

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



Cabinet

Agenda

Tuesday, 17th January, 2023
at 3.30 pm

in the

Assembly Room, Town Hall, Saturday Market Place, 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

CABINET AGENDA

DATE: CABINET - TUESDAY, 17TH JANUARY, 2023

**VENUE: ASSEMBLY ROOM, TOWN HALL, SATURDAY
MARKET PLACE, KING'S LYNN**

TIME: 3.30 pm

As required by Regulations 5 (4) and (5) of The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 - Item 15 below will be considered in private.

Should you wish to make any representations in relation to the meeting being held in private for the consideration of the above item, you should contact Democratic Services

1. MINUTES

To approve the Minutes of the Meeting held on 15 November 2022 (previously circulated).

2. APOLOGIES

To receive apologies for absence.

3. URGENT BUSINESS

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

4. DECLARATIONS OF INTEREST

Please indicate if there are any interests which should be declared. A declaration of an 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.

These 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.

5. CHAIR'S CORRESPONDENCE

To receive any Chair's correspondence.

6. MEMBERS PRESENT UNDER STANDING ORDER 34

To note the names of any Councillors who wish to address the meeting under Standing Order 34.

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

7. CALLED IN MATTERS

To report on any Cabinet Decisions called in.

8. FORWARD DECISIONS (Pages 6 - 9)

A copy of the Forward Decisions List is attached

9. MATTERS REFERRED TO CABINET FROM OTHER BODIES

To receive any comments and recommendations from other Council bodies which meet after the dispatch of this agenda.

10. WEST WINCH GROWTH AREA MASTERPLAN (Pages 10 - 238)

**11. COUNCIL TAX SUPPORT SCHEME 2023/24 (INCLUDING NOM 11/22)
(Pages 239 - 257)**

**12. RECOMMENDATIONS FROM THE URBAN WILDLIFE INFORMAL
WORKING GROUP AND ENVIRONMENT AND COMMUNITY PANEL
(Pages 258 - 261)**

13. PARKWAY DEVELOPMENT UPDATE (Pages 262 - 282)

14. EXCLUSION OF THE PRESS AND PUBLIC

The Cabinet is asked to consider excluding the public from the meeting under section 100A of the Local Government Act 1972 for consideration of the items below on the grounds that they involve the likely disclosure of exempt information as defined by paragraph 3 of Part 1 of Schedule 12A to the Act, and that the public interest in maintaining the exemption outweighs the public

interest in disclosing the information.

PRIVATE ITEM

Details of any representations received about why the following reports should be considered in public will be reported at the meeting.

15. PARKWAY DEVELOPMENT UPDATE - APPENDIX (Pages 283 - 345)

To: Members of the Cabinet

Councillors R Blunt, S Dark (Chair), A Dickinson, H Humphrey, P Kunes,
A Lawrence, G Middleton (Vice-Chair) and S Sandell

For Further information, please contact:

Sam Winter, Democratic Services Manager 01553 616327
Borough Council of King's Lynn & West Norfolk
King's Court, Chapel Street
King's Lynn PE30 1EX

FORWARD DECISIONS LIST

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
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
	Parkway	Key	Council	Development & Regeneration Asst Dir – D Ousby		Public

o

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 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

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
Additional Meeting 8 February 2023						
	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
	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)
oo	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

REPORT TO CABINET

Open		Would any decisions proposed :			
Any especially affected Wards	Mandatory/	Be entirely within Cabinet's powers to decide		NO	
	Discretionary /	Need to be recommendations to Council		YES	
West Winch	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 (10th August and 5th 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 weeks¹.
- 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

¹ 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 .

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 nd paragraph Section 11 Delivery 2 nd 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"> • 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 	Section 5 Planning Policy Page 12

	Policies (2011) * Once adopted this will replace the Core Strategy and Site Allocations & Development Management Policies	
Education requirements need to be clarified	New primary school & nursery provision x2 West Winch Primary school extension Two new primary schools (with nursery provision) and expansion of the existing West Winch Primary School	Section 6 Page 14 bullet point 1 under Education
	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'	Connectivity Masterplan Page 21
	Add title – Framework Masterplan showing indicative land uses Show area labelled F on attached plan as open space Key 'Proposed School' to be changed to 'proposed Primary Schools'	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. 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.	Section 7 Page 16
A number of comments related to climate change which should be addressed	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. Locally sourced materials to reinforce the local vernacular would be encouraged.	Section 8 Page 18 under Design and Density – 1 st paragraph
	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. Link to The Future Buildings Standard – GOV.UK (www.gov.uk)	Section 8 Page 18 second paragraph under Climate Change

	<p>The development should must make the most of opportunities to create or improve habitats. <u>This includes the Retention retention</u> 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 1st paragraph under Biodiversity</p>
	<p><u>Sewage & Drainage Sewage and Sustainable Urban Drainage Systems (SuDS)</u></p>	<p>Section 6 Page 14 Page 14 bullet point 3 under Utilities</p>
	<p>The development should must incorporate SUDS <u>in accordance with national and local policies</u> to reduce <u>minimize</u> any increases in surface water drainage <u>runoff and flooding</u></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 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. <u>The Lead Local Flood Authority's Developers Guidance contains practical advice on SuDs. Link: Information for developers – Norfolk County Council</u></p>	<p>Section 8 Page 19 Sustainable Drainage Systems – Last paragraph</p>
	<p>Connectivity is vital to in <u>achieving wider</u> accessibility, integration <u>integrating</u> for new residents and businesses and it <u>contributes</u> to a healthy community.</p>	<p>Section 9 Connectivity and Transport Page 20 1st 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: (shorturl.at/abc45) <u>which can be viewed at: Local Cycling and Walking Infrastructure Plans – Norfolk County Council</u></p>	<p>Section 9 Connectivity and Transport Page 20 second paragraph under Connectivity</p>
	<p>The layout of the new development should contribute <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 3rd paragraph under Connectivity</p>
	<p>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 <u>should connect the new homes with facilities in the new</u></p>	<p>Section 9 Connectivity & Transport Page 20 1st paragraph under Pedestrian & Cycle Access</p>

	<p>neighbourhoods and link the new development to existing facilities in West Winch and King's Lynn.</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

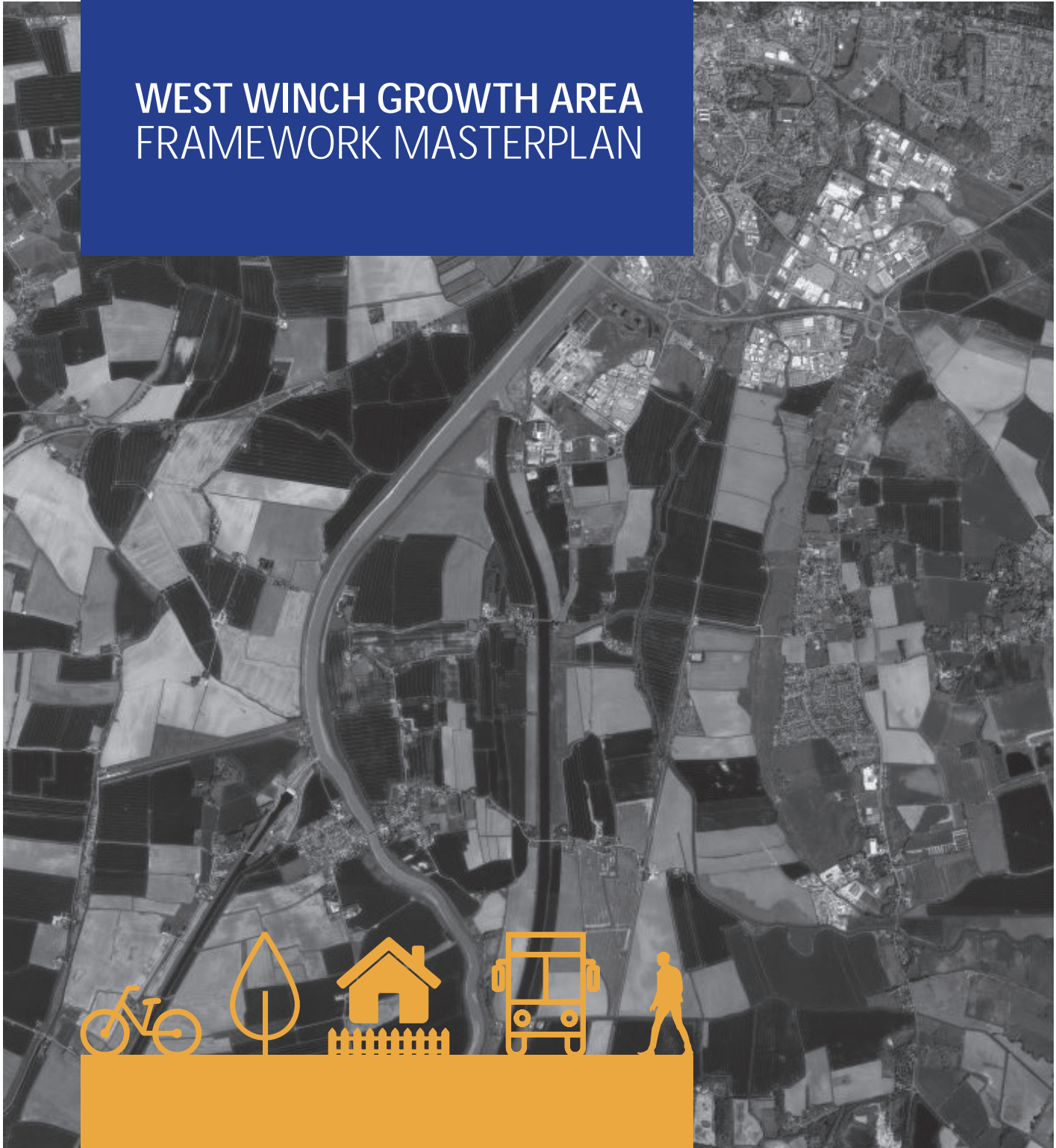
APPENDIX 2: Statement of Consultation

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.				
Question	Answer				
<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 according to their different protected characteristic, 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		

Question	Answer	Comments
<p>2. Is the proposed policy/service likely to affect relations between certain equality 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?</p>	No	
<p>3. Could this policy/service be perceived as impacting on communities differently?</p>	No	
<p>4. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?</p>	No	
<p>5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions?</p> <p>If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section</p>	No	<p>Actions:</p> <hr/> <p>Actions agreed by EWG member:</p> <p>.....</p>
<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>Decision agreed by EWG member:</p>		
<p>Assessment completed by:</p> <p>Name</p>	<p>Claire May</p>	
<p>Job title</p>	<p>Planning Policy Manager</p>	
<p>Date</p>	<p>7 November 2022</p>	

WEST WINCH GROWTH AREA FRAMEWORK MASTERPLAN



SUPPLEMENTARY PLANNING DOCUMENT
Updated 23 November 2022

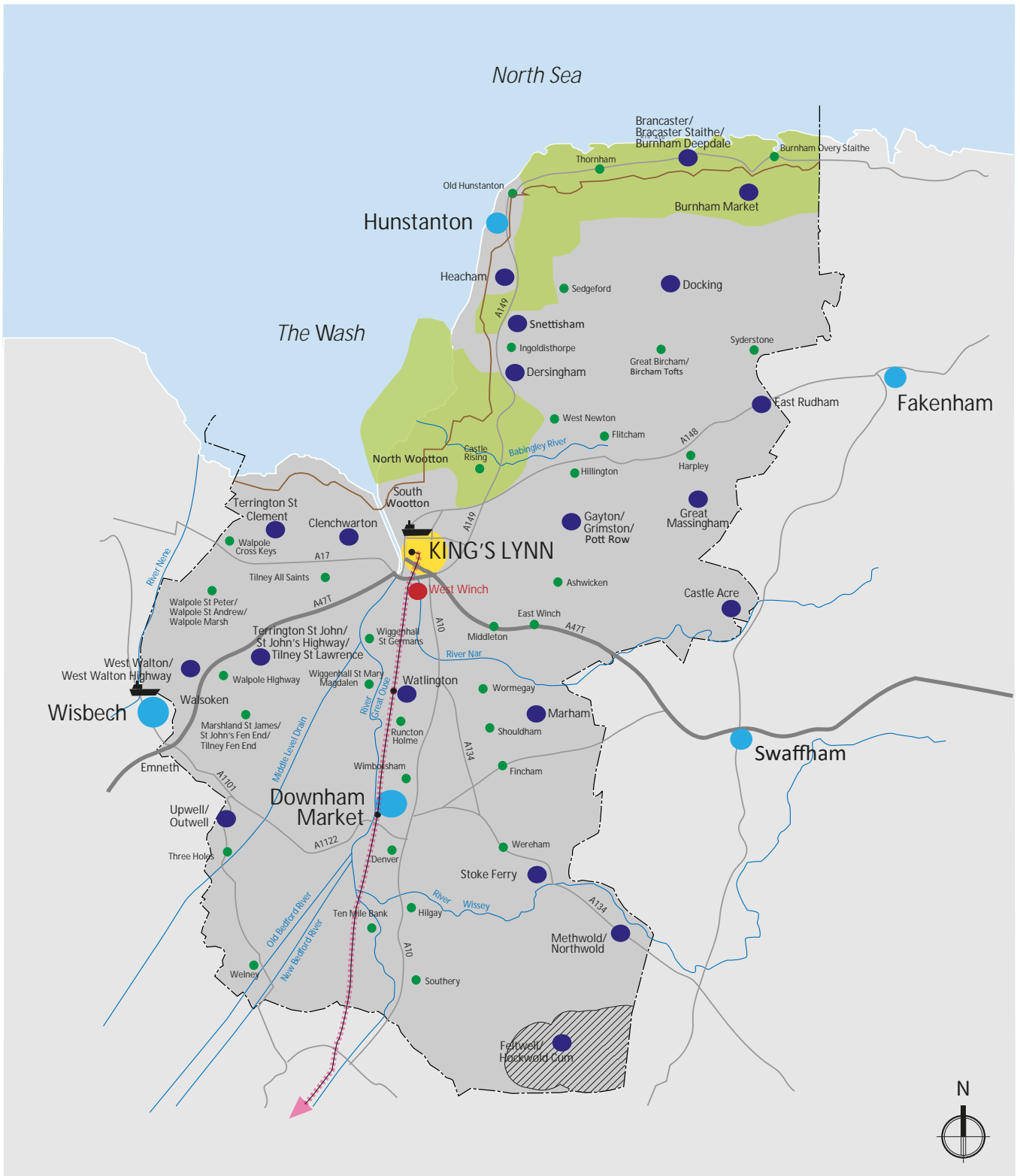




Red Line denotes Site Allocation E2.1 extents


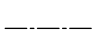











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BOROUGH CONTEXT PLAN

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 | | |

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.

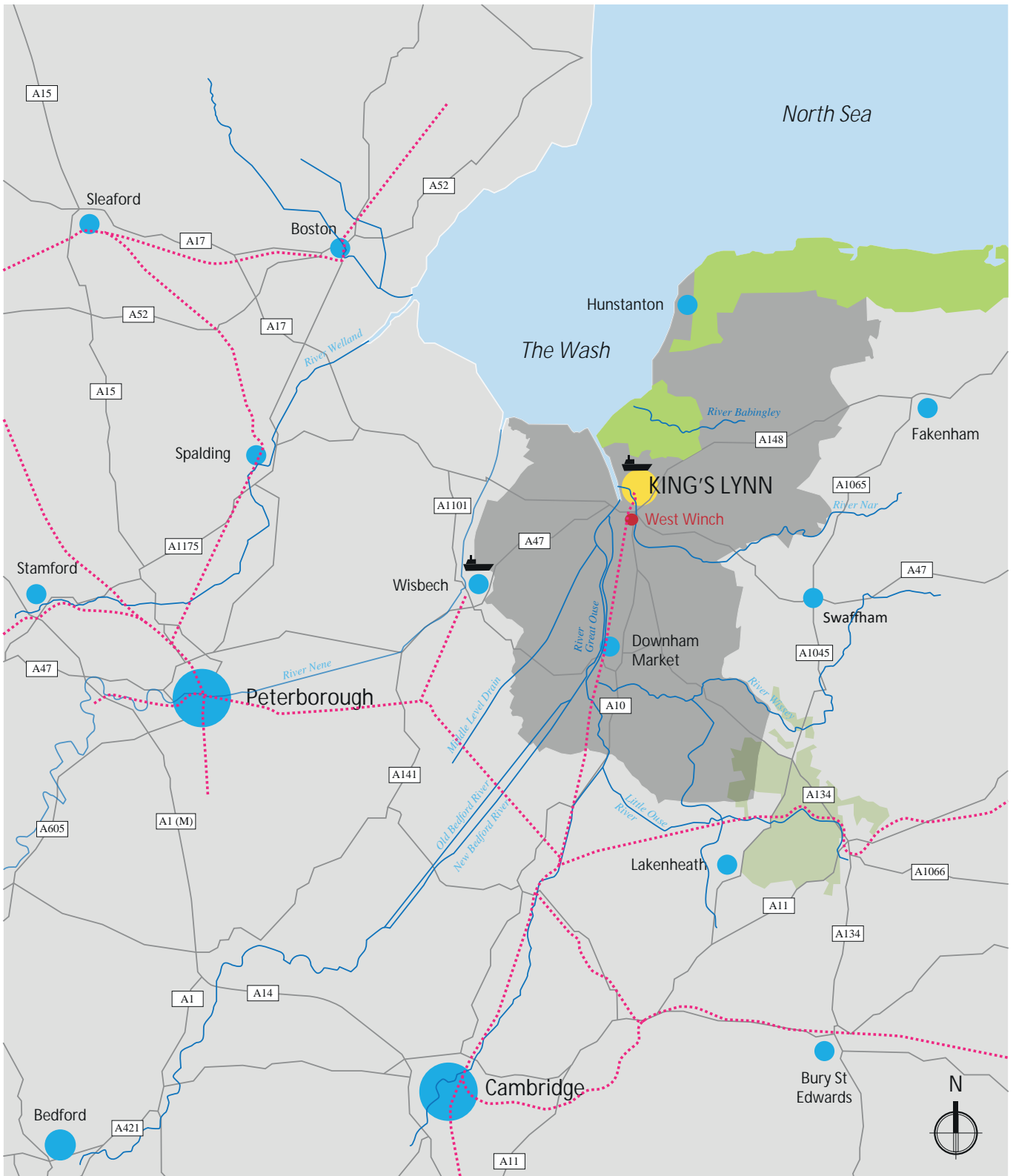
A number of actions have been undertaken in recent years to support the development; these include:

