph</p>
	<p>The details of these will be dealt with in future detail design and the evolution of the Framework Masterplan <u>growth area</u>, as well as any <u>current and/or</u> subsequent planning applications for parcels of land that may come forward in the future.</p> <p><u>The Lead Local Flood Authority's Developers Guidance contains practical advice on SuDs. Link: <a href="#">Information for developers – Norfolk County Council</a></u></p>	<p>Section 8 Page 19 Sustainable Drainage Systems – Last paragraph</p>
	<p>Connectivity is vital to <u>in achieving wider</u> accessibility, <u>integration integrating</u> for new residents and businesses and <u>it</u> contributes to a healthy community.</p>	<p>Section 9 Connectivity and Transport Page 20 1<sup>st</sup> paragraph under Connectivity</p>
	<p>The Growth Area should be well connected with surrounding communities by walking, cycling and public transport. The whole area should be better linked to local centres, places of work, education, the town centre and the countryside linking into King's Lynn Active Travel Network, as defined by the King's Lynn Local <u>Walking and Cycling Infrastructure Plan</u>. Which can be found here: (<del>shorturl.at/abe45</del>) <u>which can be viewed at: <a href="#">Local Cycling and Walking Infrastructure Plans – Norfolk County Council</a></u></p>	<p>Section 9 Connectivity and Transport Page 20 second paragraph under Connectivity</p>
	<p>The layout of the new development should <del>contribute</del> <u>support active travel</u> by creating new frontages and public open spaces that link the new neighbourhoods and their immediate surroundings.</p>	<p>Section 9 Connectivity and Transport Page 20 3<sup>rd</sup> paragraph under Connectivity</p>
	<p><del>To improve integration and permeability and to promote maximum usage, a network of safe and easy-to-use pedestrian and cycle routes along desire lines should connect the new homes with facilities in the new</del></p>	<p>Section 9 Connectivity &amp; Transport Page 20 1<sup>st</sup> paragraph</p>



	<p><del>neighbourhoods and link the new development to existing facilities in West Winch and King's Lynn.</del></p> <p><u>Increasing cycling and walking in the West Winch Growth Area will help tackle some of the most challenging issues around air quality, health and well-being and congestion on the roads. A network of safe and easy-to-use pedestrian and cycle routes will connect the new and existing homes with facilities and services within the Growth Area, with the potential to extend the connectivity further to King's Lynn and West Winch.</u></p>	<p>under Pedestrian &amp; Cycle Access</p>
<p>A number of responses relayed comments about heritage assets which also needed to be addressed more clearly. To ensure HIAs submitted with planning applications meet requirements and take account of the West Winch Heritage Impact Assessment</p>	<p>Change title of paragraph from 'Heritage' to 'Built Heritage and Archaeology'</p> <p>Whilst there are no designated heritage assets within the growth site, there are a number of listed buildings nearby including the Grade I listed Church of All Saints in North Runcton and Grade II* listed Church of St Mary in West Winch. <u>The Old Windmill, the War Memorial</u>, the Old Rectory, the Gables and The Old Dairy Farmhouse listed at Grade II.</p> <p>Development proposals will need to be accompanied by a detailed Heritage Impact Assessment that follows best practice procedure produced by Historic England and meet the requirements of planning policy contained in the National Planning Policy Framework. Submitted Heritage Impact Assessments will also need to <u>consider the findings of the Heritage Impact Assessment for West Winch. An archaeological assessment will also need to be submitted where needed.</u></p>	<p>Section 8 Page 19 Heritage</p> <p>Section 8 page 19 under Heritage</p>

<p>Some responses indicated that traffic calming measures were not clear. There is a need to make sure traffic calming measures relate to the A10 through West Winch and to indicate what measures may be included</p>	<p>Traffic calming West Winch <u>(A10) (may include speed bumps, reduced speed limits, pavement build outs etc)</u></p>	<p>Section 6 Page 14 bullet point 3 under Transport</p>
<p>Some responses queried the location of the Sports Centre mentioned on page14, this could consist of improvements to existing facilities at West Winch.</p>	<p><u>Sports Centre (could involve financial contribution towards existing sports facilities in West Winch)</u></p>	<p>Section 6 Page 14 bullet point 2 under Community</p>

#### Stage 4: Adoption

A cabinet report will be presented to the local electorate for consideration of adoption. Following the successful adoption of the SPD, it will be used to determine planning applications in the West Winch area.

## Appendix 1: Representations received

Respondent	Summary representation
<p>Castle Rising Parish Council</p> <p>North Wootton Parish Council</p> <p>South Wootton Parish Council</p>	<p>Section 1 of the draft Masterplan states that:</p> <p>“When adopted [it] will be used by applicants, Planning Officers and other council departments in the planning decision-making process.” The problem here is that it is written in the future tense whereas outline applications for 1600+ of the 2500 homes for delivery during the plan period have already been submitted and do not, because they could not, accord with a framework that hadn’t then been written. This order of events is contrary to the clear intentions in SADMP.</p> <p>Section 1 continues:</p> <p>That the Growth Area is “...a strategic urban expansion area around King’s Lynn to meet most of the Borough’s need for housing over the plan period in a sustainable manner with the appropriate level of supporting facilities.”</p> <p>It is intended to deliver 2500 homes in the plan period up to 2038 and 4000 in “the fullness of time” “with supporting infrastructure”.</p> <p>The key issues are (a) what is meant by ‘in a sustainable manner’, ‘appropriate level of supporting facilities’ (later referenced as infrastructure) and that it is intended to deliver most of the Borough’s need for housing over the plan period. Despite being a framework, the document doesn’t generally set out what is required to be sustainable, or where it does obliquely imply it, it provides no supporting evidence, as if the requirement is plucked from the air. This applies regards to healthcare services, on which not one word is written, and access to education after primary age. The document is light throughout on the delivery of sustainable transport services. It makes much of the need to connect to active travel networks, although there has to be considerable doubt how many of the new residents will consider cycling around or across the Hardwick Interchange to access King’s Lynn town centre to be a realistic option, without doubt opting instead for the unsustainable single use of private car. This is all the more likely because, in contrast to that for the West Winch Housing Relief Road (WWHAR), of the failure to work up any detail on the provision of, or funding for, an attractive public transport alternative. It is clear that for those unable to walk or cycle, whether by virtue of youth or older age, or mobility issues, being proportionately more reliant on public transport than the population at large, there is no intention to ensure their inclusion in the community. Yet sustainable transport is key to decarbonising transport as recognised in government policies developed during 2020 and 2021. It is possible that this failure contravenes the Equalities Act 2010.</p>

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Respondent	Summary representation
West Winch Parish Council	For clarity, at page 5, third paragraph, West Winch and North Runcton Parish Councils worked to produce the Neighbourhood Plan in order to try to <u>mitigate</u> the impact of the proposed development, not to ‘support’ it.
North Runcton Parish Council	As noted above – we don’t think this document achieves the stated goals stated in the last three paragraphs of page 5.
Metacre	It is noted that within Page 8 of the Framework SPD it is refers to the Masterplan showing a ‘broad distribution of land uses’, but this is not made clear on the Masterplan itself. It is also noted that later in the SPD at page 19 it refers to SUDS being dealt with through the evolution of the Framework Masterplan, so it is clear the Masterplan is not fixed. We, therefore, suggest that reference is made in the document to the fact that the detail and location of proposed land uses will be dealt with via individual planning applications.
Castle Rising Parish Council North Wootton Parish Council South Wootton Parish Council	Section 4 of the draft Masterplan refers to the Hopkins Home outline application for 1,100 homes to the North of the Growth Area and Metacre’s outline application for 500 homes in what may be called the central part of it. The total 1,600 homes, almost two thirds of the homes proposed to be built in the current plan period, had outline applications submitted (without matters that were likely to be covered in a strategic framework masterplan being reserved) <i>before</i> the Framework Masterplan was produced for consultation, let alone adoption. The Framework Masterplan has therefore been written around developers’ pre-existing applications rather than their applications fitting with a pre-existing Masterplan. It strains credibility to believe that the Masterplan has not been written very specifically to fit the developers’ wishes, rather than those of the local population, and this is evidenced by the considerable lack of detail in the document and failure to even address SADMP para E2.60.
West Winch Parish Council North Runcton Parish Council	<p>The ‘Planning History’ at page 10 should probably make it clear that the Princes Foundation were first employed to promote development of this site by Zurich Assurance, one of the main landowners. Residents have largely remained sceptical throughout.</p> <p>Regarding the two ‘live’ planning applications, we are sceptical that there has been much ‘response to consultation’. We were told recently that the Hopkins Homes scheme had been altered after ‘community input’ – but the only alterations we are aware of resulted from requirements from Highways England and NCC. In essence the Hopkins scheme is the same one first promoted in 2012. BCKLWN have themselves previously stated the Metacre scheme is ‘premature’ (even though the IDP phasing plan shows parts of it completed early).</p>

Respondent	Summary representation
<p>Castle Rising Parish Council</p> <p>North Wootton Parish Council</p> <p>South Wootton Parish Council</p>	<p>Section 5 of the draft Masterplan details the adopted policies around which the development has been set. The list omits the Core Strategy, although relevant. The SADMP, has very clear site allocation and development policies for the Growth Area including:</p> <p>Paragraph E2.5 states that the Growth Area is an urban extension, and therefore it follows that urban policies should apply, not those adopted for rural areas. This has relevance to the standards to meet an attractive public transport service.</p> <p>Policy DM1 states “When considering development proposals the Council will take a positive approach in favour of sustainable development contained in the National Planning Policy Framework (NPPF).…” The latest published NPPF (March 2021) states at paragraph 3 that “The Framework should be read as a whole…” and yet this has not been so in respect of the NPPF’s section 9 on Promoting Sustainable Transport. Indeed, the Masterplan fails to meet multiple paragraphs, including 104 (c) and (d), 105, 107, 110 (a) to (d) and 112 (a) to (c). It fails the fundamental test of sustainability, its definition at paragraph 7 of NPPF’s section on Achieving Sustainable Development, and its definition of sustainable transport in Annexe 2.</p> <p>Policy DM17 sets out standards for car parking space at new developments. It mitigates this by stating “reductions in car parking requirements may be considered for……urban locations where it can be shown that the location and the availability of a range of sustainable transport links is likely to lead to a reduction in car ownership…” This is an iterative process: by setting the baseline figure in advance is contrary to paragraph 107 of the NPPF’s section 9 on Promoting Sustainable Transport. That is written so that the local parking standards policy should follow the development not the reverse and especially as the draft Framework states that more work is still to be done on the provision of bus services. The greater the volume of housing, then, the greater the land-take from agriculture and damage to food security, the more unsustainable the development really is.</p> <p>It is evident that whilst the SADMP may align with NPPF requirements, actual development control does not. Nowhere is this currently more evident than in the Knights Hill 600-home development at South Wootton and the Growth Area Framework Masterplan gives no confidence that this area will be any different.</p>

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Respondent	Summary representation
REDACTED	<p>Page 14 suggests the provision of 3 shops – for 4,000 houses?! Even if the ‘fullness of time’ mentioned on page 5 doesn’t happen, 2,500 are already planned – which is a large village. On page 18, under ‘Neighbourhood Centres’, it says it would ‘create a sustainable layout that would enable residents (both new and existing) to walk or cycle to the local amenities to satisfy their daily needs and facilitating the development of neighbourhood identity’. Given that this development is effectively the size of Swaffham, it might be worth thinking about how many shops <u>they</u> have and whether 3 shops (plus the handful in West Winch) will satisfy the daily needs of so many people. This all of course ignores the fact that places like Swaffham (in fact 3,250 households according to Wikipedia) have developed into rounded, useful, workable towns over a period of hundreds of years. This new development in West Winch is neither a town that has developed over the years nor a planned New Town – what it looks like is satellite housing for King’s Lynn, and yet it is such a large development.</p> <p>Page 14 also has ‘library contributions’ – I have no idea what this means but would like to think it means a library facility might be provided. I feel that this is highly unlikely though, given the cavalier way our county council is currently behaving towards our library in King’s Lynn.</p>
Norfolk County Council	<p>Education</p> <p>The education infrastructure requirement as set out on page 14 should explicitly state the requirement for two new primary schools (with nursery provision) and the need for expansion of the existing West Winch primary school. The current text states ‘New primary school &amp; nursery provision x2 West Winch Primary school extension’ is considered too vague.</p> <p>Lead Local Flood Authority</p> <p>The Lead Local Flood Authority (LLFA) reviewed the draft SPD and noted in section 6 (Infrastructure Delivery Plan) of the SPD that there was no mention of the inclusion of sustainable drainage systems. While in section 8 of the SPD a small sub section titled “Sustainable Urban Drainage Systems (SuDS)” was included. The SPD seems to infer the inclusion of sustainable drainage systems is optional. This approach is not in accordance with National Planning Policy Framework (NPPF), which in paragraph 167 and 169 both refer to incorporating sustainable drainage systems in particular on major developments. The LLFA, supported by NPPF, requires the inclusion of sustainable drainage systems for the management of surface water runoff.</p>

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Respondent	Summary representation
West Winch Parish Council  North Runcton Parish Council	At page 14 - a 'Sports Centre' first appeared in the IDP document costing in 2018 – but where this facility might be located and what it might include has never been ascertained.
REDACTED	Too extensive. North Runcton in danger of losing village identity. too much Greenfield land would be lost forever.
REDACTED	I cannot see any reference to the A10 which regularly gets long hold ups with cars turning in and out of West Winch
REDACTED	Too many houses for that road and just going to cause carnage to the A10
REDACTED	There has been no provision for the Urban Centre originally promised and one retail offering is pathetic for a development of this size. The green spaces and play areas are in the wrong area.... More needs to go in by where the new houses are going. I don't have an issue in principle but the A10 is a major pinch point and this MUST be addressed to improve the traffic flow before anything else is done. My fear is that it will be done piecemeal and we will never get everything we have been promised.
REDACTED	<p>Plan showing access points to development is a major improvement on previous proposals particularly removing 350 properties from exiting via Watering Lane past existing school, however these must be developed after WWHAR is constructed to avoid further congestion to existing A10.</p> <p>With regard to development area E2.1 access via Hall Lane is acceptable route but access shown off Chestnut Ave / Elm tree Grove should be pedestrian only. Estate roads in this area with tight turning hammerheads are unsuitable for access to this site. School development should cater for parking /offloading within its boundaries avoiding road parking at drop off &amp; pick up times.</p>
REDACTED	There is a lack of retail and community space infrastructure to support the amount of housing. Cf. e.g. the ratios of such space to housing in Downham Market or Swaffham. This must be increased including in particular a dentist and a pharmacy.

Respondent	Summary representation
REDACTED	<p>The masterplan indicates a vast swathe of countryside that will be taken in to fulfil this proposal. This area includes woodland, ponds and many other natural features which support a diverse range of bird and wildlife. The area is currently enjoyed by the public with public access / footpaths in the area. The negative impacts of this plan far outweigh the benefits to the local area. What are the the benefits by the way? Funny how we are not asked to comment on Section 9, wonder why?</p>
REDACTED	<p>I know there is general unease as to why this is being built (apart from to satisfy government targets) when there is plenty of other housing developments in and around King's Lynn. This development seems to be linked to the A10 Cambridge corridor but is being located halfway between two railway stations with no provision for a railway station close by. Who is the development being targeted at - Cambridge / Ely overspill for people who can't afford Cambridge / Ely prices or for genuine local growth?</p> <p>I am concerned it is not binding on the planners and the developers. As guidance it will be far too easy for it to be ignored should pressure mount due to costs etc to for example increase housing densities, not develop the green areas, delays in the building of schools.</p> <p>There should be a process in place that ensures public communication / time for true consultation when any planning proposals etc conflict with the master framework or neighbourhood plans.</p> <p>There are also too many access points onto Rectory Lane - Most estates are designed to be fairly self contained with limited access points (2 or 3).</p> <p>There also needs to be safe cycling access from North Runcton to the West Winch community centres to allow people to use these without needing a car.</p>
REDACTED	<p>I am not apposed to the new houses but west winch needs the new road FIRST. I live on the A10 and I am scared daily to pull off my drive way, the noise pollution and the traffic which is damaging my cottage which is over 100 years old is shocking. Please please build the by road first</p>



Respondent	Summary representation
REDACTED	<p>In the northeast of the proposed area is North Runcton Conservation area. (I forget the full name). The fully wooded eastern part is off the zoned suggestion, but I am unsure how far west it goes, as there is no distinct boundary on the west side, it 'morphing' into the scrubland immediately west. Perhaps (going out there many times for peace) I have been trespassing, as I also walk often in the more open western part. (Infact, on the recent 'far too hot Tuesday' I was there with a picnic and a book).</p> <p>Could not a larger area of this corner be preserved as park/open land? There is a 'green amenity/open space' marked on the map about halfway up, but it seems a bit silly to carve up an existing natural scrubland to plant a different one further along which will have to be grown from ploughed fields.</p> <p>Anyway, thanks for your time ref. this small matter.</p>
REDACTED	<p>Obviously sections 1 to 6 cannot be commented on or changed. Unfortunately particularly section 6 IDP is crucial regarding impact on West Winch residents.</p>
REDACTED	<p>Looking at the plan I see that one of the entry/exit points into Rectory Lane is directly opposite my cottage which means I will have night time traffic lighting up my house all through the night. This exit point could be made opposite Coronation Avenue meaning that the headlights of exiting cars would light up a road instead of my house. With the amount of cars leaving and entering this new estate I can see huge difficulties for not only myself but also my neighbours in Rectory Lane getting in and out of their respective drives. This is extremely bad planning and can only lead to even heavier traffic along Rectory Lane than there is now. The name is explicit -is a Lane and not a major road and is completely unsuitable for the amount of traffic you are intending to load onto it.</p>

Respondent	Summary representation
CPRE Norfolk	<p>CPRE Norfolk is against the unnecessary development of greenfield sites when there are available brownfield sites for development. However, it is accepted that to keep pace with unrealistically and unnecessarily high housing targets imposed by central government, along with the relative paucity of brownfield sites in the Borough, and the need to maintain a steady supply of delivery of housing, sites which are allocated within the adopted Local Plan will result in their development.</p> <p>This having been stated, there is still a need and responsibility for these allocated sites, particularly those such as the West Winch Strategic Growth Area, given its size and consequences for the Borough and its residents in social, economic and environmental terms, to be delivered in such a way as to minimise harms whilst maximising gains.</p> <p>Two crucial issues should be addressed by the Framework Masterplan, as it is not clear from the documentation whether this will happen.</p> <p>Firstly, CPRE Norfolk has major concerns that the Framework does not provide strong enough requirements for the design and layout of the new housing which is to form three separate neighbourhoods. Such requirements are necessary to avoid the new housing being large, suburbanised development with little real sense of place, community or how it will meet the relevant policies of the North Runcton and West Winch Neighbourhood Plan.</p> <p>Secondly, it is not clear from the Framework, possibly partly due to the scope of the Masterplan Boundary, how the transport options will be delivered, as well as there being a lack of options which should be part of such a major development, given the need for it to be truly sustainable. This will be discussed in more detail below under Section 9. At this point it is important to call for direct linkage of the new developments to the railway line, preferably by the addition of a new station immediately to the west of West Winch. For what is in effect a new town, it is important that a full range of public transport options are provided, to improve sustainability by making the new housing less car- dependent, to help meeting net-zero targets and to improve connectivity for residents. Given the small amount of employment land in the Masterplan area, it is clear that the vast majority of new residents will need to travel out of the Masterplan area to work.</p> <p>Related to the second issue, it is important that all aspects of the Masterplan and its associated developments should clearly demonstrate how it will address climate change and specifically meet relevant net-zero targets.</p>

Respondent	Summary representation
REDACTED	Page 17 the map shows two ‘proposed access road junction points’ (see below) – but not onto any current roads. So does that mean more new roads, not just this one access road? If so, where are they going?
Norfolk County Council	<p>The accompanying key to the Map (Page 17) – the reference to a “proposed school” needs to clarify that the locations are for “two new ‘primary schools”.</p> <p>The County Council expects the delivery for the expansion of the existing primary school, high school, sixth form sectors, and the two new primary schools to be met through developer funding.</p> <p>The overall positioning of the two new school sites in relation to the developments appears reasonable.</p> <p>Both seem well placed in terms of being community facing and with a good highway network for access. This would also potentially support sustainable travel in that many of the cohort should be within a short walk. But further negotiation is required regarding the detailed location of the new school sites with Children’s Services and the Highway Authority.</p> <p>The Northern School site should be a 2FE school (site size approximately 2ha). The Southern School site should be a 3FE school (site size approximately 2.8-3ha).</p> <p>As the West Winch housing development(s) come forward Children’s Services plan would be to first expand the existing West Winch Primary School from a 1FE to a 2FE primary school, then deliver the first new primary school, in the Northern Site, and finally deliver the second new primary school with the final phases of the development.</p>

<p>Historic England</p>	<p>We welcome the large area of green open space shown to the east of the grade II listed Mill. The Mill, which was in use until 1937 dates from around 1821. Built of tarred brick in English bond, the mill has been converted into a private residence.</p> <p>The grade II listed Old Dairy Farmhouse lies just to the west of a small portion of the site which lies on the west of the A10. Development in this area has the potential to harm the significance of the heritage asset. The farmhouse derives part of its significance from the surrounding farmland. It will be important that the character, form and scale any development in this area respects the character and scale of this former agricultural context and that connection is maintained with the farmland.</p> <p>The grade II* Church of St Mary and the adjacent grade II listed War Memorial lie just to the west of the site on the A10.</p> <p>The church stands in a large churchyard and faces open countryside to its east side. Immediately south is Manor Farm, an historic farmstead containing a group of traditional farm buildings. South of this is a substantial moat which the Heritage Assessment accompanying the application states is medieval in origin and for which there is evidence of a building formerly on the platform. The three sites create an interesting group with the church relating to the historic farmstead and the moat being a possible manorial site contemporary with St Mary's. All three heritage assets have a long-standing relationship to agricultural land which contributes to an understanding of them as buildings in a rural community. In addition, the church is a landmark building in this rural setting, emphasising its pre-eminent status in the community.</p> <p>We note that it is proposed to have an area of open space and landscaping to the south of the church which is welcomed. We also note that some new community use is proposed to the south east of the church. Is this a church hall? We suggest that this new community building should reflect the architectural style of the church and so enhance the significance of the church.</p> <p>We also suggest that key views from within the site to the church should be protected and maintained. Such views can act as important landmarks and way markers within a new development and help to give the new development a sense of place and anchor it to its historical context.</p> <p>We note that built development comes quite close to the eastern end of the church in the masterplan. You will have seen from our comments in February 2022 on Application 18/02289/OM that we have objected to this application on heritage grounds unless development is removed from the northern part of this application site to the east of the church.</p>
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Respondent	Summary representation
	<p>The relationship of the church and manor with the farmland has survived despite the extensive modern development on the west side of the main road. The proposed masterplan would introduce modern housing to the east of the church, building beyond the established historic pattern of development and separating the church from the fields at this point. This would result in harm to the historic significance of the parish church by diminishing the quality of its setting that contributes to that significance. The farm and moat would also be separated from the fields by housing on their east and south sides.</p> <p>In our letter of February 2019 on this application we included a record of the consistent objections we have raised to development of the fields east of the church in 2011, 2013 and 2015. These objections were repeated in our February 2022 letter. We therefore remain of the view that to develop these fields, which form the northern part of the site in application 18/02289/OM, would be harmful to the historic significance of the grade II* listed church.</p> <p>We therefore strongly recommend the removal of some built development in this area of the masterplan. We would suggest that there is an area of open space and set back to the east of the church to provide some breathing space for the heritage asset and to enhance the significance of the asset.</p> <p>The grade II listed Old Rectory, North Runcton, lies to the east of the site. The significance of the asset is most likely to be affected by the proposed access road that runs along the eastern boundary of the development site. We suggest that careful landscaping should be required along the access road to minimise the impact on the Old Rectory.</p> <p>Finally, the grade I Church of All Saints in North Runcton lies to the east of the site. Although at a distance from the site, any key views of the church from within the site should be identified in the SPD and protected and maintained in the masterplan.</p>
<p>West Winch Parish Council</p> <p>North Runcton Parish Council</p>	<p>We are not clear why the Framework Masterplan is represented twice at page 17 and page 21. They essentially seem to be the same plan.</p>

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Respondent	Summary representation
Hopkins Homes	We support the boundaries of the masterplan and development areas identified. These follow the design principles first established by the Princes Foundation exercise and the Hopkins Homes planning application (which has been the subject to 3 rounds of consultation as the design has evolved in response to public and statutory consultee comments). We also support the level of detail provided which provides a flexible but clear framework for individual developments (providing different and complementary character areas) to come forward. Finally, it will be important to reconcile the Infrastructure Delivery Plan requirements with the Framework Masterplan. For example the community facilities being funded include a sports centre, but it is not clear where this will be located in the Framework Masterplan at this time.
REDACTED	I would not expect Agricultural, Greenfield/Brownfield land to be built upon. Period! Uk needs more self-sufficiency in food production. Drainage, Electricity & Power infrastructure needs major improvement before development commences. Expect Doctors Sugery if built to full extent.
REDACTED	The current plan of North to South development would be better placed as a West to East encompassing North Runcton. The current plan is merely a massive housing estate.
REDACTED	With regard to drainage West Winch current drainage systems are overloaded with off-line storage tanks holding back storm flows, Property flooding & foul discharges occur in village. Whilst larger areas of development east of A10 can be designed to have new separated drainage systems independent of existing network, large blocks of proposed development within existing village could not be served by existing sewer network potentially causing increased frequency of overloading & discharges.
REDACTED	The requirements on low carbon are too weak - e.g. using words like 'where practicable'. No permissions for development should be granted unless the proposed housing meets full 0-carbon standards.
REDACTED	The biodiversity and green infrastructure proposals are laughable, with all the land and natural habitat that will be destroyed under this proposal. yet it talks of improved habitats (how?) and a few open spaces with green corridors, how is that considered as an improvement on what we already have?

