

REP ID/ORGANISATION	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> <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”. 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>West Winch Parish Council</p> <p>North Runcton Parish Council</p>	<p>For clarity, at page 5, third paragraph, West Winch and North Runcton Parish Councils worked to produce the Neighbourhood Plan in order to try to <u>mitigate</u> the impact of the proposed development, not to ‘support’ it.</p> <p>As noted above – we don’t think this document achieves the stated goals stated in the last three paragraphs of page 5.</p>

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

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<p>Castle Rising Parish Council North Wootton Parish Council South Wootton Parish Council</p>	<p>Section 5 of the draft Masterplan details the adopted policies around which the development has been set. The list omits the Core Strategy, although relevant. The SADMP, has very clear site allocation and development policies for the Growth Area including:</p> <ul style="list-style-type: none"> • 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>REDACTED</p>	<p>Page 14 suggests the provision of 3 shops – for 4,000 houses?! Even if the ‘fullness of time’ mentioned on page 5 doesn’t happen, 2,500 are already planned – which is a large village. On page 18, under ‘Neighbourhood Centres’, it says it would ‘create a sustainable layout that would enable residents (both new and existing) to walk or cycle to the local amenities to satisfy their daily needs and facilitating the development of neighbourhood identity’. Given that this development is effectively the size of Swaffham, it might be worth thinking about how many shops <u>they</u> have and whether 3 shops (plus the handful in West Winch) will satisfy the daily needs of so many people. This all of course ignores the fact that places like Swaffham (in fact 3,250 households according to Wikipedia) have developed into rounded, useful, workable towns over a period of hundreds of years. This new development in West Winch is neither a town that has developed over the years nor a planned New Town – what it looks like is satellite housing for King’s Lynn, and yet it is such a large development.</p> <p>Page 14 also has ‘library contributions’ – I have no idea what this means but would like to think it means a library facility might be provided. I feel that this is highly unlikely though, given the cavalier way our county council is currently behaving towards our library in King’s Lynn.</p>

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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>
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>

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

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

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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> <p>The relationship of the church and manor with the farmland has survived despite the extensive modern development on the west side of the main road. The proposed masterplan would introduce modern housing to the east of the church, building beyond the established historic pattern of development and separating the church from the fields at this point. This would result in harm to the historic significance of the parish church by diminishing the quality of its setting that contributes to that significance. The farm and moat would also be separated from the fields by housing on their east and south sides.</p> <p>In our letter of February 2019 on this application we included a record of the consistent objections we have raised to development of the fields east of the church in 2011, 2013 and 2015. These objections were repeated in our February 2022 letter. We therefore remain of the view that to develop these fields, which form the northern part of the site in application 18/02289/OM, would be harmful to the historic significance of the grade II* listed church.</p> <p>We therefore strongly recommend the removal of some built development in this area of the masterplan. We would suggest that there is an area of open space and set back to the east of the church to provide some breathing space for the heritage asset and to enhance the significance of the asset.</p>
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	<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>
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.
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?

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

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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 enable the continuation of West Winch as a distinct settlement which can continue to be characterised by its predominantly rural setting.</p>
REDACTED	<p>Page 18 'Climate change' doesn't seem to lay down any rules about e.g. having PV on every roof; using air-source heat pumps; setting above the minimum requirements for building regs; passive solar gain etc etc. Saying it 'should seek to meet high standards of sustainable construction and design in terms of ...' is waffle – both 'should' and 'seek' don't lay down any rules. Developers will aim to provide the lowest quality they can get away with for the greatest possible profit unless their hands are held to the fire with rules that force them to address changing needs in terms of moving away from fossil fuels, working towards passive house status, etc.</p>

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

REP ID/ORGANISATION	SUMMARY REPRESENTATION
Norfolk County Council	<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 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>