- 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

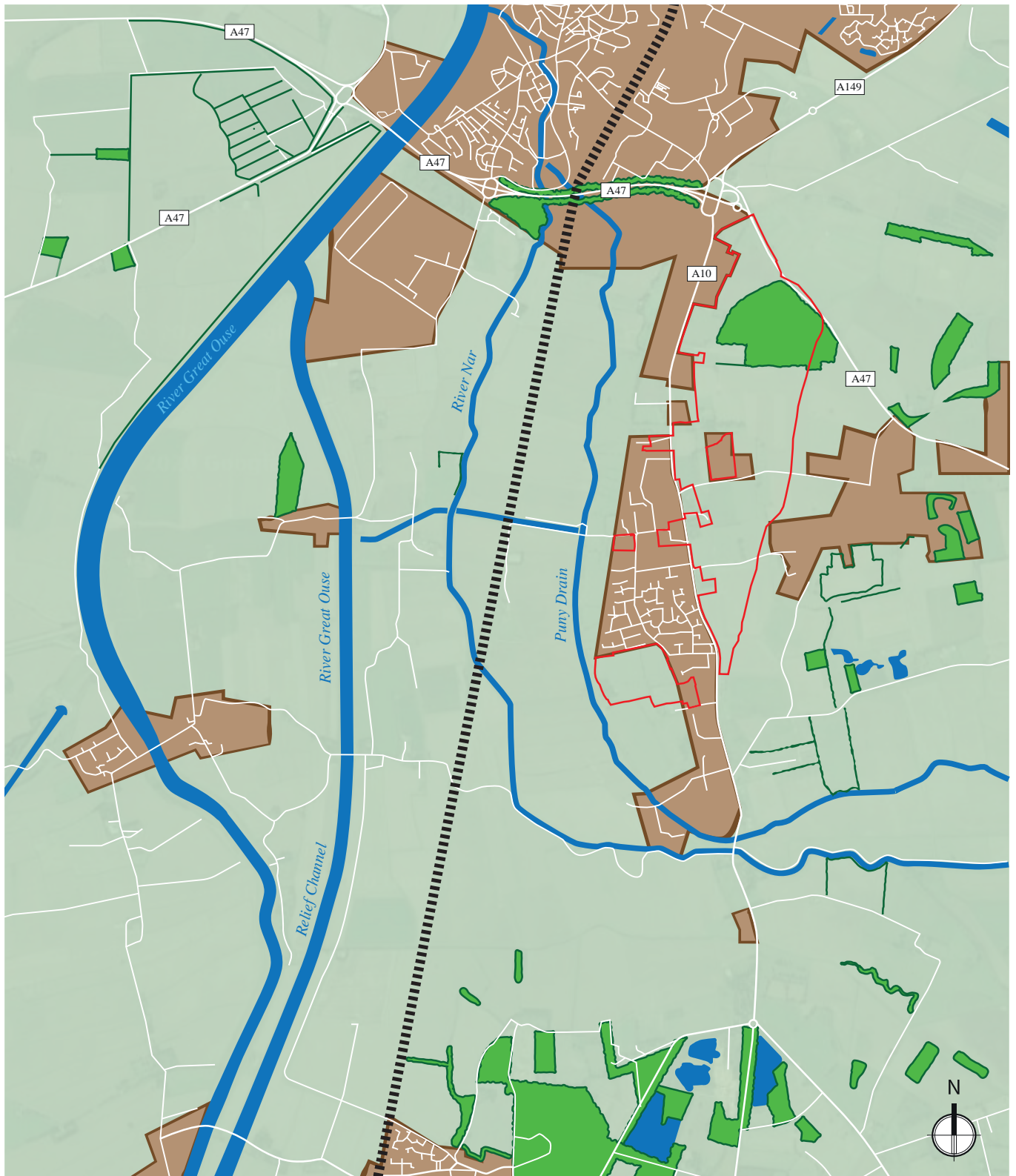
 Main Roads

 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.

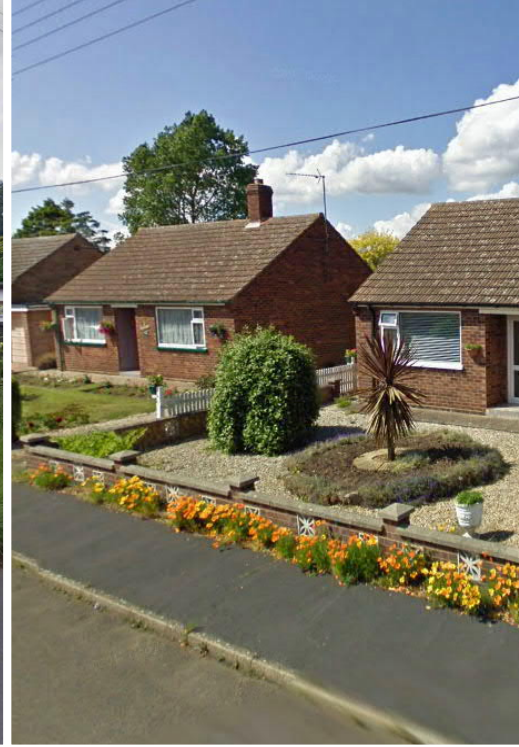
This is appropriate so that significant weight can be given to the final document in considering individual planning applications on the site. It will be a primary document referred to when Section 106 agreements are prepared.

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:

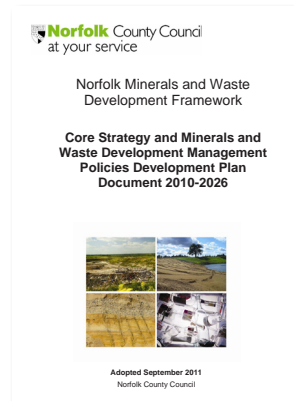
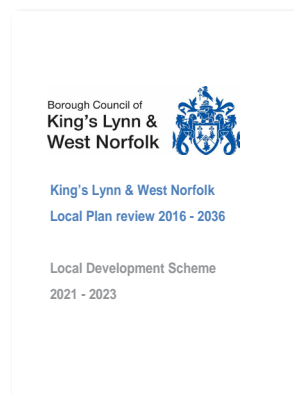
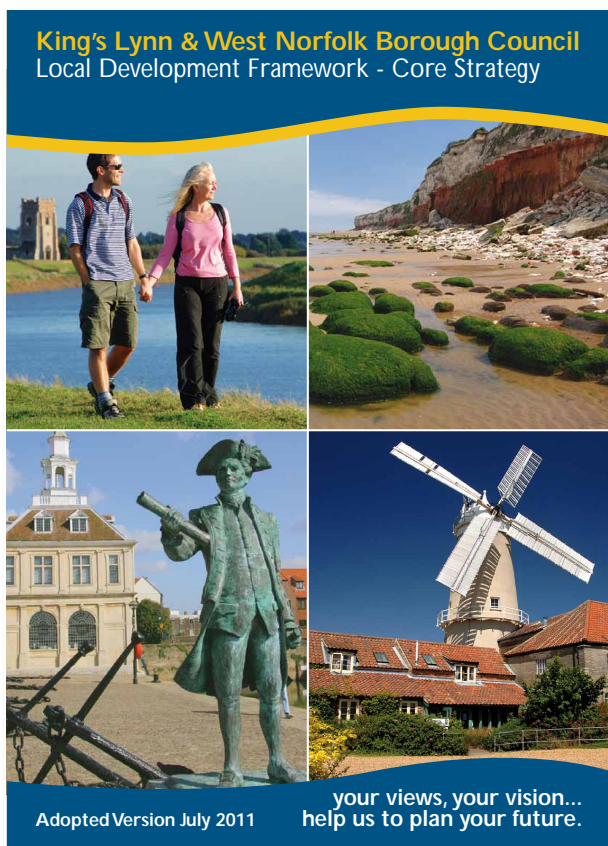
- King’s Lynn & West Norfolk Core Strategy (2011)
- King’s Lynn & West Norfolk Site Allocations and Development Management Policies (2016)
- King’s Lynn & West Norfolk Local Plan review*
- North Runcton & West Winch Neighbourhood Plan (2018)
- Norfolk Core Strategy and Minerals and Waste Development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

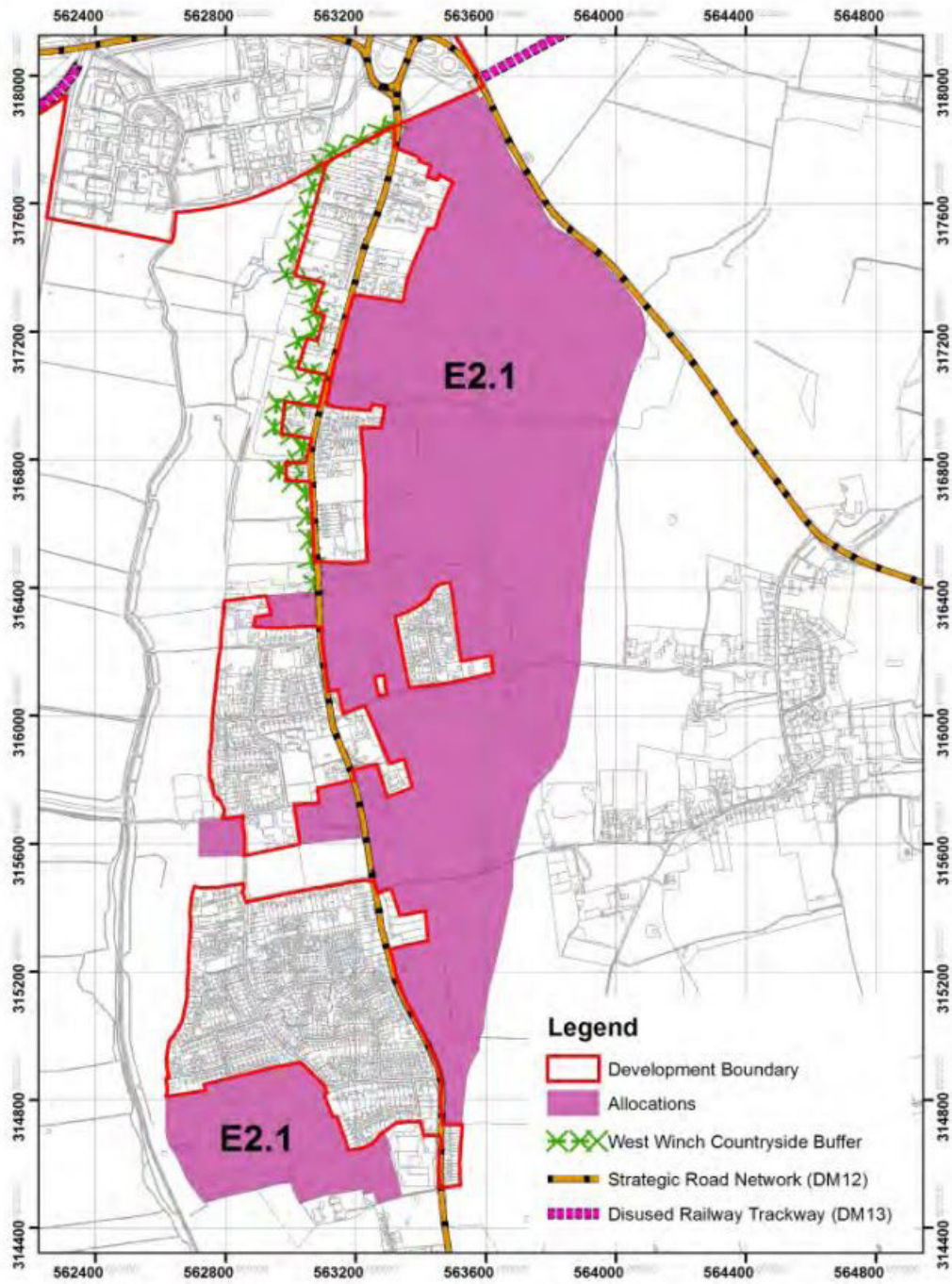
The West Winch Growth Area Strategic Policy in the Site Allocations and Development Management Policies and in the Local Plan review set out the key strategic outcomes for the area. The full text of the relevant policy documents are available on the Council’s website:

www.west-norfolk.gov.uk/homepage/19/planning_policy_and_local_plan

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

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.

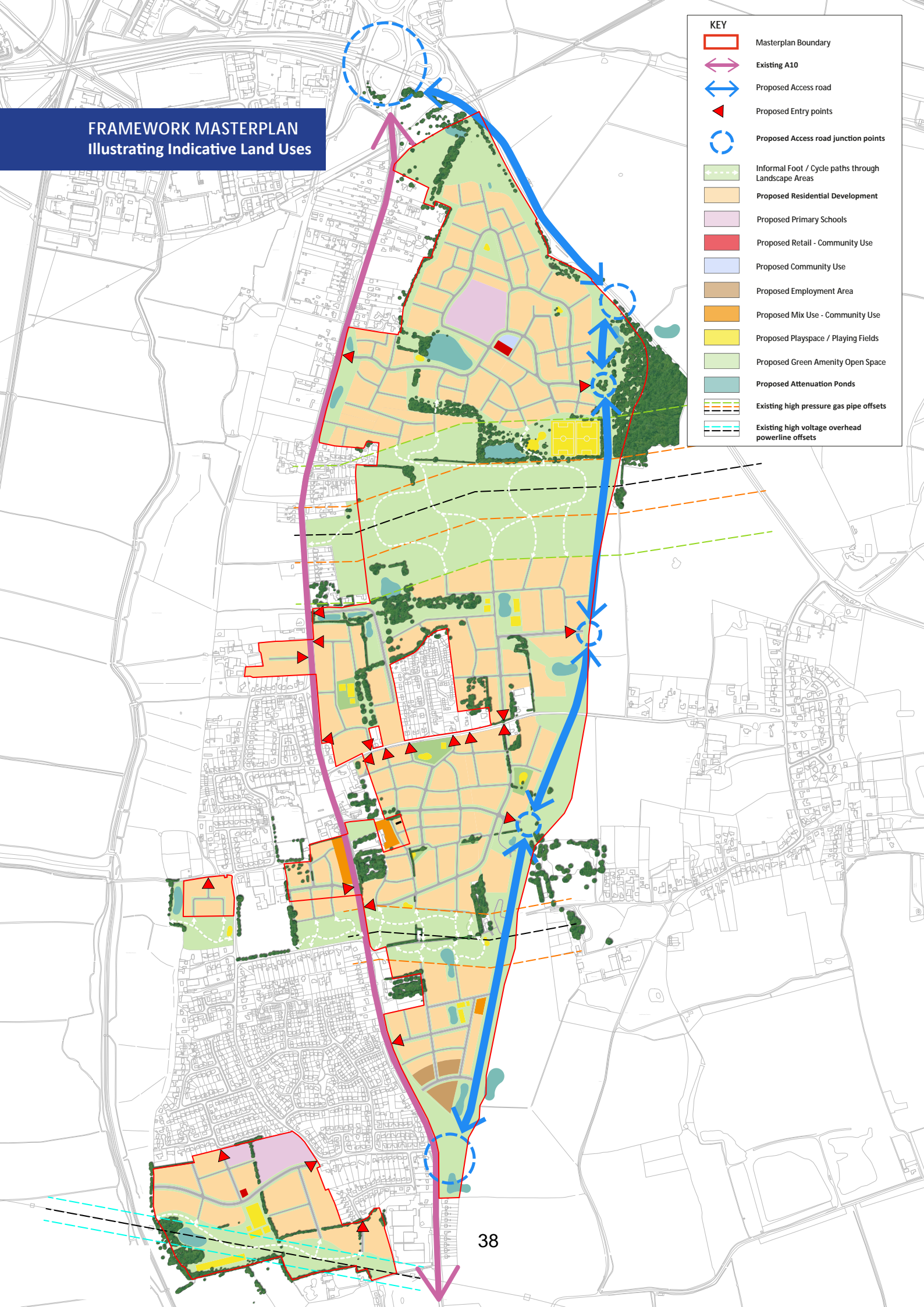
The Growth Area boundaries define where development is considered suitable. In identifying these boundaries consideration was paid to maintaining a degree of separation between the village of North Runcton and the new neighbourhoods, and good integration with the existing development and facilities in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



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

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

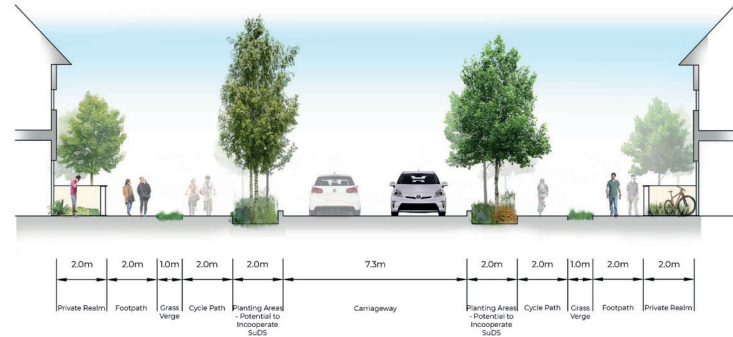
The need to improve the existing bus connectivity was identified in responses to earlier consultations. Development layouts should allow for a revised or new bus service connecting the growth area to King’s Lynn. Further work is required to establish how the increased housing numbers can help deliver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

Pedestrian + Cycling Access

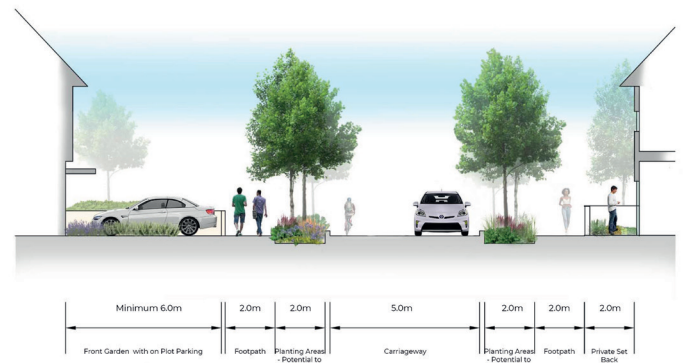
Increasing cycling and walking in the West Winch Growth Area will help tackle some of the most challenging issues around air quality, health and well-being and congestion on the roads. A network of safe and easy-to-use pedestrian and cycle routes will connect the new and existing homes with facilities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

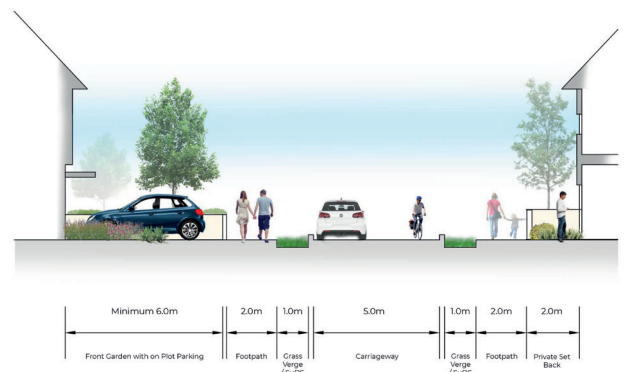
As well as allowing movement, the green links also offer opportunities for recreation and amenity space; ecological enhancement; Sustainable Drainage; and the creation of a transition from the built environment to open countryside.



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

42

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 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

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.

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.