Respondent	Summary representation
REDACTED	<p>Integral Solar Panels and best practice to minimise environmental impact should be used by all builders.</p> <p>Ensuring there are a range of styles and estates are developed to look and feel like a place people want to live - the complete opposite to King's Reach for example.</p> <p>Also there is an expectation of two new schools and a new health centre which will need to attract good professionals into the area at a time when filling existing vacancies is proving incredibly difficult. Professionals tend to not want to come to rural or semi rural places that appear to be on a limb as King'S Lynn is. Where is the effort being made by the borough council to attract people here?</p>
REDACTED	We need the road building before any more homes are built
REDACTED	At the consultation presentation I asked what type of houses would be built (namely eco and with sustainable materials etc) your reps said it would be up to the developer. Section 8 spells out under Climate Change what is expected. I want it noted that the developers MUST adhere to these requirements and I shall be watching when detailed plans are put forward.

<p>CPRE Norfolk</p>	<p>It will be very important to ensure early and comprehensive delivery of shops and other local (community) facilities in each of the new neighbourhood centres. While this will help to improve the sustainability of these neighbourhoods, further services and infrastructure will be essential both in or easily accessible from these areas.</p> <p>We support the expectation for mixed communities with a range of housing types, styles and tenures across the Growth Area. It will be particularly important to ensure that the full expected percentage (20%) of housing is affordable housing.</p> <p>We also draw attention to and support Policy GA01: Creating neighbourhoods, in the North Runcton and West Winch Neighbourhood Plan. By following this policy, it is expected that our concerns regarding the nature of the new housing developments outlined in Section 7 will be avoided.</p> <p>Consideration of climate change should extend to ensuring that all new housing of all tenures is designed and built to include features to help the development to be carbon neutral, e.g. solar panels, air-source heat pumps, and grey- water harvesting, as well as meeting building regulations with regard to electric-vehicle charging points, insulation, building materials etc.</p> <p>While the statement regarding biodiversity in the consultation document is welcome, it will be essential to include mechanisms to ensure any planting and projects such as bat and bird boxes are maintained in the long term. The only mention of lighting in the whole consultation is in this section, where it is stated that the ..."design of lighting schemes can...encourage habitat creation and enhancement." Whereas the North Runcton and West Winch Neighbourhood Plan includes in Policy WA07, design to protect and enhance local character, "night lighting should be restricted to essential public spaces, corridors and road junctions. All street lighting and other external building and space lighting should be designed to minimise light spillage and energy wastage." While we appreciate these details would not usually be apparent until the planning application stage, we feel it is important to include clear reference to the importance of protecting the rural dark skies of the immediate area, which would go some way to maintaining a separation from the Hardwick Industrial Estate and King's Lynn. At the moment the West Winch Growth Area documentation is aspirational and vague, rather than providing a clear requirement with regard to controlling external night lighting in the Growth Area.</p> <p>We support plans for significant amounts of green infrastructure in the West Winch Growth Area, including the separation of the new neighbourhoods, and to maintain separation from King's Lynn, to enable the continuation of West Winch as a distinct settlement which can continue to be characterised by its predominantly rural setting.</p>
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Respondent	Summary representation
REDACTED	<p>Page 18 ‘Climate change’ doesn’t seem to lay down any rules about e.g. having PV on every roof; using air-source heat pumps; setting above the minimum requirements for building regs; passive solar gain etc etc. Saying it ‘should seek to meet high standards of sustainable construction and design in terms of ...’ is waffle – both ‘should’ and ‘seek’ don’t lay down any rules. Developers will aim to provide the lowest quality they can get away with for the greatest possible profit unless their hands are held to the fire with rules that force them to address changing needs in terms of moving away from fossil fuels, working towards passive house status, etc.</p>

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<p>Anglian Water</p>	<p>Anglian Water strongly supports the design and development ambitions of the framework, particularly in relation to <a href="#">climate change</a>, <a href="#">SuDS (Sustainable Drainage Systems)</a>, <a href="#">biodiversity</a>, and <a href="#">green infrastructure</a>. Together these elements are inherently interdependent and align with our strategic ambitions. We suggest that integrated water management is embedded into the masterplan framework as a comprehensive approach that reinforces the framework set out in the draft SPD but provides the key links between these four elements. A focus on water quality and management will deliver a sustainable community with an enhanced environment that is resilient to the impacts of climate change.</p> <p>Whilst the framework masterplan has been shaped by a green infrastructure-led approach arising from no-build zones, it provides a fundamental structure to implementing nature-based solutions for SuDS, incorporating elements such as rainwater harvesting that can be utilised for non-potable water use and help to reduce demand for potable water. Such technologies have been used effectively to assist with delivering ambitious water efficiency measures and <a href="#">water smart communities</a> within the Anglian Water region. When designed in from the start, integrated water management delivers more resource efficient homes which also serves to reduce utility bills for new residents. We are currently working with partners on an Ofwat funded innovation project' <a href="#">Enabling Water Smart Communities</a>' to address how new developments can adapt in a sustainable way to three key impacts of climate change -flood risk, water scarcity and risk to water quality.</p> <p>We support the higher optional water efficiency standard of 110 litres per person per day, which is set out in the new King's Lynn and West Norfolk Local Plan. However, given the scale of development being delivered at West Winch, we propose that more ambitious water efficiency measures could be sought, that has the added benefit of saving energy and reducing carbon emissions. This approach will also assist in reducing capital (embedded) and operational carbon, both through the development and the infrastructure required to support the delivery of new homes and employment.</p> <p>We welcome the statement regarding the Biodiversity Net Gain (BNG) requirement when it comes into effect from 2023. Anglian Water has a voluntary business plan commitment to deliver a biodiversity net gain of 10% against the measured losses of habitats measured by area on all Anglian Water-owned land. It is also important to recognise that Anglian Water through landholdings and</p> <p>1 Consultation on our draft WRMP24 is due to commence on 6th October 2022 . Projects as well as other conservation bodies, can support the development of landscape scale BNG and linked habitats which support climate change adaptation and species resilience. We would also encourage a nature-based solutions focus for SuDS design to suitably contribute towards helping to deliver the BNG requirements of the development.</p>
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Respondent	Summary representation
<p>Norfolk Wildlife Trust</p>	<p>Thank you for consulting us on the East Lynn (West Winch) Masterplan. We have the following comments to make.</p> <p>We have previously been consulted on the two planning applications which make up the masterplan area. We note that both applications are still being discussed, and that a key area of information sought by Natural England is the extent, quality and delivery of green infrastructure space, and the contribution that this will make to the avoidance of adverse effects on a number of legally protected wildlife sites in the surrounding area, some of which are also Norfolk Wildlife Trust Reserves (for example Roydon Common). We also draw attention to the presence of the West Winch Common County Wildlife Site near to the two development proposals, which will also benefit indirectly from the creation of high quality greenspace within the development as a means of reducing visitor pressure impacts.</p> <p>With reference to this, we are happy that there will be a Masterplan SPD to co-ordinate the design and delivery of green infrastructure. Experience with similar large scale development proposals elsewhere in Norfolk has demonstrated that masterplans are an important means of ensuring that collective landscape and green infrastructure requirements are not lost between different individual planning applications.</p> <p>Given there is still outstanding information required for both applications regarding the exact design of green infrastructure and visitor pressure mitigation, we would be happy to discuss these elements further with the Council and the applicants if there is anything that we can constructively help with. Please do not hesitate to contact us to discuss this further if that would be useful.</p>

<p>Norfolk County Council</p>	<p><b>Natural Environment</b></p> <p><b>Arboriculture:</b></p> <p>The retention of the area of open space with scattered trees to the west of Sheeps Course Wood would be preferable in the design of the residential layout, rather than creating areas of new open space on former agricultural land. However, it is appreciated that the agricultural land designated as proposed open space cannot be developed due to the presence of high pressure gas pipes.</p> <p>Particular care should be taken to amend the design to retain ancient and veteran trees and other mature trees designated as Category A (in accordance with BS5837:2012 Trees in relation to design, demolition and construction) which would be identified in the pre-development Arboricultural Impact Assessment. The current design will result in the loss of a considerable number of trees for the access road, access points and residential development in the northern part of the growth area.</p> <p>The overall tree loss across the growth area will require substantial tree and hedge planting to mitigate for the habitat loss and must take account of the requirement of net gain from 2023. The landscape plans should demonstrate that sufficient space is provided to plant trees of a large mature stature (greater than 25m in height) as well as smaller ornamental trees within the housing areas.</p> <p>Reference should be made to <a href="#">Norfolk County Council's Environmental Policy</a> and Pollinator Action Plan.</p> <p>Should you have any queries with the above comments please contact REDACTED (Senior Arboriculture and Woodland Officer) REDACTED</p> <p><b>Ecology:</b></p> <p>The draft SPD incorporates or is immediately adjacent to a number of Local Wildlife Sites including Sheep's Course Wood County Wildlife Site (CWS), Brook Watering Meadow CWS, Rush Meadow CWS and West Winch Common CWS. It will therefore be essential that the masterplan is carefully designed to ensure these sites are fully protected and buffered from any development.</p> <p>The area of semi-natural grassland/ scrub mosaic habitat located within the north-east of the plan area, adjacent to Sheep's Course Wood CWS, is likely to be of significant ecological value, and is expected to currently support a wide range of protected and priority habitats and species. It is therefore recommended that current draft proposals to construct an access road and residential development on this habitat feature are</p>
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Respondent	Summary representation
	<p>revised to ensure this habitat is retained, protected, and enhanced as a valuable green infrastructure and biodiversity resource.</p> <p>Given the requirement set out in the Environment Act for all new development to achieve a minimum 10% net gain in biodiversity, it is advised that an Ecological Impact Assessment Report and associated Biodiversity Net Gain calculation (using the Defra Metric) is commissioned at the earliest opportunity to inform the framework masterplan going forwards.</p>
<p>Norfolk County Council</p>	<p>Lead Local Flood Authority</p> <p>The Lead Local Flood Authority (LLFA) reviewed the draft SPD and noted in section 6 (Infrastructure Delivery Plan) of the SPD that there was no mention of the inclusion of sustainable drainage systems. While in section 8 of the SPD a small sub section titled “Sustainable Urban Drainage Systems (SuDS)” was included. The SPD seems to infer the inclusion of sustainable drainage systems is optional. This approach is not in accordance with National Planning Policy Framework (NPPF), which in paragraph 167 and 169 both refer to incorporating sustainable drainage systems in particular on major developments. The LLFA, supported by NPPF, requires the inclusion of sustainable drainage systems for the management of surface water runoff.</p> <p>In addition, the LLFA in line with NPPF (Paragraph 169 (a)) will expect the promoters of the development parcels to apply the LLFA’s Developers Guidance. The LLFA’s Developers Guidance should be signposted within the SPD to ensure developers and the local planning authority make appropriate and timely reference to the LLFA’s guidance.</p> <p>The LLFA does acknowledge the proposed framework masterplan which identifies the proposed attenuation areas. However, the LLFA notes the attenuation areas shown in the corridor of the existing high pressure gas pipe offsets at the southern end of the development area, are different to those previously indicated in the outline planning submission 18/02289/OM (January 2022). In this planning submission, a series of cascading attenuation basins were proposed. While the masterplan is a high level plan, the LLFA was expect that features such as these attenuation basins would be included in the masterplan.</p>

Respondent	Summary representation
REDACTED	<p>The plan will replace existing green spaces with concrete (houses and buildings) and metal (cars). The current benefit afforded by the existing openness provided by the recreation ground at the William Burt Centre will be destroyed. Instead of benefiting from green open fields either side of the William Burt Centre, users will have an outlook onto residential properties. This will without doubt change the character of the area.</p> <p>Overall, green spaces will be reduced. Green spaces will be replaced with houses and cars. The impact on the environment and existing habitat will be negative.</p> <p>The number of houses proposed is too many to retain a village identity.</p>

<p>Historic England</p>	<p>Page 18 Design and Density - We welcome the reference to local character. We also suggest that reference should be made in the first paragraph to local vernacular and local materials such as Carrstone and flint to help promote the use of local materials and ensure the new development is well integrated within the environment. We also suggest the addition of the words ‘and the historic environment’ in the last sentence of the first paragraph.</p> <p>Page 19 Sustainable Drainage Systems -SuDS are a good and effective way to manage surface water drainage. However, in the design of SuDS we recommend that careful consideration is given to archaeology. We recommend consultation of the Historic Environment Record, consultation with Norfolk County Council and that some archaeological assessment may be required to inform the approach. This requirement should be included in the SPD.</p> <p>Page 19 Heritage We welcome the reference to heritage in the Supplementary Planning Document. Whilst there are no designated heritage assets within the site boundary, we welcome the identification of a number of designated heritage assets in the area. We suggest you also include the War Memorial and Old Rectory, both listed at grade II.</p> <p>There are a number buildings in the area identified as non-designated heritage assets through the Neighbourhood Plan. These assets should be identified and listed in the SPD. A map of designated and non-designated heritage assets would be useful to include in the SPD.</p> <p>There is no reference to archaeology and the need for archaeological assessment. We suggest that this is included in the SPD.</p> <p>Whilst we welcome a requirement for a detailed HIA to accompany any development proposals, it is important to emphasise that an HIA should also inform development proposals. A contextual approach to development will mean that an assessment and understanding of the historic environment should shape any proposals. This important distinction should be made in the SPD.</p> <p>In addition, this masterplan itself should be informed by an HIA which seeks to establish key principles for the development of site which seek to conserve and enhance the historic environment.</p> <p>We understand that Place Services have been commissioned KLWN to undertake an HIA for the Local Plan. The recommendations of that HIA should inform the policy wording of the emerging Local Plan and should also inform the design parameters for the protection of the historic environment set out in this masterplan/SPD. This might include areas of open space and landscaping to protect heritage assets, it might include recommendations in relation to materials and design, height etc. It might also identify key views that need to be</p>
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Respondent	Summary representation
	protected through any development proposals. We will expect to see clear recommendations set out in the HIA that should then be incorporated in the Local Plan Policy and carried forward to this masterplan SPD.
West Winch Parish Council North Runcton Parish Council	<p>Pages 18, 19 and 20 are the three pages of the SPD that cover design guidance that could extend and embellish existing policy. But the details are so thin that the original SADMP probably still offers more detail. The adopted Neighbourhood Plan (NP) certainly has more detail but isn't cross referenced at all. It is an adopted policy document.</p> <p>The section 'Design and Density' could reference NP policies WA01-WA15 and GA05. The SuDS section should reference NP policy WA04. The 'Heritage' section should reference the non-designated assets identified in NP policies WA01-WA03. The 'Green Infrastructure' section should reference NP policies WA05-WA07 and policy GA03. The 'Connectivity and Transport' section should reference NP policies GA04-GA08.</p>
Hopkins Homes	The framework provides sufficient detail to shape developments in a complementary way without providing onerous detail. The overall delivery of 4,000 homes is supported as it will improve the viability of the scheme to deliver the Infrastructure requirements.
REDACTED	Bus services need to be dramatically improved. Good to see cycle paths incorporated. Rail Station would be Beneficial.
REDACTED	Traffic is going to be a nightmare on my opinion

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Respondent	Summary representation
REDACTED	<p>4k extra homes at an average of 4 people per house meaning a potential 16000 extra people needing at access the A10 or transport. The current air quality is poor before you even factor this in and at present the Hardwick roundabout cannot process the traffic quick enough ( especially during holiday season) when traffic also queues up towards the coast road. This would worsen considerably with all the additional traffic. ( not withstanding construction traffic as well). The environmental impact of this is huge and I cannot find any reference to consistent and meaningful air quality surveys done.</p> <p>The proposed roundabout by Coolstak is too close to the village (the new traffic camera by Setch would indicate the issue is there!) so why not improve the existing roundabout at Oakwood Corner and take the link road from there to join the A47. Also there has been no consideration to put a staging stop for a train on the common to keep as much traffic away from the A10 and to avoid it going into town. It could be similar to Watlington with car parking facilities which would support commuters travelling to Lynn, Cambridge and London. If a cycle route ran from the station into town via Hardings Pits or similar it would alleviate congestion too.</p>
REDACTED	<p>The Access Road needs to be built before even the first phase of housing. Traffic on the A10 is extremely high. Commuter times and holidays excessively long queues are common place</p>
REDACTED	<p>Priority must be given to full cycle routes physically separated from car traffic to rail stations in Kings Lynn &amp; Watlington</p>
REDACTED	<p>The existing and proposed transport infrastructure is not, and will not, be sufficient to support the proposal. As the transport infrastructure stands today, it is already a nightmare travelling north toward King's Lynn and the coast, particularly at weekends, during school holidays and periods of good weather. The Hardwick flyover was constructed some years ago as a means of easing this issue, but has little to no positive effect with, in my opinion, it being built in the wrong direction. Travelling north and navigating the Hardwick roundabout sees traffic tail backs and blocked entry/exit points, while little to no traffic on the flyover. The mini roundabout installed just north of the Hardwick roundabout exacerbates the issue by causing another bottleneck.</p> <p>Before any further development and growth of West Winch and surrounding areas, a by-pass and better infrastructure is a must. The impact of further homes and traffic that it brings will not only have a massive detrimental effect on West Winch and its residents, but also to any visitors and the local economy i.e. people will steer clear if they cannot access it.</p>

Respondent	Summary representation
REDACTED	There are also plans to build a large Estate at Downham on the A10 which will add to this problem. Also any building of houses south of Lynn in Cambs for example will add to traffic through West Winch To build here is like strangulation of the A10 by traffic.
REDACTED	<p>See my comments below re North Runcton connectivity to West Winch. North Runcton would appreciate being on a significantly more frequent bus route to King's Lynn running along Rectory Lane. Safe and enjoyable cycling and walking access to the green spaces in the WWDA would also encourage their use by local residents.</p> <p>Bus services to both King's Lynn and Watlington railway stations need to be provided that link with train times to help reduce the need for a car every time someone wants to leave the development (or North Runcton!).</p>
REDACTED	The A10 is hard to get out on to without the additional traffic a new development brings. The bypass needs to be completed 1st
REDACTED	Pulling off my drive onto the a10 really scares me, it can take upto 30 minutes to get off my drive every day
REDACTED	No building should be allowed until a proper bypass is built.
REDACTED	Looks reasonable but considering the size of the development I think a greater consideration for cyclists accessing the town should be undertaken, namely a truly dedicated cycle path utilising West Winch common or beside the railway line. Gaywood and the Woottons have a good cycle path network

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Respondent	Summary representation
CPRE Norfolk	<p>As the consultation documentation highlights, “connectivity is vital to achieving accessibility, integration for new residents and businesses and can contribute to a healthy community”.</p> <p>To ensure this is achieved it is essential that the West Winch (Blue) Route as described in the King’s Lynn Local Cycling and Walking Infrastructure Plan (February 2022) is completed by the time of first occupation of new housing in the West Winch Growth Area.</p> <p>We have concerns about the lack of rail connectivity in the documentation, as this would help to meet climate change targets, make the development more sustainable and help to provide real choices for residents, particularly if they work further afield than King’s Lynn: this would help to reduce reliance on cars. To achieve a satisfactory level of rail connectivity, dedicated cycleways should be established all the way to King’s Lynn railway station and to Watlington railway station. An even better, if more costly, option would be to construct a new railway station immediately to the west of West Winch, serving the extended settlement, and to include a dedicated footpath/cycleway. It is disappointing that this option does not appear in the West Winch Growth Area proposals.</p> <p>Better bus services to and from the new neighbourhoods are also essential, in particular serving the Hardwick Industrial Estate and King’s Lynn. This is summarised in the “better bus service” section of the consultation document and in Policy GA08: provision for public transport in the North Runcton and West Winch Neighbourhood Plan.</p>

<p>Castle Rising Parish Council</p> <p>North Wootton Parish Council</p> <p>South Wootton Parish Council</p>	<p>Section 9 concerns connectivity and transport. It states that:</p> <p>“The Growth Area should be well-connected with surrounding communities by walking, cycling and public transport. The whole area should be better linked to local centres, places of work, education, the town centre and the countryside linking in to King’s Lynn’s Active Travel Network.”</p> <p>“The need to improve the existing bus connectivity was identified in responses to earlier consultations. Development layouts should allow for a revised or new bus service connecting the growth area to King’s Lynn. Further work is required to establish how the increased housing numbers can help deliver an improved service. The developers should provide subsidies for the new service.”</p> <p>SADMP Policy E2.1 Part A “Outcomes” states (6) “Provision of (a) suitable arrangements for public transport to route through the wider site, and connectivity to main routes to encourage non-car modes.”</p> <p>SADMP Policy E2.1 Part B “Process” states (d) [developers will] “Provide financial contributions towards the development of infrastructure...” and (e) [it will] “be accompanied by (1) a comprehensive strategic transportation plan for the area...” and “the Strategic Transportation Plan should expressly address the provision of and role in minimising car-based traffic of public transport across the wider allocation.”</p> <p>SADMP paragraph E2.60 states that “The need to improve the existing bus connectivity was identified in responses to earlier consultations. Development layouts should allow for a revised or new bus service connecting the growth area to King’s Lynn. Further work is required to establish how the increased housing numbers can help deliver an improved service. The developers should provide subsidies for the new service.” This was adopted in 2016, so six years later the Borough is consulting on precisely the same wording (second bullet point above), showing that nothing has moved forward in this respect in the meantime, despite outline planning applications being submitted by two developers to cover some two-thirds of the homes to be built in the Plan Period. This is a woeful failure by both the County and Borough Councils.</p> <p>In their Transport Assessments, Hopkins Homes (consistently), and Metacre (in later amendments) have proposed that public transport to the development must be financially self-sustaining. Contrary to SADMP policies and the Framework Masterplan they propose that one of the two existing bus routes divert through the development, neither of which are fit for urban extension populations or expectations, being at random and variable times. Leaving aside that this would worsen journey times and experience for existing passengers from further out, there is no evidence that this has been challenged. It is reasonable to deduce that Metacre’s later adoption of this is with the tacit or outright agreement (maybe encouragement) of County Council as highway</p>
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Respondent	Summary representation
	<p>and transportation authority. This does not accord with SADMP policy E2.1 Part B (d) and (e 1), nor with NCC LTP4 policies, nor SADMP para E2.60.</p> <p>This failure by the Borough to set an example by following its own written policies enables developers to argue their case that they should not fund or ensure provision of adequate transport services. As transportation authority, much of the blame for this may lie with the County Council. Thus whilst NPPF paragraph 112 states “Applications should (a) give priority first to walking and cycle movements and second to “facilitating high quality public transport with layouts that maximise the catchment area for bus and other public transport services and appropriate facilities that encourage public transport use, (b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport, (c) create places that are secure, safe and attractive.....” developers are able to largely ignore it with impunity, blighting the development for future generations and failing the NPPF sustainability test.</p> <p>The un-numbered map on page 21 of the draft Framework Masterplan shows a potential bus link into development “for consideration.” The proposed route does not accord with NPPF para 112 which states “...with layouts that maximise the catchment area for bus...” because it skirts around the edge of the Metacre site and does not adequately penetrate the Hopkins Home site to fulfil the para 112 requirement. Indeed by running alongside the WWHAR for much of the way, it guarantees to minimise the catchment area. It is clear that this has been drawn in after the outline applications were submitted by Hopkins Homes and Metacre without regard to either national or local policy. The route of this crucial piece of infrastructure should therefore be redrawn and, if necessary, so too the precise arrangements in the developers’ outline applications.</p>
REDACTED	Page 20 talks about ‘Better Bus Service’ to the growth area, but what about the already developed areas, i.e. West Winch and particularly North Runcton?
Norfolk County Council	<p>In a review of section 9, the LLFA observes the typical indicative primary, secondary and tertiary corridors cross sections have space potentially for SuDS. The LLFA welcomes this and seeks stronger commitment in the SPD to the inclusion of roadside sustainable drainage features.</p> <p>The LLFA would like to remind those preparing the SPD that all four pillars of SuDS (water quantity, water quality, biodiversity and amenity) must be demonstrated for the proposed solution to be considered as a sustainable drainage system.</p>