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

REP ID/ORGANISATION	SUMMARY REPRESENTATION
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>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>
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</p> <p>non-designated assets identified in NP policies WA01-WA03. The 'Green Infrastructure' section should reference NP policies WA05-WA07 and policy GA03. The 'Connectivity and Transport' section should reference NP policies GA04-GA08.</p>

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

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

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

<p>Castle Rising Parish Council North Wootton Parish Council South Wootton Parish Council</p>	<p>Section 9 concerns connectivity and transport. It states that:</p> <ul style="list-style-type: none"> • “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 policy E2.1 Part B (d) and (e 1), nor with NCC LTP4 policies, nor SADMP para E2.60. • 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.
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REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	Page 20 talks about 'Better Bus Service' to the growth area, but what about the already developed areas, i.e. West Winch and particularly North Runcton?
Norfolk County Council	<p>In a review of section 9, the LLFA observes the typical indicative primary, secondary and tertiary corridors cross sections have space potentially for SuDS. The LLFA welcomes this and seeks stronger commitment in the SPD to the inclusion of roadside sustainable drainage features.</p> <p>The LLFA would like to remind those preparing the SPD that all four pillars of SuDS (water quantity, water quality, biodiversity and amenity) must be demonstrated for the proposed solution to be considered as a sustainable drainage system.</p>
REDACTED	Access to North Runcton from West Winch via foot, cycle or disability scooter will be hazardous via proposed new Rectory Lane/Chequers Lane bridges.
Historic England	<p>P21 Connectivity and Transport Plan - We recommend the inclusion of more landscaping along the eastern access road, particularly in the area around the roundabout to the north of Rectory Lane to help protect and enhance the grade II listed Old Rectory at North Runcton. Landscaping along this eastern edge would also serve to screen and soften the development in the wider landscape.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
<p>West Winch Parish Council North Runcton Parish Council</p>	<p>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>
<p>REDACTED</p>	<p>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.</p>
<p>REDACTED</p>	<p>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.</p>
<p>REDACTED</p>	<p>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>

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

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

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

REP ID/ORGANISATION	SUMMARY REPRESENTATION
<p>004 written rep Castle Rising Parish Council North Wootton Parish Council South Wootton Parish Council</p>	<p>Sections 10 and 12 of the draft Framework Masterplan deal, respectively, with WWHAR and Governance. Section 10 states that the design will comprise the following “essential elements”:</p> <ul style="list-style-type: none"> • (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>REDACTED</p>	<p>Page 21 map. Various queries:</p> <p>The orange and red bus route seems to deviate off the access road above and below Rectory Lane and then towards the A10 – is this another new road? For buses only? This is the first time that this road has been shown on maps as far as I can remember – when did this idea come in and why?</p> <p>The note re Rectory and Chequers Lanes suggests ‘will maintain active travel connections between West Winch and North Runcton’. Are we correct to take this to mean that the access on both will be pedestrian and cycle only with no vehicular access? I asked about this at the consultation and didn’t receive a definitive answer. If it is the case that they will be pedestrian/cycle access only, how will buses serve North Runcton? It’s a long walk from e.g. Cedar Grove to the bus route off the Access Road.</p> <p>The existing path from Hillingdon Lane up to Sheep’s Course Wood will be perilously close to the new road. Will anything separate them?</p>
<p>Anglian Water</p>	<p>The detailed design of the access road will need to take account of Anglian Water assets that may be affected by the proposed route, and the necessary measures that will need to be taken to ensure continuity of water supply and our recycling network.</p>