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:

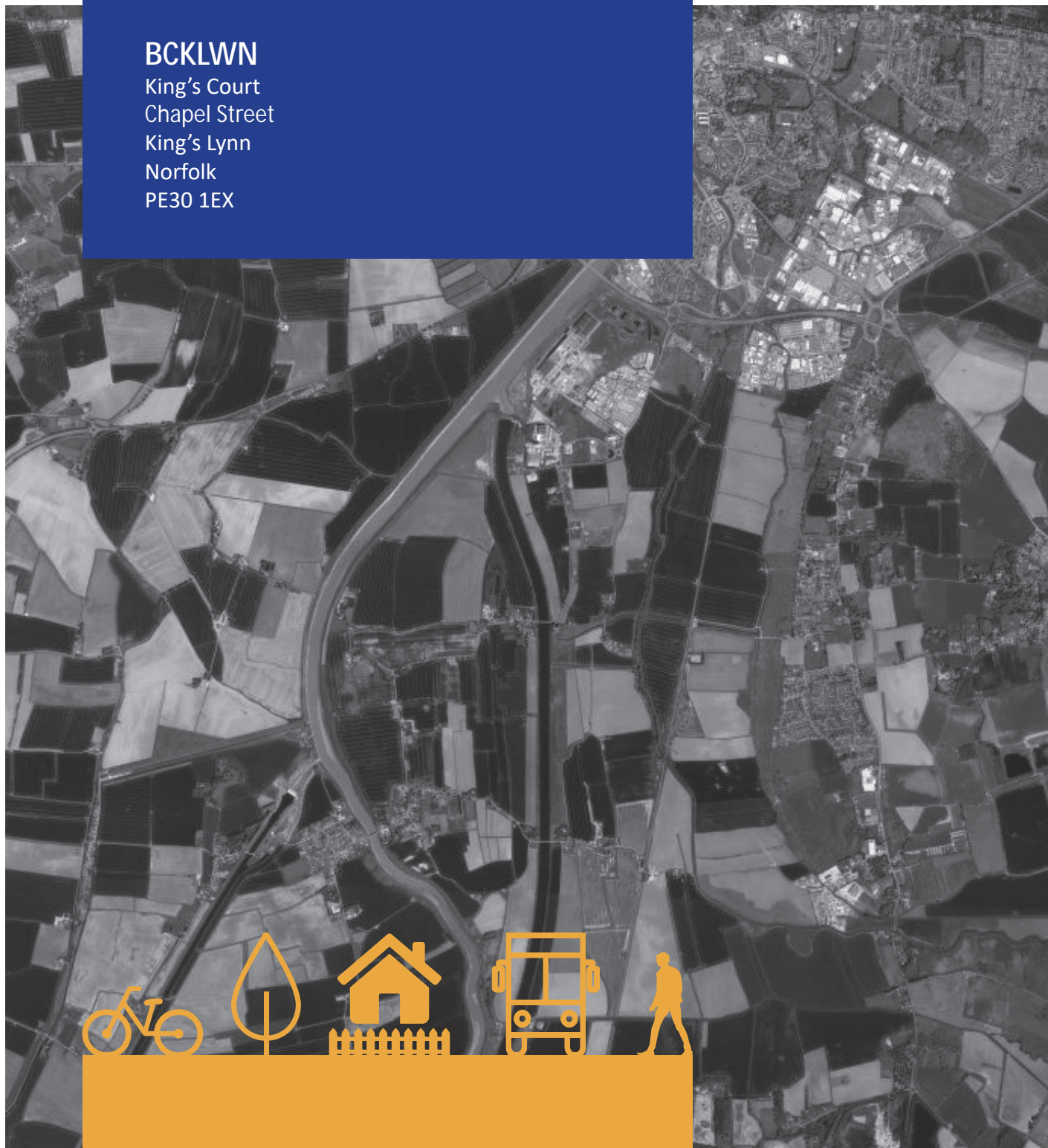
- facilitate the delivery of the West Winch Strategic Growth Area
- coordinate the development and delivery of a comprehensive development of the entire area, and
- consider associated processes for the whole growth area.



Red Line denotes Site Allocation E2.1 extents

BCKLWN

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



APPENDIX 1 CONSULTATION RESPONSES

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
1. ROLE OF FRAMEWORK MASTERPLAN			
<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> <ul style="list-style-type: none"> “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>Section 1 continues:</p> <ul style="list-style-type: none"> 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.” 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>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>	<p>A supplementary planning document supports the policies in the adopted plan and will be a material consideration in the determination of planning applications once it is adopted, hence the consultation document is written in the future tense. It does not (and cannot) add any additional policy requirements than in the adopted local plan which was found sound through the examination process.</p> <p>The document makes reference to (and a link to) the Infrastructure Delivery Plan for the growth area which sets out details of the infrastructure requirements including primary school provision. NCC are the education authority, and they confirm that there is no requirement for a secondary school on the site instead provision will be made by the expansion of existing secondary schools in the area through developer contributions.</p> <p>The IDP for the growth area sets out that land provision for a health centre will be made and the masterplan indicates where this may be located.</p> <p>The IDP for the growth area sets out the range of infrastructure which is summarised on page 14.</p> <p>The document sets out that better bus services are needed, and development layouts need to allow for a new bus service, pedestrian and cycle routes will be provided on site and these are shown indicatively on the masterplan. Developer contribution will be required to provide bus services.</p>	<p>None</p>

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West Winch Parish Council North Runcton 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. As noted above – we don't think this document achieves the stated goals stated in the last three paragraphs of page 5.	The North Runcton and West Winch Neighbourhood Plan supports the development by providing detailed policies for the West Winch Growth Area (Policies GA1 to GA10).	Section 5 Planning Policy Page 12. Changes to make it clear that the policies within the development plan (including North Runcton and West Winch NP) are a consideration in the development management process.
2. WHAT THE SPD CONTAINS			
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.	Noted. Section 7 on page 16 it is highlighted that 'The Framework Masterplan provides a template against which the Council will assess all individual planning applications.' Additional wording to make clear that the detail and location of proposed land uses will be determined at the planning application stage and that the masterplan is indicative Meant to refer to the evolution of the growth area rather than the Framework Masterplan at section 8 page 19	Last Paragraph page 19 under Sustainable Urban Drainage Systems to be changed to: 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. Section 7 Page 16 additional sentence: 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.
3. CONSULTATION			
4. PLANNING HISTORY			
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.	The SPD does not provide any additional policy requirements than the adopted local plan. The indicative masterplan does use the plans that were submitted as part of the planning application, but the masterplan is indicative and detailed design will be finalised through the planning application process.	None.

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West Winch 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.	Noted. A brief history of the site is provided but it is not necessary for the finite details to be included.	None
North Runcton Parish Council	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).	Comments relate to the planning applications and not wholly relevant for the SPD as it focuses on guiding the planning application. Comments received on the planning application will be considered in the normal way.	None
5. PLANNING POLICY			

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
Castle Rising Parish Council North Wootton Parish Council South Wootton Parish Council	<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"> • 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. • 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. • 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. • 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>Section 5 of the SPD states the following: The relevant policy framework for the site is set by:</p> <ul style="list-style-type: none"> • 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) <p>Not a comment on the SPD.</p>	<p>None</p>
6. INFRASTRUCTURE DELIVERY PLAN			

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Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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>	<p>Noted. The IDP which has gone through a validation process has resulted in the conclusion that 3 shops are a minimum requirement, it is not limited. If there’s demand for more shops, they can come forward.</p> <p>Noted. ‘Library contributions’ means developer contributions towards improvements of library facilities.</p>	<p>None</p> <p>None</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 & 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>	<p>The summary states the same requirements, but it is accepted that the wording could be changed to reflect the wording of the Infrastructure Delivery Plan for the Growth area better.</p> <p>Section 6 is meant to reflect the requirements set out in the Infrastructure Delivery Plan for the Growth Area. Strategic Urban Drainage is included in the IDP and was intended to be covered by the third bullet point under Utilities. Revised wording can be added to make it clear that SuDS are a requirement of the IDP.</p> <p>Section 8 page 19 states that ‘development should incorporate SuDS ..’ The provision of SuDs is a requirement of the local plan policies and national planning policies. Wording can be changed to make it clear that it is a requirement.</p>	<p>Page 14 bullet point 1 under Education to be changed: Two new primary schools (with nursery provision) and expansion of the existing West Winch Primary School</p> <p>Page 14 bullet point 3 under Utilities to be changed: Sewage and Sustainable Urban Drainage Systems (SuDS)</p> <p>Section 8 page 19, first paragraph under Sustainable Urban Drainage Systems (SUDS)</p> <p>The development must incorporate Sustainable Urban Drainage Systems to address surface water drainage.</p>

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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.	The Infrastructure Delivery Plan (IDP) for the South East King's Lynn Strategic Growth Area sets out an assumed combined 1500m2 sports hall (approx. 4 halls) in the area. A link to the IDP is contained in Section 6 of the SPD and a link to the IDP is provided. The IDP recognises sports centres in the 'Community Facilities/Community Use' theme, therefore it can be seen on the masterplan map under 'Proposed Community Use'. They are to be delivered in accordance with phasing plan to be agreed prior to the development. Exact location will be determined at the planning application stage.	None
7. THE FRAMEWORK MASTERPLAN			
REDACTED	Too extensive. North Runcton in danger of losing village identity. too much Greenfield land would be lost forever.	Noted. The extent of the allocation at West Winch has been established through the Site Allocations document which was subject to an independent examination in public and substantive consultation.	None
REDACTED	I cannot see any reference to the A10 which regularly gets long hold ups with cars turning in and out of West Winch	Section 10 of the SPD states that the access road planned for the development will help ensure that the new development has minimal impact on the existing A10 as it passes through the village and address existing traffic problems on the A10 by providing an alternative route around the village. Section 6 of the SPD lists the infrastructure requirements and under Transport there is a bullet point 'Traffic Calming West Winch'. The Infrastructure Delivery Plan for the development specifically requires traffic calming measures through West Winch Village. It is accepted that this isn't clear that these measures in some part relate to the A10. Additional text to be added to the final SPD	Section 6 The infrastructure requirements consist of the following: Transport <ul style="list-style-type: none"> • Housing Access Road Roundabouts • Dualling on A47 east of Hardwick • Traffic calming West Winch (A10) (May included speed bumps, reduced speed limits, pavement build out etc) • Local Road & Streets • Sustainable Transport including, Bus Strategy, Cycle & Shared use pathways
REDACTED 53	Too many houses for that road and just going to cause carnage to the A10	Section 10 of the SPD states that the access road planned for the development will help ensure that the new development has minimal impact on the existing A10 as it passes through the village and address existing traffic problems on the A10 by providing an alternative route around the village. Section 6 of the SPD lists the infrastructure requirements and under Transport there is a bullet point 'Traffic Calming West Winch'. The Infrastructure Delivery Plan for the development specifically requires traffic calming measures through West Winch Village.	None
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.	There are three neighbourhood centres proposed in the Framework Masterplan each of which will have new shops and related uses to enable residents, new and existing, to access local services. The Framework Masterplan references the Infrastructure Delivery Plan for the area which sets out the following green spaces will be provided across the site: 10 ha of playing fields, 6ha equipped play areas, 0.6ha of allotments, 4ha of other green spaces, 28 ha of natural and semi natural green spaces and a multi use play area. The Framework Masterplan shows the indicative location of the greenspaces dispersed throughout the built-up area. The proposed access road and improvements to the A10 are to serve the development and to ease the existing traffic. Development will take place over a number of years and infrastructure will be delivered at certain times – details of the strategic infrastructure delivery is set out in the Infrastructure Delivery Plan for the area referenced in the Draft SPD.	None

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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 & pick up times.</p>	<p>Noted. Section 10 of the SPD states that the access road planned for the development will help ensure that the new development has minimal impact on the existing A10 as it passes through the village and address existing traffic problems on the A10 by providing an alternative route around the village.</p> <p>Noted. Parking and road layout will be determined in the individual planning application.</p>	<p>None.</p> <p>None</p>
REDACTED	<p>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.</p>	<p>Section 6 of the SPD lists the infrastructure that will be provided on site and the Infrastructure Delivery Plan for the area sets this out in more detail. Regarding community space there will be 10 ha of playing fields, 6ha equipped play areas, 0.6ha of allotments, 4ha of other green spaces, 28 ha of natural and semi natural green spaces and a multi use play area.</p> <p>A health centre will also be provided.</p>	None
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 benefits by the way?</p> <p>Funny how we are not asked to comment on Section 9, wonder why?</p>	<p>It is accepted that development will affect the land and some natural habitats. Unfortunately, this is unavoidable. There are however planning policies in place to ensure that development proposals seek to avoid, and where this is not possible, justify, mitigate or compensate for any adverse impacts on biodiversity as well as seeking to enhance sites through the creation of features of new biodiversity interest.</p> <p>From 2023 the requirements for Biodiversity Net Gain (BNG) will come into effect which will require developments to deliver at least 10% biodiversity net gain from November 2023. BNG will be measured using Defra's biodiversity metric</p> <p>Section 8 of the SPD under 'Biodiversity' it states that development should make the most of opportunities to create or improve habitats. Retention of hedgerows and mature trees, use of native species in landscaping, installation of bird and bat boxes and design of lighting schemes can all encourage habitat creation and enhancement.</p> <p>Although parts of the site are accessible to the public via public footpaths the majority of the site is in private ownership. The development proposals will provide 10 ha of playing fields, 6ha equipped play areas, 0.6ha of allotments, 4ha of other green spaces, 28 ha of natural and semi natural green spaces.</p> <p>The online representation form specifically requests comments on Section 9.</p>	None

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Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
<p>REDACTED</p> <p>55</p>	<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>	<p>The Growth Area is located south of, and acting as an extension to, the most sustainable settlement within the Borough, King's Lynn. This position also means it is within the A10/Main Rail Growth Corridor, an overall area identified for growth to take place over the Plan period. There are no plans for a station. The nearest stations are at King's Lynn and Watlington.</p> <p>Planning applications will be considered against the current development plan for the area which consists of National Planning Policy Framework, the Local Plan and the North Runcton and West Winch Neighbourhood Plan. The SPD once adopted will also be a material consideration in the determination of planning applications and will also be the primary document referred to when Section 106 agreements are prepared in relation to the site.</p> <p>The Council encourages meaningful community involvement in all planning applications. There are consultation processes in place for planning applications which is set out in the Councils Statement of Community Involvement.</p> <p>The Framework Masterplan provides indicative locations for egress and access. These will be finalised at the planning application stage. The Growth Area is not envisaged to be developed as a self-contained estate rather a comprehensive and connected development linking existing and new communities.</p> <p>Agreed. The Framework Masterplan on page 21 of the SPD shows the indicative footways and cycle paths through landscape areas which could provide a route from North Runcton to the William Burt Social Club and Village Hall.</p>	<p>None</p>
<p>REDACTED</p>	<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>	<p>Noted. 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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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.</p>	<p>None</p>

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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>	<p>There is no designated conservation area in the vicinity of the site. There is a County Wildlife Site (wooded area known as Sheep's Course Wood) that adjoins the allocation to the northeast. The route for the proposed access road will separate this area from the development so it is not possible to preserve a larger area for open space. However, the Framework Masterplan on page 21 indicates that a pedestrian crossing will be provided at the Hopkins' site to provide access to Sheep's Course Woods. In addition, the development proposals will provide 10 ha of playing fields, 6ha equipped play areas, 0.6ha of allotments, 4ha of other green spaces, 28 ha of natural and semi natural green spaces.</p>	None
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>	<p>Agreed, the Infrastructure set out in the Infrastructure Delivery Plan for the area is very important and will ensure that the necessary transport, education, utilities and community infrastructure is provided.</p>	None
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>	<p>Noted. Additional dwellings will result in additional traffic in the longer term. The Framework Masterplan is high level and indicative, detailed road layout will be determined at planning application stage.</p>	None

<p>CPRE Norfolk</p>	<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>Noted</p> <p>Agreed</p> <p>Development proposals will need to consider the design policies contained within the development plan for the area which includes the National Planning Policy Framework, the BCKLWN Local Plan, and the North Runcton and West Winch Neighbourhood Plan.</p> <p>The Infrastructure Delivery Plan for South East King's Lynn Strategic Growth Area (West Winch) (2018) (SEKLSGA) sets out the key strategic infrastructure that is required to support the housing. The Framework Masterplan SPD identifies that there is a need to improve the existing bus connectivity and that development proposals should allow for a revised or new bus service to King's Lynn. The Framework Masterplan on page 21 of the SPD provides details of a potential bus route. Regarding walking and cycle routes the Framework Masterplan requires that there is a network of safe and easy to use pedestrian and cycle routes to connect new homes and facilities in King's Lynn and West Winch and a shared-use footway and cycleway alongside the new housing access road.</p> <p>There are no plans for a new station. However, the Framework Masterplan could provide more details about access to King's Lynn Station in the LCWIP.</p> <p>The Framework Masterplan (page 18) recognises that there is an opportunity for development proposals to apply best practice to make efficient use of resources and meet energy efficiency and low- carbon targets. It refers to the need for development to seek to meet high standards of sustainable construction and design in terms of energy efficiency, water resources, recycled and reclaimed materials and renewable and low-carbon energy. Local Plan policy requires that a Sustainability and Climate Change Statement is submitted with any planning applications which will need to demonstrate how development is addressing these issues.</p> <p>National policy and guidance do not allow us to seek higher carbon reductions than required by Building Regulations. The government are introducing the Future Homes Standard which through a number of updates to the Building Regulations will require all new homes built from 2025 will produce 40 – 50% less carbon emissions than the current Building Regs (2022)</p>	<p>None</p> <p>None</p> <p>None</p> <p>Additional wording to be added in Section 9 re connectivity to King's Lynn Station.</p> <p>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.</p> <p>Additional Wording to be added on Future Homes Standard to Climate Change section on page 18</p>
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Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
	<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>		<p>From 2025 development proposals will need to meet the Future Homes Standard. Link to The Future Buildings Standard – GOV.UK (www.gov.uk)</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>	<p>The map on page 17 details 6 junction points on the access road – it also details the proposed entry points which indicate where the new roads may be located. The map on page 21 better demonstrates where the indicative road layout may be. Detailed design will be determined at the planning application stage</p>	None.