Respondent	Summary representation
REDACTED	Access to North Runcton from West Winch via foot, cycle or disability scooter will be hazardous via proposed new Rectory Lane/Chequers Lane bridges.
Historic England	<p>P21 Connectivity and Transport Plan - We recommend the inclusion of more landscaping along the eastern access road, particularly in the area around the roundabout o the north of Rectory Lane to help protect and enhance the grade II listed Old Rectory at North Runcton. Landscaping along this eastern edge would also serve to screen and soften the development in the wider landscape.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment</p>

Respondent	Summary representation
<p>West Winch Parish Council</p> <p>North Runcton Parish Council</p>	<p>Regarding the masterplan and the cross sections on page 20, there only seems to be one ‘primary corridor’ and a couple of connections shown on the plan. Is this correct? What are the principles being illustrated by these sections? We support street tree planting – but is the design shown compatible with NCC adoptable road design policy and the easements required by service providers? We are doubtful. But if this is a clear design ambition, then this document needs to clearly state this.</p> <p>We are unconvinced that the 25m wide ‘primary corridor’ design, 21m wide ‘secondary corridor’ design, or 19m wide ‘tertiary corridor’ design can actually be delivered on the masterplans presently submitted by Hopkins and Metacre. Obviously, their plans are presently only outline application designs – but, judging by measuring at the relevant scales, they would not be able to work up these schemes into reserved matters design detail if these illustrative sections are the preferred road corridor layouts. So, are the sections in the draft SPD illustrating required design principles or not?</p> <p>In the tertiary corridor design, street tree planting is indicated a few metres from the dwellings, which is not best practice and unlikely to be acceptable on the clay soils underlying this site.</p> <p>We note the second proposed new primary school has now been located off Hall Lane. This is new and has not previously been consulted upon. West Winch PC will canvass residents to see how they feel about this. Including this area in the growth plan has already proved contentious and was strongly opposed by residents.</p> <p>None of the ‘Relief Road’ junctions have presently been offered in the current Metacre submission so that all traffic from their scheme would presently access the site from Rectory Lane and the A10. The IDP phasing plan indicates that both the Hopkins and Metacre scheme would complete initial phases before the Relief Road is complete. We object to this and do not agree that it will be acceptable or sustainable.</p> <p>The vehicular access road over the ‘Relief Road’ at Rectory Lane is an agreed requirement and we are concerned about the less than clear current BCKLWN stance on this. (Officers stated at the recent consultation event that it was a cycle/pedestrian access only). In our view this is a <u>red line</u> requirement.</p>
<p>Metacre</p>	<p>Page 21 of the SPD refers to the provision of new Rectory Lane and Chequers Lane bridges over the proposed access road. Limited detail has been provided on these bridges and it is not clear how they are to be delivered. This should be expanded upon in the document.</p>

Respondent	Summary representation
REDACTED	Will bring too much Traffic and pollution to proposed residential areas and take up much quiet Rural area. Too close to North Runcton Village and will change the character of West winch and North Runcton.
REDACTED	This road HAS to be a dual carriageway. It is great that it has been identified that Dualling of the existing A47 between Hardwick Interchange roundabout and the housing access road is required, but this is a very heavy traffic route which requires at least two lanes each way.
REDACTED	The new road MUST be built before one property is built. The A10 and Hardwick is gridlocked going to the coast in the summer and shops at Christmas time. It would be foolhardy not to shop the commitment to relieve this issue before building houses.
REDACTED	The proposed link road needs to be completed IN FULL before any building be commenced. Currently the A10 is a massive car park at peak times and at others just downright dangerous. From the top o f Lomg Lane the footpath to the shop and woefully inadequate and for a frail person or child ist is an accident waiting to happen.
REDACTED	The WWHAR is a game changer to any new development in West Winch & it is imperative construction is funded & undertaken prior to any major development taking place. Current traffic loading of A10 is untenable at times & any significant development exiting onto existing road will only increase problem. Indicated at presentation 300 properties from Hopkins site can exit via new roundabout near 'The Winch', Vehicles exiting this site would take priority over north bound A10 traffic, I believe this will cause further traffic delays at peak times heading to Hardwick roundabout & any new development should be limited prior to new road construction.
REDACTED	This must be built before ANY housing is approved. It is the only way that the road will ever be built, otherwise the housing will be approved and built in small packets until it is nearly all built and no road. Don't approve ANY of the housing, not even 300, and this will put pressure on completing the new road.
REDACTED	The Access Road needs to be built before even the first phase of housing. Traffic on the A10 is extremely high. Commuter times and holidays excessively long queues are common place
REDACTED	The new road needs to be in place before the development is started . Th A10 is already very heavily congested with large vehicles so what will it be like when all the vehicles bringing materials arrive.



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Respondent	Summary representation
REDACTED	See above. In addition, the West Winch Housing Access Road will NOT address existing traffic problems on the A10 as detailed, why would anyone divert off the A10 to use a road that from the plan includes 4 roundabouts which will invariably become bottle necks?
REDACTED	<p>Living in North Runcton this will have the greatest impact, both in terms of visual change to the countryside around, but also to noise and connectivity. The key issues for us are ensuring the design minimises noise impact, ensuring that the noise levels in North Runcton are not adversely affected by the road and also limiting visibility. North Runcton is a rural village. We want it to remain so.</p> <p>Secondly ensuring that any natural habitats are preserved or replaced when it is built.</p> <p>Thirdly - accepting the proposals made in the Neighbourhood plan - namely Rectory Lane having a bridge over the access road to West Winch ideally with the whole road being 30mph with speed calming measures such as road narrowing and no heavy vehicles (but no speed bumps as these are noisy!). Rectory Lane needs to stop being a cut through where people ignore the speed limits (we have measured people doing 65mph along the road). Chequer Lane to be blocked (maybe at the common gate) except for pedestrians, cyclists and horse riders with an appropriate bridge over the access road with Manor Farm only access onto or off the access road.</p>
REDACTED	The bypass needs to be completed before starting. This will in turn help with access.
REDACTED	I am not apposed to the new houses but west winch needs the new road FIRST. I live on the A10 and I am scared daily to pull off my drive way, the noise pollution and the traffic which is damaging my cottage which is over 100 years old is shocking. Please please build the by road first
REDACTED	Completely inadequate and will not be used by the majority of vehicles. A proper bypass should be built starting at the Oakwood roundabout going to Constitution Hill as proposed and agreed 30 years ago. Then they can build as many houses as they like but it will ruin the character of the village.

Respondent	Summary representation
REDACTED	<p>There is no detail as to when this road will be built, within Section 6 Infrastructure Delivery Plan indeed it is implied that it is not a requirement before Hopkins or Metacre start building off the A10. Why have you not published the key infrastructure needs and at what point they will be required, this publication indicates that the road and other infrastructure requirements may not arrive causing an unacceptable level of disruption to West Winch residents and others using the A10. I have already objected to Metacre plans being adopted before the new road has been built.</p> <p>The A10 section through Setchey and West Winch is on record as being one of (if not) the busiest single carriageway A road in the UK and NCC Highways have always objected to planning applications that would impact on the this section of the road. The Borough Council also supported this stance I can see no reason to change that position in relation to the Metacre and Hopkins plans prior to building of this road.</p>
CPRE Norfolk	<p>A new “Relief Road” or ‘West Winch Housing Access Road’ (WWHAR) as described in policies GA03: ensuring transport infrastructure and GA04: design of ‘relief road’ in the North Runcton and West Winch Neighbourhood Plan, as well as in the consultation documentation is essential. This needs to be delivered before first occupation of any of the new housing in the West Winch Growth Area, to ensure there is good connectivity and less congestion for the new housing and for the existing settlement.</p> <p>Without secure funding for the WWHAR any other development within the West Winch Growth Area should not be permitted. If the WWHAR is not in place before first occupation of any new housing, it would lead to intolerable congestion and resulting road safety issues. In particular this would be an unreasonable burden for existing residents of West Winch and nearby settlements.</p>
REDACTED	<p>I would hope that the A10 Bypass would be in place before any of the housing developments start.</p> <p>A10 is a absolute nightmare in the mornings know.</p>
REDACTED	<p>Surely a loop road needs building that links the A10 from Tottenhill to go and join the A47 east of Middleton and west of the River Ouse thus removing the heavy traffic from the Hardwick roundabout and the road going over the River Ouse. In future the number of vehicles will only increase and so needs to be a dual carriageway.</p>

Respondent	Summary representation
<p>004 written rep Castle Rising Parish Council North Wootton Parish Council South Wootton Parish Council</p>	<p>Sections 10 and 12 of the draft Framework Masterplan deal, respectively, with WWHAR and Governance. Section 10 states that the design will comprise the following “essential elements”:  (third bullet of six) “Sustainable transport measures (public transport, walking and cycling”  Developer part-funding will be secured through Section 106 Agreements  Consultation process for WWHAR planned for later in 2022  Section 12 gives a precise figure of £13.5m developer contribution to WWHAR and traffic calming in West Winch village, in stark contrast to the need, apparently still after six plus years, to do more work on the public transport element of the infrastructure notwithstanding developer resistance to its inclusion in the first schemes.  It gives absolutely no confidence whatsoever that either the County or Borough Councils have any real intention to ensure that this element of the Masterplan is delivered, to the detriment not only of the new residents but existing local residents and those travelling from the rural area further out from King’s Lynn. It is a “lose lose” for all except the developers for whom such lack of action will be a considerable financial gain.</p>
<p>REDACTED</p>	<p>Page 21 map. Various queries:  The orange and red bus route seems to deviate off the access road above and below Rectory Lane and then towards the A10 – is this another new road? For buses only? This is the first time that this road has been shown on maps as far as I can remember – when did this idea come in and why?  The note re Rectory and Chequers Lanes suggests ‘will maintain active travel connections between West Winch and North Runcton’. Are we correct to take this to mean that the access on both will be pedestrian and cycle only with no vehicular access? I asked about this at the consultation and didn’t receive a definitive answer. If it is the case that they will be pedestrian/cycle access only, how will buses serve North Runcton? It’s a long walk from e.g. Cedar Grove to the bus route off the Access Road.  The existing path from Hillingdon Lane up to Sheep’s Course Wood will be perilously close to the new road. Will anything separate them?</p>

Respondent	Summary representation
Anglian Water	<p>The detailed design of the access road will need to take account of Anglian Water assets that may be affected by the proposed route, and the necessary measures that will need to be taken to ensure continuity of water supply and our recycling network.</p>
<p>West Winch Parish Council  North Runcton Parish Council</p>	<p>At page 22 we note that the Relief Road junction with the A47 is now stated as a 'signalised roundabout'. We object to this and are surprised if Highways England regard this as acceptable. It would introduce a significant additional barrier to east-west movement on a trunk road and, we would expect, additional queues, pollution and increased journey time. We are already of the view that the Relief Road and associated roadworks will simply move existing congestion problems from one place to another and another major signalised junction less than 1km from Hardwick will ensure that.</p> <p>At page 22, the statement that the new road will “make sure traffic from the new development has a minimal impact on the exiting A10 as it passes through the village” and “it will provide an alternative route around the village” is false. Setch and the southern end of the settlement will still have the A10. Consultants working for Hopkins and Metacre have calculated that the first 1600 dwellings will generate nearly 10,000 additional vehicle journeys a day. Any residents that believe the new road will significantly reduce traffic congestion in the locality have been seriously misled</p> <p>We note the recent comments from the BCKLWN 'Environmental Quality' officer regarding the Metacre application, which seem to imply that only electrical vehicles will prevent significant air quality impacts from the cumulative development. But electric vehicles are still polluting and will still cause congestion.</p> <p>We are doubtful that the one new bus route indicated on the plan will provide optimal public transport coverage for the development and therefore comply with public transport design guidance.</p> <p>We note the one peripheral cycleway – but the key requirement for cycling is linkage to elsewhere (King's Lynn, the hospital, Middleton...). Without these links, cycling will not become a viable alternative to vehicular transport. We note the IDP costings specifically <u>omit</u> a figure for these links. The Town Plan project area included the WWGA, but little of that fund now appears to be proposed for 'active transport', and none of it is proposed to improve cycle links to West Winch.</p>

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Respondent	Summary representation
Hopkins Homes	It is important this road is not over engineered and becomes a barrier to pedestrian and cycle connectivity with the surrounding area. The initial proposals (considered through the Princes Foundation consultation exercise) were for a 40 mph boulevard route with many crossing points. It will be important for this road to retain these characteristics in order to support wider community connections.
REDACTED	As noted in previous sections phasing is critical with low numbers of infill initially allowed with major development taking place following construction WWHAR.
REDACTED	No delivery until access road built
REDACTED	The noise during road construction will be considerable - especially from the reversing and H&S signals made by vehicles. Hours need to be limited to minimise disturbance to the village between 6pm and 8am.
REDACTED	<p>Infrastructure Viability (Section 106) is still in question, so why are detailed plans from Metacre and Hopkins being considered. West Winch residents deserve a better deal and must not be put at undue disruption because infrastructure delivery can not be met before house building starts.</p> <p>Phasing indicates house building is anticipated 2-5 years before the new road is completed, this is not acceptable. Alternative access roads to new developments could be established off the A47 maybe (2013 plans enabled this why change causing undue problems on the A10?)</p>
CPRE Norfolk	<p>As highlighted in section 10, it is essential that the West Winch Housing Access Road is delivered before any of the new housing is occupied. This is to ensure disruption and inconvenience from the new development for current residents is not made intolerable, in addition to the need to maintain traffic flows on the A47 and A10. It will also be important to ensure other infrastructure for the new development, and to support the existing settlement, is delivered in good time and not at the end of any housing construction, or worse not at all. This includes medical facilities, educational facilities, shops etc. This delivery needs to be secured and guaranteed by appropriate legal means</p> <p>e.g. S106 agreements. As noted in our comments for section 12, there is a worrying lack of detail about the range and type of this additional essential infrastructure and supporting development.</p>

Respondent	Summary representation
REDACTED	<p>Page 23 'Phasing' says ' it is expected that an element of delivery could come forward during the next 2-5 years prior to completion of the WWHAR, some of which will be prior to the completion of the WWHAR' which doesn't make sense in any way but seems to be saying that some of the houses could be built before the road, doesn't it? But how many? And how will the pressure on the A10 and A47 be mitigated in this time? Even if Hopkins only builds 200 houses before the road starts, it will put enormous pressure on an already overloaded system. And will the much-vaunted links to bus and cycle routes be in place before all these people move into the new houses? I highly doubt it!</p>

<p>Environment Agency</p>	<p>Thank you for your letter dated 5 August 2022 notifying us of the consultation on the draft SPD. We welcome the opportunity to comment.</p> <p>The key issue of concern currently is water resources. The development proposed is within the area supplied by Anglian Water. We have identified in our 2015 Anglian River Basin Management Plan (RBMP) that current levels of water abstraction are causing, or risk causing, environmental damage in various river catchments across East Anglia. Therefore, we have recently (2021/22) reviewed abstraction licences including those held by the water companies to address risks of deterioration and allow waterbodies to recover.</p> <p>Any resultant loss in available water supplies from this review will need to be addressed in the Anglian Water’s next WRMP (WRMP24). Replacement supplies are likely to require strategic supply options (for example reservoirs and long-distance transfers) that could have significant delivery times. The draft SPD envisages delivery of 2,500 new homes up to 2038, and the section on ‘phasing’ suggests this would be over a period of 15-20 years, with approximately 60-200 homes delivered yearly. We strongly recommend the Council checks with Anglian Water on the realistic availability of sustainable water supplies during this period, and to ensure the plans for phasing of the development match the delivery of water supply infrastructure. We would not be able to support development that results in increased rates of water abstraction from surface and groundwater bodies where it will cause deterioration in the environment or compromise the measures being taken to move to more sustainable levels of abstraction.</p> <p>The SPD refers to the Infrastructure Delivery Plan 2018; however, the Council appears to have a more recent version available dated 2022. Our concerns regarding water resources should also be considered for the IDP if not already. However, the WRMP24 draft consultations are not expected until October 2022.</p> <p>Under ‘Design and Development Expectations’ the SPD should endorse the use of water efficiency measures in the form of water efficient technology, fixtures and fittings, in line with the emerging Local Plan policy standards, to alleviate further demand on potable water supplies as much as possible. There is an opportunity here to be ambitious and to think of further ways the development could reduce water demands through water re-use, grey and black water systems and rainwater harvesting.</p> <p>Although there is sufficient capacity for wastewater at King’s Lynn Water Recycling Centre, the SPD should reference the importance of phasing (in agreement with Anglian Water) to allow timely upgrades to the sewerage infrastructure, which will also protect the water environment.</p> <p>The parcel of land furthest south (site E2.1) is partially at risk from fluvial flooding from the river Nar and potentially further afield from the River Ouse. The SPD ‘Design and Development Expectations’ should be</p>
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Respondent	Summary representation
	<p>informed by the recommendations of the Council’s Level 2 Strategic Flood Risk Assessment for these sites. This will help future applicants design the site to ensure safety from all forms of flood risk, taking climate change into account.</p> <p>We welcome the sections on Sustainable Drainage Systems, Biodiversity and Green Infrastructure. However, to maximise multiple environmental and social benefits there should be more cross-over between these design areas and ambition for integrated water management, habitat connectivity and improving water quality.</p> <p>We hope these comments are useful in preparing the final version of the SPD document. If you have any questions regarding our advice, please contact us.</p>



Respondent	Summary representation
Anglian Water	<p>Anglian Water commends the approach being taken by the Council to facilitate a Collaboration Agreement between the remaining landowners, that will assist in delivering the remainder of the growth area in a coordinated manner, not least in respect of infrastructure delivery. We agree with the statement that <i>"the Growth Area has the best potential to be delivered if it is considered as a whole and in a consistent manner"</i>. This would reflect our initial analysis of infrastructure requirements for the West Winch growth area in respect of the current development proposals by Hopkins and Metacre. As a result of the updated housing trajectory for West Winch {provided by the Council to the Inspector for the Local Plan examination) we recognise that the proposed delivery of the full quantum of 4,000 dwellings to 2048/49 will assist with our future investment requirements, in addition to developer contributions, over the longer term.</p> <p>We note that the IDP {Infrastructure Delivery Plan) for the South East King's Lynn Strategic Growth Area includes estimates of costs for standard connections to water supply and the sewerage system, however, the IDP might require further revision given the updated <a href="#">trajectory</a> for delivery. Early engagement with our pre-development team in Developer Services can help to ensure that the necessary infrastructure is in place to address the capacity of the 4,000-home development to 2048/49. This will necessitate appropriate connections, and sufficient infrastructure to address the increased flows through our water recycling network. There is currently sufficient headroom at the King's Lynn Water Recycling Centre {WRC) to accommodate the proposed growth, however, our <a href="#">draft Drainage and Wastewater Management Plan</a> {DWMP) identifies a long-term strategy to 2050 of 'wait and see' which will monitor the performance of the WRC network and identify whether any further measures need to be taken in subsequent reviews of the DWMP.</p> <p>In terms of future water supply, the <a href="#">Water Resources Management Plan</a> (WRMP19) for the period 2020-2045, sets out how we intend to achieve a secure supply of water for our customers while protecting and enhancing the environment. Our current WRMP is addressing our supply-demand balance, which, if we took no action, would see our region experienced significant water shortages within the next five years. We are now in the process of preparing WRMP24, with a draft to be submitted to Defra in October 2022. In line with statutory requirements, we will be holding a public consultation on this draft WRMP in the autumn.</p>

Respondent	Summary representation
Norfolk County Council	In section 11 regarding the delivery of the development, the LLFA notes there is very limited information available at present regarding the phasing of the development’s delivery. The LLFA reminds both the local planning authority and the developers that the development must not increase flood risk during the lifetime of the development, which includes the different phases of construction. Therefore, a detailed phasing plan will be required to demonstrate that appropriate surface water management systems will be in place to ensure there is no change in flood risk.
Hopkins Homes	The framework is right to allow a degree of development prior to the completion of the WWHAR. Transport evidence demonstrates that development of c300 homes can be accommodated onto the existing network without significant adverse effect. The early delivery of homes would also allow financial contributions towards road, education and drainage infrastructure improvements to be captured quickly in the process. It would also provide housing in an area where housing supply is needed.
REDACTED	The West Winch Stakeholder group needs to be a real consultation group. Based on experience so far it feels like it is a one way communication of what is going to happen. Officers and councillors need to listen and try and adapt within the framework to address real concerns and issues. Also there needs to be proactive and regular communication to the public being honest about the reasons when decisions are being made.

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Respondent	Summary representation
<p>004 written rep Castle Rising Parish Council North Wootton Parish Council South Wootton Parish Council</p>	<p>Sections 10 and 12 of the draft Framework Masterplan deal, respectively, with WWHAR and Governance. Section 10 states that the design will comprise the following “essential elements”:  (third bullet of six) “Sustainable transport measures (public transport, walking and cycling”  Developer part-funding will be secured through Section 106 Agreements  Consultation process for WWHAR planned for later in 2022  Section 12 gives a precise figure of £13.5m developer contribution to WWHAR and traffic calming in West Winch village, in stark contrast to the need, apparently still after six plus years, to do more work on the public transport element of the infrastructure notwithstanding developer resistance to its inclusion in the first schemes.  It gives absolutely no confidence whatsoever that either the County or Borough Councils have any real intention to ensure that this element of the Masterplan is delivered, to the detriment not only of the new residents but existing local residents and those travelling from the rural area further out from King’s Lynn. It is a “lose lose” for all except the developers for whom such lack of action will be a considerable financial gain.</p>
<p>West Winch Parish Council North Runcton Parish Council</p>	<p>Lastly, we feel that the pages on ‘Delivery’ and ‘Governance’, aspects of which we take issue with, indicate that this document is really about promoting the scheme to third parties – possibly the Planning Inspectorate and Department of Transport? These pages would appear to have no place in a supplementary planning guidance document if it was focussed on assisting the delivery of high quality sustainable development.</p>
<p>Hopkins Homes</p>	<p>The establishment of a Project Board and Delivery Group is supported in principle, subject to further detail on representation and role.</p>
<p>Metacre</p>	<p>With regards to the proposed phasing as referenced at Page 23 of the SPD, we support the expectation that an element of delivery can come forward during the next 2-5 years prior to the completion of the Housing Access Road. Indeed, the Council will note that the evidence submitted with outline application (ref: 18/02289/OM) demonstrates the 500 units comprising Phase 1 can come forward prior to the Housing Access Road.</p>
<p>REDACTED</p>	<p>build oposite William Burt Centre towards common side will spoil quiet country lane and change views from center. where are the horses of West Winch Going? Can Kings Lynn Hospital cope will a build of this magnitude and population increase. Where are people going to work?</p>

Respondent	Summary representation
REDACTED	<p>I cannot see any reference to the A10 which regularly gets long hold ups with cars turning in and out of West Winch</p> <p>Also another 4000 homes would put pressure on the hospital that may even close if funding cannot be found for a new building.</p>
REDACTED	<p>Why do we need 4,000 extra houses? Just greedy and really going to affect people already living in the village</p>
REDACTED	<p>No provision made for the existing flood risk which are yet to be resolved. The extra 4k homes will place massive pressure on flood Risk which needs to be resolved in full before any progress made.</p>
REDACTED	<p>West Winch is effectively 'land locked' with access &amp; exit to the village only achievable from A10, this road historically has suffered from continual tail backs with any incident north or south of village. These occur with current property count circa 1400, increasing property count by 400% relies totally on WWHA being constructed at the earliest possible stage. Traffic calming existing A10 is essential as development progresses.</p>