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

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

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

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

REP ID/ORGANISATION	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 experience significant water shortages within the next five years. We are now in the process of preparing WRMP24, with a draft to be submitted to Defra in October 2022. In line with statutory requirements, we will be holding a public consultation on this draft WRMP in the autumn.</p>
Norfolk County Council	<p>In section 11 regarding the delivery of the development, the LLFA notes there is very limited information available at present regarding the phasing of the development's delivery. The LLFA reminds both the local planning authority and the developers that the development must not increase flood risk during the lifetime of the development, which includes the different phases of construction. Therefore, a detailed phasing plan will be required to demonstrate that appropriate surface water management systems will be in place to ensure there is no change in flood risk.</p>
Hopkins Homes	<p>The framework is right to allow a degree of development prior to the completion of the WWHAR. Transport evidence demonstrates that development of c300 homes can be accommodated onto the existing network without significant adverse effect. The early delivery of homes would also allow financial contributions towards road, education and drainage infrastructure improvements to be captured quickly in the process. It would also provide housing in an area where housing supply is needed.</p>
REDACTED	<p>The West Winch Stakeholder group needs to be a real consultation group. Based on experience so far it feels like it is a one way communication of what is going to happen. Officers and councillors need to listen and try and adapt within the framework to address real concerns and issues. Also there needs to be proactive and regular communication to the public being honest about the reasons when decisions are being made.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
004 written rep Castle Rising Parish Council North Wootton Parish Council South Wootton Parish Council	<p>Sections 10 and 12 of the draft Framework Masterplan deal, respectively, with WWHAR and Governance. Section 10 states that the design will comprise the following “essential elements”:</p> <ul style="list-style-type: none"> • (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>
West Winch Parish Council North Runcton Parish Council	<p>Lastly, we feel that the pages on ‘Delivery’ and ‘Governance’, aspects of which we take issue with, indicate that this document is really about promoting the scheme to third parties – possibly the Planning Inspectorate and Department of Transport? These pages would appear to have no place in a supplementary planning guidance document if it was focussed on assisting the delivery of high quality sustainable development.</p>
Hopkins Homes	<p>The establishment of a Project Board and Delivery Group is supported in principle, subject to further detail on representation and role.</p>
Metacre	<p>With regards to the proposed phasing as referenced at Page 23 of the SPD, we support the expectation that an element of delivery can come forward during the next 2-5 years prior to the completion of the Housing Access Road. Indeed, the Council will note that the evidence submitted with outline application (ref: 18/02289/OM) demonstrates the 500 units comprising Phase 1 can come forward prior to the Housing Access Road.</p>
REDACTED	<p>build oposite William Burt Centre towards common side will spoil quiet country lane and change views from center. where are the horses of West Winch Going? Can Kings Lynn Hospital cope will a build of this magnitude and population increase. Where are people going to work?</p>
REDACTED	<p>I cannot see any reference to the A10 which regularly gets long hold ups with cars turning in and out of West Winch Also another 4000 homes would put pressure on the hospital that may even close if funding cannot be found for a new building.</p>
REDACTED	<p>Why do we need 4,000 extra houses? Just greedy and really going to affect people already living in the village</p>
REDACTED	<p>No provision made for the existing flood risk which are yet to be resolved. The extra 4k homes will place massive pressure on flood Risk which needs to be resolved in full before any progress made.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	<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>
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>
REDACTED	<p>It is a good document that shares the desire of the council regarding this scheme.</p> <p>The viability of the scheme is questionable with all the issues of where will people come from to live here, how will the schools and health centres be staffed, being half way between Watlington and King's Lynn centre makes it a bit of an island meaning people will want to have and use cars.</p> <p>Can the development truly meet all the government requirements around sustainability?</p> <p>Finally - the consultation on the road when it comes needs to be open with the officers and councillors listening to peoples views and trying to truly take account of them.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	<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>
CPRE Norfolk	<p>There is far too little discussion of essential infrastructure in the consultation document. In particular, there is only one reference to health provision, which is almost certainly one of the main concerns of existing residents and of potential new residents.</p> <p>The consultation does not specifically ask for comments on Section 6, Infrastructure Delivery Plan, where certainty around these issues should be provided, to ensure that sufficient reassurance is given that essential services and facilities will be provided. If this certainty for provision of key infrastructure does not exist this would give CPRE Norfolk serious misgivings about the whole proposal. It is essential that appropriate health and dental services are provided within the settlement given the anticipated growth in population, and the need to avoid unnecessarily long journeys for residents. It is acknowledged there is some facility for making comments on the delivery of the scheme under section 11.</p> <p>As noted under Section 8 above, clearer requirements regarding external night lighting should be included.</p> <p>It is important that community stakeholders' views on necessary community facilities are listened to and then delivered through the development process.</p>
REDACTED	<p>The area is already overpopulated, the road network is already at breaking point, our local hospital is trying to collapse, our waste water/ effluent is having to be pumped into the sea, how bad do things need to get before you realise we already have too many people?</p> <p>Please stop building .</p>
REDACTED	<p>After looking at the master plans, I only have 1 major concern (LAND / STORM WATER).</p> <p>We have trouble know at the bottom of Willow Drive with land / storm water, Because the land owner in front of us has raised the land level and we live in a hole.</p> <p>The field behind Coolstak warehousing has a large dip in the field which fills up with storm water and goes into the concrete culvert and onto the common.</p> <p>But the land drain pipes which goes from the bottom of Willow Drive + The pipe from the field which runs side by side out onto the common cannot cope.</p> <p>The dike in the common of which the pipes go into has been cleaned for at least 30 years.</p> <p>I all of the dikes on the common behind Willow Drive has been cleaned for over 30 years.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
REDACTED	<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. 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>