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
<p>Norfolk County Council</p> <p>59</p>	<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>Noted</p> <p>The Infrastructure Delivery Plan (IDP) for the South East King’s Lynn Strategic Growth Area sets out the key strategic infrastructure that is required to support the housing objectives of the Growth Area and identifies where and at what time that infrastructure is required, who is responsible for delivering it, the predicted cost of provision and how these costs are expected to be funded or contributed to. A link to the IDP is contained in Section 6 of the SPD and a link to the IDP is provided. The IDP states that the costs for education will be covered by developer contributions.</p> <p>Noted</p> <p>Noted. The detailed location of the primary schools will be done at the planning application stage</p> <p>Noted. The Infrastructure Delivery Plan (IDP) for the South East King’s Lynn Strategic Growth Area sets out 2ha and 3.5ha is required for primary school provision</p> <p>Noted.</p>	<p>Key to Framework Masterplan on page 17 to be changed from ‘Proposed School’ to Proposed Primary Schools’</p> <p>Key to Connectivity & Transport Masterplan on page 21 to be changed from ‘Proposed School’ to Proposed Primary Schools’</p> <p>None</p> <p>None</p> <p>None</p> <p>None</p> <p>None</p>

<p>Historic England</p>	<p>Page 17 Draft Masterplan - Our comments on the masterplan focus on the areas around designated heritage assets.</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 form 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>Noted</p> <p>Planning application for the site will need to be accompanied with the necessary heritage assessment to avoid any significant damage to the grade II listed Old Dairy Farmhouse. Development management policies contained in the Local Plan and the neighbourhood plan will influence the design and character of the area.</p> <p>Noted</p> <p>Noted</p> <p>Agreed. The planning application will include more details on the design of the community space. The focus of this Framework Masterplan is where and how to allocate housing and infrastructure.</p> <p>Noted. The protection of key views can be flagged at the planning application consultation. There are policies in place in the Core Strategy, Site Allocation and Development Management Policies Plan and the Neighbourhood Plan that would provide protection for the views and character of the area.</p>	<p>Wording to be added to Section 8 page 19 to include all heritage asset and to ensure that it is clear that a detailed Heritage Impact Assessment be submitted with planning applications and take account of West Winch HIA.</p> <p>None</p> <p>None</p> <p>None</p> <p>None</p> <p>None</p> <p>None</p>
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Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
61	<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> <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>Noted. A heritage impact assessment has been undertaken for the West Winch Growth Area that follows best practice procedures produced by Historic England, the Chartered Institute for Archaeologists and is designed to meet the requirements of heritage planning policy contained in Section 16 of the National Planning Policy Framework (NPPF).</p> <p>Noted. The detailed design and heritage consultation will be finalised in the planning application. A full Heritage Impact Assessment is required for the development.</p>	

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
West Winch Parish Council North Runcton Parish Council	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.	Noted. The Framework Masterplan on page 21 provides more details on the connectivity of the area including options for sustainable transport modes. The two maps are focusing on different aspects of the development.	Add title to masterplan on page 17 to distinguish.
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.	Noted. The IDP recognises sports centres in the 'Community Facilities/Community Use' theme, therefore it can be seen on the Framework Masterplan map under 'Proposed Community Use'. They are to be delivered in accordance with phasing plan to be agreed prior to the development.	None
8. DESIGN & DEVELOPMENT EXPECTATIONS			
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.	Noted. The land is allocated for development through the local plan which was subject to extensive consultation and an examination.. The Infrastructure Delivery Plan for the Growth Area requires the provision of allotments, health centre, electricity, gas and drainage infrastructure as part of the development.	None
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.	The extent of the allocation at West Winch has been established through the Site Allocations document which was subject to an independent examination in public and substantive consultation and found to be 'sound'.	None
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.	Noted. The Infrastructure Delivery Plan for the growth area identifies issues relating to sewerage improvements in the area. Sewer upgrades needed to serve future development are expected to be funded by developers, if it is necessary to lay off-site to serve the developments then the normal procedure is for the developer to requisition a connection point under Section 98 of the Water Industry Act 1991. The water company will then design and construct a suitable sewer, which may include for enhancements to the downstream sewer system to cater for the proposed flows. All costs associated with the requisition will be recharged to the developer. If a strategic system is required to serve more than one development, then the water company may choose to design the system to cater for the future flows. The developer will then be required to pay for the proportion of costs associated with that development with the remainder paid for by the water company who will recharge those costs as the other developments progress.	None
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.	National policy and guidance does not allow us to seek higher carbon reductions. On 15 June 2022, national building regulations were updated to enhance energy performance standards for new buildings through Part L 2021 which required a 31% uplift in energy efficiency requirements compared to the standard (Part 2013) with the second due when the Future Homes Standard regulations come into force – anticipated in 2025- at which point development proposals would have to demonstrate 40-50 per cent lower than those built to current Building Regulations standards.	Additional Wording to be added on Future Homes Standard to Climate Change section on page 18

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
REDACTED	<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>	<p>It is accepted that development will affect the land and some natural habitats. Unfortunately, this is unavoidable. There are however planning policies in place to ensure that development proposals seek to avoid, and where this is not possible, justify, mitigate or compensate for any adverse impacts on biodiversity as well as seeking to enhance sites through the creation of features of new biodiversity interest.</p> <p>from 2023 the requirements for Biodiversity Net Gain (BNG) will come into effect which will require developments to deliver at least 10% biodiversity net gain from November 2023. BNG will be measured using Defra's biodiversity metric</p> <p>Section 8 of the SPD under 'Biodiversity' it states that development should make the most of opportunities to create or improve habitats. Retention of hedgerows and mature trees, use of native species in landscaping, installation of bird and bat boxes and design of lighting schemes can all encourage habitat creation and enhancement.</p> <p>Regarding green infrastructure there will be 10 ha of playing fields, 6ha equipped play areas, 0.6ha of allotments, 4ha of other green spaces, 28 ha of natural and semi natural green spaces.</p>	None
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>	<p>Policy LP06 of the Local Plan recognises this and encourages development proposals across the Borough to maximise opportunities from solar technologies and through design to support solar orientation and enhance solar gain. Section 8 of the SPD under 'Climate Change' also highlights that 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.</p> <p>Agreed. As set out in the SPD in Section 8 under '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. Design of development will be influenced by the design policies within the West Winch and North Runcton Neighbourhood Plan and the Local Plan.</p> <p>The CCG is responsible for the provision of health facilities and the staffing of these. The provision of the two primary schools will be phased in line with the number of properties to be built. The Infrastructure Delivery Plan for the growth area sets out that the first new primary school will be required at the occupation of 600 dwellings and the second at the occupation of 2,000 dwellings. Attracting professionals to staff the schools and health centre are the responsibility of the CCG and Norfolk County Council.</p>	None

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
REDACTED	We need the road building before any more homes are built	Noted. 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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the The WHAR is expected to begin in 2025, with construction taking around 2 years to complete.	None
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.	The Framework Masterplan (page 18) recognises that there is an opportunity for development proposals to apply best practice to make efficient use of resources and meet energy efficiency and low- carbon targets. It refers to the need for development to seek to meet high standards of sustainable construction and design in terms of energy efficiency, water resources, recycled and reclaimed materials and renewable and low-carbon energy. Local Plan policy requires that a Sustainability and Climate Change Statement is submitted with any planning applications which will need to demonstrate how development is addressing these issues.	None

CPRE Norfolk	<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</p>	<p>Agreed.</p> <p>Noted</p> <p>The Framework Masterplan follows what is proposed to be supported in Policy GA01 in the North Runcton and West Winch Neighbourhood Plan.</p> <p>The Framework Masterplan (page 18) recognises that there is an opportunity for development proposals to apply best practice to make efficient use of resources and meet energy efficiency and low- carbon targets. It refers to the need for development to seek to meet high standards of sustainable construction and design in terms of energy efficiency, water resources, recycled and reclaimed materials and renewable and low-carbon energy.</p> <p>National planning policy does not allow us to specify the type of renewable energy product that developers should use nor to require development to provide less carbon emissions that the Building Regulations seek.</p> <p>Local Plan policy requires that a Sustainability and Climate Change Statement is submitted with any planning applications which will need to demonstrate how development is addressing these issues.</p> <p>Noted</p>	None
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Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
	enable the continuation of West Winch as a distinct settlement which can continue to be characterised by its predominantly rural setting.		
Written rep 005	<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>	<p>The Framework Masterplan (page 18) recognises that there is an opportunity for development proposals to apply best practice to make efficient use of resources and meet energy efficiency and low- carbon targets. It refers to the need for development to seek to meet high standards of sustainable construction and design in terms of energy efficiency, water resources, recycled and reclaimed materials and renewable and low-carbon energy.</p> <p>National planning policy does not allow us to specify the type of renewable energy product that developers should use nor to require development to provide less carbon emissions that the Building Regulations seek.</p> <p>Local Plan policy requires that a Sustainability and Climate Change Statement is submitted with any planning applications which will need to demonstrate how development is addressing these issues.</p>	None

<p>Anglian Water</p>	<p>Anglian Water strongly supports the design and development ambitions of the framework, particularly in relation to climate change, SuDS (Sustainable Drainage Systems), biodiversity, and green infrastructure. 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 <u>water smart communities</u> 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 ' <u>Enabling Water Smart Communities</u>' 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</p>	<p>Support noted.</p> <p>Agreed. It's provided in the SPD that details of SUDS will be dealt with in future detail design and the evolution of the Framework Masterplan and in planning application that come forward.</p> <p>Noted. Water efficiency of residential homes will be dealt with in planning applications for parcels of land that may come forward in the future. The Council appreciates any meaningful and constructive feedback during the consultation of planning applications.</p> <p>Noted</p>	<p>None</p> <p>None</p>
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Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
	<p>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 .</p> <p>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>		
<p>Norfolk Wildlife Trust</p> <p>68</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>Noted</p> <p>Noted.</p>	<p>None</p> <p>None</p>

<p>Norfolk County Council</p>	<p>Natural Environment</p> <p>Arboriculture: 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 <u>Norfolk County Council's Environmental Policy</u> and Pollinator Action Plan.</p> <p>Should you have any queries with the above comments please contact Anne Crotty (Senior Arboriculture and Woodland Officer) anne.crotty@norfolk.gov.uk</p> <p>Ecology: 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 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</p>	<p>Noted. Due to the high-pressure pipelines causing constraints in allocating open space, the designated areas were the most sustainable locations.</p> <p>Noted. Further design details are proposed in the individual planning applications. There are national and local policies in place to ensure that any significant harm to the environment is avoided. Further text could be added to the SPD to emphasise the importance of ancient trees.</p> <p>There are planning policies in place to ensure that development proposals seek to avoid, and where this is not possible, justify, mitigate or compensate for any adverse impacts on biodiversity as well as seeking to enhance sites through the creation of features of new biodiversity interest.</p> <p>From 2023 the requirements for Biodiversity Net Gain (BNG) will come into effect which will require developments to deliver at least 10% biodiversity net gain from November 2023. BNG will be measured using Defra's biodiversity metric</p> <p>Section 8 of the SPD under 'Biodiversity' it states that development should make the most of opportunities to create or improve habitats. Retention of hedgerows and mature trees, use of native species in landscaping, installation of bird and bat boxes and design of lighting schemes can all encourage habitat creation and enhancement.</p> <p>Regarding green infrastructure there will be 10 ha of playing fields, 6ha equipped play areas, 0.6ha of allotments, 4ha of other green spaces, 28 ha of natural and semi natural green spaces.</p>	<p>None</p> <p>Section 8 Design and Density Change 'should' to 'will' in the 3rd para: The development should make the most of these assets to create a sense of place by reflecting and where possible incorporating them into the development.</p> <p>Section 8 Biodiversity Change 'should' to 'must': The development must make the most of opportunities to create or improve habitats. Change the second sentence to: 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 which can all encourage important habitat creation and enhancement.</p>
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Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
	Biodiversity Net Gain calculation (using the Defra Metric) is commissioned at the earliest opportunity to inform the framework masterplan going forwards.		
70 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>	<p>Noted. Any planning application coming forward in the Framework Masterplan area must comply with NPPF, Core Strategy and SADMP policies, which set out requirements for SUDS. Changes to the text can be made to make this requirement clearer.</p> <p>Noted. Additional information about LLFA guidance can be added to the SPD.</p> <p>Noted. Future schemes coming forward will evolve their requirements for the wider site.</p>	<p>Page 19 SUDS Change text in the opening para: The development must incorporate SUDS in accordance with national and local policies to reduce any increases in surface water runoff and flooding.</p> <p>Page 19 SUDS Add text to the last para: The Lead Local Flood Authority’s Developers Guidance contain practical advice on sustainable urban drainage solutions.</p> <p>None</p>
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>Noted. The site is in a sustainable location and it would provide for the necessary number of housing to be provided by the Borough Council, set out in the housing target. There are green spaces designated in the Framework Masterplan, regarding green infrastructure, there will be 10 ha of playing fields, 6ha equipped play areas, 0.6ha of allotments, 4ha of other green spaces, 28 ha of natural and semi natural green spaces. It is accepted that development will affect the land and some natural habitats. Unfortunately, this is unavoidable. There are however planning policies in place to ensure that development proposals seek to avoid, and where this is not possible, justify, mitigate or compensate for any adverse impacts on biodiversity as well as seeking to enhance sites through the creation of features of new biodiversity interest.</p> <p>From 2023 the requirements for Biodiversity Net Gain (BNG) will come into effect which will require developments to deliver at least 10% biodiversity net gain from November 2023. BNG will be measured using Defra’s biodiversity metric</p>	None

Historic England	<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>Noted</p> <p>Noted. SUDS implementation will be detailed when planning applications for parcels of land may come forward.</p> <p>Noted</p> <p>Noted. Planning applications will have to consider the Neighbourhood Plan which lists the non-designated heritage assets, planning policy will require HIA which will identify assests.</p> <p>Noted. Additional text can be added to the SPD.</p> <p>Noted. Planning applications in the masterplan area will be accompanied by a HIA where required to inform the development proposal. National and local policies set further requirements on how to deal with non-designated heritage assets in order to avoid any significant harm to the historic environment in the area.</p> <p>Comments do not relate to SPD.</p>	<p>Page 18 Design and Density Adding to the first paragraph: Locally sourced materials to reinforce the local vernacular would be encouraged.</p> <p>None</p> <p>Page 19 Heritage Include War Memorial and Old Rectory in the list of listed buildings.</p> <p>Page 19 Heritage Change the title to Built Heritage and Archeology. Add new para after the last: Development in the area will need to be accompanied with archaeological assessment where needed.</p> <p>None</p>
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Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
	<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</p> <p>North Runcton Parish Council</p> <p>72</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 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>	<p>Noted. This is a Framework Masterplan that sets out the allocations of uses in the masterplan area. Any planning application that may come forward will need to comply with the development plan for the area the documents that make up the development plan are listed in the SPD.</p> <p>Noted. It is not intended for this document to list policies from other documents – it does refer tot eh development plan for the area including the neighbourhood plan.</p>	<p>None</p> <p>None</p>
<p>Hopkins Homes</p>	<p>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.</p>	<p>Noted</p>	<p>None</p>
<p>9. CONNECTIVITY & TRANSPORT</p>			
<p>REDACTED</p>	<p>Bus services need to be dramatically improved. Good to see cycle paths incorporated. Rail Station would be Beneficial.</p>	<p>Noted. The SPD specifies that improvements to 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. There are no plans for a station. The Framework Masterplan could provide more details about access to the nearby stations</p>	<p>None</p>
<p>REDACTED</p>	<p>Traffic is going to be a nightmare on my opinion</p>	<p>Noted</p>	<p>None</p>

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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>	<p>Noted. 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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the The WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p> <p>Consultation on the WWHAR is due soon. Opportunity to comments on detailed design at that point.</p>	None

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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	<p>Noted. Additional dwellings will result in additional traffic in the longer term.</p> <p>Noted. 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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the The WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p> <p>It is accepted that a development of this size will change the character of the area. Development management policies contained in the Local Plan and the neighbourhood plan will influence the design and character of the area.</p>	None
REDACTED	Priority must be given to full cycle routes physically separated from car traffic to rail stations in Kings Lynn & Watlington	Cycle routes will be designed to recommended local standards, as required by the County Council	None
REDACTED 74	<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>	<p>Noted. 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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the The WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p>	None
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.	Noted.	None

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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>	<p>Noted. The SPD specifies that improvements to 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>	None
REDACTED	<p>The A10 is hard to get out on to without the additional traffic a new development brings. The bypass needs to be completed 1st</p>	<p>Noted. 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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the The WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p> <p>The WWHAR will be subject to a consultation period and that will be an opportunity for residents to raise any concerns.</p>	None
REDACTED	<p>Pulling off my drive onto the a10 really scares me, it can take upto 30 minutes to get off my drive every day</p>	Noted	None
REDACTED	<p>No building should be allowed until a proper bypass is built.</p>	<p>Noted. 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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the The WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p> <p>The WWHAR will be subject to a consultation period and that will be an opportunity for residents to raise any concerns.</p>	None

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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	The masterplan proposes dedicated cycle ways in the masterplan area with potential to extend it towards King's Lynn centre. The Highways Authority has been taken the decision about the design of the layout for the road network. Further consultations will take place on the road network and layout.	None
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>Noted</p> <p>Noted. The phasing of the necessary infrastructure for the masterplan is set out in the Infrastructure Delivery Plan.</p> <p>There is no station proposed for West Winch, however, improved connectivity to King's Lynn and Watlington will enable more people to take trains more conveniently.</p> <p>Noted. The SPD specifies that improvements to 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. There are no plans for a station. The Framework Masterplan could provide more details about access to the nearby stations.</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</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> <ul style="list-style-type: none"> • “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.” • “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.” • 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.” • 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.” • 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. • 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 	<p>Comments relate to planning applications</p>	<p>None</p>
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Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
78	<p>policy E2.1 Part B (d) and (e 1), nor with NCC LTP4 policies, nor SADMP para E2.60.</p> <ul style="list-style-type: none"> 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. 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>The masterplan is indicative only. It is the intention that bus service improvements are provided as part of any development.</p> <p>Comments relate to planning application</p>	
REDACTED	<p>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?</p>	<p>NCC as the Highway Authority are responsible for strategies relating to Bus Services and are currently working on a Bus Service Improvement Plan for the County</p>	None
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>	<p>Noted. The design of SUDS will be determined when planning application for the parcels of land come forward. Developers will be directed to the LLFA Developer’s Guidance at the planning application stage.</p> <p>Agreed. Any planning application that might come forward will need to comply with national and local policies on SUDS.</p>	<p>None</p> <p>None. See above proposed changes to SuDs section</p>

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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.	Detailed design will be in the WWHAR consultation where there will be an opportunity to comment again. All routes/access will have to DDA/Inclusive Design compliance.	None
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>	<p>Noted. This masterplan SPD focuses on the allocation of housing and infrastructure, not the individual design of them. This comment should be made at the consultation about the access road.</p> <p>Noted</p>	<p>None</p> <p>None</p>

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
<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>The plan is indicative. Support for tree planting noted</p> <p>Indicative masterplan. Design of roads will be done at the planning application stage in consultation with the Highways Authority.</p> <p>Trees will be planted in accordance with best practice. The SPD provides indicative plans.</p> <p>This is an indicative masterplan. The location of the school/s will be determined in consultation with the Education Authority at the planning application stage.</p> <p>Comments relate to planning application</p> <p>Not a comment on the SPD</p>	<p>None</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>	<p>Detailed design will be in the WWHAR consultation where there will be an opportunity to comment again.</p>	<p>None</p>