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Respondent	Summary representation
REDACTED	<p>If this is the only way to provide much-needed housing then I cannot argue against it. But I do not believe this is the only way. I have lived in central Kings Lynn since 1979, and am more and more conscious of the number of empty buildings in the centre of town. Empty dwellings above shops, empty floors in the old post office building, the old Debenhams, empty space above town centre offices, and spaces such as open car parks where extra floors could provide housing. And all using the existing services, shops and amenities without the need for cars in order to get in from out of town. I lived for four years on the Fairstead estate. I walked into town for work and to reach the railway station. But people are not walking much now. Those who will live in new housing at West Winch will want to drive into the town centre and thus exacerbate traffic problems.</p> <p>Housebuilders will naturally seek to find greenfield sites for developments, and there is only so much that councils can do to mitigate the resulting transport problems. I would like to be assured that the borough is constantly seeking ways the town can be developed so that brownfield sites are identified for new housing. I bought a derelict feedmill in King's Staithe Square for £5,300 in 1975. It provided a spacious home for me and my wife and two children. My wife died in 2009, by which time the children were living away. I converted my house into two flats. I live in one, and have sold the other one for £195,000. I am surrounded by other people in large houses that could also be converted into more living spaces. A campaign to tempt people to profit from making best use of their houses would not go amiss - making money for the principals, providing convenient town centre housing for more people, and reducing the impact of more cars on our roads.</p>
REDACTED	<p>I back on to the field where there is a proposal to build another school near Elmtree Grove and properties . This area is very quiet and building a school here would make this area very busy and at present a lot of bungalows in that area. Why extend to this end of the village when there is already plans near the North Runcton site. West winch as a village will no longer exist !!</p>
REDACTED	<p>This whole plan stinks of greed. No thought for the existing community, countryside or local area in general.</p>
REDACTED	<p>There should be a display and meeting in Downham as before to discuss this with Mr Blunt. I hope the new P.M is our local M.P and this nonsense stopped and a new Hospital built so the thousands of over 65's in Downham can get to it.</p>

Respondent	Summary representation
REDACTED	<p>It is a good document that shares the desire of the council regarding this scheme.</p> <p>The viability of the scheme is questionable with all the issues of where will people come from to live here, how will the schools and health centres be staffed, being half way between Watlington and King's Lynn centre makes it a bit of an island meaning people will want to have and use cars.</p> <p>Can the development truly meet all the government requirements around sustainability?</p> <p>Finally - the consultation on the road when it comes needs to be open with the officers and councillors listening to peoples views and trying to truly take account of them.</p>
REDACTED	<p>Our hospital is literally falling down and cannot cope with current residents. I have lived here 5 years and have never been able to get a NHS dental appt. How on earth can we take on up to 4000 homes. Roads and NHS infrastructure in King's Lynn needs to be dealt with first of all. The town cannot sustain this many additional properties!</p>
REDACTED	<p>I attended the presentation at the William Burt Centre on 10th August why were the developers not present? Also why were there no Growth Area Masterplan folders available</p> <p>(only available on line 26 pages) not everyone has access to the Internet. Nobody I spoke to gave information on how to comment? This is a consultation process how will I know whether my comments are even looked at let alone acted upon?</p>

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Respondent	Summary representation
CPRE Norfolk	<p>There is far too little discussion of essential infrastructure in the consultation document. In particular, there is only one reference to health provision, which is almost certainly one of the main concerns of existing residents and of potential new residents.</p> <p>The consultation does not specifically ask for comments on Section 6, Infrastructure Delivery Plan, where certainty around these issues should be provided, to ensure that sufficient reassurance is given that essential services and facilities will be provided. If this certainty for provision of key infrastructure does not exist this would give CPRE Norfolk serious misgivings about the whole proposal. It is essential that appropriate health and dental services are provided within the settlement given the anticipated growth in population, and the need to avoid unnecessarily long journeys for residents. It is acknowledged there is some facility for making comments on the delivery of the scheme under section 11.</p> <p>As noted under Section 8 above, clearer requirements regarding external night lighting should be included.</p> <p>It is important that community stakeholders' views on necessary community facilities are listened to and then delivered through the development process.</p>
REDACTED	<p>The area is already overpopulated, the road network is already at breaking point, our local hospital is trying to collapse, our waste water/ effluent is having to be pumped into the sea, how bad do things need to get before you realise we already have too many people?</p> <p>Please stop building .</p>

Respondent	Summary representation
REDACTED	<p>After looking at the master plans, I only have 1 major concern (LAND / STORM WATER).</p> <p>We have trouble know at the bottom of Willow Drive with land / storm water, Because the land owner in front of us has raised the land level and we live in a hole.</p> <p>The field behind Coolstak warehousing has a large dip in the field which fills up with storm water and goes into the concrete culvert and onto the common.</p> <p>But the land drain pipes which goes from the bottom of Willow Drive + The pipe from the field which runs side by side out onto the common cannot cope.</p> <p>The dike in the common of which the pipes go into has been cleaned for at least 30 years.</p> <p>I all of the dikes on the common behind Willow Drive has been cleaned for over 30 years.</p>



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<p>REDACTED</p>	<p>I have just returned from observing the above at West Winch Village Hall this afternoon and was in discussion with a member of your staff to gather some information.</p> <p>I was told by one of your Housing Managers that the land in question was owned by a mixture of private owners, including developers, when I asked if the Council owned any land here, specifically farms, I was told no they did not.</p> <p>I understand that most of this land is valuable farm land, I came across this article of December 2021 (see link below) and am rather amazed that I was not told that the Council had indeed sold one of their important farms off to the developers. (Eight sites as written by the article!)</p> <p>In view of this, I wonder if you could let me know how much the council were given for this piece of valuable farming land, that is now lost and gone forever, from the developers and if the Council are prepared to replace the amount of land elsewhere to continue to grow food and crops.</p> <p>I also questioned the fact that Government were stipulating a while back that new development is favoured on brown field sites, rather than usable farming land and green field sites, of which there are many brown field sites in and around Kings Lynn. I was told that there just would not be enough land to sustain 4,000 new homes. However, seeing that this project will take 18 years there is certainly time to find and work on a huge project to find these brown field sites as land changes, especially in the light of councils selling their properties as more and more are working from home and offices are less needed. Town centres are becoming smaller leaving gaps of unused properties and brown field sites empty just ready for new development.</p> <p>I feel that there is lack of imagination here, it is so easy for the Council to sell off their land for a quick price without any consideration for the environment. The town of Kings Lynn is poorly managed and the town planning is non descript, leaving ugly houses abandoned which could be properly resourced and used and the creation of many roads becoming pathways only lined with trees, flowers and shrubs. So much could be done but I feel that Kings Lynn is abandoned to the get rich quick eagerness of the Council as they continue to sell off their land and farms, destroying local countryside, destroying local villages as they become eaten up with the Kings Lynn suburb and destroying farmland which could easily be farmed by many young people who wish to take this career forward.</p> <p><a href="https://www.edp24.co.uk/news/housing/west-winch-homes-farm-sale-controversy-8542568">https://www.edp24.co.uk/news/housing/west-winch-homes-farm-sale-controversy-8542568</a></p> <p>I am open to discussion as I realize the need for housing, although the real need for housing is for those who are unable to obtain a mortgage or have not the scale of earnings to devote a lifetime to such expensive repayment schemes. There are only 20% of these new houses allocated for housing association homes.</p>
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Respondent	Summary representation
	<p>Could not the council if they did sell off the farms allocate these areas specifically for housing for the association homes. Surely that would have been a fairer option as Councils are or should be, or were in the past there to provide housing, another responsibility which has been waived elsewhere to save Councils money.</p>
<p>REDACTED</p>	<p>I have already completed an online form REDACTED and would like to reinforce some comments I made.</p> <p>In particular you will realise I am totally against building work starting before the WWHAR West Winch Housing Access Road is built, which will become the newly aligned A10 bypassing the village.</p> <p>The proposed early start developments by Hopkins and Metacre of a combined 1600 homes will necessitate undue traffic on an already congested stretch of the A10 through West Winch causing problems for West Winch residents and all A10 road users.</p> <p>An Alternative way to provide access for builders and new residents while we wait for the Full WWHAR is as follows:- In Section 11 titled Delivery, in my on line form return XXCMVRWT I suggested an alternative access road from the A47. This would follow the proposed line of the eventual WWHAR with the exception that the major works at Hardwick Interchange and dualling as envisaged and link to the A10 at Setchey could wait until NCC and Central Government DFT agree the funding. In the meantime the developers would fund this element of the infrastructure build (which is the norm for major developments and not as you are proposing). Of course the council will have a difficult job persuading the developers to put up front much more money regarding Infrastructure costs than they are being asked to do under the current plans, put forward by these companies. The Section 106 could easily be written to cover this way of accessing the Growth Area.</p>

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<p>004 written rep Castle Rising Parish Council North Wootton Parish Council South Wootton Parish Council (see other comments above – section 1,4,5,9,10 &amp; 12)</p>	<p>I am pleased to have the opportunity to comment on the above document and planning policy framework. Whilst I recognise that the document necessarily covers a range of topics to guide the West Winch area development, my observations are limited to how transportation, decarbonisation and access to services for new (and existing) residents. I would like this placed on the Borough’s planning portal without delay.</p> <p>Summary and conclusion</p> <p>The draft Growth Area Framework Masterplan fails to meet the Borough’s own policies in the Core Strategy and Site Allocations and Development Management Plan (SADMP) both adopted as recently as 2016. As a result it fails to meet the National Planning Policy Framework (NPPF) and National Design Guide (NDG). The SADMP in particular paved the way for a significant shift in the way development planning would be approached in the Borough but the evidence is that this has failed, and, in respect of sustainable transportation in particular, developer pressure, coupled with what may appear County Council indifference, has triumphed, so that the development looks and feels sustainable, but actually is not.</p> <p>Documents studied for this submission</p> <p>The South East King’s Lynn Growth Area draft Framework Masterplan (being consulted on and to which this responds)</p> <p>The Local Plan Core Strategy</p> <p>The Site Allocation and Development Management Policies</p> <p>Norfolk County Council Local Transport Plans, LTP3 and LTP4</p> <p>Transport for the East’s draft strategy, January 2021</p> <p>The National Planning Policy Framework issued in 2019 with revisions in 2021</p> <p>The National Design Guide latest update January 2021</p> <p>The importance of transport sustainability and decarbonisation</p> <p>Transport sustainability is fundamentally important to this. Of carbon emissions in the UK economy as a whole, transportation is the most polluting sector accounting for 28% of carbon emitted (Decarbonising Transport, Setting the Agenda, Dept for Transport, March 2020) yet in the East of England that figure is 45% (Transport for the East draft strategy document, January 2021). Furthermore, whereas King’s Lynn urban area has 1.6% of Transport East area’s population it has 6.5% of its AQMA. Thus the East of England performs significantly</p>
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worse than the UK as a whole on transportation pollution and King’s Lynn significantly worse than the East of England as a whole, making it amongst the worst areas in the UK. Within King’s Lynn, Gaywood has the worst air quality, just where high school students from the Growth Area would mainly be going to school as Springwood High has no spare places. Ensuring that the Growth Area meets transport sustainability criteria is therefore essential to air quality in the town more generally and to the new residents’ children as well. In respect of South Wootton developments, FOI requests by that Parish Council to both Borough and County Councils in Autumn 2020 showed that neither had conferred with the other, nor internally considered the air quality impacts of their decisions. There is little evidence that this has changed with respect to the Growth Area.

The NPPF defines sustainable development as “meeting the needs of the present without compromising the ability of future generations to meet their own needs.” (para 7) and sustainable transport modes as “Any efficient, safe and accessible means of transport, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport.” (Annexe 2, Glossary of terms). If the Growth Area meets these two definitions then it passes the NPPF sustainability test, at least in terms of transportation, but if not then it is not sustainable and the draft Framework Masterplan should not be adopted because “at the heart of the framework is a presumption in favour of sustainable development” (para 10). Paragraph 8 states “Achieving sustainable development means that the planning system has three over-arching objectives, which are interdependent.....” First is an economic objective which includes “identifying and co-ordinating the provision of infrastructure”. Second is a social objective which includes “with accessible services....that reflect current and future needs”. Third is an environmental objective which includes “mitigating and adapting to climate change, including moving to a low-carbon economy.”

It is clear that the draft Framework Masterplan will not produce a development that meets the national definitions of sustainability nor those enshrined in local development plans. Nowhere is this more evident than in the access of existing and new residents to essential services. The High Schools are full – according to an internal County Council memo of January 2019 – and cannot take further students, which begs the question why funding is being put towards extra spaces at existing sites rather than building a new site at the Growth Area to channel post-primary students from communities South of Lynn and North of Downham Market. This would reduce traffic congestion and air quality breaches in Gaywood whereas by adding student numbers from the Growth Area it will significantly worsen.

The same can be said of access to primary and specialist healthcare facilities. None are proposed and indeed the draft Framework Masterplan makes absolutely no reference to this key aspect of infrastructure. Both the developers’ Transport Assessments refer to dental and footcare clinics within walking or cycling distances but

they too are silent on access to services that are fundamentally necessary to residents of the area. This is a massive failure of the Framework Masterplan and shows the inadequacy of the Borough’s planning team.

**Borough Council’s draft Sustainability Assessment**

Consultation has recently closed on the Borough’s own assessment of the sustainability of its development policies and site proposals. It scores each policy and site from a series of objectives and features. Site sustainability factors include:

Access to services – development providing supporting local services; availability of public transport to towns and similar major centres

Community and social – development providing community facilities, housing type appropriate to local area and need, contributing to healthy lifestyles

Highways and transport – “relationship of development to transport networks, especially public transport, free flow and efficiency of use of highway and other transport networks, transport infrastructure improvements and extensions .....and reduction of car use”

Despite no plan for access to healthcare or post-primary education, and despite no work done on developing sustainable public transport alternatives to the private car in accordance with its own policies and those of others, remarkably it concludes that the Growth Area residential allocations shows a positive score for highways and transport. This is because of the proposed WWHAR, which it describes as “to provide access and permeability to parts of the Growth Area, some of the submitted sites, due to their location, are detached from this ‘fixed line’ and/or Growth Area itself. This connectivity is vital to achieving links and integration between the new residents and businesses and can contribute to a healthy community” (sic).

It is difficult to understand what is meant, but the only possible conclusion is that the Borough views transport sustainability as coming from a new road for traffic to divert on to, irrespective of how much additional traffic is generated by the growth area. This is entirely contrary to national, county and its own policies indicated above. It illustrates the failure of the Borough Council to understand the wide range of issues that comprise sustainability or to take heed of central government policies, themselves based on the United Nation’s 17 Global Goals of Sustainable Development, to which the UK government is a signatory.

**Summary and conclusion**

Respondent	Summary representation
	<p>The draft Growth Area Framework Masterplan fails to meet the Borough’s own policies in the Core Strategy and Site Allocations and Development Management Plan (SADMP) both adopted as recently as 2016. As a result it fails to meet the National Planning Policy Framework (NPPF) and National Design Guide (NDG). The SADMP in particular paved the way for a significant shift in the way development planning would be approached in the Borough but the evidence is that this has failed, and, in respect of sustainable transportation in particular, developer pressure, coupled with what may appear County Council indifference, has</p>
<p>REDACTED</p>	<p>In April 1974, my husband and I moved to West Winch (Archdale Close front facing A10) with 5 young children aged 2-8 years. Our concern was the closeness to the A10 but were assured that by 2 years there would be a bypass! Our solicitor had made appropriate enquiries on our behalf. It is now 48 years later and still no bypass but the open fields which we enjoyed have now been on increasing the traffic accessing the A10 to diabolical proportions. 3 roads – Chapel Lane, Long Lane, Gravel Hill Lane from West Winch and 1 road from North Runcton – Rectory Lane. My late mother lived in a cottage next to the Church Hall before a speed limit was installed. Her cottage and the church hall rattled and shook as heavy lorries sped past. She and I did a survey over 2 days documenting the number and type of vehicles passing up and down the A10. This was sent to Henry Bellingham (now Sir) who was instrumental in getting a speed limit of 40mph – not that it is always obeyed – I and some of my friends have had cars and motorbikes overtake us as we adhere to 40mph! More building must be put on hold until the A10 bypass is in situ and infrastructure us in place.</p> <p>Wherever these new homeowners will work they will have to travel either way on the A10 adding to the congestion and pollution of the air. The promise of infrastructure I wonder whether this will come to fruition? When the Bovis and Hopkins homes were built there was the promise of shops etc, and all that materialised was a private dentist and a few play areas! Promises, promises.</p> <p>West Winch was once a lovely village where there was a real community spirit but now that has gone as the village? Has grown out of all proportion and which out of town supermarkets and other shops the town itself is dying a death especially as there are no parking fees.</p>

Respondent	Summary representation
<p>Castle Rising Parish Council</p>	<p>There must be a complete review of the current mitigation measures to make sure this development does not become solely car dependant.</p> <p>We are deeply concerned after our experiences over the Knights Hill development where mitigation measures have been cut by County, the same cracks are appearing at West Winch particularly over the questionable delivery of the planned relief road and inadequate public transport provision.</p> <p>County and Borough choose not to understand or recognise major transport and highways implications and provide solutions to help us tackle the appalling over capacity and hence dangerous emissions levels. As neighbouring parish councils, we are all concerned the impact and knock-on effect the planned 4,000 home at West Winch will have on West Norfolk.</p> <p>We are keen to bring new homes to our wonderful area, on condition they are delivered in a fully sustainable and environmentally friendly manner.</p> <p>Planers must understand when pursuing large applications their desire to boost housing numbers must not override good mitigation measures.</p> <p>The number one priority to sustainable development is good planning, essential to avoid the negative and harmful impact poor infrastructure will have on both current and future residents. When trying to seek improvements Parishes and the local voice are very frustrated, although consulted, views and concerns are largely ignored.</p>

Respondent	Summary representation
North Wootton Parish Council	<p>*** has been working with and advising the parishes of South Wootton, North Wootton and Castle Rising all of whom are deeply concerned at the lack of mitigation measures on the large developments at West Winch and South Wootton.</p> <p>These will result in making such developments car dependent and deeply impact on our already atrocious emissions record at a time when we should be seeking to improve the environment. Unfortunately Norfolk County Council have allowed not only the cancellation of public transport entering the Knights Hill site they have now suggested the major developments at West Winch commence without the planned relief road for which there is now no guarantee of funding. You will read from the attached, the developments are not now NPPF compliant. We must ensure the planners stop granting large applications by disregarding and cancelling original mitigation measures proposed by developers. This is all in an attempt to open the door to boost housing numbers with total disregard to the negative and harmful impact on current and new residents in West Norfolk.</p> <p>North Wootton PC fully endorses the content of ***s submission and I attach a copy here.</p>



Respondent	Summary representation
<p>South Wootton Parish Council</p>	<p>*** has been working with and advising the Parishes of South Wootton, North Wootton and Castle Rising all of whom are deeply concerned at the lack of mitigation measures on the large developments at West Winch and South Wootton. South Wootton Parish Council fully endorse *** attached Masterplan submission and trust attention to these vital areas will</p> <p>be addressed to make future development fully NPPF compliant.</p> <p>There must be a complete review of the current mitigation measures to make sure this development does not become solely car dependant.</p> <p>We are deeply concerned after our experiences over the Knights Hill development where mitigation measures have been cut by County, the same cracks are appearing at West Winch particularly over the questionable delivery of the planned relief road and inadequate public transport provision.</p> <p>County and Borough choose not to understand or recognise major transport and highways implications and provide solutions to help us tackle the appalling over capacity and hence dangerous emissions levels. As neighbouring parish councils, we are all concerned the impact and knock-on effect the planned 4,000 home at West Winch will have on West Norfolk.</p> <p>We are keen to bring new homes to our wonderful area, on condition they are delivered in a fully sustainable and environmentally friendly manner.</p> <p>Planers must understand when pursuing large applications their desire to boost housing numbers must not override good mitigation measures.</p> <p>The number one priority to sustainable development is good planning, essential to avoid the negative and harmful impact poor infrastructure will have on</p> <p>both current and future residents. When trying to seek improvements Parishes and the local voice are very frustrated, although consulted, views and concerns are largely ignored.</p>

<p>Anglian Water (See sections 8,10 &amp; 11)</p>	<p>Anglian Water welcomes the opportunity to comment on the South East King's Lynn (West Winch) Growth Area Framework Masterplan (SPD), which will guide the development of up to 4,000 dwellings over the longer term.</p> <p>Since privatisation, increased demand from population growth in the Anglian Water region has been met through demand management, including industry leading leakage reduction and metering programmes. This means we put in the same amount of water into supply as we did some 30 years ago. In the context of future levels of growth, environmental protection, and climate resilience we need to innovate further in demand management and rainwater harvesting and re use options while securing timely new supply and strategic distribution options, such as reservoirs and additional supplies through to provide further resilience by the mid-2030s.</p> <p>Anglian Water is the sewage undertaker and water company for the borough. Anglian Water responds to Local Plan and other relevant planning consultations from the position that we are looking to support sustainable growth in the region. We welcome the approach taken in the SPD, which is set in the framework of emerging strong policy requirements in the Local Plan (currently at examination) aimed at future proofing water supply and water recycling capacity to enable and support growth while protecting the environment .</p> <p>Our specific comments on the masterplan framework are as follows:</p> <p>CONTEXT</p> <p>Anglian Water recognises that West Winch is a long-standing allocation identified in the Core Strategy (2011) and SADM P (2016) We note that the West Winch Growth Area will deliver 2,500 new homes in relation to the new Local Plan period to 2038, and up to 4000 new homes overall, together with supporting infrastructure. We welcome the purpose of this framework to provide a clear statement to bring the co-ordination and the phasing of infrastructure together to enable the development to come forward.</p> <p>Anglian Water considers that the Growth Area presents a real opportunity to deliver a sustainable and resilient community that will provide positive benefits for the people who live and work in the area, by addressing the current and future challenges of population growth, the impacts of climate change and environmental protection. These are the key challenges Anglian Water has identified in our Strategic Direction Statement and underpin our purpose and strategic ambitions, which are:</p> <ul style="list-style-type: none"> <li>Make the East of England resilient to the risks of drought and flooding</li> <li>Enable sustainable economic growth in the UK's fastest growing region</li> </ul>
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Respondent	Summary representation
	<p>By 2030, be a net zero business and reduce the carbon in building and maintaining our assets by 70%</p> <p>Work with others to achieve significant improvement in ecological quality across our catchments</p> <p>In terms of water resources, Anglian Water is currently drafting the Water Resources Management Plan (WRMP24) for the period 2025-20501, which builds on the strategic supply options outlined in the current WRMP19 including our Strategic Pipeline Alliance and bringing forward options for two new reservoirs (one in Lincolnshire and another in The Fens). The strategic options in WRMP19 also include water reuse and river augmentation schemes in Kings Lynn.</p> <p>King's Lynn is within the North Fenland Water Resource Zone (WRZ), which is one of only very few of our WRZs that is predicted to remain in surplus supply by 2045. Transfers utilising resource from the west of our region, and surplus from North Fenland WRZ will address sustainability reduction and drought impacts in discrete groundwater systems, where there are no other resource options available.</p> <p><b>CONCLUSION</b></p> <p>Anglian Water is supportive of the masterplan framework being developed for the South East King's Lynn Growth Area, subject to the amendments suggested, and considers it has the potential to deliver a successful new community that is resilient to the impacts of climate change.</p>

<p>National Grid (plan also provided)</p>	<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Grid</p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK’s four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid’s core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p>Proposed development sites crossed or in close proximity to National Grid assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. Details of the sites affecting National Grid assets are provided below.</p> <p><i>Gas Transmission</i></p> <table border="1" data-bbox="491 992 1398 1421"> <thead> <tr> <th data-bbox="491 992 800 1122">Development Plan Document Site Reference</th> <th data-bbox="800 992 1398 1122">Asset Description</th> </tr> </thead> <tbody> <tr> <td data-bbox="491 1122 800 1273">E2.1 West Winch Growth Area</td> <td data-bbox="800 1122 1398 1273">Gas Transmission Pipeline, route: BACTON TO WISBECH NENE WEST</td> </tr> <tr> <td data-bbox="491 1273 800 1421"></td> <td data-bbox="800 1273 1398 1421">Gas Transmission Pipeline, route: BACTON TO WISBECH NENE WEST</td> </tr> </tbody> </table>	Development Plan Document Site Reference	Asset Description	E2.1 West Winch Growth Area	Gas Transmission Pipeline, route: BACTON TO WISBECH NENE WEST		Gas Transmission Pipeline, route: BACTON TO WISBECH NENE WEST
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*Electricity Transmission*

Development Plan Document Site Reference	Asset Description
E2.1 West Winch Growth Area	4VV ROUTE TWR (001 - 223); 400Kv Overhead Transmission Line route: NORWICH MAIN - WALPOLE 1

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid’s assets. We would be grateful if you could check that our details as shown below are included on your consultation database:

REDACTED Director	REDACTED Town Planner
REDACTED	REDACTED
Avison Young Central Square South Orchard Street Newcastle upon Tyne NE1 3AZ	National Grid National Grid House Warwick Technology Park Gallows Hill Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us. Yours faithfully,

Director

REDACTED REDACTED For and on behalf of Avison Young

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here:

<https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed.