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

<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> <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 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</p>
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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

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

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

REP ID/ORGANISATION	SUMMARY REPRESENTATION
North Wootton Parish Council	<p>*** has been working with and advising the parishes of South Wootton, North Wootton and Castle Rising all of whom are deeply concerned at the lack of mitigation measures on the large developments at West Winch and South Wootton.</p> <p>These will result in making such developments car dependent and deeply impact on our already atrocious emissions record at a time when we should be seeking to improve the environment. Unfortunately Norfolk County Council have allowed not only the cancellation of public transport entering the Knights Hill site they have now suggested the major developments at West Winch commence without the planned relief road for which there is now no guarantee of funding. You will read from the attached, the developments are not now NPPF compliant. We must ensure the planners stop granting large applications by disregarding and cancelling original mitigation measures proposed by developers. This is all in an attempt to open the door to boost housing numbers with total disregard to the negative and harmful impact on current and new residents in West Norfolk.</p> <p>North Wootton PC fully endorses the content of ***s submission and I attach a copy here.</p>
South Wootton Parish Council	<p>*** has been working with and advising the Parishes of South Wootton, North Wootton and Castle Rising all of whom are deeply concerned at the lack of mitigation measures on the large developments at West Winch and South Wootton. South Wootton Parish Council fully endorse *** attached Masterplan submission and trust attention to these vital areas will 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 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> <ol style="list-style-type: none"> 1. Make the East of England resilient to the risks of drought and flooding 2. Enable sustainable economic growth in the UK's fastest growing region 3. By 2030, be a net zero business and reduce the carbon in building and maintaining our assets by 70% 4. Work with others to achieve significant improvement in ecological quality across our catchments <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>
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National Grid
(plan also provided)

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

About National Grid

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

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

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

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

Gas Transmission

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

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

Electricity Transmission

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

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

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

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

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

Director

REDACTED REDACTED For and on behalf of Avison Young

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

Electricity assets

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

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

REP ID/ORGANISATION	SUMMARY REPRESENTATION
	<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></p> <p>High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.</p> <p>National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.</p> <p>National Grid's '<i>Guidelines when working near National Grid Gas assets</i>' can be downloaded here: 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>

County & Borough Councillor
Alexandra Kemp

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

- a blight on West Winch, and increase the poor residential amenity from the heavy traffic through the village
- a liability to the highway, due to the lack of necessary strategic road infrastructure with no bypass in place
- an increase to the current risk of flooding to existing homes, because of the lack of competent flood prevention infrastructure which must be provided in advance of any development of the Growth Area.