10. WEST WINCH HOUSING ACCESS ROAD

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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.	Noted. Additional dwellings will result in additional traffic in the longer term. It is accepted that a development of this size will change the character of the area. Development management policies contained in the Local Plan and the neighbourhood plan will influence the design and character of the area.	None
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.	Detail of the design of the WWHAR is being undertaken by the Highway Authority. There is a consultation on the WWHAR due shortly where an opportunity for comments can be made.	None
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.	<p>Noted. 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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the The WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p> <p>The WWHAR will be subject to a consultation period and that will be an opportunity for residents to raise any concerns.</p>	None
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 of Long Lane the footpath to the shop and woefully inadequate and for a frail person or child ist is an accident waiting to happen.	See above response	None
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.	See above response	None

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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.	See above response	None
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	See above response	None
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.	See above response	None
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?	See above response	None
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 remainso.</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>	<p>Additional dwellings will result in additional traffic in the longer term. It is accepted that a development of this size will change the character of the area. Development management policies contained in the Local Plan and the neighbourhood plan will influence the design and character of the area.</p> <p>It is accepted that development will affect the land and some natural habitats. Unfortunately, this is unavoidable. There are however planning policies in place to ensure that development proposals seek to avoid, and where this is not possible, justify, mitigate or compensate for any adverse impacts on biodiversity as well as seeking to enhance sites through the creation of features of new biodiversity interest.</p> <p>From 2023 the requirements for Biodiversity Net Gain (BNG) will come into effect which will require developments to deliver at least 10% biodiversity net gain from November 2023. BNG will be measured using Defra's biodiversity metric Section 8 of the SPD under 'Biodiversity' it states that development should make the most of opportunities to create or improve habitats. Retention of hedgerows and mature trees, use of native species in landscaping, installation of bird and bat boxes and design of lighting schemes can all encourage habitat creation and enhancement.</p> <p>Regarding green infrastructure there will be 10 ha of playing fields, 6ha equipped play areas, 0.6ha of allotments, 4ha of other green spaces, 28 ha of natural and semi natural green spaces.</p> <p>Noted. The proposed bridges will be consulted on later in the year as part of the WWHAR Consultation to be undertaken by NCC.</p>	<p>None</p> <p>None</p> <p>None</p>

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
REDACTED	The bypass needs to be completed before starting. This will in turn help with access.	<p>Noted. 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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the The WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p> <p>The WWHAR will be subject to a consultation period and that will be an opportunity for residents to raise any concerns.</p>	None
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	See above response	None
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.	See above	None
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>	<p>See above</p> <p>There is a link to the Infrastructure Delivery Plan for West Winch</p> <p>Comments relate to planning applications</p>	None

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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>	<p>Noted. 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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p> <p>The WWHAR will be subject to a consultation period and that will be an opportunity for residents to raise any concerns.</p>	None
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>	See Above	None
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>	See above	None
<p>48</p> <p>Castle Rising Parish Council</p> <p>North Wootton Parish Council</p> <p>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"> • (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 <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>Noted. Section 12 sets out that contributions for the WWHAR and traffic calming measures will be expected to come from Government funding (£50m) and developer contributions (£13.5). Section 6 of the SPD lists the infrastructure requirements and under Transport there is a bullet point 'Traffic Calming West Winch', The Infrastructure Delivery Plan for the development specifically requires traffic calming measures through West Winch Village. It is accepted that this isn't clear that these measures in some part relate to the A10. Additional text to be added to the final SPD.</p> <p>Consultation on the access road will take place later this year, comments can be made at the time. The Council encourages meaningful community involvement in all consultations.</p>	<p>Additional text setting out proposed traffic calming measures to be included in SPD at section 6 page 14</p> <p>Traffic calming measures might include: Speed bumps Reduced speed limits Pavement build outs</p>

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
REDACTED	<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?</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>The masterplan is indicative.</p> <p>Consultation on the access road will take place later this year, comments can be made at the time. The Council encourages meaningful community involvement in all consultations.</p>	None
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>Noted. The access road had been designed by the Highways Authority, consultation on the access road will take place later this year, Anglian Water will be further consulted at the time.</p>	None

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
<p>West Winch Parish Council</p> <p>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>	<p>Noted. The access road had been designed by the Highways Authority, consultation on the access road will take place later this year, further comments can be made at the time.</p> <p>Noted. 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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p> <p>Noted. The SPD specifies that improvements to 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.</p> <p>Noted. Cycling infrastructure will enable residents to access services and facilities without needing a car within the masterplan area, connecting the neighbouring communities and open countryside.</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>
<p>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>Noted. Cycling and pedestrian infrastructure is important to make the masterplan sustainable for current and future residents, offering alternative options to the car. Decisions about the design of the road network were taken by the Highways Authority, consultation will take place later in the year where further comments can be made.</p>	<p>None</p>
<p>11. DELIVERY</p>			

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
REDACTED	As noted in previous sections phasing is critical with low numbers of infill initially allowed with major development taking place following construction WWHAR.	<p>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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p> <p>Consultation on the access road will take place later this year, comments can be made at the time. The Council encourages meaningful community involvement in all consultations.</p>	None
REDACTED	No delivery until access road built	See above.	None
REDACTED 87	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.	The law does not limit noise to certain hours but between 11pm to 7am the Council can enforce restricted permitted noise levels – here are some exceptions, for example some road works need to be carried out at night due to safety reasons or to reduce disruption to the road network. Noise considerations will be addressed during the planning process and noise restrictions will often be applied to planning permissions. For any project where noise becomes an issue, the Council can serve a notice restricting hours and the work that can be done.	None
REDACTED	<p>Infrastructure Viability (Section 106) is still in question, so why are detailed plans from Metacre and Hopkins being considered.</p> <p>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>	<p>Viability of the infrastructure has been undertaken. Comment doesn't relate to SPD.</p> <p>Details about the supporting infrastructure, its costings and phasing is set out in the Infrastructure Delivery Plan. Further details will also come forward in the planning applications.</p>	None

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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>	<p>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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p> <p>Consultation on the access road will take place later this year, comments can be made at the time. The Council encourages meaningful community involvement in all consultations.</p> <p>Details about the supporting infrastructure, its costings and phasing is set out in the Infrastructure Delivery Plan. Further details will also come forward in the planning applications.</p>	None
<p>REDACTED</p> <p>88</p>	<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>. 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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p> <p>Consultation on the access road will take place later this year, comments can be made at the time. The Council encourages meaningful community involvement in all consultations.</p> <p>Details about the supporting infrastructure, its costings and phasing is set out in the Infrastructure Delivery Plan. Further details will also come forward in the planning applications.</p>	None

<p>Environment Agency</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>Noted</p> <p>Noted. Phasing plans of the development has been supplied to Anglian Water and discussions will continue on sustainable water supplies for the area.</p> <p>The IDP referred to in the SPD relates to the infrastructure requirements for the West Winch Growth area. The Infrastructure Delivery plan produced in 2022 relates to the infrastructure requirements for the whole of the Borough in relation to the Local Plan – it incorporates the infrastructure requirements from the West Winch IDP</p> <p>Water efficiency is an important issue and the Local Plan policy will contain the requirement for water efficiency standards when adopted. Planning applications will have to comply with the Building Regulations in relation to water efficiency until that time. Local Plan policies also provide requirements for water re-use and recycling/design etc and are not repeated in the SPD. Additional wording to Section 5 Planning Policy to be added to explain more clearly that development proposals will have to consider the development plan policies.</p> <p>The Council is consulting with Anglian Water to help inform their forward plan in relation to works required for the site. Not a matter for the SPD</p> <p>Agreed. Development proposals will need to submit a site-specific flood risk assessment in line with the SFRA Level 2 at the planning application stage.</p> <p>Noted. This Framework Masterplan SPD is focused on the allocation of housing and infrastructure. The council agrees that the development should be 'future-proof'. Section 8 sets out Sustainable Urban Drainage Systems and further</p>	<p>None</p> <p>None</p> <p>Additional wording to Section 5 page 12 to make it clear that the development plan will need to be taken into consideration in the preparation of development proposals. Also wording about development proposals to consider the new Local Plan once adopted so need to word along the lines of 'The relevant policy framework for the site is set by the development plan for the area which currently consists of'.... Add in * against King's Lynn & West Norfolk Local Plan Review and add a note to say that once adopted this will replace the Core Strategy and Site Allocations and Development Management policies</p> <p>None</p>
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Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
	<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>information will be included in the SPD for developers on SUDS guidance. The Council is open to bring the best fitting solutions for water management into the area, planning applications that come forward will need to comply with national and local policies to ensure sustainable water management. Section 8 of the SPD under 'Climate Change' also highlights that the development should seek to meet high standards of sustainable construction and design in terms of water resources.</p> <p>It is accepted that there have been issues with flooding in West Winch village. It is not the responsibility of the proposed development in the growth area to address this issue. 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</p> <p>Noted. Detailed SUDS design will be available in the individual planning applications.</p> <p>Noted</p>	<p>None</p> <p>None</p>

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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.	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	None
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.	Noted. The Highways Authority will provide comments on highways issues on individual planning applications.	None
12. GOVERNANCE			
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.		None
<p>Castle Rising Parish Council</p> <p>North Wootton Parish Council</p> <p>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"> • (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 <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>	Noted. Section 12 sets out that contributions for the WWHAR and traffic calming measures will be expected to come from Government funding (£50m) and developer contributions (£13.5). Section 6 of the SPD lists the infrastructure requirements and under Transport there is a bullet point 'Traffic Calming West Winch'. The Infrastructure Delivery Plan for the development specifically requires traffic calming measures through West Winch Village. It is accepted that this isn't clear that these measures in some part relate to the A10. Additional text to be added to the final SPD.	Additional text re traffic calming on A10 – see above

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
West Winch Parish Council North Runcton Parish Council	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.	This SPD is a framework for the delivery of the site. Details of the Governance Arrangements is to provide details of the collaborative work undertaken on the growth area with relevant stakeholders	None
Hopkins Homes	The establishment of a Project Board and Delivery Group is supported in principle, subject to further detail on representation and role.	Noted. The Project Board/Team and Delivery Group are already in existence.	None
Metacre	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.	Noted	None
OTHER COMMENTS			
REDACTED 03	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?	Noted. The CCG is responsible for the provision of health facilities – in practice, the available capacity would be reviewed at the time of specific planning applications and the appropriate contributions for additional infrastructure will be sought at that time. The West Winch Growth Area sets out a health centre will be provided on the site. We can't determine where people will work in future but it is expected that some will work in King's Lynn and there are proposed employment areas in the masterplan.	None
REDACTED	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.	Section 10 of the SPD states that the access road planned for the development will help ensure that the new development has minimal impact on the existing A10 as it passes through the village and address existing traffic problems on the A10 by providing an alternative route around the village. Section 6 of the SPD lists the infrastructure requirements and under Transport there is a bullet point 'Traffic Calming West Winch'. The Infrastructure Delivery Plan for the development specifically requires traffic calming measures through West Winch Village. It is accepted that this isn't clear that these measures in some part relate to the A10. Additional text to be added to the final SPD. The CCG is responsible for the provision of health facilities – in practice, the available capacity would be reviewed at the time of specific planning applications and the appropriate contributions for additional infrastructure will be sought at that time. The West Winch Growth Area sets out a health centre will be provided on the site.	Section 6 The infrastructure requirements consist of the following: Transport • Housing Access Road Roundabouts • Dualling on A47 east of Hardwick • Traffic calming West Winch (A10) (may include speed bumps, reduced speed limits, pavement build outs etc) • Local Road & Streets • Sustainable Transport including, Bus Strategy, Cycle & Shared use pathways None
REDACTED	Why do we need 4,000 extra houses? Just greedy and really going to affect people already living in the village	Noted. The proposed development is planned to meet housing targets in the Borough and has been allocated through the local plan process, which was subject to extensive consultation and subject to an independent examination by an Inspector appointed by the Secretary of State.	None

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
REDACTED	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.	It is accepted that there have been issues with flooding in West Winch village. It is not the responsibility of the proposed development in the growth area to address this issue. 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. Detailed SuDS and issues with surface water run off will be dealt with at the planning application stage in consultation with the LLFA	None
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.	<p>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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p> <p>Consultation on the access road will take place later this year, comments can be made at the time. The Council encourages meaningful community involvement in all consultations.</p>	None

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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>	<p>The Council has sought to maximise the delivery of housing within the built-up urban area including through intensification and higher densities of development to make the most efficient use of land and making as much use as possible for previously developed brownfield sites and underutilised land. However, it is not possible to achieve the levels of new housing development which would be required to meet needs within the urban area, and as such there will be a requirement to release land in appropriate locations to accommodate a proportion of development.</p>	None
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>	<p>Noted. The extent of the allocation at West Winch has been established through the Site Allocations document which was subject to an independent examination in public and substantive consultation.</p>	None
REDACTED	<p>This whole plan stinks of greed. No thought for the existing community, countryside or local area in general.</p>	No comment	None
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>	<p>Consultation events were held in the locality of the growth area.</p>	None

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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>	<p>Noted</p> <p>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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p> <p>Consultation on the access road will take place later this year, comments can be made at the time. The Council encourages meaningful community involvement in all consultations.</p>	None
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>	<p>The CCG is responsible for the provision of health facilities – in practice, the available capacity would be reviewed at the time of specific planning applications and the appropriate contributions for additional infrastructure will be sought at that time. The West Winch Growth Area sets out a health centre will be provided on the site.</p>	None
REDACTED 66	<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 (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>	<p>The consultation event was specifically for the Framework Masterplan and not a consultation on any specific planning proposals which residents can comment on through the normal way. There were hard copies of the Framework Masterplan available at the event.</p>	None

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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>	<p>Noted. In Section 6 (page 14) there is a link for the Infrastructure Delivery Plan which sets out the necessary infrastructure that will be implemented in a timely manner in more detail.</p> <p>The CCG is responsible for the provision of health facilities and the staffing of these.</p> <p>This will be considered at the planning application stage taking account current legislation, national and local planning policies.</p> <p>The Council encourages meaningful community involvement in all planning applications. There are consultation processes in place for planning applications which is set out in the Councils Statement of Community Involvement.</p>	None
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? Please stop building .</p>	<p>The infrastructure delivery plan for the West Winch Growth Area sets out the infrastructure requirements for the area. It is a requirement for the Council to plan and deliver sufficient housing to meet the needs of its area.</p>	None
REDACTED	<p>After looking at the master plans, I only have 1 major concern (LAND / STORM WATER). 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. 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. 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. The dike in the common of which the pipes go into has been cleaned for at least 30 years. I all of the dikes on the common behind Willow Drive has been cleaned for over 30 years.</p>	<p>It is accepted that there have been issues with flooding in West Winch village. It is not the responsibility of the proposed development in the growth area to address this issue. 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.</p>	None

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<p>REDACTED</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>https://www.edp24.co.uk/news/housing/west-winch-homes-farm-sale-controversy-8542568</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</p>	<p>Not a comment on the SPD. No comment</p> <p>Not a comment on the SPD. No comment.</p> <p>Not a comment on the SPD. No comment</p> <p>The Council has sought to maximise the delivery of housing within the built-up urban area including through intensification and higher densities of development to make the most efficient use of land and making as much use as possible for previously developed brownfield sites and underutilised land. However, it is not possible to achieve the levels of new housing development which would be required to meet needs within the urban area, and as such there will be a requirement to release land in appropriate locations to accommodate a proportion of development.</p> <p>Not a comment on the SPD.</p> <p>Not a comment on the SPD.</p>	<p>None</p>
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Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
	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.		
REDACTED	<p>I have already completed an online form XXCMVRWT 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>	<p>Noted</p> <p>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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p> <p>Consultation on the access road will take place later this year, comments can be made at the time. The Council encourages meaningful community involvement in all consultations.</p>	None

<p>Castle Rising Parish Council</p> <p>North Wootton Parish Council</p> <p>South Wootton Parish Council</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> <ul style="list-style-type: none"> • 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 <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 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.</p>	<p>The Draft SPD does not contradict the policies of the NPPF, Core Strategy or SADMP.</p>	<p>None</p>
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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,

The Education Authority have informed the Infrastructure Delivery Plan for West Winch which includes the provision of 2 new primary schools as well as an extension to the existing primary school at West Winch. The Education Authority’s view is that a secondary school is not required on site instead improvements/capacity will be made at the existing secondary schools. The Infrastructure delivery plan sets out a full list of infrastructure to be provided and details of phasing and includes the provision for healthcare.

Relates to SA for Local Plan which is not subject to this consultation. The SA for the adopted SADMP in which the West Winch Growth Area was found sound as part of the examination process.

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
102	<p>transport infrastructure improvements and extensionsand reduction of car use”</p> <p>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).</p> <p>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.</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</p>	Noted	

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
<p>REDACTED</p> <p>103</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>	<p>Noted. Section 10 of the SPD states that the access road planned for the development will help ensure that the new development has minimal impact on the existing A10 as it passes through the village and address existing traffic problems on the A10 by providing an alternative route around the village.</p> <p>Section 6 of the SPD lists the infrastructure requirements and under Transport there is a bullet point ‘Traffic Calming West Winch’, The Infrastructure Delivery Plan for the development specifically requires traffic calming measures through West Winch Village. It is accepted that this isn’t clear that these measures in some part relate to the A10. Additional text to be added to the final SPD.</p>	<p>None</p>

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
Castle Rising Parish Council	<p>There must be a complete review of the current mitigation measures to make sure this development does not become solely car dependant. 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>	<p>Noted.</p> <p>Comment refers to planning application</p> <p>The Highway Authority is the responsible authority for highways.</p>	None
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>	Noted	None

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
<p>South Wootton Parish Council</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">105</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 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. 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>	<p>None</p> <p>See above comments</p>	<p>None</p>

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">106</p> <p>Anglian Water</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 longerterm.</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> <ol style="list-style-type: none"> 1. Make the East of England resilient to the risks of drought and flooding 	<p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p>
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Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
107	<p>2. Enable sustainable economic growth in the UK's fastest growing region</p> <p>3. By 2030, be a net zero business and reduce the carbon in building and maintaining our assets by 70%</p> <p>4. 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>CONCLUSION</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>	Noted	None

<p>National Grid</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 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="388 1272 1151 1703"> <thead> <tr> <th>Development Plan Document Site Reference</th> <th>Asset Description</th> </tr> </thead> <tbody> <tr> <td rowspan="4">E2.1 West Winch Growth Area</td> <td>Gas Transmission Pipeline, route: BACTON</td> </tr> <tr> <td>WISBECH NENE</td> </tr> <tr> <td>WEST</td> </tr> <tr> <td>Gas Transmission Pipeline, route: BACTON</td> </tr> <tr> <td></td> <td>WISBECH NENE</td> </tr> <tr> <td></td> <td>WEST</td> </tr> </tbody> </table> <p>Avison Young (UK) Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS</p>	Development Plan Document Site Reference	Asset Description	E2.1 West Winch Growth Area	Gas Transmission Pipeline, route: BACTON	WISBECH NENE	WEST	Gas Transmission Pipeline, route: BACTON		WISBECH NENE		WEST	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p> <p>None</p>
Development Plan Document Site Reference	Asset Description													
E2.1 West Winch Growth Area	Gas Transmission Pipeline, route: BACTON													
	WISBECH NENE													
	WEST													
	Gas Transmission Pipeline, route: BACTON													
	WISBECH NENE													
	WEST													

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:

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>

Noted

Noted. National Grid is a statutory consultee and therefore will be consulted during any public consultation related to the masterplan developments.