National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: [www.nationalgridet.com/network-and-assets/working-near-our-assets](http://www.nationalgridet.com/network-and-assets/working-near-our-assets)

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

Respondent	Summary representation
	<p>National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid’s 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.</p> <p>National Grid’s ‘<i>Guidelines when working near National Grid Gas assets</i>’ can be downloaded here: <a href="http://www.nationalgridgas.com/land-and-assets/working-near-our-assets">www.nationalgridgas.com/land-and-assets/working-near-our-assets</a></p> <p><u>How to contact National Grid</u></p> <p>If you require any further information in relation to the above and/or if you would like to check if National Grid’s transmission networks may be affected by a proposed development, please visit the website: <a href="https://lsbud.co.uk/">https://lsbud.co.uk/</a></p> <p>For local planning policy queries, please contact: <a href="mailto:nationalgrid.uk@avisonyoung.com">nationalgrid.uk@avisonyoung.com</a></p>

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<p>County &amp; Borough Councillor Alexandra Kemp</p>	<p>As the local County Councillor for West Winch, here is my response to the West Winch Masterplan and I also attach the 2014 North Runcton &amp; West Winch Surface Water Management Strate Prepared by the Middle Level Commissioners for the East of Ouse, Polver and Nar Internal Drainage Board April 2014, for your urgent consideration. Can you please acknowledge receipt. Unfortunately, I have concluded that the Masterplan for 4,000 homes, in its current form, would be:</p> <p>a blight on West Winch, and increase the poor residential amenity from the heavy traffic through the village</p> <p>a liability to the highway, due to the lack of necessary strategic road infrastructure with no bypass in place</p> <p>an increase to the current risk of flooding to existing homes, because of the lack of competent flood prevention infrastructure which must be provided in advance of any development of the Growth Area.</p> <p>The Bypass must be built out in full and the A10 traffic-calmed to a village road, and a wholesale review and reconditioning of the drainage system through West Winch take place, before any development starts.</p> <p>Flooding on Hall Lane and Eller Drive, West Winch June 2020</p> <p><b>INCREASED FLOOD RISK TO WEST WINCH FROM 4,000 HOME DEVELOPMENT</b></p> <p>The Local Lead Flood Authority at NCC was wrong to remove its 7-year Flood Risk Holding Objection on the 4,000 home development in 2020, even though the developer had not completed an investigation into the capacity into the existing drain in West Winch to cope with the surface water run-off. The LLFA said the applicant had to try to trace the drainage from the site to the Puny Drain, but it is plain after 10 years that the land ownership is unclear and any such channels are likely to be in poor repair and there is missing infrastructure.</p> <p>Back in 2014, this is what the Drainage Board, with responsibility for the Puny Drain on West Winch Common, wrote about the 4,000 home proposal: “However the proposed development can be expected to greatly increase the impermeable land cover and this is likely to lead to a large increase in the speed and rate of runoff, potentially exacerbating the existing problem of flooding and potential flood risk within the existing village settlements and surrounding farm land.”</p> <p>North Runcton &amp; West Winch Surface Water Management</p> <p>Strategy Prepared by the Middle Level Commissioners for the East of Ouse, Polver and Nar Internal Drainage Board April 2014</p>
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	<p>Since 2014, Climate Change has increased and with it the risk of extreme surface drainage events.</p> <p>So the Drainage Board report said the developers should conduct a detailed drainage report about the potential flood impact of the development on West Winch Village and later said that it is no reason not to do it because it costs money. They said the report should include:</p> <p>potential impact of run-off from higher areas to lower areas – especially where development in lower areas may already have inadequate surface water drainage provision.</p> <p>The capacity of the existing drainage system to cope with additional runoff especially at key ‘pinch points’ such as the Pyny and Pierpoint drains.</p> <p>The natural constraints on drainage design options defined by the clay soils.</p> <p>But there has still been no off-site flood report for the impact on flood-risk on West Winch downstream, which the Drainage Board requested in 2014. This report should be part of the Masterplan. You cannot approve a masterplan that does not get the basics right.</p> <p>The Drainage Board wrote in June 2021 “The fact that an investigation costs money I feel is a poor excuse not to do it. The drainage condition proposed by the LLFA seems to be very focussed on the on-site drainage and I have no issue with the points in it. I do not consider though that it adequately deals with off-site drainage matters which are the main points of concern”</p> <p>The 2014 Drainage Board report found -:</p> <ul style="list-style-type: none"> <li>a significant lack of data on the existing drainage infrastructure in West Winch particularly the storm water sewer network.</li> <li>a significant history of localised flooding</li> <li>a lack of clarity of maintenance responsibility</li> <li>poor sewer maintenance of piped and open channel drainage with a lack of fall and in some cases inadequate design</li> <li>an abundance of non-adopted sewers and the catchment is poorly-draining clay based</li> <li>a reliance on soakaway drainage</li> </ul>
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**FLOODING JUNE 2020 in WEST WINCH – Hall Lane and Eller Drive**

**MISSING FLOOD DRAINAGE INFRASTRUCTURE**

**Speed and Rate of Run-off**

Four dwellings were flooded in August 2022 on Hall Lane, West Winch at the bottom of the slope down from the A10. Water reached a level of 10-12 inches and created an emergency situation which it took the Fire Service an hour to bail out. This show the current flood pressure points and vulnerability of West Winch village to surface water flooding, downstream from the proposed growth area above it.

One of these bungalows on Hall Lane was flooded for the third time in twenty years.

**Double Whammy**

Water was directed into properties from Hall Lane from below the properties upwards, but also downwards from gardens above the properties. The pictures above show the flooding on Eller Drive and Hall Lane in 2020.

In 2013, Back Lane had a tsunami on the highway.

It is inexcusable that to date, crucial recommendations of the 2014 Flood Report for West Winch by the Drainage Board, commissioned by the West Winch and North Runcton Neighbourhood Plan, providing guidance at sub-catchment level, have not been followed.

**Increased Risk of Surface Water Run-Off**

The existing West Winch Village is built on a slope, that descends down from the A10. Most of the existing village of West Winch is much lower than the main 4,000- home Masterplan Development Site.

West Winch is a Fen-edge village based on poor-draining Kimmeridge Clay and is lower than North Runcton at 18-20 m AOD. The new development, which will be between both settlements between the A10 and the A17, is going to be on higher land than West Winch at 10-20 m AOD, on land associated with underlying clay that is not free draining and is therefore one of the poorest materials for infiltration or soakaway.

The law of gravity puts West Winch at risk of surface water run-off from the new development.

**RISK OF FLOODING FROM POOR EXISTING DRAINAGE NETWORK**

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	<p>There is potential for increased risk of surface water runoff and of flash flooding on homes in the existing village of West Winch, if the network is not improved.</p> <p>As the County Councillor, I have had 3 new flood prevention schemes installed in West Winch, on Chapel Lane, Watering Lane and Back Lane to improve surface water drainage. But more is needed to cushion West Winch from such intensive development.</p> <p>I had a flood drainage engineering scheme on Back Lane in 2015 where a house had been flooded. But a further connection is needed to Common Close. We await funding.</p> <p>The new Drainage Scheme at the top of Watering Lane in 2020 helps keeps water off the road. But this could not and did not stop a flood at the bottom of Watering Lane, due to a nexus of poor network drainage management issues involving Anglian Water, Cadent Gas and a private body, on Commonsides near the Puny Drain, in 2021.</p> <p>Residents see rainwater running down the roads off the A10, Chapel Lane, Long Lane, Watering Lane, Gravel Hill Lane.</p> <p>A barrier had to be built by Anglian Water, to stop water running down Long Lane straight into the property in Hall Lane, at the bottom of Long Lane which runs horizontally from the A10 to Hall Lane.</p> <p>The last major development in West Winch, on the higher ground, around Oak Avenue, in the centre of West Winch, produced flood problems for existing residents on Hall Lane.</p> <p>Houses have since been flooded along Hall Lane.</p> <p>A new house, at the bottom of Southfields Drive, was flooded.</p> <p>The last developers built over a lake, which later opened up on pre-existing property on Hall Lane and caused a flood there.</p> <p>Climate change increases the risk of heavy surface water-run off and extreme flash flooding events.</p> <p>Norfolk County Council had to pay to put a culvert under Hall Lane from the last major development, in the Oak Avenue Bovis homes, because the developer did not put in adequate drainage.</p> <p>These improvements are still not enough in the face of Climate Change and of more development.</p> <p>Water Table and Groundwater Flood Risk</p>
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The water table in West Winch already is very high. The new development could raise the water table, and lead to increased risk of groundwater flooding for the most populated part, the Oak Avenue area, especially from the development of Site

But this increased flood risk has not been quantified in a report, as it should have been.

The proposed development of hundreds of homes on the watermeadow in the flood hazard zone at the bottom of Gravel Hill Lane, Site F, will raise the water table for homes higher up in Hall Lane, where there is already a flood problem.

On Elm Tree Grove, at the bottom of Gravel Hill Lane, drainage is already poor. Residents tell me they have had to hire a pump, to clear the water from their properties. Development on Site F adjacent is likely to raise the water table and risk groundwater and surface water flooding on Elm Tree Grove.

Residents are aware of the flood risk issues and collected 500 signatures to a petition against development on Site F. There was also another petition, which I presented to the Borough Council, when Nick Daubney was Leader.

The Masterplan is inadequate in including Site F, the Gravel Hill Lane Site

Site F should be taken out as it increases risk of flooding off-site and this against the National Policy Planning Framework.

Site F is in the flood hazard zone on the Common and is habitually flooded. The Masterplan does not address this because the right reports have not been done.

St Mary’s Church on the A10 is at the highest point of the village on the east side of the A10, but the groundwater level is so high that double graves, dug in the winter, fill up with water.

If the water table is so high even at the top of the hill, the impermeable areas created at the bottom of the slope, will increase the risk of flooding for existing homes above, when thousands of acres of farmland become impermeable spaces on the new development.

A former Parish Clerk, living at the top of Long Lane just below the A10, reported that when they dug a hole in the garden, it immediately filled up with water.

Any development in Gravel Hill Lane at the foot of the hill, would create a flood risk on- site, and would also raise the high water table along Hall Lane and Gravel Hill Lane and increase flood risk for existing homes.

**LACK OF AMENITIES – A Dormitory Town on the A10**

There is no provision for a Health Centre, a Doctors Surgery, a Dentists Surgery in the Masterplan. There is far too little retail space allocated, for what will be a town the size of Swaffham or Fakenham.

The Masterplan is poorly designed like a dormitory town, with no proper centre or landmarks to bring a sense of place. But if the Growth Area is a home for people who will commute to Ely or Cambridge on the A10, this will place further pressure on the highway network.

Even if residents take the train, they will have to drive on the A10 to Lynn or Watlington Railway Station.

West Winch Primary School is at capacity now and local children cannot find a place.

Sports England have placed a Holding Objection on the development, as it does not have enough places for on-site recreation and exercise and this will lead to people getting into their cars and driving off site for recreation.

Noise Pollution Hopkins Report says the homes on to the A10 would be so noisy to live in that residents could not open their windows or live in outdoor open spaces.

**Mistakes in the Masterplan and Suggested Improvements**

**Bypass Needed Before Development Starts - as A10 is at full capacity and maximum residential disamenity**

**No Highway Capacity** The Masterplan wrongly assumes highway capacity for 300 homes on the A10, before bypass is fully built out. There isn't. It assumes the bypass could be built piecemeal. It can't. The A10 functions too badly now and cannot be made worse.

**No Highway Assessment of Impact on West Winch Highways** failed to ask the developer to do a Traffic Impact Assessment on the A10 and estate road junctions from the proposed 300 new homes, on the grounds all the traffic would be going north. This is not credible as some Residents would go south to drive children to West Winch Primary, to go work or go shopping in Downham Market, Ely or Cambridge, or to take the train from Watlington.

**Safety A10 in West Winch and Setchey** is the worst performing section in the Mayor of Cambridgeshire's report, is an accident cluster site throughout, and has 20,000 vehicles a day, at least 11% HGV's, with 800 maximum-size HGV sugarbeet lorry movements a day from the Wislington for half the year. The lorries thunder over manholes, and cause damage and keep residents awake at night. There are rear-end shunt accidents as the poor sightlines as traffic does not expect vehicles to stop and turn on bends into driveways or estate roads. It is

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therefore essential to take the through traffic out and traffic calm the A10 to a village road before any more development

Residents complain they cannot get out of their driveway or the estate roads on to the A10 safely now They have to leave extra time just to get out on the A10 and this is impossible in the Summer with the heavy holiday traffic. The constant stream of traffic and no traffic lights to turn in to the estate roads, makes the A10 a constant danger.

Traffic on A10 worse since lockdown Residents who bought homes on the A10 during lockdown are kept at wake at night by the traffic and tell me they want to move.

Residents can't cross the A10 safely now The traffic impact would certainly worsen for the new residential development of 30 homes opposite the Winch.

Residents cannot now cross the road, to get to the bus stop on the A10, and have asked me for a crossing.

Highways say it is too dangerous for a crossing at the Winch. If it is too dangerous for a crossing, Highways should have stopped the development in the first place, as it goes against the principle of Active and Sustainable Travel.

Setchey needs a crossing now Residents cannot safely cross the road as there is no pedestrian crossing at all.

Residents cannot now safely cross the A10 at any point. The loss of amenity from any more development will be too great. There is only one pedestrian crossing along the whole stretch of the A10 in West Winch and Setchey. But even then lorries do not always stop, so I had to fight to keep the School Crossing Patrol and have higher traffic heads put in at the crossing. More development along the A10 would make the situation worse. The Bypass needs to come first so West Winch Road can be traffic-calmed.

Bypass must include Setchey The Masterplan is inadequate as it starts the Bypass from Gravel Hill Lane, but the Bypass must start south of Setchey.

The Bypass is 50 years overdue. Resident campaigned for the bypass with the MP in 1974. The Government recognised the need for the Bypass and plans were drawn up for the routes in 1990, the funding was produced but was then withdrawn and the plans were put in the Norwich Record Office. Then there was a 300 home development in the middle of West Winch but no bypass. There is the issue of trust and the traffic is much worse now than in 1990, so there is no excuse not to complete the bypass first.

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The Masterplan leaves West Winch in the lurch If development begins, there will be no guarantee the bypass will ever be built, either in part or completely.

Active Travel Deficit The A10 is unfriendly to walk along, because of fast moving lorries along a relatively narrow road which produce noise, pollution and a backdraft which is frightening for many, as you feel as if you are going to be blown into the hedge. It feels like walking along a motorway.

· The Masterplan does not guarantee funding for the improvements to the walking and cycling routes needed for Active Travel along the A10.

Building on the A10 first is the wrong place it would be logical to start building on the much wider A47, which is not as busy as the A10 in West Winch and Setchey, instead of starting development on the A10 which is too pressured.

There needs to be investment in public transport on the A10 with more frequent, earlier and later buses West Winch Village has poor public transport, is poorly related to Lynn, being cut off by the inhospitable Hardwick Roundabout, and this isolation is evidenced by the fact that the Neighbourhood Plan initiative found that West Winch has the highest second, third and fourth car ownership per household in the Borough. Residents who do not drive says they are marooned in West Winch for 4 days over Bank Holiday weekends, when there are no buses.

The Masterplan in its current form is not fit for purpose as it is missing vital highway and flood infrastructure that must be delivered before any development starts.

Appendix 1 North Runcton & West Winch Surface Water Management Strategy Prepared by the Middle Level Commissioners for the East of Ouse, Polver and Nar Internal Drainage Board April 2014

The Drainage Board conclusions in 2014 were:

It is is clear from our investigations that there is a significant lack of information available relating to the existing buried surface water infrastructure. It is also known that there have been historical reports of localised flooding due to inadequacies within this system and perhaps relating to its maintenance. It is therefore recommended that further comprehensive survey of the current drainage system be commissioned to allow a full analysis of the system and for recommendations to be made on where modification and improvements are required. An ongoing management and maintenance plan for all surface water drainage infrastructure should also be drawn up and agreed with the relevant authorities and land owners.

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As stated above there needs to be full survey of the drainage ditch network with cross sections and asset condition information. This information will be vital to plan the works that need to be carried out on the drainage ditches to bring them back up to their full carrying and storage potential. We suggest that developers are required to undertake this survey and identify what on-site and off-site surface drainage improvements are required in order to integrate proposed development into the overall drainage strategy outlined in this report. Such planning should be carried out in liaison with Anglian Water and the County Council in their capacities as Lead Local Flood Authority and managers of the A10, and the local IDB bodies.

The solutions outlined in this report are the preferred options based on our initial analysis. It is, however, recognised that this strategic overview will not have identified all the constraints or the opportunities that future development might be able to deliver, and that development plans are not yet fixed. It is therefore expected that where proposals move away from those identified within this strategy the fundamental principles are retained.

Whilst infiltration drainage is not considered to be appropriate for the primary drainage design within the two parishes it is believed that site level SuDS techniques can and should be incorporated into the development designs. Whilst unlikely to be meaningfully utilized when the ground is saturated in the wettest winter months, they will have real value in taking up water in high intensity summer storms and can increase the diversity of soft landscaping features within the development zones.

The key to the long term success of surface water run-off management will be in the achievement of securing a long term maintenance strategy for the entire surface water infrastructure serving the developments. This would best be achieved through adoption of primary infrastructure by a statutory authority, with the appropriate payment of commuted sums to ensure that sufficient funds are available for this purpose.

Negotiations with land owners beyond the development areas identified in the master plan will be necessary to achieve the best outcome. This should include opening discussions with the East of Ouse Polver and Nar IDB to explore how the Puny Drain could be modified to accommodate un-attenuated discharges. This could be of particular value in providing alternatives where a ‘ransom’ situation might otherwise arise.

It is understood that the North Runcton and West Winch Neighbourhood Plan will refer to this strategy in policy relating to drainage and surface water management. The strategy will also ideally be adopted by BCKLWN as a preferred approach for addressing surface water management in the area and should be used to inform the planning process when considering all new when considering all new development proposals in the North Runcton and West Winch Neighbourhood Plan area.



Respondent	Summary representation
	<p>The section of the Puny Drain that runs east-to-west south of Setchey and at the rear of the Garage Lane business area, is in poor condition and would ideally be improved with the assistance of funding generated from wider development. The optimum functioning of the Puny Drain will be essential for sustainable surface water management in the Neighbourhood Plan area and will also benefit the wider catchment. The East of Ouse, Polver and Nar IDB can advise further on this matter.</p>
REDACTED	<p>i object to the plan and the proposed building of too many houses for the reasons stated above.</p>

<p>Natural England</p>	<p>SUMMARY OF NATURAL ENGLAND’S ADVICE</p> <p>FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES</p> <p>As submitted, the Supplementary Planning Document (SPD) and future associated planning applications within the Growth Area could have potential significant effects on the following designated sites:</p> <p>The Wash Special Protection Area (SPA)</p> <p>The Wash and North Norfolk Coast Special Area of Conservation (SAC)</p> <p>The Wash Ramsar Site</p> <p>North Norfolk Coast Special Protection Area (SPA)</p> <p>North Norfolk Coast Special Area of Conservation (SAC)</p> <p>North Norfolk Coast Ramsar Site</p> <p>Norfolk Valley Fens Special Area of Conservation (SAC)</p> <p>Breckland Special Protection Area (SPA)</p> <p>Breckland Special Area of Conservation (SAC)</p> <p>Roydon Common and Dersingham Bog Special Area of Conservation (SAC)</p> <p>Roydon Common Ramsar Site</p> <p>Dersingham Bog Ramsar Site</p> <p>Damage or destroy the interest features for following Sites of Special Scientific Interest (SSSIs) for the above European sites have been notified.</p> <p>River Narr Site of Special Scientific Interest (SSSI)</p> <p>The Wash Site of Special Scientific Interest (SSSI)</p> <p>North Norfolk Coast Site of Special Scientific Interest (SSSI)</p> <p>Breckland Farmland Site of Special Scientific Interest (SSSI)</p>
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Breckland Forest Site of Special Scientific Interest (SSSI)

Roydon Common Site of Special Scientific Interest (SSSI)

Dersingham Bog Site of Special Scientific Interest (SSSI)

Natural England advises that further information is required to determine the significance of these impacts and the scope for mitigation. The following information is required:

A Habitats Regulations Assessment, proceeding to Appropriate Assessment.

The HRA should consider potential water quality impacts on European sites from wastewater treatment, discharge, and surface water run-off. Potential impacts on the River Nar SSSI from this impact pathway should also be assessed, this could be through the HRA or a separate SSSI impact assessment.

The HRA should consider potential impacts from recreational disturbance on European sites, including mitigation measures such as a proportionate contribution to the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS), and Green Infrastructure (GI) requirements for developments within the growth area. Potential impacts on the River Nar SSSI from this impact pathway should also be assessed, this could be through the HRA or a separate SSSI Impact Assessment.

If required by the HRA and/or SSSI Impact Assessment, we advise that mitigation measures should be secured and detailed within the Supplementary Planning Document (SPD).

In addition to our advice on designated sites, Natural England also provides advice on the following issues below:

Securing Biodiversity Net Gain (BNG)

Best and Most Versatile Agricultural Land

Sustainable Drainage Systems (SuDS)

Natural England’s further advice on designated sites and advice on other issues is set out below.

NATURAL ENGLAND’S DETAILED ADVICE

Advice under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended)

Habitats Regulations Assessment (HRA)

Despite the proximity of the application to European Sites, the consultation documents provided do not include information to demonstrate that the requirements of regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) have been considered by your authority, i.e., the consultation does not include a Habitats Regulations Assessment.

It is Natural England’s advice that the proposal is not directly connected with or necessary for the management of the European site. Your authority should therefore determine whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out. Natural England must be consulted on any appropriate assessment your authority may decide to make.

Natural England advises that there is currently not enough information provided in the application to determine whether the likelihood of significant effects can be ruled out.

We recommend you obtain the following information to help you undertake a Habitats Regulations Assessment:

i. Water Quality

The proposals have the potential to affect the water quality of designated sites from wastewater treatment discharges and surface water runoff, due to the proximity of the River Nar SSSI which connects to The Wash and North Norfolk Coast Special Area of Conservation (SAC), The Wash Special Area of Protection (SPA) and The Wash Ramsar site, which are vulnerable to nutrient impacts.

When consulting Natural England on proposals with the potential to affect water quality resulting in nutrient impacts on European Sites, please ensure that a Habitats Regulations Assessment is included. Potential impacts on the River Nar SSSI from this impact pathway should also be assessed, this could be through the HRA or a separate SSSI impact assessment. Without this information Natural England will not be in a position to comment on the significance of the impacts. For large scale developments, Natural England may provide advice on a cost recovery basis through our [Discretionary advice service](#).

ii. Recreational Disturbance

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	<p>Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) Norfolk Local Planning Authorities (LPAs) are working collaboratively to deliver a Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) to ensure that the cumulative impacts of additional visitors arising from new developments of housing and tourism, to European sites, will not result in any adverse effects which cannot be mitigated. All Norfolk LPAs are collecting a tariff of £185.93 per new dwelling towards the strategic mitigation package, at the time planning permission is approved.</p> <p>Green Infrastructure (GI)</p> <p>Developments of this scale should include provision of well-designed open space/green infrastructure, proportionate to its scale. Such provisions can help minimise any predicted increase in recreational pressure to the European sites by containing the majority of recreation within and around the development site boundary away from European sites.</p> <p>The applicant may wish to consider the benchmark standards for accessible natural greenspace; the Town and Country Planning Association (TCPA) have published <a href="#">Guides and Principles for Garden Communities</a>, and Guide 7, Principal 9, references 40% green infrastructure as a target quantum.</p> <p>We advise that the Suitable Accessible Natural Green Space (SANGS) guidance here can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. Please find SANGS guidance in our response email as a separate attachment. GI design should seek to achieve the Natural England Accessible Natural Greenspace Standards, detailed in <a href="#">Nature Nearby</a>, including the minimum standard of 2 ha informal open space within 300 m of everyone’s home.</p> <p>As a minimum, we advise that such provisions should include:</p> <ul style="list-style-type: none"> <li>High-quality, informal, semi-natural areas</li> <li>Circular dog walking routes of 2.7 km<sup>2</sup> within the site and/or with links to surrounding public rights of way (PRoW)</li> <li>Dedicated ‘dogs-off-lead’ areas</li> <li>Signage/information leaflets to householders to promote these areas for recreation</li> <li>Dog waste bins</li> </ul>
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	<p>Long term maintenance and management of these provisions</p> <p>The River Nar SSSI</p> <p>The Growth Area is approximately 1.2km from River Nar SSSI. It is possible that additional access to the river and adjacent footpath, could lead to recreational disturbance impacts. We recommend that the Local Planning Authority considers these potential impacts either within the HRA, or in a separate SSSI impact assessment.</p> <p>Site of Special Scientific Interest (SSSI)</p> <p>Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England’s advice. You must also allow a further period of 21 days before the operation can commence.</p> <p>2) <u>Other advice</u></p> <p>Biodiversity Net Gain (BNG)</p> <p>Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120,174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal.</p> <p>We advise that there is an opportunity within this growth area to contribute towards securing &gt;10% BNG by connecting biodiversity hotspots, creating chalk and acid grassland and insect rich habitats and wetlands designed within the on-site GI. Any sensitive habitat created to achieve BNG should be carefully managed to maintain its favourable condition.</p> <p>Furthermore, we encourage the LPA to consider a policy of 15% or 20% BNG in the SPD. Strategic level viability assessments in <a href="#">Kent</a> have concluded that this shift will not impact viability in most cases irrespective of onsite or offsite BNG delivery. This is because after the initial cost of securing the minimum 10% BNG, the cost of increase to 15 or 20% is much less and generally negligible.</p>
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	<p>Where onsite measures are not possible, you should consider off site measures. Opportunities for onsite enhancement might include:</p> <p>Providing a new footpath through the new development to link into existing rights of way.</p> <p>Restoring a neglected hedgerow.</p> <p>Creating a new pond as an attractive feature on the site.</p> <p>Planting trees characteristic to the local area to make a positive contribution to the local landscape.</p> <p>Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.</p> <p>Incorporating swift boxes or bat boxes into the design of new buildings.</p> <p>Designing lighting to encourage wildlife.</p> <p>Adding a green roof to new buildings.</p> <p>Natural England’s <a href="#">Biodiversity Metric 3.1</a> may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the <a href="#">Small Sites Metric</a> may be used. This is a simplified version of <a href="#">Biodiversity Metric 3.1</a> and is designed for use where certain criteria are met. It is available as a beta test version.</p> <p>You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:</p> <p>Links to existing greenspace and/or opportunities to enhance and improve access.</p> <p>Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g., by sowing wildflower strips)</p> <p>Planting additional street trees.</p> <p>Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.</p>
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Restoring neglected environmental features (e.g., coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Natural England’s [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Biodiversity Metric 3.1](#) and is available as a beta test version.

ii. Best and Most Versatile Agricultural Land

The majority of the proposed Growth Area appears to be classified as Grade 2 under the provisional Agricultural Land Classification (ALC) and is therefore likely considered Best and Most Versatile Agricultural Land. Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 174 and 175). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#) Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of ‘best and most versatile’ agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling separate guidance on soil protection for site restoration and aftercare is available on [Gov.uk](#) website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying [Good Practice Guide for Handling Soils in Mineral Workings](#).