The Bypass must be built out in full and the A10 traffic-calmed to a village road, and a wholesale review and reconditioning of the drainage system through West Winch take place, before any development starts.

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

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

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

North Runcton & West Winch Surface Water Management

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

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

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

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

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

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

The 2014 Drainage Board report found -:

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

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

MISSING FLOOD DRAINAGE INFRASTRUCTURE

Speed and Rate of Run-off

- Four dwellings were flooded in August 2022 on Hall Lane, West Winch at the bottom of the slope down from the A10. Water reached a level of 10-12 inches and created an emergency situation which it took the Fire Service an hour to bail out. This shows 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 the bypass could be built piecemeal. It can't. The A10 functions too badly now and cannot be made worse.
- No Highway Assessment of Impact on West Winch Highways failed to ask the developer to do a Traffic Impact Assessment on the A10 and estate road junctions from the proposed 300 new homes, on the grounds all the traffic would be going north. This is not credible as some Residents would go south to drive children to West Winch Primary, to go work or go shopping in Downham Market, Ely or Cambridge, or to take the train from Watlington.
- Safety A10 in West Winch and Setchey is the worst performing section in the Mayor of Cambridgeshire's report, is an accident cluster site throughout, and has 20,000 vehicles a day, at least 11% HGV's, with 800 maximum-size HGV sugarbeet lorry movements a day from the Wislington for half the year. The lorries thunder over manholes, and cause damage and keep residents awake at night. There are rear-end shunt accidents as the poor sightlines as traffic does not expect vehicles to stop and turn on bends into driveways or estate roads. It is therefore essential to take the through traffic out and traffic calm the A10 to a village road before any more development
- Residents complain they cannot get out of their driveway or the estate roads on to the A10 safely now They have to leave extra time just to get out on the A10 and this is impossible in the Summer with the heavy holiday traffic. The constant stream of traffic and no traffic lights to turn in to the estate roads, makes the A10 a constant danger.
- Traffic on A10 worse since lockdown Residents who bought homes on the A10 during lockdown are kept at wake at night by the traffic and tell me they want to move.

- Residents can't cross the A10 safely now The traffic impact would certainly worsen for the new residential development of 30 homes opposite the Winch.
- Residents cannot now cross the road, to get to the bus stop on the A10, and have asked me for a crossing.
- Highways say it is too dangerous for a crossing at the Winch. If it is too dangerous for a crossing, Highways should have stopped the development in the first place, as it goes against the principle of Active and Sustainable Travel.
- Setchey needs a crossing now Residents cannot safely cross the road as there is no pedestrian crossing at all.
- Residents cannot now safely cross the A10 at any point. The loss of amenity from any more development will be too great. There is only one pedestrian crossing along the whole stretch of the A10 in West Winch and Setchey. But even then lorries do not always stop, so I had to fight to keep the School Crossing Patrol and have higher traffic heads put in at the crossing. More development along the A10 would make the situation worse. The Bypass needs to come first so West Winch Road can be traffic-calmed.
- Bypass must include Setchey The Masterplan is inadequate as it starts the Bypass from Gravel Hill Lane, but the Bypass must start south of Setchey.
- The Bypass is 50 years overdue. Resident campaigned for the bypass with the MP in 1974. The Government recognised the need for the Bypass and plans were drawn up for the routes in 1990, the funding was produced but was then withdrawn and the plans were put in the Norwich Record Office. Then there was a 300 home development in the middle of West Winch but no bypass. There is the issue of trust and the traffic is much worse now than in 1990, so there is no excuse not to complete the bypass first.
- The Masterplan leaves West Winch in the lurch If development begins, there will be no guarantee the bypass will ever be built, either in part or completely.
- Active Travel Deficit The A10 is unfriendly to walk along, because of fast moving lorries along a relatively narrow road which produce noise, pollution and a backdraft which is frightening for many, as you feel as if you are going to be blown into the hedge. It feels like walking along a motorway.
- The Masterplan does not guarantee funding for the improvements to the walking and cycling routes needed for Active Travel along the A10.
- Building on the A10 first is the wrong place it would be logical to start building on the much wider A47, which is not as busy as the A10 in West Winch and Setchey, instead of starting development on the A10 which is too pressured.
- There needs to be investment in public transport on the A10 with more frequent, earlier and later buses West Winch Village has poor public transport, is poorly related to Lynn, being cut off by the inhospitable Hardwick Roundabout, and this isolation is evidenced by the fact that the Neighbourhood Plan initiative found that West Winch has the highest second, third and fourth car ownership per household in the Borough. Residents who do not drive says they are marooned in West Winch for 4 days over Bank Holiday weekends, when there are no buses.