Noted

None

None

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
110	<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: www.nationalgridet.com/network-and-assets/working-near-our-assets</p> <p><u>Gas assets</u> 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>		None

<p>Redacted</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 & 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, 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> <ul style="list-style-type: none"> • 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. <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>INCREASED FLOOD RISK TO WEST WINCH FROM 4,000 HOME DEVELOPMENT</p> <ul style="list-style-type: none"> • 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>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</p>	<p>Noted. Additional dwellings will result in additional traffic in the longer term. Section 10 of the SPD states that the access road planned for the development will help ensure that the new development has minimal impact on the existing A10 as it passes through the village and address existing traffic problems on the A10 by providing an alternative route around the village.</p> <p>The infrastructure set out in the Infrastructure Delivery Plan for the area is very important and will ensure that the necessary transport, education, utilities and community infrastructure is provided.</p> <p>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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.</p> <p>Consultation on the access road will take place later this year, comments can be made at the time. The Council encourages meaningful community involvement in all consultations.</p> <p>Noted. Any site specific issues will be dealt with in the planning application.</p> <p>It is accepted that there have been issues with flooding in West Winch village. It is not the responsibility of the proposed development in the growth area to address this issue. 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.</p> <p>Noted</p>	<p>None</p>
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	<p>exacerbating the existing problem of flooding and potential flood risk within the existing village settlements and surrounding farm land.”</p> <p>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</p> <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> <ul style="list-style-type: none"> • 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. <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> <ul style="list-style-type: none"> • 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>The 2014 Drainage Board report found -:</p> <ul style="list-style-type: none"> • 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 <p>FLOODING JUNE 2020 in WEST WINCH – Hall Lane and Eller Drive</p>	<p>Noted. The extent of the allocation at West Winch has been established through the Site Allocations document which was subject to an independent examination in public and substantive consultation. Planning applications on sites that are potentially affected by flooding are required by national policy to carry out a risk assessment.</p> <p>Noted</p> <p>Noted. 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.</p> <p>NPPF para 167 and 169 clearly set out how the application will need to ensure that flood risk is not increased by the development and maintenance is in place for drainage systems.</p>	
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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 Commonsides 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

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 growth area (Hopkins application) with the provision of an access roundabout on the A10 in advance of the east-west link road through the Hopkins site connecting to the A47. Once this link road is in place, up to 1100 houses can be built. 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. Development of the WWHAR is expected to begin in 2025, with construction taking around 2 years to complete. The new access road for the growth area in combination with 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.

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 Wissington 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 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.

- 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 runoff management will be in the achievement of securing

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
119	<p>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.</p> <ul style="list-style-type: none"> • 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. • 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. 		
RHMNRSHN	i object to the plan and the proposed building of too many houses for the reasons stated above.	Noted	None

<p>Natural England</p> <p>120</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"> • The Wash Special Protection Area (SPA) • The Wash and North Norfolk Coast Special Area of Conservation (SAC) • The Wash Ramsar Site • North Norfolk Coast Special Protection Area (SPA) • North Norfolk Coast Special Area of Conservation (SAC) • North Norfolk Coast Ramsar Site • Norfolk Valley Fens Special Area of Conservation (SAC) • Breckland Special Protection Area (SPA) • Breckland Special Area of Conservation (SAC) • Roydon Common and Dersingham Bog Special Area of Conservation (SAC) • Roydon Common Ramsar Site • Dersingham Bog Ramsar Site <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"> • River Narr Site of Special Scientific Interest (SSSI) • The Wash Site of Special Scientific Interest (SSSI) • North Norfolk Coast Site of Special Scientific Interest (SSSI) • Breckland Farmland Site of Special Scientific Interest (SSSI) • Breckland Forest Site of Special Scientific Interest (SSSI) • Roydon Common Site of Special Scientific Interest (SSSI) • Dersingham Bog Site of Special Scientific Interest (SSSI) <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"> • 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 	<p>Noted.</p> <p>This relates to local plan making not to the SPD</p>	<p>None</p>
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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](#)

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 km² 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](#) 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.

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 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 [here2](#). 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](#).

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
127	<p>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.</p> <p>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.</p> <p>1 https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals 2http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</p> <p>Rights of Way, Access land, Coastal access, and National Trails 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 www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.</p> <p>Biodiversity duty Your authority has a duty 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 here.</p>		

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
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.	Agreed	All Heritage Assets to be listed in SPD

West Winch Parish Council North Runcton Parish Council	<p>Further to the consultation events held on August 10th and 5th 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"> 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). 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>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 (by providing) 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</p>	<p>The development plan for the area provides the development management policies that development proposals will be assessed. The SPD provides an indicative land use masterplan which adds to the policies.</p> <p>Comment relates to the Local Plan.</p> <p>The development plan for the area provides the development management policies that development proposals will be assessed. The SPD provides an indicative land use masterplan which adds to the policies.</p> <p>Section 5 Planning Policy sets out the development plan for the area and lists those documents including the neighbourhood plan. Additional wording to make clear that development proposals need to consider the policies within these documents.</p> <p>The sustainability Appraisal for the current local plan was considered at the examination and found sound</p>	<p>None</p> <p>None</p> <p>None</p> <p>See changes proposed above re making it clear that the development plan (including the Neighbourhood Plan) set the development management policies for the area.</p>
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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.

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

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:

<https://www.uttlesford.gov.uk/article/4974/Supplementary-Planning-Documents-and-other-planning-guidance>

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 will ensure sustainable development.

Noted. This SPD provides an indicative layout of where development proposals may go. It was not intended to be a detailed and all-inclusive masterplan.

SPD to be re-named as West Winch Growth Area

None

None

None

Noted

Agreed.

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
131	<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>	<p>Noted</p> <p>Noted. The Borough Context Plan, the Wider Context Plan and Site Context Plan provide those who are not familiar with the area the context of the site.</p> <p>Comment on the Local Plan Allocation.</p> <p>Noted. Urban area doesn’t best describe the built area. Change required.</p> <p>The SPD provides a framework masterplan that provides indicative areas for different land uses. The SPD once adopted will be a material consideration in the determination of planning applications.</p>	<p>Change Urban Areas to Existing Settlements on Site Context Plan</p> <p>None</p>

Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
<p>REDACTED</p> <p>133</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>	<p>Not a comment on the SPD</p> <p>Detailed design of housing development will be considered against design policies within the development plan.</p> <p>The design of the WWHAR is the responsibility of the Highways Authority who are due to consult on more detail when further comments can be made.</p> <p>The Infrastructure Delivery Plan sets out details of all the infrastructure required. The SPD also summarises these to include 2 new primary schools.</p> <p>These are indicated in the indicative masterplan maps</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p> <p>None</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> <ul style="list-style-type: none"> • 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. • 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. • A Local Football Facilities Plan (LFFP) 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 & 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"> • An anticipated significant existing shortfall of Artificial Grass Pitches (AGP). • Issues faced regarding poor grass pitch quality at some sites. • A need to improve/refurbish several changing pavilions. • 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. • 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><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>Noted</p>	<p>None</p>
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Rep/Organisation	SUMMARY REPRESENTATION	OFFICERS RESPONSE	PROPOSED CHANGES TO DRAFT SPD
	<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>I hope the above comments are helpful in terms of developing this masterplan.</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: Active Design Sport England</p>		



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 PPG¹ 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*

¹ 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.

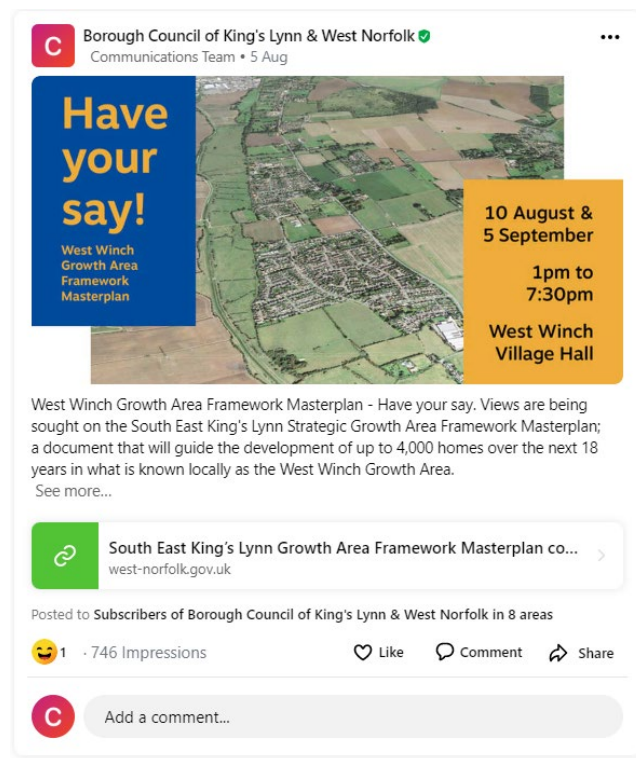
We boosted the post just before the event and this was seen by 7,222 Facebook or Instagram users.

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 .

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 nd paragraph Section 11 Delivery 2 nd 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"> • 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) 	Section 5 Planning Policy Page 12

	<ul style="list-style-type: none"> Norfolk Core Strategy and Minerals and Waste Development Management Policies (2011) <p>* <u>Once adopted this will replace the Core Strategy and Site Allocations & Development Management Policies</u></p>	
Education requirements need to be clarified	<p>New primary school & nursery provision x2 West Winch Primary school extension</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 st 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 (www.gov.uk)</u></p>	Section 8 Page 18 second paragraph under Climate Change
	<p>The development should <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 st paragraph under Biodiversity
	<p>Sewage & Drainage</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 should <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 drainage <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: Information for developers – Norfolk County Council</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 1st 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: (shorturl.at/abe45) <u>which can be viewed at: Local Cycling and Walking Infrastructure Plans – Norfolk County Council</u></p>	<p>Section 9 Connectivity and Transport Page 20 second paragraph under Connectivity</p>
	<p>The layout of the new development should contribute <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 3rd paragraph under Connectivity</p>
	<p>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</p>	<p>Section 9 Connectivity & Transport Page 20 1st paragraph</p>

	<p>neighbourhoods and link the new development to existing facilities in West Winch and King's Lynn.</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 & 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>

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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>

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 & 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 & 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>

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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	<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>
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>

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.

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<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>

<p>Anglian Water</p>	<p>Anglian Water strongly supports the design and development ambitions of the framework, particularly in relation to climate change, SuDS (Sustainable Drainage Systems), biodiversity, and green infrastructure. 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 water smart communities 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' Enabling Water Smart Communities' 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
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>

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<p>Norfolk County Council</p>	<p>Natural Environment</p> <p>Arboriculture:</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 Norfolk County Council's Environmental Policy 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>Ecology:</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 & 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>

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<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>

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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.

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 trajectory 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 draft Drainage and Wastewater Management Plan {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 Water Resources Management Plan (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 & 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>https://www.edp24.co.uk/news/housing/west-winch-homes-farm-sale-controversy-8542568</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>

<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)</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 extensionsand 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

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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>

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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
<p>North 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.</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 & 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"> Make the East of England resilient to the risks of drought and flooding Enable sustainable economic growth in the UK's fastest growing region
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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>CONCLUSION</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

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: www.nationalgridgas.com/land-and-assets/working-near-our-assets</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: https://lsbud.co.uk/</p> <p>For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com</p>

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<p>County & 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 & 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>INCREASED FLOOD RISK TO WEST WINCH FROM 4,000 HOME DEVELOPMENT</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 & 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 Punny 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"> 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
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	<p>FLOODING JUNE 2020 in WEST WINCH – Hall Lane and Eller Drive</p> <p>MISSING FLOOD DRAINAGE INFRASTRUCTURE</p> <p>Speed and Rate of Run-off</p> <p>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.</p> <p>One of these bungalows on Hall Lane was flooded for the third time in twenty years.</p> <p>Double Whammy</p> <p>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.</p> <p>In 2013, Back Lane had a tsunami on the highway.</p> <p>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.</p> <p>Increased Risk of Surface Water Run-Off</p> <p>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.</p> <p>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.</p> <p>The law of gravity puts West Winch at risk of surface water run-off from the new development.</p> <p>RISK OF FLOODING FROM POOR EXISTING DRAINAGE NETWORK</p>
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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 Commonsides 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

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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

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 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.

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

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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 Guides and Principles for Garden Communities, 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 Nature Nearby, 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"> High-quality, informal, semi-natural areas Circular dog walking routes of 2.7 km² 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
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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 >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 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.</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 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.</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 Discretionary Advice Service.</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 & Suffolk Team</p> <p>ANNEX A – Additional advice</p> <p>Natural England offers the following additional advice:</p> <p>Landscape</p> <p>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.</p> <p>Protected Species</p> <p>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.</p> <p>Local sites and priority habitats and species</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](#)². 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>

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Respondent	Summary representation
	<p>2http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</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 www.nationaltrail.co.uk 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 duty 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 here.</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 North Runcton Parish Council</p>	<p>Further to the consultation events held on August 10th and 5th 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

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:

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Respondent	Summary representation
	<p data-bbox="447 269 1850 300">https://www.uttlesford.gov.uk/article/4974/Supplementary-Planning-Documents-and-other-planning-guidance</p> <p data-bbox="447 329 1839 430">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 1467 490">We attach further specific comments on the BCKLWN draft SPD at Appendix 1.</p> <p data-bbox="447 518 1860 618">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="447 646 1335 677">Each section and paragraph should be numbered for easy reference.</p> <p data-bbox="447 704 1824 768">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="447 795 1887 972">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 1000 1803 1101">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 1128 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 1461 1287">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_{2.5} 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 (>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>

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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 Local Football Facilities Plan (LFFP) 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 & 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:Active Design Sport England</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.

REPORT TO CABINET

Open		Would any decisions proposed :			
Any especially affected Wards	Mandatory	Be entirely within Cabinet's powers to decide		NO	
		Need to be recommendations to Council		YES	
		Is it a Key Decision		NO	
Lead Member: E-mail: Cllr Sam Sandell Cllr.sam.sandell@west-norfolk.gov.uk		Other Cabinet Members consulted: Cllr Stuart Dark			
		Other Members consulted: Corporate Performance Panel			
Lead Officer: Jo Stanton, Revenues and Benefits Manager E-mail: joanne.stanton@west-norfolk.gov.uk Direct Dial:01553 616349		Other Officers consulted: S151 Officer			
Financial Implications YES	Policy/ Personnel Implications NO	Statutory Implications YES	Equal Impact Assessment YES If YES: Pre- screening only	Risk Management Implications YES	Environmental Consideration s NO
If not for publication, the paragraph(s) of Schedule 12A of the 1972 Local Government Act considered to justify that is (are) paragraph(s)					

Date of meeting: 17 January 2023

COUNCIL TAX SUPPORT: FINAL SCHEME FOR WORKING AGE PEOPLE FOR 2023/2024

Summary

The council must implement a Council Tax Support (CTS) scheme for its working age residents for each financial year. We must first decide on a draft CTS scheme which is open for public consultation, and then must agree a final CTS scheme, taking into account the consultation responses.

Since 2017, authority has been delegated to the council Leader, in consultation with the relevant Portfolio Holder and the s151 Officer, to agree the draft CTS scheme. The draft CTS scheme was open for consultation from 1 November 2022 to 12 December 2022. 25 responses were received and are included in this report.

The final CTS scheme for 2023/2024 is a continuation of the 2022/2023 CTS scheme, with two minor changes to keep it in line with wider welfare reform changes.

Recommendation

Cabinet agree the draft CTS scheme for 2023/2024 which went to public consultation is recommended to Council as the final CTS scheme for 2023/2024.

Reason for Decision

To ensure a CTS scheme for working age people for 2023/2024 is agreed by full Council by 11 March 2023.

1. Introduction

- 1.1. Council Tax Support (CTS) is a reduction awarded to people on low incomes to help with the cost of their council tax bill. Since 2013 each district council is responsible for its own CTS scheme for working age people, and must review and agree the scheme each year. The CTS Scheme for 2023/2024 must be agreed by full Council by 11 March 2023, although in practice it needs to be agreed by January 2023 as it forms part of the taxbase and budget setting process.
- 1.2. The draft CTS scheme was agreed by a delegated decision earlier in the year and is opened to a six week public consultation. This report details the results of the consultation, the comments made and the recommended final CTS Scheme for 2023/2024.
- 1.3. Details on the CTS scheme can be found on the council's website at https://www.west-norfolk.gov.uk/info/20019/council_tax_support.

2. Background

- 2.1. When deciding our CTS scheme for working age customers we must first consult with our major preceptors, then decide a draft CTS scheme to go to public consultation. Once the consultation has closed the final CTS scheme for the next year must then be agreed by full Council.
- 2.2. Our working age CTS scheme principles are included at Appendix B and have remained largely unchanged since the scheme started in 2013, with the exception of the maximum level of support which was raised from 75% to 84% from 2022/2023 for working age people not in a protected group (pension age people and people in protected groups can receive up to 100% of their council tax bill). The principles are based on the rules for the old Council Tax Benefit scheme prior to 2013 and use many of the same principles as the ongoing Housing Benefit scheme. This makes the scheme easier for our customers to understand, and simpler to administer.
- 2.3. Since 2013 the working age CTS scheme rules have been amended to reflect wider welfare reform changes, including amendments to the Housing Benefit rules and the introduction of Universal Credit in 2018. There have been fewer changes in recent years as the pace of welfare reform has slowed. There have been no significant welfare reform changes in the current year that need to be reflected in our CTS scheme for 2023/2024 and only two minor updates are proposed at section 5.
- 2.4. CTS for pension age people is paid under national regulations. We are responsible for the administration of the pension age scheme, and we meet the cost of these claims, however central government is responsible for the rules of the scheme

3. The Current Council Tax Support Scheme - 2022/2023

- 3.1. The principles of the current CTS scheme for 2022/2023 are included at Appendix B.
- 3.2. The CTS scheme uses the same calculation method as the old Council Tax Benefit scheme (which ended in 2013) and the CTS scheme for pension age people. A person's total household income is assessed against an allowed

amount which is based on their circumstances. The allowed amount is the same as the amount for Housing Benefit, with the exception of a more generous limit for earnings. If their income is less than the allowed amount, they receive the maximum amount of CTS payable under the scheme. If their income is more than the allowed amount, the maximum CTS is reduced by 20p for every £1 over the amount allowed.