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

iii. SuDS

We support the inclusion of sustainable drainage systems (SuDS) to manage surface water disposal, these systems can be used to create wetland habitats for wildlife in an attractive aquatic setting. We advise that this is considered and incorporated into the design, the CIRIA guidance (susdrain.org) provides useful information about integrating SuDS and biodiversity. The maintenance of SuDS should be provided for the lifetime of the projects within Growth Area.



	<p>Further general advice on consideration of protected species and other natural environment issues is provided at Annex A.</p> <p>Should developers wish to discuss the detail of measures to mitigate the effects described above with Natural England, we recommend that they seek advice through our <a href="#">Discretionary Advice Service</a>.</p> <p>We would be pleased to provide advice on the discharge of planning conditions or obligations attached to any planning permission to address the issues above.</p> <p>Should the proposal change, please consult us again. Yours sincerely</p> <p>Priyanka Adhikari Norfolk &amp; Suffolk Team</p> <p>ANNEX A – Additional advice</p> <p>Natural England offers the following additional advice:</p> <p><b>Landscape</b></p> <p>Paragraph 174 of the <a href="#">National Planning Policy Framework</a> (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry- stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape &amp; Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the <a href="#">Landscape Institute</a> Guidelines for Landscape and Visual Impact Assessment for further guidance.</p> <p><b>Protected Species</b></p> <p>Natural England has produced <a href="#">standing advice</a><sup>1</sup> to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.</p> <p><b>Local sites and priority habitats and species</b></p>
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You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found [here](#)<sup>2</sup>. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

1 <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

Respondent	Summary representation
	<p><a href="http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx">2http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</a></p> <p>Rights of Way, Access land, Coastal access, and National Trails</p> <p>Paragraphs 100 and 174 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website <a href="http://www.nationaltrail.co.uk">www.nationaltrail.co.uk</a> provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.</p> <p>Biodiversity duty</p> <p>Your authority has a <a href="#">duty</a> to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available <a href="#">here</a>.</p>
Historic England	Page 7 Site Context Plan - It would be helpful if listed buildings and other designated and non designated heritage assets were shown on this Site Context Plan.

<p>West Winch Parish Council</p> <p>North Runcton Parish Council</p>	<p>Further to the consultation events held on August 10<sup>th</sup> and 5<sup>th</sup> September and in regard to the current consultation period, we provide the following comments and observations on the draft Supplementary Planning Document.</p> <p>As we understand it, a Supplementary Planning Document (SPD) is a non-statutory document that can be used to provide planning guidance and detail to support statutory documents and policy.</p> <p>In this case the statutory adopted documents are the Local Plan (Core Strategy and SADMP) and the Neighbourhood Plan. We feel that the detail already provided in both these documents goes further and provides more substantive guidance than this draft SPD and therefore to a large extent, the proposed SPD seems entirely superfluous.</p> <p>We note in the draft document that reference is made to the ‘Local Plan Review’ currently at examination. However, in relation to the West Winch Growth Area there is no substantial difference between the SADMP (2016) and the Local Plan Review document – except that:</p> <p>the proposed settlement size has been upped by 500 to 4000 (a figure that we are doubtful can actually be achieved within the site at the proposed densities and with the other constraints and design goals as set out).</p> <p>The Local Plan Review Policy E2.1 now includes an additional bullet point 10 - <i>The Borough Council will prepare a supplementary planning document ‘Masterplan’ to co-ordinate development provisions for the Strategic Growth Area.</i> In our view the draft SPD does <u>nothing</u> to help coordinate development provisions at all.</p> <p>The level of cross referencing between the draft SPD and the statutory documents is poor – especially in relation to the Neighbourhood Plan – which we feel is largely ignored.</p> <p>The contention at page 5 that the SPD will <i>aid clarity and effectiveness</i> (by providing) <i>one source for: viability; infrastructure requirements importantly including the West Winch Housing Access Road) and; planning policy requirements...</i> is simply not illustrated by this document.</p> <p>Particularly in relation to making a clear case for viability, the draft SPD offers nothing other than a statement (highlighted beige at page 23) stating the project is <i>‘potentially capable of being viable’</i> – which seems risible.</p> <p>The amount of infrastructure required for this project has always made viability extremely questionable. This was the reason BCKLWN gave for not applying CIL to the area and why so much money was spent on delivering an ‘Infrastructure Delivery Plan’. As only one example of where a changing economic context must now call the whole project into question, the roadwork was provisionally costed at £65Mn more than 5 years</p>
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ago and since then Brexit, the pandemic, the Ukraine war and other factors have all contributed to massive cost inflation especially in construction works.

We have reviewed the Sustainability Appraisal. We have no faith that this document provides a true and objective assessment of the sustainability of proposed development in the Local Plan until 2036. In particular we have no faith that a sustainable transport plan is proposed, especially in relation to the West Winch Growth Area. This SPD provides little or no further detail explaining how a multi-modal, low-carbon transport system can be created within the development. As we have maintained all along, the entire scheme will be heavily dependent on private vehicular transport resulting in thousands of additional local car journeys every day – a mode of transport widely understood to be the most carbon heavy and polluting part of the entire transport network.

In summary this document appears to offer one thing – an illustrative sketch masterplan ‘endorsed’ by the Borough Council. As it has been brought forward so late, it has been largely designed to fit around two existing outline planning applications, neither of which appear to be able to accommodate improved local transport or a first-class cycle network.

As an SPD is a non-statutory document, there is no requirement that any future building should or will come forward in this way. The SPD certainly does not achieve its stated goal highlighted blue at page 5, of providing ‘*co-ordination*’. It does nothing of the sort.

A useful SPD planning guidance document for this development would set out best practice design principles, clear requirements on design styles and public realm elements and community infrastructure. It would significantly add to the existing information set out in the Local Plan and Neighbourhood Plan. It would require developers to work up revised schemes to ensure that high quality sustainable infrastructure can be accommodated.

We note the South Cambridgeshire 180-page document setting this out for Waterbeach New Town and the 80-page document setting out requirements for land at Cherry Hinton.

[scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/supplementary-planning-documents-spd](https://scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/supplementary-planning-documents-spd)

We also note that some local authorities have simply adopted national design guides as their own and made these into useful SPDS. For example, Uttlesford have adopted the very good ‘Building for a Healthy Life’ guidance developed by Homes England:

Respondent	Summary representation
	<p data-bbox="447 269 1850 302"><a href="https://www.uttlesford.gov.uk/article/4974/Supplementary-Planning-Documents-and-other-planning-guidance">https://www.uttlesford.gov.uk/article/4974/Supplementary-Planning-Documents-and-other-planning-guidance</a></p> <p data-bbox="447 329 1839 431">If the Borough and County Councils wish to follow national planning policies, as well as their own statutory documents, then in our view this SPD needs to be withdrawn and replaced with a comprehensive document that <u>will</u> ensure sustainable development.</p> <p data-bbox="447 459 1472 492">We attach further specific comments on the BCKLWN draft SPD at Appendix 1.</p> <p data-bbox="447 519 1860 621">On the cover – rather than calling the area ‘South East King’s Lynn’ – why not refer to it as the ‘West Winch Growth Area’, which is what everyone has been referring to it as for more than a decade. Better still the ‘West Winch and North Runcton Growth Area’ – which is actually what it is.</p> <p data-bbox="447 649 1339 682">Each section and paragraph should be numbered for easy reference.</p> <p data-bbox="447 709 1829 774">We are not entirely clear that the three ‘site context’ plans are necessary or useful. They don’t appear to be referred to anywhere in the document text.</p> <p data-bbox="447 802 1892 974">We note that at page 7, the ‘Site Context Plan’ shows most of the Hopkins Homes development option site as a ‘Significant Woodland Block’. We tend to agree with this description. The site is presently a mosaic of woodland, scrub and grassland with significant biodiversity value and other environmental benefits. It is a shame that the proposed masterplan will largely remove it and we don’t see how this fits with the Local Plan claim (para E2.10) that one of the reasons for allocation of this site is that it limits ‘landscape impact’.</p> <p data-bbox="447 1002 1808 1099">It would be accurate to alter the Site Context Plan label ‘Urban Area’ to ‘Settlement’. Residents have long argued against ‘urbanisation’ of the villages. Referring to development as ‘urban’ also has implications for planning legislation.</p> <p data-bbox="447 1127 1850 1229">We question whether any of the supposed contents of the SPD as set out on page 7 are actually provided. Principally in our view it provides little or no additional detail to existing policy and is certainly not a document that can be given ‘significant weight’ in planning decisions.</p> <p data-bbox="447 1256 1465 1289">We are not clear of the relevance of all of the photographs at pages 11 and 15.</p>

<p>BCKLWN Environmental Quality</p>	<p>The Secretary of State had specifically identified cumulative matters of concern such as the ‘potential for increases in traffic’ and also ‘emissions associated with the potential increase in traffic’ from this area. To fully understand cumulative impacts we would expect therefore in the West Winch growth area, with shared infrastructure to model emissions / transport input data in accordance with the combined approach within section 6.22 (k) of the IAQM’s guidance e.g.;</p> <p><i>“In some particular cases, there may be another notable proposed development (without planning permission) in close proximity that could contribute an impact at receptors in combination with the primary development being assessed. In these circumstances, it may be necessary to quantify this combined impact for selected receptors and assess it against the future baseline.”</i></p> <p>This means when carrying out modelling for air quality from subsequent developments and as part of this SPD that the transport input data (as AADT) should be combined rather than simply included within a creeping baseline. This ensures cumulative impacts are fully assessed from one development to another.</p> <p>Furthermore, it has already been shown from the most recent transport assessment that traffic distribution rates will be around 25% of the total along Hardwick Rd and therefore towards the Air Quality Management Areas of King’s Lynn (Railway Rd AQMA). To ensure a consistent approach reference must be made to this distribution rate when estimating changes in traffic flows for air quality purposes within the AQMAs. Critically, this distribution rate along Hardwick Rd is irrespective of phasing or the completion of the West Winch Housing Access Rd as it is a road link post-development.</p> <p>Receptors should include critical ones within the AQMA’s when assessing potential impacts</p> <p>Given existing traffic is considered significant therefore subsequent developments in this area must also set out how to offset traffic emissions based on IAQM (2017) methodology by estimating emissions for NOx and PM<sub>2.5</sub> and then to derive damage costs. These costs are used to determine extent of mitigation / offsetting required for example to help support subsidised school travel which is in addition to any travel plan commitments. Discussion with the environmental quality team is recommended.</p> <p>We would also expect suitable electric vehicle charging schemes within this area for example that clearly show extent of any charging infrastructure to non-associated parking spaces (visitor / accessible spaces) and fast-charging provision (&gt;7kW) where possible based on dwell time. It should be noted that parking standards (NCC 2022) refer to one visitor parking space per 5 dwellings. A suitable electric vehicle charging scheme is necessary as whilst for the most part Approved Document-S under the Building Regulations will deliver electric</p>
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Respondent	Summary representation
	<p>vehicle charging infrastructure, there are a number of limitations i.e. no fast-charging provision, parts 6.2 to 6.12 are all optional and it does not apply to non-associated parking spaces.</p>
Metacre	<p>These representations, submitted on behalf of Metacre Limited, comment on the Southeast King’s Lynn Growth Area Masterplan Supplementary Planning Document (‘SPD’) consultation with the aim of supporting the general principles set out in the Masterplan, but providing comments on the detail contained in the document.</p> <p>As set out above, we support the production of the SPD to guide development within the Growth Area, but there are several comments we seek to make on the document before it can, in our view, be adopted.</p> <p>Comments on the draft SPD</p> <p>We note that with regards to the Framework Plan within the SPD, it is based upon a similar plan that was previously prepared by Metacre and shared with the Council. However, there has been several changes made to the Framework Plan from what was shared with the Council including the re-location of the school, which is supported, and the re-location of retail uses to the west of the A10. In addition, the location of the proposed junctions has changed, but limited detail has been provided towards the reasoning for this.</p> <p>It is also apparent that the Plan within the SPD reflects the superseded Masterplan for the Phase 1 outline planning application (ref: 18/02289/OM) and again shows the retail centre to the west of the A10. This retail centre has now been relocated to the east of the A10 and to the south of St Mary’s Church and can be seen in the most up to date Masterplan that accompanies the outline application referred to above and is also attached to this letter. The Framework Plan in the SPD should, therefore, be updated to correlate with the outline Masterplan that is currently subject to determination.</p>
Metacre	<p>With regards to terminology, the SPD title refers to the South East King’s Lynn Growth Area, but the document text refers to the West Winch Growth Area throughout. This should be revised for consistency.</p>



Respondent	Summary representation
REDACTED	<p>Will land set for green spaces stay in this category and if so, how many years into the future? Other previous allocated green spaces in the village have been developed.</p> <p>The proposed access roads junctions adjacent and opposite of 1 and 2 Rectory Lane cause hazards for parking and access as well as obscuring the junctions.</p> <p>There should be a rail station at West Winch to reduce vehicle movements.</p> <p>Completely surrounding two cottages with modern housing will look odd, de-value the existing cottages and make new adjacent properties less appealing.</p> <p>Access junctions to the WWHAR will make the existing roads into rat runs, the WWHAR should completely bypass West Winch to take traffic away and around. West winch traffic would then use the existing A10 traffic calmed road to the Hardwick roundabout.</p> <p>Trying to save money on the WWHAR by starting at Gravel Hill Lane instead of Oakwood Corner roundabout will not ease traffic going from the south of West Winch to the North or West Winch at all.</p> <p>Existing schools cannot cope with the increase in population, more people will be driving their children to other villages etc from the new West Winch developed locations. What type and size of school is proposed at the North end of the development?</p> <p>Who will be paying for fencing etc where roads, houses and green spaces are adjacent to existing properties?</p> <p>What are “mixed use/Community use” allocated areas going to be?</p>

<p>Sports England</p>	<p>Sport England supports the development of a masterplan to cover this significant growth area within the King’s Lynn area.</p> <p>The proposal is for an additional 2,500 new homes, this will generate demand for new sports facilities, with the potential for 4,000 new homes in the longer term.</p> <p>The proposed infrastructure includes provision for indoor sport and outdoor sport, and Sport England would wish to be involved in the development of this element of the project.</p> <p>The proposals include an indoor sports centre, multi use games areas and sports pitches for outdoor sport.</p> <p>I have received the following input from NGBs for sport:</p> <p><u>Football</u></p> <p>The authority is lacking a Playing Pitch Strategy to provide a suitable evidence base as to current and future needs of residents, and therefore the impact of further development on opportunities to participate in football activities. We would request further information to understand how the infrastructure requirements listed have been decided upon, and the detail of what specifically is to be provided.</p> <p>A PPS is currently in development. We would advocate and expect the PPS to anticipate planned growth within the authority and provide clarity to the appropriate priorities and facility mix aligned to the growth area.</p> <p>A <a href="#">Local Football Facilities Plan (LFFP)</a> was developed for the borough by Knight, Kavanagh and Page (KKP) on behalf of the Football Foundation, and in partnership with the Borough Council of King’s Lynn &amp; West Norfolk, Norfolk Football Association and others. Whilst the LFFP is not a detailed demand and supply analysis of all pitch provision, it does identify priorities/shortfalls for the borough, including:</p> <p>An anticipated significant existing shortfall of Artificial Grass Pitches (AGP).</p> <p>Issues faced regarding poor grass pitch quality at some sites.</p> <p>A need to improve/refurbish several changing pavilions.</p> <p>The LFFP is based on current team numbers at the time of its production and didn’t account for additional demand generated by an increased population. It is expected that challenges currently faced would be exacerbated by growth in the borough.</p>
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Respondent	Summary representation
	<p>The Football Foundation and County FA are working on a project in West Winch at the William Burt Social Club, led by the Parish Council, for changing room and social space improvements. But current planned projects will not satisfy all priorities identified within the LFFP.</p> <p><u>Hockey</u></p> <p>No specific comment other than the focus for hockey revolves around sustaining the two pitches at Lynn Sport so any new demand within in the area will be met by Pelicans Hockey Club.</p> <p><u>Rugby Union</u></p> <p>The West Winch development lies to the south of Kings Lynn, 5 miles from West Norfolk RUFC. With 2,500 homes delivered by 2038 and up to 4,000 in total. This will inevitably have an impact on a club already over capacity!</p> <p>The club already have plans to expand ancillary provision to try to meet the current demand, this is only further exacerbated by the future demand. The PPS is currently in process and nearing Stage C for Kings Lynn so we will be able to factor this into the report, to reflect the future demand and needs of the club to clearly outline any S106 contributions.</p> <p><u>Cricket</u> – no comments received.</p> <p><u>Tennis</u> – no comments received.</p> <p>Sport England would support the development of footpaths and cycleways to encourage people to be more physically active, in line with Active Design principles:<a href="#">Active Design   Sport England</a></p>
REDACTED	Connectivity is vital in achieving wider accessibility, integrating new residents and businesses and it contributes to a healthy community.
REDACTED	The layout of the new development should support active travel by creating new frontages and public open spaces that link the new neighbourhoods and their immediate surroundings.

Respondent	Summary representation
REDACTED	Increasing cycling and walking in the West Winch Growth Area will help tackle some of the most challenging issues around air quality, health and well-being and congestion on the roads. A network of safe and easy-to-use pedestrian and cycle routes will connect the new and existing homes with facilities and services within the Growth Area, with the potential to extend the connectivity further to King’s Lynn and Watlington.

**POLICY REVIEW AND DEVELOPMENT PANEL REPORT**

REPORT TO:	Regeneration and Development Panel		
DATE:	10 <sup>th</sup> January 2022		
TITLE:	Town Deal Project Update		
TYPE OF REPORT:	Requested by the Panel		
PORTFOLIO(S):	Portfolio Holder for Regeneration and Development and Portfolio Holder for Business, Culture and Heritage		
REPORT AUTHOR:	Jemma Curtis, Regeneration Programmes Manager		
OPEN/EXEMPT	Open	WILL BE SUBJECT TO A FUTURE CABINET REPORT:	No

**REPORT SUMMARY/COVER PAGE**

PURPOSE OF REPORT/SUMMARY:
The Regeneration and Development Panel, at their meeting on 8 <sup>th</sup> November 2022 requested an update on the status of the Town Deal Projects. The update is attached.
RECOMMENDATIONS:
To note the update.

# King's Lynn Town Deal Status Update – December 2022

BUSINESS CASE	BUSINESS CASE APPROVAL STATUS	PROGRESS UPDATE	KEY RISKS
<b>PROJECT 1 Youth &amp; Retraining Pledge</b>	Approved – in delivery phase	<ul style="list-style-type: none"> <li>Commissioning of activities has begun with providers on framework</li> <li>Initial recruitment of young people has commenced</li> <li>Continuing networking with organisations that work with young people that are NEET</li> <li>Additional Activity Coordinator to be recruited.</li> </ul>	<ul style="list-style-type: none"> <li>Failure to recruit support organisations/volunteers</li> <li>Failure to recruit participants into the project</li> <li>Failure to recruit SME's</li> </ul>
<b>PROJECT 2 Public Realm</b>	Approved – in delivery phase	<ul style="list-style-type: none"> <li>Art work brief developed and project call to artists launched.</li> <li>Rail Station Street Furniture installation complete</li> <li>Revised design &amp; build procurement approach underway for Pop up kiosks – planning application pending following engagement with Historic England.</li> <li>Purfleet Arch design progressing with suppliers to check cost &amp; buildability.</li> </ul>	<ul style="list-style-type: none"> <li>Price increases on proposed interventions</li> <li>Supplier/contractor supply issues</li> <li>Impact of procurement issues on programme and spend</li> </ul>
<b>PROJECT 3 Multi User Community Hub</b>	Approved – first annual payment pending	<ul style="list-style-type: none"> <li>Business Case Summary Document approved Nov 22.</li> <li>Site acquisition near completion</li> <li>Heads of Terms to be agreed for funding agreement with BCKLWN</li> <li>Procurement of D&amp;B contractor underway</li> <li>Next phase of consultation to commence</li> </ul>	<ul style="list-style-type: none"> <li>Uncertainties around inflation /unforeseen build challenges impacting build costs</li> <li>Delays to project: e.g property purchase, relocation of masts, planning permission</li> <li>Public Realm and MUCH design phases not aligning</li> </ul>
<b>PROJECT 4 Riverfront Regeneration</b>	Approved – first annual payment pending	<ul style="list-style-type: none"> <li>Discussions and due diligence continue with interested parties for Sommerfeld &amp; Thomas site</li> <li>Business Case Summary Document approved Nov 22.</li> <li>Interim Project Manager appointed.</li> <li>Stakeholder engagement planned for early 2023 prior to next design stage.</li> </ul>	<ul style="list-style-type: none"> <li>Securing investor/developer partner</li> <li>Planning permissions</li> <li>Timescales</li> <li>Revenue implications from agreed scheme</li> </ul>
<b>PROJECT 5 Active &amp; Clean Connectivity</b>	Approved – first annual payment pending	<ul style="list-style-type: none"> <li>Active Travel Hub; Invuu commissioned to prepare RIBA stage 3 for Baker Lane site.</li> <li>Motability ways appointed Travel Plan engagement June/July/August 2022. Capacity for 2 further businesses to be recruited.</li> <li>Business Case Summary Document approved.</li> <li>Heads of Terms to be agreed for funding agreement with BCKLWN for LCWIP schemes</li> <li>Progressing scope of behaviour change programme</li> </ul>	<ul style="list-style-type: none"> <li>Planning &amp; permissions for schemes</li> <li>Member, stakeholder, and public support for Active Travel measures</li> </ul>

**PROJECT 6  
St George's Guildhall  
and Creative Hub**

Approved – in delivery  
phase

- NLHF stage 1 application feedback received.
- Communications Plan updated for next phase
- DLUCH approval of Summary Document & first annual payment received.
- Progression of Meanwhile uses and activities of centre.
- CIO submission to Charity Commission. Founding directors appointed.
- Procurement of lead design team for RIBA stage 2 & 3 to commence Jan 2023.
- Discussions and development of relationship with Arts Council progressing.