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

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

The Drainage Board conclusions in 2014 were:

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

REP ID/ORGANISATION	SUMMARY REPRESENTATION
	<p>required. An ongoing management and maintenance plan for all surface water drainage infrastructure should also be drawn up and agreed with the relevant authorities and land owners.</p> <ul style="list-style-type: none"> • 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. • 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.
REDACTED	i object to the plan and the proposed building of too many houses for the reasons stated above.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON DESIGNATED SITES

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:

- 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

Damage or destroy the interest features for following Sites of Special Scientific Interest (SSSIs) for the above European sites have been notified.

- 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)

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

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](https://www.gov.uk) website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying [Good Practice Guide for Handling Soils in Mineral Workings](#).

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

iii. SuDS

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

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

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

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

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

Priyanka Adhikari Norfolk & Suffolk Team

ANNEX A – Additional advice

Natural England offers the following additional advice:

Landscape

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

Protected Species

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

Local sites and priority habitats and species

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

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	<p>connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.</p> <p>Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found 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.</p> <p>Ancient woodland, ancient and veteran trees</p> <p>You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland 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</p> <p>Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.</p> <p>1 https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals</p> <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>

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

<p>West Winch Parish Council North Runcton Parish Council</p>	<p>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 into question, the roadwork was provisionally costed at £65Mn more than 5 years ago and since then Brexit, the pandemic, the Ukraine war and other factors have all contributed to massive cost inflation especially in construction works.</p> <p>We have reviewed the Sustainability Appraisal. We have no faith that this document provides a true and objective assessment of the sustainability of proposed development in the Local Plan until 2036. In particular we have no faith that a sustainable transport plan is proposed, especially in relation to the West Winch Growth Area. This SPD provides little or no further detail explaining how a multi-modal, low-carbon transport system can be created within the development. As we have maintained all along, the entire scheme will be heavily dependent on private vehicular transport resulting in thousands of additional local car journeys every day – a mode of transport widely understood to be the most carbon heavy and polluting part of the entire transport network.</p> <p>In summary this document appears to offer one thing – an illustrative sketch masterplan 'endorsed' by the Borough Council. As it has been brought forward so late, it has been largely designed to fit around two existing outline planning applications, neither of which appear to be able to accommodate improved local transport or a first-class cycle network.</p>
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REP ID/ORGANISATION	SUMMARY REPRESENTATION