- 3.3. For 2022/2023 the maximum amount of CTS payable for a working age person who is not in a protected group is limited to 84% of their weekly council tax bill. For example, if someone's weekly council tax bill is £10 the maximum CTS they can receive is £8.40. This is an increase of 9% on the maximum amount of 75% in 2021/2022.
- 3.4. There are a number of people who are in a protected group and can receive a higher amount of CTS due to their circumstances, including those receiving a Disability Premium, Carer's Allowance or who are responsible for a child under the age of five. Pension age people are paid under a national set of rules and are unaffected by any changes to our CTS scheme. These groups are also not subject to the limit on the maximum amount of CTS.

4. Options Considered

- 4.1. We can consider changes to the principles of the existing CTS scheme, for example to award people more CTS by increasing the maximum weekly council tax bill that is paid under the scheme. At present we pay up to 84% of the weekly council tax bill for non-protected groups but this can be changed. A more generous scheme would increase the incomes of local residents but would reduce our taxbase, raising the cost to us and our precepting authorities. Estimates of the additional costs for increasing the levels of support are shown below. This extra cost would have to be found from within the existing budgets for each of the authorities.
- 4.2. Increasing the CTS scheme to a maximum of 100% of the weekly council tax bill would mean that 1,399 working age people who are not in a protected group (as shown at section 8) would be able to receive help to cover up to 100% of their council tax bill, rather than 84%, and would award an additional £255,000 a year in council tax support.
- 4.3. However a 100% scheme reduces the taxbase by 126.5 band D properties and the annual £255,000 cost of the additional council tax support is shared between all the preceptors in proportion to their share of the council tax bill as shown below:

Maximum CTS		100%
Total CTS Before @ 84%		£5,118,221
Total CTS After @ 100%		£5,373,065
Change - additional cost		£ 254,844
<u>Shares 2022/2023</u>		
Norfolk County Council	75.29%	£ 191,872
Police and Crime Commissioner	14.29%	£ 36,417
BCKLWN	6.92%	£ 17,635
Parishes	3.50%	£ 8,920
		£ 254,844
Taxbase - Additional Reduction in Band D properties	£ 2,014.93	126.5

- 4.4. This is an extra annual cost and would have to be found from within the existing budgets every financial year for each of the authorities. This would also mean we are out of line with other Norfolk authorities as all other authorities except one currently ask for a contribution from their working age CTS claimants.
- 4.5. Alternatively, we could consider reducing the cost of the CTS scheme by reviewing the Protected Groups as listed in Section 8 and Appendix B (with the exception of Pension Age people). We could consider removing some or all of the protections and only paying up to a certain percentage of the weekly council tax bill.
- 4.6. To remove all the protections would lower the cost of our scheme by £688,000, reducing the cost to us and our preceptors. However, it would mean that 3,631 people in the Protected Groups no longer benefit from a more generous CTS scheme and will pay more council tax.
- 4.7. There are also alternative CTS scheme models that can be considered for our working age scheme, such as a banded discount scheme, where a set percentage discount is awarded based on a person's income and household.
- 4.8. Changing our scheme to an alternative model will involve significant changes and financial disruption for our customers, and inevitably there will be winners and losers. It would also mean the rules for working age customers were different to those for pension age customers, and different to the rules for Housing Benefit.

5. Council Tax Support Consultation

- 5.1. Norfolk County Council and the Norfolk Police and Crime Commissioner have been contacted for their comments on the scheme. Both have responded to confirm they support our proposed scheme.
- 5.2. The CTS consultation is primarily available via the council's website and as a paper form if requested. Online responses are encouraged as data can be electronically logged and collated. The consultation opened on 1 November 2022 and is publicised through social media, council emails, newsletters and council Members.

5.3. The consultation lasted for six weeks and closed on 12 December 2022. 25 responses have been received. These are shown at Appendix C which should be read in conjunction with this report.

5.4. There was broad support for keeping the current CTS scheme, and a number of comments were made about the scheme design and operation. Responders were invited to provide their own ideas about changes for the CTS scheme, and a number were supportive of increasing the help available, with some suggesting a maximum limit of 100%. The implications of this are shown at 4.3.

5.5. No further changes are proposed as a result of the consultation responses and the proposed final CTS scheme for 2023/2024 is a straightforward continuation of the 2022/2023 CTS scheme with two minor updates as shown at 6.2.

5.6. The final CTS Scheme is only for working age people. Pension age claims continue to be paid under the national CTS scheme regulations.

6 The 2023/2024 CTS Scheme

6.1 It is proposed to keep the current CTS Scheme principles for the final CTS Scheme for 2023/2024. No major changes are proposed.

6.2 Two minor updates are proposed to reflect wider welfare reform changes:

6.2.1 Payments made as a 'thank you' payment under the government's Homes for Ukraine scheme will be disregarded as income and capital in our CTS Scheme

6.2.2 Any other government payments made under a financial assistance scheme, introduced during a financial year, and disregarded for Housing Benefit purposes, will also be disregarded for the purpose of our CTS scheme.

7 Notice of Motion 11/22

7.1 Councillor Jones proposed the following Notice of Motion (11/22), seconded by Councillor Ryves:

7.2 "This Council recognises that the cost-of-living crisis is adversely affecting many local people, especially people on very low incomes. This Council additionally notes that it has a very high General Reserve Fund of over £8 million above the recommended level. This Council further notes to increase the Council Tax Support Scheme to 100% to every eligible Council Taxpayer based on last year's figures will run to less than £30,000 to this Council. Therefore, this Council approves increasing its Council Tax Support Scheme to 100% to every eligible Council Taxpayer."

7.3 The impact of increasing our CTS Scheme so it covers up to 100% of the council tax bill is shown at 4.3.

7.4 Making the change would reduce our taxbase by 126.5 band D properties, lowering the total council tax income by £255,000, and our own income by £17,600. This figure is lower than last year as the maximum weekly council tax that can be paid has increased to 84% this year.

7.5 This is an ongoing cost which will impact the taxbase in 2023/2024 and future years.

8 Caseload Analysis

8.1 Pension age people account for 47% of our CTS caseload – around 4,400 claims. Working age people account for the other 53%, around 5,000 claims, and of these over two thirds are in a protected group. This leaves around 1,400 people who are working age but not in a protected group.

8.2 An analysis of the working age caseload is shown below, showing the claims in protected groups, and the groups they are in. The biggest protected group are people who receive Personal Independence Payment (or the old Disability Living Allowance):

CASELOAD ANALYSIS 03/10/2022			
Working Age - Protected Group	Claims on 03/10/2022	% of claims	Total Cost @ 84%
Attendance Allowance	-	0%	£ -
Carers Allowance	53	1%	£ 48,298
Constance Attendance Allowance	-	0%	
Carer Premium	115	3%	£ 110,670
Child under 5	754	21%	£ 583,418
Disabled Child Premium	-	0%	£ -
Disabled Premium	10	0%	£ 12,014
Employment and Support Allowance Support Group	492	14%	£ 513,517
Other	139	4%	£ 134,195
Personal Independence Payment / DLA	2,068	57%	£ 2,109,235
Working Tax Credit - Disabled	-	0%	£ -
Total Working Age in Protected Groups	3,631	100%	£ 3,511,347
Protected Groups	3,631	72%	£ 3,511,347
Not Protected Groups	1,399	28%	£ 862,211
Total	5,030	100%	£ 4,373,558

8.3 A breakdown of the employment status of the two groups is shown below. Nearly a third of people not in a protected group are working but their income is low so they still qualify for CTS.

Protected Groups	Working	Not Working	Total
Couple	49	404	453
Family	126	332	458
Lone Parent	218	808	1,026
Single Person	41	1,653	1,694
Total	434	3,197	3,631
	12%	88%	

Non Protected Groups	Working	Not Working	Total
Couple	20	73	93
Family	46	32	78
Lone Parent	225	245	470
Single Person	151	607	758
Total	442	957	1,399
	32%	68%	

8.4 The council tax bands for the working age caseload are also shown below. Over 90% of the households are in council tax bands A and B.

Council Tax Band	Protected Groups	Non Protected Groups	Total	%
A	2,596	971	3,567	70.9%
B	703	275	978	19.4%
C	192	96	288	5.7%
D	81	39	120	2.4%
E	44	13	57	1.1%
F	11	3	14	0.3%
G	2	2	4	0.1%
H	-	-	-	
Unbanded	2	-	2	
Total	3,631	1,399	5,030	

9 Corporate Priorities

9.1 The CTS scheme supports Corporate Priority 1 – Provide important local services within our available resources.

9.2 Due to the budget setting timetable we must agree a CTS scheme for working age people for the 2023/2024 year by January 2023.

10 Financial Implications of Proposal

10.1 No major changes to the CTS Scheme are envisaged, so there are no direct financial implications as a result of the final scheme proposal.

10.2 There has been growth in the taxbase again this year, mostly due to an increase in new domestic properties being added to the council tax list and a reduction in the numbers of people claiming CTS. The taxbase forecast for 2023/2024 shows growth slightly ahead of the taxbase in the Financial Plan.

10.3 As at 1 October 2022 the total cost of our 2022/2023 CTS scheme is £9.91m across 9,500 claims. CTS reduces our taxbase by the equivalent of 4,918 band D properties. This reduction in taxbase is equal to a cost of £685,422 to the borough council (4,918 x £139.37). £332,000 of this cost to us is for the CTS scheme for pension age people, paid under the national regulations. We have no powers to alter this element of the scheme or the associated costs.

	Claims	Total Cost	Average Cost Per Claim
Pension Age Claims	4,409 (46.5%)	£4.80m (48.4%)	£1,088
Working Age Claims	5,079 (53.5%)	£5.11m (51.6%)	£1,006
Total	9,488	£9.91m	£1,044

10.4 We have also awarded £207,000 in council tax Hardship Relief for 2022/2023, which is fully funded by a government grant so does not affect the taxbase

10.5 A rise in the number of working age CTS claims will increase the cost of the scheme and the impact on the council's taxbase. At present the cost of the CTS scheme is within the predictions in the Financial Plan and is monitored weekly to identify any changes.

11 Any other Implications/Risks

11.1 The CTS scheme for 2023/2024 is designed to meet the projections as detailed in the Financial Plan. However, any increases in demand due to an economic downturn, changes in the composition of the caseload, for example an increase in the number of pension age claimants, or unforeseen changes to other welfare benefits during the year could represent a financial risk by increasing the cost of the CTS scheme and reducing the taxbase further.

11.2 The impact of the Cost of Living Crisis on the cost and composition of the CTS caseload is being closely monitored.

11.3 The financial impact of the CTS scheme is, and will continue to be, reviewed monthly.

12 Equal Opportunity Considerations

12.1 The pre-screening Equality Impact Assessment (EIA) is included at Appendix A. A full EIA was completed as part of the Cabinet Report of 7 September 2016. As the changes to the scheme since then and for 2023/2024 are minor and positive so no further assessment has been completed.

13 Consultation

13.1 The draft CTS scheme for 2023/2024 was open to public consultation from 1 November 2022 to 12 December 2022. The full results are summarised at section 5 and included in full at Appendix C.

14 Conclusion

14.1 Cabinet is asked to agree that the draft CTS scheme for 2023/2024 which went to public consultation is recommended and full Council as the final CTS scheme for 2023/2024.

15 Personnel Implications

15.1 None

16 Environmental Considerations

16.1 None

17 Statutory Considerations

17.1 The council is required to agree a CTS Scheme for the 2023/2024 financial year by 11 March 2023, although in practice it has to be agreed by January 2023 as it forms part of the council's taxbase and budget setting process.

18 Declarations of Interest / Dispensations Granted

18.1 None

19 Background Papers

19.1 None

Appendix A: Pre-Screening Equality Impact Assessment



Name of policy/service/function	Local Council Tax Support Scheme 2023/2024				
Is this a new or existing policy/service/function?	Continuation of, and updates to, an existing Policy				
Brief summary/description of the main aims of Policy being screened. Please state if this policy/service is rigidly constrained by statutory obligations	Council Tax Support is a discount given to residents on a low income to help with the cost of their council tax bill. The council is free to agree its own local scheme for the discount for working age people.				
Question	Answer				
<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 according to their different protected characteristic, 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	✓			
	Disability	✓			
	Gender			✓	
	Gender Re-assignment			✓	
	Marriage/civil partnership			✓	
	Pregnancy & maternity			✓	
	Race			✓	
	Religion or belief			✓	
	Sexual orientation			✓	
Other (eg low income)	✓	✓			
Question	Answer	Comments			
2. Is the proposed policy/service likely to affect relations between certain equality 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?	No				
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	There are protections for those who have a disability, caring responsibilities, children under 5 or are pension age.			
<p>5. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions?</p> <p>If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section</p>	No	Actions:			
		Actions agreed by EWG member:			
Assessment completed by:	Joanne Stanton				
Job title	Revenues and Benefits Manager				
Date	5 December 2022				

Appendix B: Principles of the Current CTS Scheme

Our current CTS scheme assesses people's income against an allowed amount, called an 'applicable amount'. If their income is less than the applicable amount they receive full CTS, subject to a 25% contribution if they are working age and not in a protected group. If it is more than the applicable amount their CTS is reduced by 20p for every extra £1.

Our current CTS Scheme Principle:

An equal cut is made to everyone apart from those in a protected group.

The key points are:

- Working Age people have their CTS calculated based on 84% of their weekly CTS bill)
- A weekly £10 deduction is made for each non-dependent regardless of their income
- The maximum amount of Capital allowed is £6,000
- No Tariff Income is assumed for capital under £6,000
- Self Employed people are assumed to have an income of at least the minimum wage
- There is no Second Adult Rebate

To fulfil the requirement to consider vulnerable groups, CTS will be paid based on the national, more generous scheme for the following groups:

- Those who have reached the qualifying age for State Pension Credit (under central government rules)
- Households with at least one child under the age of 5
- Those entitled to the Disability Premium, the Disabled Child Premium or the Carer Premium as part of their needs calculation
- Those in receipt of Carer's Allowance, Attendance Allowance or Constant Attendance Allowance
- Those receiving Working Tax Credit including a disability element
- Those in the Employment and Support Allowance Support group
- Those in receipt of Disability Living Allowance or Personal Independence Payment
- Those in receipt of Carer's Allowance

The CTS scheme also includes incentives to find work. People are allowed to keep an extra £10 (above the national limit) before their CTS is affected. This is known as a disregard and the amounts are:

- | | |
|-----------------------|-----|
| • Single | £15 |
| • Couple | £20 |
| • Disabled or a Carer | £30 |
| • Lone Parent | £35 |

We also have a local income disregard as below:

- War Pensions will be fully disregarded in the income calculation

General CTS Scheme Rules

- In all other areas the CTS Scheme rules will follow the rules for working age Housing Benefit claims

Appendix C – Council Tax Support 2023/2024 Consultation Responses

250

Question	Responses	Comments/Alternatives												
Should we keep the current Council Tax Support scheme?	<table border="1"> <thead> <tr> <th data-bbox="398 316 499 419">Yes</th> <th data-bbox="510 316 611 419">No</th> <th data-bbox="622 316 768 419">Don't Know / Blank</th> <th data-bbox="779 316 913 419">Total</th> </tr> </thead> <tbody> <tr> <td data-bbox="398 427 499 451">14</td> <td data-bbox="510 427 611 451">5</td> <td data-bbox="622 427 768 451">6</td> <td data-bbox="779 427 913 451">25</td> </tr> <tr> <td data-bbox="398 459 499 483">56%</td> <td data-bbox="510 459 611 483">10%</td> <td data-bbox="622 459 768 483">24%</td> <td></td> </tr> </tbody> </table>	Yes	No	Don't Know / Blank	Total	14	5	6	25	56%	10%	24%		<ul style="list-style-type: none"> • The level of support should be raised to 100% • There is too much reliance on benefits, everyone should pay their way. I am fed up with subsidizing others peoples children and people who are too lazy to work • I've looked at your notes and my eyes glazed over! You explain the scheme to someone who knows all about it. You don't explain the scheme to someone who doesn't know anything about the scheme. Why not make it easy you understand? You'll not increase take-up of the scheme like this. Work harder at understanding how ordinary people will read what you have written • We need the scheme but it needs extending to support more people • It should be protected, the crisis we are going through now is needed more than ever • Working people on low wages need all the support available and this support should be extended in BCKLWN as it is in Norwich. I support the retention of the Support Scheme. The first question is most unclear in that I want the support kept but I believe it should be extended to 100% • These type of support initiatives have proved to be and will continue to be absolutely essential in providing much needed structured support to those that need it
Yes	No	Don't Know / Blank	Total											
14	5	6	25											
56%	10%	24%												
Do you agree with changing the CTS scheme to ignore payments made under the 'Homes for Ukraine' scheme?	<table border="1"> <thead> <tr> <th data-bbox="398 1074 499 1177">Yes</th> <th data-bbox="510 1074 611 1177">No</th> <th data-bbox="622 1074 768 1177">Don't Know / Blank</th> <th data-bbox="779 1074 913 1177">Total</th> </tr> </thead> <tbody> <tr> <td data-bbox="398 1185 499 1209">16</td> <td data-bbox="510 1185 611 1209">7</td> <td data-bbox="622 1185 768 1209">2</td> <td data-bbox="779 1185 913 1209">25</td> </tr> <tr> <td data-bbox="398 1217 499 1241">64%</td> <td data-bbox="510 1217 611 1241">28%</td> <td data-bbox="622 1217 768 1241">8%</td> <td></td> </tr> </tbody> </table>	Yes	No	Don't Know / Blank	Total	16	7	2	25	64%	28%	8%		No disagreements or alternatives proposed
Yes	No	Don't Know / Blank	Total											
16	7	2	25											
64%	28%	8%												

<p>Do you agree with changing the CTS scheme to ignore payments made under any other government financial assistance scheme?</p>	<table border="1"> <thead> <tr> <th>Yes</th> <th>No</th> <th>Don't Know / Blank</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>16</td> <td>6</td> <td>3</td> <td>25</td> </tr> <tr> <td>64%</td> <td>24%</td> <td>3%</td> <td></td> </tr> </tbody> </table>	Yes	No	Don't Know / Blank	Total	16	6	3	25	64%	24%	3%		<p>No disagreements or alternatives proposed</p>
Yes	No	Don't Know / Blank	Total											
16	6	3	25											
64%	24%	3%												

Options for changes to the Council Tax Support scheme:

<p>Please use the space below to explain what changes you would like to see, the reasons for this and what you think the impact will be on both people receiving Council Tax Support, and wider council tax payers who will be impacted by any changes to the cost of our scheme caused by any changes.</p>	<p>The changes I would propose are:</p>	<ul style="list-style-type: none"> • No others I can think of • 100% • The support should be raised to 100% • Everyone should pay full council tax with no exceptions and no subsidies • Increase support for low income families & self-employed to 100% for those who are currently struggling with the cost of living • None • Help working people or those who have had to give up work but can't get help from anyone • Don't change • The maximum level of support should be increased to 100% wherever possible • Leave things as they are • You're rushing about, aren't you? (we would like to hear your views)(rues for how we treat earnings) You're trying to make the scheme too complicated. Instead you should be making it simpler to understand • Offering more support to those on low income, e.g disregarding universal credit as income
---	---	--