- Continued engagement with site occupiers
- Securing further match funding
- Community & stakeholder engagement

## REGENERATION AND DEVELOPMENT PANEL WORK PROGRAMME 2022/2023

DATE OF MEETING	TITLE	TYPE OF REPORT	LEAD OFFICER/ ATTENDEE	OBJECTIVES AND DESIRED OUTCOMES
<b>6<sup>th</sup> June 2022 Special Meeting</b>	Appointment of Vice Chair for the Municipal Year			
	Cabinet Report: Update to Town Deal to reflect the revised project prioritisation and changes in funding allocations	Cabinet Report	Jemma Curtis	To consider the report and make any appropriate recommendations to Cabinet
<b>14<sup>th</sup> June 2022</b>	<b>A tour of the Guildhall, starting at 2.00pm, has been arranged for Panel Members prior to the meeting.</b>			
	Appointments to Task Groups and Informal Working Groups	Operational	Democratic Services Officer	
	Portfolio Holder Q&A Session			Questions to be submitted in advance of the meeting
	Local Development Scheme	Cabinet Report	Claire May	To consider the report and make any appropriate recommendations to Cabinet
	Chairs Item – Verbal Update on Caravan Site in King’s Lynn and Coach Park	Verbal Update	Duncan Hall	Verbal Update requested by the Chair.
<b>23<sup>rd</sup> June 2022 Special Meeting</b>	Cabinet Report - Levelling Up Fund	Cabinet Report	Jemma Curtis	To consider the report and make any appropriate recommendations to Cabinet
	Cabinet Report – Guildhall Complex Business Case	Cabinet Report		To consider the report and make any appropriate recommendations to Cabinet
	Cabinet Report – Norfolk County Council Levelling Up Submission	Cabinet Report		To consider the report and make any appropriate



				recommendations to Cabinet
<b>21<sup>st</sup> July 2022</b>	Update on Active Travel Programme	Update requested by the Panel	David Ousby, Jason Richardson	Previous update presented in April and Panel requested it come back in July.
	Multi User Community Hub – Town Deal Project		Jemma Curtis	
	Riverfront Regeneration – Town Deal Project		Jemma Curtis/ Matthew Henry	
	Cabinet Report – CIL proposed changes to the Governance Arrangements		Hannah Wood Handy	To consider the report and make any appropriate recommendations to Cabinet
	Cabinet Report - West Winch Concept Masterplan		Claire May	To consider the report and make any appropriate recommendations to Cabinet
<b>30<sup>th</sup> August 2022 Special Meeting</b>	Cancelled			
<b>13<sup>th</sup> September 2022 MEETING CANCELLED</b>	Southgates Masterplan Public Consultation	Policy Development	Abigail Rawlings	Presentation from BDP
	Town Deal Business Case – MUCH	Cabinet Report		To consider the report and make any appropriate recommendations to Cabinet
	Cabinet Report – Town Deal Business Case ACC	Cabinet Report		To consider the report and make any appropriate recommendations to

				Cabinet
<b>22<sup>nd</sup> September 2022 – Special Meeting</b>	Cabinet Report - Town Deal Business Case – Riverfront	Cabinet Report	Matthew Henry	To consider the report and make any appropriate recommendations to Cabinet
	Cabinet Report - Town Deal Business Case – MUCH	Cabinet Report	Jemma Curtis, Duncan Hall and NCC	To consider the report and make any appropriate recommendations to Cabinet
	Cabinet Report – Town Deal Business Case ACC	Cabinet Report	David Ousby, Jemma Curtis	To consider the report and make any appropriate recommendations to Cabinet
<b>8<sup>th</sup> November 2022</b>	Portfolio Holder Q&A Session			Questions to be submitted in advance of the meeting
	Establishment of a Tourism Informal Working Group	Operational	Democratic Services	To set up an Informal Working Group and agree its Terms of Reference
	HLF Guildhall Update and Next Steps		Jemma Curtis, Duncan Hall and Mike Auger	To receive an update
	Vice Chair Discussion Item – Climate Change and Future Development	At the request of the Vice Chair	Councillor Gidney	Panel discussion
<b>10<sup>th</sup> January 2023</b>	Norfolk Local Cycling and Walking Infrastructure Plan		Jemma Curtis and representatives from Norfolk County Council	
	Cabinet Report – Parkway	Cabinet Report	David Ousby	To consider the report and make any appropriate recommendations to

				Cabinet
	Cabinet Report - West Winch Framework Masterplan	Cabinet Report	Geoff Hall	To consider the report and make any appropriate recommendations to Cabinet
	Guildhall Project – Business Case Budget	Update requested by the Panel	Duncan Hall	
	Town Deal Projects Update	Update requested by the Panel	Duncan Hall and Jemma Curtis	
	Update on Railway Gates as raised at the meeting in November.	Update requested by the Panel	Duncan Hall	
<b>1<sup>st</sup> February 2023 at 4.30pm Additional Meeting &amp; 2<sup>nd</sup> February 2023 at 2.30pm – Additional Meetings</b>	To consider Cabinet Reports scheduled to go to Cabinet on 7 <sup>th</sup> and 8 <sup>th</sup> February 2023. Reports will be split between the two meetings.			
	Cabinet Report - Guildhall CIO Governing Document	Cabinet Report	Duncan Hall	To consider the report and make any appropriate recommendations to Cabinet
	Cabinet Report – Southgates Regeneration Area Development Brief and Next Steps	Cabinet Report	Duncan Hall	To consider the report and make any appropriate recommendations to Cabinet
	Cabinet Report – Levelling up Government Response and Actions	Cabinet Report	Duncan Hall	To consider the report and make any appropriate recommendations to Cabinet
	Cabinet Report – Lynnsport One	Cabinet	David Ousby	To consider the report and

		Report		make any appropriate recommendations to Cabinet
	Cabinet Report – Southend Road, Hunstanton	Cabinet Report	David Ousby	To consider the report and make any appropriate recommendations to Cabinet
	Cabinet Report – Hunstanton Bus Station	Cabinet Report	David Ousby	To consider the report and make any appropriate recommendations to Cabinet
	Cabinet Report – West Winch Collaboration Agreement	Cabinet Report	Geoff Hall	To consider the report and make any appropriate recommendations to Cabinet
<b>28<sup>th</sup> February 2023</b>	Portfolio Holder Q&A Session			Questions to be submitted in advance of the meeting
	Custom Build Task Group – Terms of Reference Review	Requested by the Panel		To review the Terms of Reference and Task Group Membership
	CITB Update	Requested by Councillor Morley	Representatives from the CITB	To provide the Panel with an update.
<b>11<sup>th</sup> April 2023</b>	Portfolio Holder Q&A Session			Questions to be submitted in advance of the meeting

### To be scheduled

- Heacham Beach Development opportunities
- Hunstanton Masterplan Update

**FORWARD DECISIONS LIST**

<b>Date of meeting</b>	<b>Report title</b>	<b>Key or Non Key Decision</b>	<b>Decision Maker</b>	<b>Cabinet Member and Lead Officer</b>	<b>List of Background Papers</b>	<b>Public or Private Meeting</b>
17 January 2023						
	West Winch Framework Masterplan	Key	Council	Development and Regeneration Asst Dir – S Ashworth		Public
	Council Tax Support Scheme 2023/24 (including NoM 11/22)	Key	Council	Finance Asst Dir – M Drewery		Public
	Recommendations from the Urban Wildlife Informal Working Group	Non	Cabinet	Environment and Climate Change Asst Dir – S Ashworth	Informal Working Group Agendas and Minutes	Public
229	Parkway	Key	Council	Development & Regeneration Asst Dir – D Ousby		Public

<b>Date of meeting</b>	<b>Report title</b>	<b>Key or Non Key Decision</b>	<b>Decision Maker</b>	<b>Cabinet Member and Lead Officer</b>	<b>List of Background Papers</b>	<b>Public or Private Meeting</b>
7 February 2023						
	Budget	Key	Council	Finance Asst Director – M Drewery		Public
	Capital Programme	Key	Council	Finance Asst Director – M Drewery		Public
	Treasury Management Policy update	Key	Council	Finance Asst Dir M Drewery		Public
	Shared Prosperity Fund Update	Non	Cabinet	Business, Culture and Heritage Assistant Director D Hall		Public

	Guildhall CIO Governing Document	Non	Cabinet	Business Culture & Heritage Asst Dir - D Hall		Public
	Southgates Regeneration Area Development Brief and Next Steps	Key	Council	Development and Regeneration Asst Dir – D Hall		Public
	Levelling up Government response and actions	Key	Council	Business Culture & Heritage Asst Director – D Hall		Public
	Lynnsport One	Key	Council	Regeneration & Development Asst Dir Companies & Housing Delivery – D Ousby		Public

<b>Date of meeting</b>	<b>Report title</b>	<b>Key or Non Key Decision</b>	<b>Decision Maker</b>	<b>Cabinet Member and Lead Officer</b>	<b>List of Background Papers</b>	<b>Public or Private Meeting</b>
Additional Meeting 8 February 2023						
230	Call in of officers decisions	Non	Council	Leader Monitoring officer		Public
	Southend Road Hunstanton	Key	Cabinet	Development and Regeneration Asst Dir – D Ousby		Public
	Hunstanton Bus Station report	Key	Cabinet	Development & Regeneration Asst Dir – D Ousby		Public
	West Winch Collaboration Agreement	Non	Cabinet	Development and Regeneration Exec Dir – G Hall		Public
	Notice of Motion 16/22 – Peer Review	Non	Cabinet	Leader Chief Executive		Public
	Freedom of the Borough - amendments	Non	Council	Leader Chief Executive		Public
	LUF – Oasis – Update and Site Approval	Key	Cabinet	Leader Asst Dir – D Ousby		Public

Date of meeting	Report title	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
7 March 2023						
	Custom and Self Build Site – Stoke Ferry	Non	Cabinet	Regeneration and Development Assistant Director - D Hall		Public
	Review of Unreasonable complaints Policy	Non	Council	Leader Monitoring Officer		Public
231	Asset Management – Land and Property	Key	Cabinet	Property Asst Dir Property and Projects		Private - Contains exempt Information under para 3 – information relating to the business affairs of any person (including the authority)
	Changes to Council Tax Charges for Long Term Empty Properties and Second Homes for 2024/2025	Key	Council	Finance Asst Dir – M Drewery		Public
	LGA Model Code of Conduct	Non	Council	Leader Asst Dir – A Baker		Public

Date of meeting	Report title	Key or Non Key Decision	Decision Maker	Cabinet Member and Lead Officer	List of Background Papers	Public or Private Meeting
18 April 2023						

**Items to be scheduled**

	Notice of Motion 7-21 – Councillor Kemp – Equalities	Non	Council	Leader Asst Dir B Box		Public
	Procurement Strategy	Non	Cabinet	Finance Asst Dir – D Ousby		Public
	Review of Planning Scheme of Delegation (summer 23)	Non	Council	Development and Regeneration Asst Dir – S Ashworth		Public



**POLICY REVIEW AND DEVELOPMENT PANEL REPORT**

REPORT TO:	Regeneration and Development Panel		
DATE:	10 <sup>th</sup> January 2023		
TITLE:	Parkway Development Update		
TYPE OF REPORT:	Cabinet Report		
PORTFOLIO(S):	Councillor Blunt, Regeneration and Development		
REPORT AUTHOR:	David Ousby and James Grant		
OPEN/EXEMPT	Open with Exempt Appendix	WILL BE SUBJECT TO A FUTURE CABINET REPORT:	Yes

**REPORT SUMMARY/COVER PAGE**

<b>PURPOSE OF REPORT/SUMMARY:</b>
An update of the Parkway Development Scheme, seeking final approval to proceed with the development.
<b>KEY ISSUES:</b>
Members are directed to the attached Cabinet report for full details of the key issues.
<b>OPTIONS CONSIDERED:</b>
Members are directed to the attached Cabinet report for full details of the options.
<b>RECOMMENDATIONS:</b>
The Panel are requested to consider the report and make any appropriate recommendations to Cabinet.
<b>REASONS FOR RECOMMENDATIONS:</b>
To scrutinise recommendations being made for an executive decision.

## REPORT TO CABINET

<b>Open (Appendices 3, 5-7 exempt)</b>		Would any decisions proposed: Be entirely within Cabinet's powers to decide NO Need to be recommendations to Council YES Is it a Key Decision YES			
<b>Any especially affected Wards</b> Gaywood Clock Ward	Discretionary				
Lead Member: Cllr Richard Blunt E-mail: <i>cllr.richard.blunt@West-Norfolk.gov.uk</i>		Other Cabinet Members consulted: Leader and Deputy Leader			
		Other Members consulted: Cabinet			
Lead Officers: David Ousby / James Grant E-mail: <i>corporateprojects@west-norfolk.gov.uk</i> Direct Dial: 01553 616505		Other Officers consulted: Chief Executive, Monitoring Officer, S151 Officer, Interim Projects Technical & Delivery Advisor, Executive Director (Environment & Planning)			
Financial Implications YES	Policy/ Personnel Implications YES	Statutory Implications YES	Equal Impact Assessment YES	Risk Management Implications YES	Environmental Considerations YES
Exempt appendices are not for publication. Paragraph 3 of Schedule 12A of the 1972 Local Government Act is considered to justify that information relating to the financial or business affairs of any particular person (including the authority holding that information).					

**Date of meeting: 17<sup>th</sup> January 2023**

### **TITLE - PARKWAY DEVELOPMENT UPDATE**

#### **Summary**

**An update on the Parkway Development Scheme, seeking final approval to proceed with the development**

#### **Recommendations:**

- 1. That Cabinet recommends to full Council that it approves an amendment to the Capital budget estimate from £48.367m to £54.462m, as detailed in section 9 of the report through a revised Capital Programme.**
- 2. That the Executive Director (Development Services), in consultation with the Portfolio Holder for Development & Regeneration and Monitoring Officer be given delegated authority to approve the final terms of a Project Partnering Contract (PPC) 2000 with Lovell Partnership Limited (LPL) under the Major Housing Partnership Development Management Agreement (30 April 2015) to deliver this project.**
- 3. That the Council shall dispose of the properties as set out in Table 1 of the report, with the affordable and private rented tenures transferred to the Council's wholly owned subsidiaries West Norfolk Housing Company Limited (WNHC) and West Norfolk Property Limited (WNPL).**
- 4. That the Executive Director (Development Services), in consultation with the Portfolio Holder for Environment, the Portfolio Holder for Development & Regeneration, and the Monitoring Officer, determine the future management arrangements for the proposed wildlife and environment site to the East of the development.**

### **Reason for Decision**

- **To deliver on council corporate objectives:**
  - **Delivering growth in the economy and with local housing**
  - **Protecting and enhancing the environment, including tackling climate change; deliver on the council's commitment to be carbon neutral by 2035;**
  - **Improving social mobility and inclusion through stimulation of economic activity in the local area;**
  - **Creating and maintaining good quality places that make a difference to people's lives.**
- **To deliver affordable and private rented (PRS) housing for acquisition by the council's wholly owned housing companies to support the delivery of council corporate objectives;**

## **1. Background**

- 1.1. On 18th September 2018 cabinet recommended to Council, that it enter into a contract with Homes England, to accept their accelerated funding (ACP) offer to bring this site forward. The principal requirement for the ACP funding is that the housing is delivered at 130% of the current market housing delivery rate. The contract was agreed on the basis that this development should be taken forward as part of the Major Housing Contract with Lovell Partnerships Limited to facilitate the acceleration of the development. The ACP funding totals £2,124,716.
- 1.2. In addition to the ACP funding, the development is supported by funding from the Business Rates Pool (BRP) of £200,000. Both the ACP and BRP funding have already been paid to the Council.
- 1.3. On 6<sup>th</sup> August 2019 cabinet approved the purchase of the College of West Anglia (COWA) land and expenditure of £2,063,000 to progress the development prior to a further report on the overall; viability of the scheme.
- 1.4. The scheme will provide affordable dwellings. This is in line with the Council's policy of 15% 'tenure blind' affordable housing homes in King's Lynn. The remaining 85% of homes will be a mixture of for sale and private rented (PRS) properties.
- 1.5. It is proposed that the Affordable and PRS housing will be disposed to and managed by the Council's wholly owned companies
- 1.6. On 3rd August 2021 cabinet considered a report to reduce the scheme from 379 units to a smaller site of up to 228 dwellings, removing the need to develop the adjacent wetland site and construct a bridge over the railway line. This followed concerns and objections to the previously consented scheme. Cabinet resolved that:
  - A new planning application be submitted to a revised scheme of up to 228 dwellings,
  - Capital funding allocation of £45.2m for the development of the site
  - Approve optional environmental enhancements of £1.7m (included within the Capital funding allocation above) as detailed in section 8 of the report.
- 1.7. Since August 2021 significant design development has been undertaken. In parallel there has been significant cost inflation in both the material and labour market. Whilst there has been growth in house sales values in this period, the current global economic situation could lead to a recession and a fall in house values
- 1.8. Lovell Partnership Ltd (LPL) are currently engaged to undertake all necessary pre- development under our existing Development Management Agreement (30 April 2015). To proceed with construction works the council is required to enter a Project Partnering Contact (PPC 2000).

## **2. Update on Progress**

- 2.1. Since the last update to cabinet on the 3<sup>rd</sup> of August 2021 significant work has been undertaken by the Corporate Projects Team and LPL to prepare the scheme for implementation.

- Planning Consent (21/01837/FM) was approved on the 29<sup>th</sup> March 2022 for a scheme of 226 units (**Appendix 1 – Site Plan**).
- A tenure breakdown as detailed within Table 1 has been set.

Table 1 - Tenure Split

Bedrooms					
Tenure	1	2	3	4	Total
Open Market	0	30	78	38	146
Affordable Rent	8	6	8	2	24
Shared Ownership	0	5	5	0	10
Private Rental	15	21	10	0	46
<b>Total</b>	23	62	101	40	226

- A Section 106 agreement for the site has been agreed and entered into by all necessary parties.
- Pre commencement planning conditions have been discharged or awaiting discharge having been submitted.
- Detailed design development has been progressed including house designs, utility infrastructure designs, and highways designs. This includes voluntary carbon reduction measures and environmental enhancements over and above current regulatory standards.
- Utility companies have been engaged and necessary applications / sectional agreements have been progressed.
- LPL undertook an exercise with the local High school, King’s Lynn Academy, to select a marketing name to the development. The name “Florence Fields” was selected after Florence Green, an English woman who at the time of her death was thought to have been the last surviving veteran of the First World War from any country, having served in the Woman’s Royal Air Force. Florence lived in King’s Lynn from 1920 to the end of her life in 2012.
- LPL have undertaken a full financial adjudication of the site outlining all anticipated risks, costs, income sources, and grant funding opportunities. Heir High Level Appraisal is included in **Appendix 3**.

2.2. Designs, investigations, and other due diligence has therefore progressed to a point in which development can commence and start on site.

2.3. An assessment of the investment value of the PRS housing and the impact of the acquisition / revenue cost is included in **Appendix 5** of this report.

### 3. Programme

- 3.1. An updated program for the revised scheme can be seen below. The key stages on the programme (which is governed by the requirements for the ACP funding agreement) are as follows:

Table 2 – Development Programme

ACP funding agreement dates	Original date	Revised date
Start on site of housing development	March 2021	Jan 2023
Start on site of first housing unit (foundation laid)	May 2022	June 2023
Practical Completion (Building Control sign-off final housing unit)	March 2026	July 2026

#### 4. Wider Benefits of the Development

- 4.1. Cabinet agreed the Climate Change Strategy and Action Plan at its meeting on 21 September 2021. The Parkway project will support the Strategy by investing in environmental benefits. These include
- EV Charging points to all properties
  - Enlarged windows to enhance natural daylight
  - Maximisation of Solar PV throughout the scheme
  - Air Source Heat pumps throughout in lieu of gas central heating
  - Thermal efficiency / insulation above Building Regulations requirements
- 4.2. Investment in these measures will not only support the council’s climate change agenda but provide benefits to the new home occupants, particularly with rising energy costs. The final cost of these measures, currently estimated at £1.7m is likely to exceed £2m. The increased cost is included within the LPL contract contingency sums shown in the capital programme estimate table in **Appendix 4** of this report.
- 4.3. Section 5 below details the arrangements for the designation and management of a proposed wildlife site as part of the investment in the Parkway project.
- 4.4. The Parkway project will generate £193,744 In S106 funding detailed in table 3 below, which will be invested in off site open space provision and sustainable travel.

<i>Table 3 – S106 contributions</i>		£
Off Site Commuted Sum Payment		71,464
Sustainable Travel Contribution (£530 per dwelling)		119,780
Travel Plan Review Fee		2,500
<b>Total</b>		<b>193,744</b>

- 4.5. Delivery of 226 high quality, environmental advanced new housing, of mixed tenure, will provide homes to meet the increasing local demand. Through the Council’s wholly owned housing companies West Norfolk Housing Company (WNHC) and West Norfolk Property Ltd (WNPL) the Council will be able to influence and provide homes to meet the increasing demands for housing across all tenure groups. The need for both Private Rented and Affordable Housing is evidenced in the Council Housing Needs Assessment 2020.
- 4.6. Delivery of 226 new homes will support the Council’s revenue budget in that each Band D equivalent property generates £2,000 per annum as detailed in **Table 4** below

<i>Table 4 – average Band D (2022/23) Council Tax precepts for 226 new homes</i>	£
Norfolk County Council	342,831
Police & Crime Commissioner	65,088
BCKLWN	31,498
Parish & Town Councils	12,615
Special Expenses	3,343
<b>Total</b>	<b>455,374</b>

## **5. Proposed wildlife and environment site**

- 5.1. The land to the east of the development site, originally secured for housing under the original Parkway planning consent, has been removed from the housing scheme. A planning pre-commencement condition (condition 25), to provide a scheme for habitat enhancement and associated management and a programme for implementation, will be discharged prior to start on site. An allowance of £50,000 is included within the development costs for surveys, planting, and habitat improvement.
- 5.2. Proposals for the future management of the wildlife and environment site are currently under discussion external trusts that may be able to take responsibility for the site future management.
- 5.3. The proposals have been developed in partnership with Norfolk Wildlife Trust (NWT) – who share the Councils’ environmental aspirations for the site and bring significant experience and knowledge to the project.
- 5.4. The Corporate Project team are undertaking investigations into the best way to manage the site moving forward in consultation with the Council’s Public Open Space Team and will assess options and recommendations for the Portfolio Holder for Environment to consider that provides the best ongoing value to the council and secures the goals for this important area of land.

## **6. Acquisition of land from 3<sup>rd</sup> parties**

- 6.1. The exact location of the Northeast Boundary of the site, adjacent to King’s Lynn Academy (owned by Norfolk County Council), has been disputed. The actual fence line is not aligned to the registered boundary, and there are areas in which both parties’ registration shown ownership.
- 6.2. As part of our due diligence, prior to entering contract with LPL, the team has identified that part of our proposed development site extends onto land owned by Norfolk County Council (NCC). There is a risk that, should agreement not be made with the County Council, that the gardens to some of the properties will fall outside of the demised title.
- 6.3. Whilst the Corporate Projects team is in dialogue with the County Council and believe the transfer of the disputed land will be agreed, if the agreement is not forthcoming, the planning consent can be amended to ensure no works take place on land owned by NCC. This would not require the movement of any properties, roads, or key infrastructure within our design. It would result in around 17 properties gardens being made around 3m shorter. Smaller gardens may result in slightly lower disposal values.

## **7. Transfer of land to 3<sup>rd</sup> parties**

- 7.1. Within housing developments of this scale, there will be parcels of land that

do not fall within any dwelling's demise, but which exist for the benefit of those households. These areas, typically unadopted roads serving a discrete area of the site, will be transferred to management companies set up for the purpose of transferring the responsibilities for managing these areas to the residents they serve. The demise of these parcels to the residents will be through the discharge of a freehold covenant contained within the relevant property titles, through the scheme of delegation by the Executive Director in consultation with the Portfolio Holder.

- 7.2. In addition to the above, there will be parcels of land where an interest will need to be given to other authorities and statutory undertakers. This will include adopted highways and footpaths, and foul and surface water pumping stations. These interests will be granted through a freehold covenant contained within the relevant property titles, through the scheme of delegation by the Executive Director in consultation with the Portfolio Holder.

## **8. Policy Implications**

- 8.1. The site will help deliver on a range of Corporate Business Plan priorities and objectives: –

- Delivering growth in the economy and with local housing by delivering this local plan site allocation, including the delivery of the council's Affordable Housing Policy through a compliant delivery of 15% affordable housing
- Protecting and enhancing the environment, including tackling climate change, by implementing the council's carbon reduction strategy. The environmental enhancements included within the design of the scheme will help to deliver on the council's commitment to be carbon neutral by 2035
- Improving social mobility and inclusion through stimulation of economic activity in the local area through direct and indirect employment, and the creation of apprenticeships within the local construction industry
- Creating and maintaining good quality places that make a difference to peoples lives, through improving open and green spaces that are accessible for all that promote active lifestyles and clean travel options, both within the site and by connecting surrounding neighbourhoods to green travel corridors throughout the town. This will in turn help to improve the health and wellbeing of our communities

- 8.2. The development will deliver 34 affordable homes for the council's wholly owned Affordable Housing Company (WNHC), the establishment of which was approved by Cabinet on 28<sup>th</sup> June 2016.