	<p>As an SPD is a non-statutory document, there is no requirement that any future building should or will come forward in this way. The SPD certainly does not achieve its stated goal highlighted blue at page 5, of providing ‘co-ordination’. It does nothing of the sort.</p> <p>A useful SPD planning guidance document for this development would set out best practice design principles, clear requirements on design styles and public realm elements and community infrastructure. It would significantly add to the existing information set out in the Local Plan and Neighbourhood Plan. It would require developers to work up revised schemes to ensure that high quality sustainable infrastructure can be accommodated.</p> <p>We note the South Cambridgeshire 180-page document setting this out for Waterbeach New Town and the 80-page document setting out requirements for land at Cherry Hinton.</p> <p>scams.gov.uk/planning/local-plan-and-neighbourhood-planning/supplementary-planning-documents-spd</p> <p>We also note that some local authorities have simply adopted national design guides as their own and made these into useful SPDS. For example, Uttlesford have adopted the very good ‘Building for a Healthy Life’ guidance developed by Homes England:</p> <p>https://www.uttlesford.gov.uk/article/4974/Supplementary-Planning-Documents-and-other-planning-guidance</p> <p>If the Borough and County Councils wish to follow national planning policies, as well as their own statutory documents, then in our view this SPD needs to be withdrawn and replaced with a comprehensive document that <u>will</u> ensure sustainable development.</p> <p>We attach further specific comments on the BCKLWN draft SPD at Appendix 1.</p> <p>On the cover – rather than calling the area ‘South East King’s Lynn’ – why not refer to it as the ‘West Winch Growth Area’, which is what everyone has been referring to it as for more than a decade. Better still the ‘West Winch and North Runcton Growth Area’ – which is actually what it is.</p> <p>Each section and paragraph should be numbered for easy reference.</p> <p>We are not entirely clear that the three ‘site context’ plans are necessary or useful. They don’t appear to be referred to anywhere in the document text.</p> <p>We note that at page 7, the ‘Site Context Plan’ shows most of the Hopkins Homes development option site as a ‘Significant Woodland Block’. We tend to agree with this description. The site is presently a mosaic of woodland, scrub and grassland with significant biodiversity value and other environmental benefits. It is a shame that the proposed masterplan will largely remove it and we don’t see how this fits with the Local Plan claim (para E2.10) that one of the reasons for allocation of this site is that it limits ‘landscape impact’.</p> <p>It would be accurate to alter the Site Context Plan label ‘Urban Area’ to ‘Settlement’. Residents have long argued against ‘urbanisation’ of the villages. Referring to development as ‘urban’ also has implications for planning legislation.</p> <p>We question whether any of the supposed contents of the SPD as set out on page 7 are actually provided. Principally in our view it provides little or no additional detail to existing policy and is certainly not a document that can be given ‘significant weight’ in planning decisions.</p> <p>We are not clear of the relevance of all of the photographs at pages 11 and 15.</p>

REP ID/ORGANISATION	SUMMARY REPRESENTATION
BCKLWN Environmental Quality	<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> <ul style="list-style-type: none"> • <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>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 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>

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

REP ID/ORGANISATION	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>

Sports England	<p>Sport England supports the development of a masterplan to cover this significant growth area within the King's Lynn area.</p> <p>The proposal is for an additional 2,500 new homes, this will generate demand for new sports facilities, with the potential for 4,000 new homes in the longer term.</p> <p>The proposed infrastructure includes provision for indoor sport and outdoor sport, and Sport England would wish to be involved in the development of this element of the project.</p> <p>The proposals include an indoor sports centre, multi use games areas and sports pitches for outdoor sport.</p> <p>I have received the following input from NGBs for sport:</p> <p><u>Football</u></p> <ul style="list-style-type: none"> • 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><u>Rugby Union</u></p> <p>The West Winch development lies to the south of Kings Lynn, 5 miles from West Norfolk RUFC. With 2,500 homes delivered by 2038 and up to 4,000 in total. This will inevitably have an impact on a club already over capacity!</p> <p>The club already have plans to expand ancillary provision to try to meet the current demand, this is only further exacerbated by the future demand. The PPS is currently in process and nearing Stage C for Kings Lynn so we will be able to factor this into the report, to reflect the future demand and needs of the club to clearly outline any S106 contributions.</p> <p><u>Cricket</u> – no comments received.</p>
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REP ID/ORGANISATION	SUMMARY REPRESENTATION
	<p>Tennis – no comments received.</p> <p>Sport England would support the development of footpaths and cycleways to encourage people to be more physically active, in line with Active Design principles: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.
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.