		<ul style="list-style-type: none"> • More people being able to get help • Stop putting the Council tax up each year • The people affected are poorly paid, in work and deserve more money in their pockets to enable them to eat and heat, to buy clothes and shoes for their children. They just need not to pay Council tax until their wages and the economy improve. To change the amount of council tax upwards of second homeowners and holiday home premises to 150% would raise money collected by the council • Happy as it is • Discount on the council tax due to earnings • Try to treat all family the same with any extra help during this time • I'm happy with the scheme as it currently operates • No changes • Pensioners should automatically get a discount on their council tax if they are both receiving attendance allowance
	<p>The reasons for these changes are:</p>	<ul style="list-style-type: none"> • Greater support to working people in hardship • This gives a benefit of around £200 pa to a significant number of households who are experiencing genuine financial difficulty • People should pay their way instead of expecting handouts • Many families are struggling • Its good as it is • To help • Don't change • It's just the right decent thing to do? A marginal cost for a net gain for the district & a huge impact for the recipients? We live in a district where there is a huge disparity between the wealthiest and the poorest. Those of us who can provide any additional support to others *must* do so. Its simple morality • Hard working people can't afford to pay more council tax to support others • If its simple, people are more likely to understand it and apply. And its easier to administer • It would help a lot of people who are in work but still don't earn

		<p>enough</p> <ul style="list-style-type: none"> • Lots of people need help at the moment • Would help a lot more people if there was a standardised amount • The Council Tax is paid by too many low waged and not enough second home owners • Not enough to live on • Because we all are struggling more than other since the cost of livings gone up • No changes required as far as I can see • Would help with costs
	<p>The impact on Council Tax Support recipients and wider council tax payers will be:</p>	<ul style="list-style-type: none"> • None • Help recipients, the council can absorb the costs through right first time efficiencies • The impact on recipients (an extra £30 per month) is of great value and the cost to other tax payers in the borough non existent • There would be more money available or council tax could be reduced • My understanding is that the most cost impact of this to the council is 20K but it will provide significant support • No difference • None • Some people have a worry removed - that may allow then to turn the heating on or a few extra meals, others will see a small increase to their bill and forego a bottle of wine or some other frivolous expenditure • More for scroungers, more to be paid by hard workers • More people will apply. Administration costs will be less. More money will go into peoples pockets, less money will be spent on administration costs • Slight increase • More help for people • Impact would be a fair outcome for all • The recipients would be better off. The council will benefit and the system will be fairer

- A better outcome
- May make it harder to live off we need to look for extra money to pay the council
- The impact must always be offset against the benefit provided and needed. I feel happy to pay a little more if this will ensure the correct level of support is maintained
- Don't know

Are you or somebody in your household getting Council Tax support	Yes	No	Don't Know / Blank	Total	
	5	19	1	25	
	20%	76%	4%		
Any other comments	None				

CTX Consultation 2023/2024

Response Number	I have read the background information (above) about the CTS Scheme	Should we keep the current Council Tax Support scheme?	Please use the space below to make any comments you have	Do you agree with changing the CTS scheme to ignore payments made under the 'Homes for Ukraine' scheme?	If you disagree what alternative would you propose?	Do you agree with changing the CTS scheme to ignore payments made under any other government financial assistance scheme?	Please use the space below to explain what changes you would like to see, the reasons for this and what you think the impact will be on both people receiving Council Tax Support, and wider council tax payers who will be impacted by any changes to the cost of our scheme caused by any changes.			Are you or somebody in your household receiving CTS?
							The changes I would propose are:	The reasons for these changes are:	The impact on Council Tax Support recipients and wider council tax payers will be:	
1	Yes	Yes		Yes		Yes	No others I can think of	N/A	None	No
2	Yes	No		No		No	n/a	n/a	n/a	No
3	Yes	Yes		Yes		Yes	.	.	.	No
4	Yes	Yes		Yes		Yes	n/a	n/a	n/a	Yes
5	Yes	No		Yes		Yes	100%	Greater support to working people in hardship.	Help recipients, the Council can absorb the costs through right first time efficiencies.	No
6	Yes	Yes	the level of support should be raised to 100%	Yes		Yes	the support should be raised to 100%	this gives a benefit of around £200 pa to a significant number of households who are experiencing genuine financial difficulty	the impact on recipients (an extra £30 per month) is of greta value and the cost to other tax payers in the Borough non existent	No
7	Yes	No	There is too much reliance on benefits, everyone should pay their way, I am fed up of subsidizing other people's children and people who are too lazy to work.	No		No	Everyone should pay the full council tax with no exceptions and no subsidies	People should pay their way instead of expecting handouts	There would be more money available or council tax could be reduced	No
8	Yes	Yes		Yes		Yes	Increase support for low income families & self employed to 100% for those who are currently struggling with the cost of living	Many families are struggling	My understanding is that the cost impact of this to the council is 20k but it will provide significant support	No
9	Yes	Yes		No		No	None	It's good as it is	No difference	Don't know, not sure
10	No	No		Yes		Yes	Help working people or those who have had to give up work but can't any help from anyone.	To help	None	No
11	Yes	Yes		No		No	Don't change	Don't Chang	Would cost more for people on low incomE	No
12	Yes	Yes		Yes		Yes	The maximum level of support should be increased to 100% wherever possible.	re there is huge dis	Some people have a worry removed - that may allow them to turn the heating on or a few extra meals, others will see a small increase to their bill and forego a bottle of wine or some other frivolous expenditure.	No
13	Yes	Don't know		No		No	Leave things as they are	Hard working People can't afford to pay more Council tax to support others	More for scroungers, more to be paid by hard workers	No

14	Yes	Don't know	I've looked at your notes and my eyes glazed over! You explain the scheme to someone who knows all about it. You don't explain the scheme to someone who doesn't know anything about the scheme. Why not make it easy to understand? You'll not increase take-up of the scheme like this. Work harder at understanding how ordinary people will read what you've written.	No		No	You're rushing about, aren't you? (we would like to hear your views) (rules for how we treat earnings). You're trying to make the scheme too complicated. Instead you should be making it simpler to understand.	If it's simple, people are more likely to understand it and to apply. And it's easier to administer.	More people will apply. Administration costs will be less. More money will go into people's pockets, less money will be spent on administration costs.	No
15	Yes	No	We need the scheme but it needs extending to support more people	No		Yes	Offering more support to those on low income, e.g. disregarding universal credit as income	It would help a lot of people who are in work but still don't earn enough	Slight increase	Yes
16	Yes	Yes		Yes		Yes	-	-	-	Yes
17	Yes	Yes		Yes		Yes	More people being able to get help	Lots of people need help at the moment	More help for people	No
18	Yes	Yes	It should be protected, the crisis we are going through now, support is needed more now than ever	Yes		Yes	Stop putting the council tax up every year.	Would help a lot more people if there was a standardised amount	Impact would be a fair outcome for all	Yes
19	Yes	Don't know	Working people on low wages need all the support available and this support should be extended in BKLWN as it is in Norwich. I support the retention of the Support Scheme. The first question is most unclear in that I want the support kept but believe it should be extended to 100%.	Yes		Yes	The people affected are poorly paid, in work and deserve more money in their pockets to enable them to eat and heat, to buy clothes and shoes for their children. They just need to not pay Council tax until their wages and the economy improve. To change the amount of Council Tax upwards of second home owners and holiday home premises to 150% would raise money collected for the council.	The Council Tax is paid by too many low waged and not enough second home owners.	The recipients will be better off. The council will benefit and the system will be fairer.	No
20	Yes	Yes		Yes		Yes	Happy as is	N/a	N/a	No
21	Yes	Yes		Yes		Yes	Discount on late council tax due to earnings	Not enough to live on	A better outcome	No
22	Yes	Don't know		Yes		Don't know	Try to treat all family the same with any extra help during this time.	Because we all are struggling more than other since the cost of livings gone up.	May make it harder to live if we need to look for extra money to pay the council.	Yes
23	Yes	Yes	These type of support initiatives have proved to be and will continue to be absolutely essential in providing much needed and structured support to those that need it.	Yes		Yes	I'm happy with the scheme as it currently operates	No changes required as far as I can see	The impact must always be offset against the benefit provided and needed, I feel happy to pay a little more if this will ensure the correct level of support is maintained.	No
24	Yes	Don't know		Don't know		Don't know	No Changes	?	?	No

25	Yes	Don't know		Don't know		Don't know	Pensioners should automatically get a discount on their council tax if they are both receiving an attendance allowance.	Would help with extra costs	Don't know	No
Yes	24	14		16		16				5
No	1	5		7		6				19
Don't Know	0	6		2		3				1

REPORT TO CABINET

Open		Would any decisions proposed :			
Any especially affected Wards	Mandatory/	Be entirely within Cabinet's powers to decide		YES/NO	
	Discretionary/	Need to be recommendations to Council		YES/NO	
	Operational	Is it a Key Decision		YES/NO	
Lead Member: Councillor Paul Kunes E-mail: cllr.paul.kunes@west-norfolk.gov.uk			Other Cabinet Members consulted: None		
			Other Members consulted: Environment and Community Panel and Urban Wildlife Informal Working Group		
Lead Officer: Stuart Ashworth E-mail: stuart.ashworth@west-norfolk.gov.uk			Other Officers consulted:		
Financial Implications YES/NO	Policy/ Personnel Implications YES/NO	Statutory Implications YES/NO	Equal Impact Assessment YES/NO	Risk Management Implications YES/NO	Environmental Considerations YES/NO

Date of meeting: 17th January 2023

RECOMMENDATIONS FROM THE ENVIRONMENT AND COMMUNITY PANEL'S URBAN WILDLIFE INFORMAL WORKING GROUP

Summary

At its meeting on 9th June 2021 the Environment and Community Panel established an Informal Working Group to look at Urban Wildlife. This report presents the recommendations from the Group, which have been supported by the Environment and Community Panel, for the Cabinet to consider.

Recommendation

1. That the recommendations from the Environment and Community Panel, as set out in the report, are passed to the Cabinet Biodiversity Task Group for consideration.
2. That the Environment and Community Panel be kept updated on progress with the recommendations as appropriate.

Reason for Decision

To promote urban wildlife in the Borough of King's Lynn and West Norfolk.

1.0 Background

- 1.1 At its meeting on 9th June 2021 the Environment and Community Panel established an Urban Wildlife Informal Working Group.
- 1.2 The Informal Working Group held four meetings and the notes from the meeting are available for Members to view on the Mod Gov Intranet system. This included a meeting with the Portfolio Holder for Environment to discuss their proposed recommendations to the Environment and Community Panel.

1.3 The Informal Working Group presented their recommendations to the Environment and Community Panel at their meeting on 5th October 2022.

2.0 Recommendations from the Environment and Community Panel.

2.1 The Environment and Community Panel supported the recommendations from the Informal Working Group, as set out below, and recommended that they be presented to Cabinet for consideration. Additional commentary on the recommendations is also set out below.

1. Encourage the use of bird boxes, bat boxes and hedgehog highways in new and existing Borough Council properties.

To investigate the possibility of adopting a policy of giving the option of installing swift and bat boxes, bee bricks and hedgehog highways in new developments. The Group acknowledge that it would be difficult to insist that this was included in new developments, but feel that people should be given the option of having them provided. The Group also encourage installation of items to promote Urban Wildlife in existing Council facilities where appropriate.

2. The Council to investigate providing wildflower seeds for redundant allotments and community orchards/gardens and encourage the planting of wildlife seeds in the community.

The Group would like the Council to give consideration to planting wildflower seeds in redundant areas such as unused allotments and community areas. They ask that the Council use pollinators and flowers that benefit wildlife where possible. Parishes could also be encouraged to plant redundant areas.

3. The Council to encourage bird feeding stations and nest boxes in schools.

This could involve the Men's Shed who have indicated that they would be interested in assisting with the provision of nest boxes for schools.

4. Support of a 'Nest Box Trail' in King's Lynn.

This is an initiative by Julian Moulton and his idea is to locate a variety of nest boxes throughout King's Lynn with a map and guide. Boxes could be located at playgrounds, public spaces and various buildings. This could be publicised by having a stand at town centre events.

5. Produce literature advising how residents can help support their urban wildlife and promoting the nest box trail in King's Lynn.

This could include links to local organisations who are interested in promoting Urban Wildlife along with links to useful websites, details of the best types of plants to encourage urban wildlife and helpful hints and tips to support urban wildlife in their own gardens.

6. Engage with local groups to participate in urban wildlife.

Organisations such as Men's Shed, In Bloom and schools could be engaged to promote urban wildlife. Stands at events could promote the nest box trail and provide literature as mentioned in recommendation 5 above.

Linking with recommendation 3 above, schools could be encouraged to become involved by promoting what they have done for urban wildlife, with the possibility of a competition.

The Informal Working Group have also been approached by NVN (Nature Volunteer Network) who have offered to collect wild bird seed for bee highways in the Borough. They are careful only to collect 10-20% of the seed on any given wild plant. This is an example of a local organisation who wants to contribute and also a demonstration of the cooperation the Borough can encourage and develop between outside bodies interested in local wildlife.

7. Encourage Councillors to promote Urban Wildlife in their Wards and Parishes where appropriate.

This could include promoting the benefits of Urban Wildlife and signposting to relevant organisations. Councillors could suggest ideas to their Parishes such as bulk buying wild bird seed, which would bring the cost down to residents, and then could be sold at cost by Parish Councils. Councillors could also provide detail of good work in their Wards which could be circulated to other Councillors via the Members Bulletin and then cascaded down to Parish Councils as appropriate.

3 Options considered

- 3.1 The urban wildlife working group has made recommendations which have been supported by the Environment & Community panel. The options will be for this to be supported by Cabinet and taken forward in an appropriate way, or not supported.
- 3.2 Given the fact the Biodiversity Task group has already been agreed, and there is a general drive to improve biodiversity, it is considered that the only feasible option is that this should be supported by Cabinet and taken forward. In addition, the new Biodiversity Task Group would be the ideal forum to discuss these recommendations from Environment and Community Panel.

4.0 Financial Implications

- 4.1 There are no financial implications at this stage, as the proposal is that the recommendations from the Environment & Community Panel, relating to their working group, will be considered in more detail by the Cabinet Biodiversity Task Group.

5.0 Personnel Implications

- 5.1 There are none.

6.0 Environmental Considerations

- 6.1 These are positive, as the aim is to improve and help urban wildlife in the borough.

7.0 Statutory Considerations

- 7.1 None

8.0 Equality Impact Assessment (EIA)

- 8.1 As recommendations to be considered by another task group, not applicable at this stage.

9.0 Risk management Implications

9.1 None

10.0 Declarations of Interest/Dispensations Granted

10.1 None

11.0 Background Papers

Agendas and minutes from the Urban Wildlife Informal Working Group available on the Intranet.

Report and minutes from the Environment and Community Panel meeting held on 5th October 2021.

REPORT TO CABINET

Open (Appendices 3, 5-7 exempt)		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			
Any especially affected Wards 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: 17th 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 6th 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 3rd 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 29th 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
Total	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
Total		193,744

- 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
Total		455,374

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 3rd 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 3rd 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 28th 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 8th 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
Undervalue amount	£1,225

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>	£,000
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
Total expenditure to date	£5,084
Total funding received to date (ACP and BRP)	£2,135
Total net cost to date	£2,949

- 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
Total Development Costs	£48,367	£54,462	£6,095
Total Revenues	-£47,309	-£51,938	-£4,629
Total Funding	-£2,315	-£2,315	£0
Return before financing	-£1,257	£209	£1,466
Borrowing costs	-	£674	£674
Development Return after financing	-£1,257	£883	£2,349

- 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 8th 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>Risk 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>Sensitivity/Consequences 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>Risk The anticipated growth over the 5 years to 2027 does not materialise- property prices either stagnate or fall in real terms</p> <p>Sensitivity/Consequences 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 Appendix 5</p>	Low

<i>Table 8</i> Risk items	Risk Implications and Sensitivity	Level of Risk
Costs increase more than anticipated	<p>Risk Build costs exceed the contingencies allowed for within the LPL contract price, and or other unknown additional / abnormal costs materialise</p> <p>Sensitivity/Consequences Significant site investigations, due diligence and supply chain engagement, along with forecast easing of tender inflation shown in the GBCI index (included in Appendix 2), 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>Risk Mortgage interest and PWLB rates continue to increase</p> <p>Sensitivity/Consequences 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>Risk 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>Sensitivity/Consequences 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 Appendix 5</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 28th June 2016 – CAB33 -Affordable Housing Company

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

Report to Cabinet 6th 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			
Question		Answer			
<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 according to their different protected characteristic, 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>					
				√	
				√	
				√	
				√	
				√	
				√	
				√	
				√	
				√	
				√	
Question	Answer	Comments			
2. Is the proposed policy/service likely to affect relations between certain equality	No				

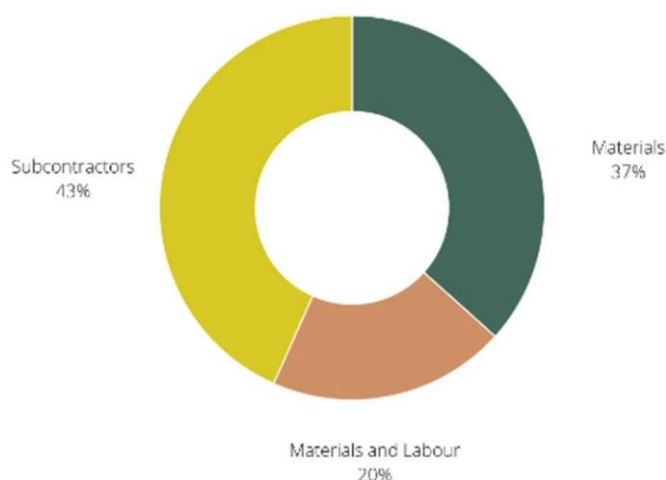
communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?		
3. Could this policy/service be perceived as impacting on communities differently?	No	
4. Is the policy/service 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	Actions:
		Actions agreed by EWG member:
<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 1st January 2023, this effects pipework, kerbs, paving slabs, manhole rings etc.
- British Gypsum – from 1st 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 1st April 2023, Celotex have 10% increase on PIR products from 1st 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
Significant LPL tender cost increases:	000s		
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		
Total LPL Tender Price Movement	£5,927		
Total Development Costs	£48,367	£54,462	£6,095
Revenues			
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
Total Revenues	-£47,309	-£51,938	-£4,629
Funding			
ACC	-£2,115	-£2,115	£0
Business rates Pool	-£200	-£200	£0
Total Funding	-£2,315	-£2,315	£0
Return before financing	-£1,257	£209	£1,466
Borrowing costs	-	£674	£674
Development Return after financing	-£1,257	£883	£2,349
Target savings	000s		
Groundworks contingency	£625		
Inspirations (carpets, upgrades etc.)	£146		
Total target savings	£771		

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