- 8.3. The development will deliver 46 private rented homes (20% of the total) for the council's wholly owned Private Rented Housing Company (WNPL). The retention for private rent of a minimum of 20% of the housing units developed by the council on large urban sites over 50 units was approved by Cabinet on 8<sup>th</sup> January 2019

- 8.4. The Council will be disposing of the properties under section 123 Local Government Act 1972, which generally provides that a local authority may dispose of land in any manner it wishes. Under the General Disposal Consent (England) 2003 local authorities can dispose of land for less than best consideration, on condition that the undervalue does not exceed two million pounds, and where the authority considers that this will



contribute to the promotion or improvement of economic, social or environmental well-being in its area.

- 8.5. As set out in paragraph 9.19 below, the Council is advised that the proposed disposal to WNHC would be at a undervalue of ca. £1.2m. However, as set out above, the Council considers that the transfer to WNHC promotes a number of policy objectives which justify the disposal at an undervalue, consistent with government guidance on the General Disposal Consent.
- 8.6. Accordingly, the disposal to WNHC would also be subject to section 29 of the Subsidy Control Act 2022, as a Subsidy for Services of Public Economic Interest. The Council would assign and entrust WNHC with the task of using the undervalue towards providing social housing for people failed by the commercial housing market.
- 8.7. Due to economic changes, the amount that WNHC can offer the council for the affordable properties has lowered. An Independent Valuation report dated 3rd November 2022 commissioned by the council (**Appendix 6**) determines a higher valuation for the affordable housing, based on comparable market evidence.
- 8.8. Disposing of the affordable housing to WNHC, at the values given at the date of the valuation report, as shown in **table 5** below, would therefore be at an undervaluation of £1.2m. The actual value at disposal will be subject to further independent valuations by both the council and WNHC.

<i>Table 5 - Affordable Housing Undervalue</i>	000s
WNHC offer	£3,681
Independent Red Book valuation	£4,906
<b>Undervalue amount</b>	<b>£1,225</b>

## 9. Financial Viability Assessment

- 9.1. Total capital expenditure (including commitments) as of December 2022 on the Parkway development to date is shown in **table 6** below.
- 9.2. The Bridge and Road costs relate to the previous planning application for 379 dwellings, granted on 15th April 2021. A report to Cabinet on 21st August 2021 set out the reasons for a revised scheme that excluded a new road bridge and the development of the eastern part of the consented scheme. The costs that cannot be recovered have been absorbed into the project costs are shown in **table 6** below as Bridge and Road Costs.
- 9.3. The pre contract development work on the revised scheme, including costs for work on the design of the previously consented scheme that could be reused, are included above. Main contract works will not commence prior to cabinet approval.
- 9.4. The council's direct costs, comprising mostly engineering consultancy fees in relation to the Bridge & Road costs that are not included within the LPL contract are shown. Legal and valuation fees are shown separately below.
- 9.5. The acquisition cost of the COWA site Land was approved by cabinet on 6th August 2019.
- 9.6. The Corporate Project Team overheads, including the council's external Quantity Surveyor (GCBA) fees to date are included.
- 9.7. Against these costs, the council has received the ACP (£2,124,716) and BRP (£200,000) funding.

<i>Table 6 – expenditure to date</i>	<b>£,000</b>
Bridge and Road Costs	1,799
DMA / DSP Fees (pre contract with Lovell)	1,596
PPC / Costs (main contract with Lovell)	0
BCKLWN Direct Costs	390
Sales, Marketing & Legal	24
Land (adjustments or purchase costs)	1,040
Off Site Contributions (CIL, 106, 287, etc.)	0
Corporate Project Team Overheads – including GCBA Fees	235
<b>Total expenditure to date</b>	<b>£5,084</b>
<b>Total funding received to date (ACP and BRP)</b>	<b>£2,135</b>
<b>Total net cost to date</b>	<b>£2,949</b>

- 9.8. The Corporate Projects Team met with LPL on the 22nd of September 2022 to undertake a full financial adjudication of the scheme. The proposed PPC 2000 is not a fixed price contract - all costs are estimates and subject to change. The Council does however review and approve each subcontractor package prior to entering to ensure the best cost has been achieved
- 9.9. As has been noted within previous reports, there are significant abnormal costs associated with groundworks on the Parkway site, resulting in high build costs. Ground levels needs raising for flood risk mitigation, foundations will need piling, and there are significant water attenuation systems required to manage surface water. A list of abnormal items and their estimated costs is included within the Valuation Report (**Appendix 7**)
- 9.10. **Table 7** below summarises the estimated capital position against that reported to cabinet in August 2021. Since then, there has been significant inflation impacting on the capital requirements of this scheme, however in parallel house price increases have partially mitigated these costs. A more detailed summary including details of significant LPL tender cost increases is included in **Appendix 4**
- 9.11. The current outlook from LPL's Chief Estimator for materials and sub-contractor prices is included in **Appendix 2**. In view of this outlook, the cost estimate summary in **table 7** below includes significant inflation allowances and plot contingencies, where packages of works have not yet been fully costed or agreed. The High-Level appraisal of the LPL contract and revenue forecast is included in **Appendix 3**.
- 9.12. The total LPL tender cost increase is consistent with the General Building Cost Index (GBCI) published in the BCIS quarterly briefing on building costs and tender prices, showing an increase of 14.3% for the year to 2Q2022 (included in **Appendix 2**).

<i>Table 7 – Summary Capital Programme Estimate</i>	Current Estimate	January 2022 Estimate	Movement
<b>Total Development Costs</b>	<b>£48,367</b>	<b>£54,462</b>	<b>£6,095</b>
<b>Total Revenues</b>	<b>-£47,309</b>	<b>-£51,938</b>	<b>-£4,629</b>
<b>Total Funding</b>	<b>-£2,315</b>	<b>-£2,315</b>	<b>£0</b>
<b>Return before financing</b>	<b>-£1,257</b>	<b>£209</b>	<b>£1,466</b>
<b>Borrowing costs</b>	<b>-</b>	<b>£674</b>	<b>£674</b>
<b>Development Return after financing</b>	<b>-£1,257</b>	<b>£883</b>	<b>£2,349</b>

- 9.13. The estimate above includes the cost of development interest of £674,000– the financing costs of the development – from January 2023 through to completion in 2026. The

development cashflow model calculating the development interest is included in **Appendix 6**.

- 9.14. Potential target savings opportunities of circa £771,000 have been identified, as shown in the summary in **Appendix 4**. These mostly related to groundworks and foundation design, which may be achieved once LPL are mobilised on site and the ground conditions have been assessed. These potential savings have not been taken in the total costs at this stage.
- 9.15. The estimate has not included additional revenue generated from the sale of “Inspirations” - those items sold to the incoming occupants (including carpets). Data from sales at NORA 4 indicates an allowance of £1,000 per open market property would be a conservative estimate.
- 9.16. Disposal of the PRS homes to WNPL has been factored in the LPL High Level Appraisal shown in **Appendix 3** at a discount of 10% of Open Market Value, based on a bulk purchase discount, which has an impact on the anticipated revenues. The principle of a 10% discount on market value (which would deliver significant savings on legal fees) and the reasons to support it were detailed in the business plan for WNPL which accompanied the report to council on 8<sup>th</sup> January 2019.
- 9.17. The independent valuation report (**Appendix 6**) presents a higher market value for the PRS, albeit without applying a discount of 10% for a bulk purchase arrangement,
- 9.18. The actual value at disposal will be subject to a further independent valuation by both the council and WNPL, on a Fair Value basis. For the purpose of the financial appraisal, the total development cost for the PRS dwellings has been calculated as **£9,453,000** (pro-rata total development costs) and the impact of the investment by the council into PRS properties through WNPL has been presented in **Appendix 5**.
- 9.19. The scheme retains the environmental enhancements identified in the August 2021 Cabinet report, over and above the requirements to comply with Planning and Building Regulations, including:
- EV Charging points to all properties
  - Enlarged windows to enhance natural daylight
  - Maximisation of Solar PV throughout the scheme
  - Air Source Heat pumps throughout in lieu of gas central heating
  - Thermal efficiency / insulation above Building Regulations requirements

## **10. Personnel Implications**

- 10.1. The scheme will be delivered by the Corporate Projects team, using the Major Housing Contract with LPL. As a result, there are no personnel implications. Staff costs and other overheads are included within the council’s revenue budget and are not separately capitalised.

## **11. Environmental Considerations**

- 11.1. Environmental considerations remain unchanged since the previous cabinet report, with Photovoltaic Solar Panels, Air Source Heating, Electric Car Charging, and other environmental technologies remaining core to the sites design approach as outlined in sections 4, 5 and 9 above.

## **12. Statutory Considerations**

- 12.1. The statutory authority for the proposal is contained in s1 of the Localism Act 2014 and

s12 and s95 of the Local Government Act 2003.

12.2. This report complies with the terms and conditions of the Councils contract with Lovell for the Major Housing Project

### 13. Equality Impact Assessment (EIA)

13.1. No relevant impacts

### 14. Risk Management Implications

14.1. The main risks associated with proceeding with the development are as follows:

- Market values fall
- Market values fail to increase as expected
- Cost increase more than anticipated
- Higher than anticipate interest rates
- Borrowing requirement to fund the development phase

14.2. **Table 8** below assess the risk implications, sensitivity and level of risk.

<i>Table 8</i> Risk items	Risk Implications and Sensitivity	Level of Risk
Market values fall	<p><b>Risk</b> In terms of market values, these are anticipated to fall by 11% in 2023, with an overall growth of 3% in the 5 years to 2027. Should the scheme start on site in January 2023 as intended, it is unlikely that more than 7 properties will be completed by the end of the 2023 financial year, limiting exposure to a downturn in property prices.</p> <p><b>Sensitivity/Consequences</b> The sales valuations are bases on current market values, which are due to fall in the near term but recover in the medium term.</p>	Medium
Market values fail to increase as expected	<p><b>Risk</b> The anticipated growth over the 5 years to 2027 does not materialise- property prices either stagnate or fall in real terms</p> <p><b>Sensitivity/Consequences</b> Housing markets are cyclical, but demand for housing remains strong. The council will retain the option of disposing of properties into the private rented market to mitigate this risk. A more detailed assessment of house price forecasts in included within <b>Appendix 5</b></p>	Low

<i>Table 8</i> Risk items	Risk Implications and Sensitivity	Level of Risk
Costs increase more than anticipated	<p><b>Risk</b> Build costs exceed the contingencies allowed for within the LPL contract price, and or other unknown additional / abnormal costs materialise</p> <p><b>Sensitivity/Consequences</b> Significant site investigations, due diligence and supply chain engagement, along with forecast easing of tender inflation shown in the GBCI index (included in <b>Appendix 2</b>), give some confidence that prices will not increase beyond the LPL contract price. Likely savings of £771,000 have been identified. Should costs and revenues increase / decrease by 5% respectively, a worst-case scenario could result in a loss of circa £5m, with a best-case scenario delivering a surplus of circa £4.6m. Capital estimates will be regularly monitored and reported to cabinet. The estimated development return shown in this report is the best estimate that can be provided to members at this point in time.</p>	Medium
Higher than anticipated interest rates	<p><b>Risk</b> Mortgage interest and PWLB rates continue to increase</p> <p><b>Sensitivity/Consequences</b> Markets have priced in future interest rate rises with an increasing number of mortgage products available that are on rates that are decreasing. Current PWLB rates for 25-year maturity loans are stable at around 4.48%. BoE recession forecasts make it unlikely to support prolonged increases in base rates.</p>	Low
Borrowing requirement to fund the development phase	<p><b>Risk</b> Council is required to use PWLB borrowing to support the development of the scheme, and to fund the purchase of properties for the wholly owned companies</p> <p><b>Sensitivity/Consequences</b> The peak debt during the development phase is around £15m, due to cash inflows from sales offsetting expenditure, with the net position at the end of the development near neutral. The borrowing for WNHC to acquire the affordable housing (which represents 6.1% of the total development costs) is agreed at 4.5% above BoE base rate, which insulates the council from the borrowing requirement risk. The WNPL financial viability assessment shows a return on investment to the council and is included in <b>Appendix 5</b></p>	Low

## 15. Conclusions

15.1. The proposed development will deliver on a number of corporate objectives:

- Delivering growth in the economy and with local housing
- Protecting and enhancing the environment, including tackling climate change
- Improving social mobility and inclusion, and
- Creating and maintaining good quality places that make a difference to people's lives

- 15.2. Should the scheme not proceed, the council will have expended £4.5m on the site. There would be a risk that, in addition to the expenditure to date, Homes England would seek to recover the Accelerated Construction Funding of £2.125m, depending on what the future plans are for the development site.
- 15.3. The council is under a contract with Homes England to deliver the housing at a pace determined by the Accelerated Construction Programme agreement. If there is a delay in progressing with the scheme, Homes England would determine that the council is in breach of the funding agreement, and may take remedial action, including recovery of grant funding.
- 15.4. Should the council seek to dispose of the site to a 3rd party for development, this may be an option, however recovery of the £4.5m expended to date could be challenging, given the projected out turn costs set out in table 4.

## **16. Declarations of Interest / Dispensations Granted**

16.1. None

### **Background Papers**

Report to Cabinet: 3rd August 2021

Report to Cabinet 21 September 2021 - CAB46 - Climate Change Strategy and Action Plan 2021 – 2024

Affordable Housing Policy April 2011

Housing Needs Assessment 2020

SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES PLAN Adopted September 2016

Report to Cabinet 28<sup>th</sup> June 2016 – CAB33 -Affordable Housing Company

Report to Cabinet 8<sup>th</sup> January 2019 – CAB111 – West Norfolk Property Company – Governance and Business Plan

Report to Cabinet 6<sup>th</sup> August 2019 – CAB37 – Parkway Accelerated Construction Scheme

### **Appendices**

Appendix 1 – Site plan

Appendix 2 - Lovell Partnerships Materials & Subcontractor Q3 Outlook & BCIS index

Appendix 3 - Lovell High Level Appraisal (exempt)

Appendix 4 – Capital Programme Estimate Table

Appendix 5 - WNPL – Parkway PRS portfolio financial viability assessment (exempt)

Appendix 6 – Development Cashflow (exempt)

Appendix 7 – Red Book Valuation (exempt)

**Pre-Screening Equality Impact Assessment**

Borough Council of  
**King's Lynn & West Norfolk**



Name of policy/service/function		Parkway			
Is this a new or existing policy/service/function?		Existing			
Brief summary/description of the main aims of the policy/service/function being screened.  Please state if this policy/service is rigidly constrained by statutory obligations		The creation of 226 new homes of which : -  15% Affordable 20% PRS 65% Private Sale			
<b>Question</b>		<b>Answer</b>			
<p><b>1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups <b>according to their different protected characteristic</b>, for example, because they have particular needs, experiences, issues or priorities or in terms of ability to access the service?</b></p> <p>Please tick the relevant box for each group.</p> <p>NB. Equality neutral means no negative impact on any group.</p>					
				√	
				√	
				√	
				√	
				√	
				√	
				√	
				√	
				√	
				√	
<b>Question</b>	<b>Answer</b>	<b>Comments</b>			
<b>2. Is the proposed policy/service likely to affect relations between certain equality</b>	No				

communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?		
3. Could this policy/service be perceived as impacting on communities differently?	No	
4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	No	Shortage of 'decent' housing in the Borough.
5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions?  If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section	No	<b>Actions:</b>
		<b>Actions agreed by EWG member:</b> .....
<p>If 'yes' to questions 2 - 4 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary:</p> <p>N/A</p> <p>Decision agreed by EWG member:</p>		
Assessment completed by:		
Name David Ousby		
Job title Assistant Director		
Date 29/11/2022		

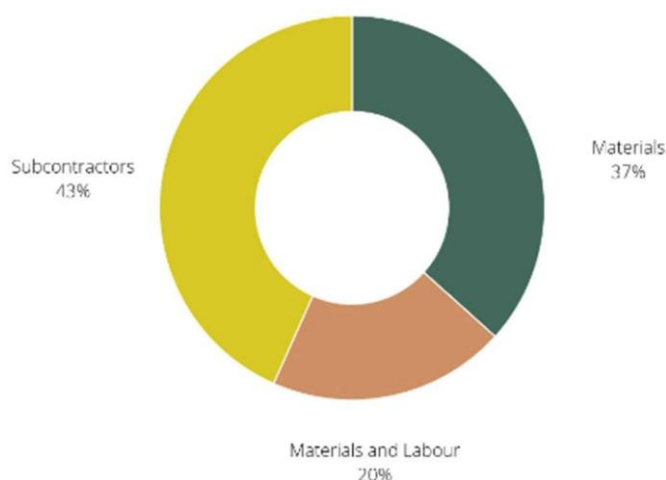


# Appendix 1 – Site Plan



## Appendix 2

### Lovell Partnerships Materials & Subcontractor Q3 Outlook



With output & demand continuing to grow we are unlikely to see any changes in the shorter term, looking further ahead Q2/Q3 next year could start to see a different outlook as whilst the demand for housing will still be there, the non-housing & private sector work is predicted to slow down.

#### Materials

Summary below of materials and few key points worth noting, usually the January increases could be expected to be 3 to 4% but from the notifications being received we can expect significant increases. These are being due to energy cost increases, shortage of raw materials which increases demand which contribute to increase.

The only exception seems to be timber which has reduced from prices seen earlier in year and no further increase being predicted in the short term.

- Timber – No increases expected, prices have reduced from earlier in year
- Bricks – Currently increasing on monthly basis, latest from Forterra in following link [Forterra Price Increase](#).
- Blocks – See below for example below on a standard Durox block how prices have been jumping in recent years, the 12% increase was implemented earlier this year

Product	2018	2019	2019.5	2020	2021	2021.5	2022
Durox 3.6n	8.44	9.16	9.41	9.48	9.78	11.81	13.64

(and another 12+% to come!).

- Roof Tiles – Wienerberger suggesting an increases of 18.90% on Clay tiles, 17% on concrete tiles in December 2022
- Pre-Cast Concrete products – 9.75% increase from 1<sup>st</sup> January 2023, this effects pipework, kerbs, paving slabs, manhole rings etc.
- British Gypsum – from 1<sup>st</sup> January 2023 products increasing between 12 to 17%, this effects plasterboard, plaster, sealers etc.
- Insulations – Knauf insulations have announced increases between 7.3 & 9.3% on glass mineral type insulations coming into effect from 1<sup>st</sup> April 2023, Celotex have 10% increase on PIR products from 1<sup>st</sup> March 2023

## **Sub-Contractors**

On issuing tender enquiries we are still not getting the level of returns of pre-covid due to the high volume of opportunities however there is a feeling that we are now starting to see a change and sub-contractors are getting nervous as we enter 2023. Below is summary from recent feedback and conversations with our supply chain.

- Groundworks – Keen to look at new jobs, resource issues starting to ease
- Brickwork – Labour resource levels still not matching demand, so rates still remain high
- Carpentry – Labour resource still causing problems we are looking at new contractors to ease pressure on current
- Roof Tiling – Similar to brickwork in that very busy, labour shortages and materials prices still causing concern
- Electrical – Level of new enquiries has dropped, keen to start looking at new work
- Mechanical – Again we are looking to introduce new contractors to supply chain to help ease pressure on current
- Decorators – Not quite as bad as the other trades noted
- Plasterers – Ditto roof tiling, materials prices about to rise again and labour shortage concerns

22nd November 2022

**Darren Brannigan**

**Chief Estimator**

**LOVELL**

A MORGAN SINDALL GROUP COMPANY

Update on the Quarterly briefing, September 2022

16-Sep-2022

**Update on the BCIS Quarterly briefing of building costs and tender prices**

September 2022

**BCIS update of tender prices and building costs**

The General Building Cost Index (GBCI) for 2Q2022 has been revised slightly upwards to 432 from 431, and now shows costs rising by 5.6% compared with the previous quarter, and by 14.3% on an annual basis.

The BCIS All-in Tender Price Index (TPI) for 3Q2022 has been revised down to 366 from 371, the figure published in the August 2022 edition of BCIS Quarterly briefing - five year forecast of building costs and tender prices. Prices rose by 1.4% compared with the previous quarter, and by 8.0% compared with a year earlier. The revised index for 3Q2022 is based on the new TPI Panel Index. The panel reported that contractors were keen to maintain their order books which resulted in keen pricing for suitable projects while the spread of tenders received was widening. Contractors were more able to manage inflation by pre-ordering materials and this was resulting in earlier requests for information. Prices of materials continue to move upwards, with fuel and energy prices having the largest impact. Prices for imported European goods continue to escalate and affect trade pricing.

In September, the UK government announced an estimated £150bn support package for businesses and households struggling with record high energy costs. Confirmation of the six-month business support scheme is due in November and there is concern for the end of this month when many businesses reach the end of their fixed price contracts.

The Office for National Statistics (ONS) reports the total volume of new construction orders (excluding infrastructure) in 2Q2022 fell by 13% compared with the previous quarter, or by 16% compared with the same quarter in 2021.

The labour market remains tight with the current cost of living crises continuing to put upward pressure on costs. Availability of suitable labour remains a long-term issue for construction.

The forecast of building costs has been adjusted upwards for 2024, mainly driven by an expectation of increase in wages due to labour shortages and rising living expenses.

Table 1: BCIS Forecast of building costs

Year on year	Forecast	
	Aug 2022	Sep 2022
2Q2022 to 2Q2023	+3.2%	+3.2%
2Q2023 to 2Q2024	+3.6%	+5.8%
2Q2024 to 2Q2025	+3.0%	+3.4%
2Q2025 to 2Q2026	+3.2%	+2.9%
2Q2026 to 2Q2027	+2.2%	+2.4%

Source: BCIS

The forecast of tender prices has been revised down for 2023 due to reported efficiencies in procurement, softening in the materials price growth and increased competition to maintain order books. An upwards adjustment for 2024 is mainly driven by an expected increases in labour costs. Over the remainder of the forecast period, annual percentage changes remain at similar levels.

Table 2: BCIS Forecast of tender prices

Year on year	Forecast	
	Aug 2022	Sep 2022
2Q2022 to 2Q2023	+5.5%	+4.4%
2Q2023 to 2Q2024	+4.7%	+6.9%
2Q2024 to 2Q2025	+3.8%	+4.2%
2Q2025 to 2Q2026	+2.7%	+2.6%

Year on year	Forecast	
	Aug 2022	Sep 2022
2Q2026 to 2Q2027	+2.4%	+2.1%

Source: BCIS

The BCIS new work output forecast remains unchanged from August 2022 publication.

Table 3: Summary of forecasts

	Percentage change 2Q on 2Q				
	2022 to 2023	2023 to 2024	2024 to 2025	2025 to 2026	2026 to 2027
TPI	4.4%	6.9%	4.2%	2.6%	2.1%
GBCI	3.2%	5.8%	3.4%	2.9%	2.4%
New work output*	+4.9 (2022)	+2.0 (2023)	+2.8 (2024)	+2.4 (2025)	+3.0 (2026)

\* Constant prices 2019

## Appendix 4 – Capital Programme Estimate Table

<i>Estimated Capital Programme Position</i>	Current Estimate	Jan 2023 Estimate	Movement
Expenditure	000s	000s	000s
Land Acquisition	£1,040	£1,040	£0
Bridge & Road Abortive Costs	£1,790	£1,790	£0
BCKLWN Direct Costs	£400	£568	£168
Lovell Tender Cost (including marketing and sales costs) -	£45,137	£51,064	£5,927
<b>Significant LPL tender cost increases:</b>	<b>000s</b>		
Contingencies and risk allowance	£2,532		
Materials cost inflation allowance	£1,250		
Provisional allowance for UKPN HV Diversions	£870		
Site levels – increased to gain Environment Agency approval	£350		
Additional flood doors / windows required to meet EA approval for flood resistance	£475		
S278 works – the Highways Authority require a more extensive package of works -	£450		
<b>Total LPL Tender Price Movement</b>	<b>£5,927</b>		
<b>Total Development Costs</b>	<b>£48,367</b>	<b>£54,462</b>	<b>£6,095</b>
<b>Revenues</b>			
Open Market Sales	-£35,612	-£40,413	-£4,801
Affordable rented Houses	-£2,441	-£2,231	£210
Shared Ownership Homes	-£1,363	-£1,351	£12
Private rented Homes	-£7,893	-£7,943	-£50
<b>Total Revenues</b>	<b>-£47,309</b>	<b>-£51,938</b>	<b>-£4,629</b>
<b>Funding</b>			
ACC	-£2,115	-£2,115	£0
Business rates Pool	-£200	-£200	£0
<b>Total Funding</b>	<b>-£2,315</b>	<b>-£2,315</b>	<b>£0</b>
<b>Return before financing</b>	<b>-£1,257</b>	<b>£209</b>	<b>£1,466</b>
Borrowing costs	-	£674	£674
<b>Development Return after financing</b>	<b>-£1,257</b>	<b>£883</b>	<b>£2,349</b>
<b>Target savings</b>	<b>000s</b>		
Groundworks contingency	£625		
Inspirations (carpets, upgrades etc.)	£146		
<b>Total target savings</b>	<b>£771</b>		

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