

Draft Policy LP12 – Transportation Policy

Link to draft policy and comments in full received from the draft consultation stage:

<https://west-norfolk.objective.co.uk/portal/lpr2019/lpr2019?pointId=s1542883375638#section-s1542883375638>

Consideration of the Issues: (Appendix 1 provides a summary of comments, suggested modifications and an officer response/ proposed action)

The main issues raised were:

- A number of the matters raised are the responsibility of the County Council i.e. in relation to:
 - a. the Lynn-Hunstanton railway line reopening;
 - b. wider transport planning through the Local Transport Plan;
 - c. and leading the lobbying for A47 improvements.

- Changes suggested to the Policy by the County Council making references to additional transport bodies, etc. It is recommended that these can be incorporated to improve it.
- Changes suggested by Historic England re numbered bullet points and a reference to the HAZ Parking Study. These are recommended for inclusion.
- A number of comments were made which were effectively seeking the deletion of the Knights Hill allocation. This is dealt with elsewhere.
- A concern was raised that public transport provision needs to be enhanced to improve connectivity, reducing air quality impacts through reduced car usage. The King’s Lynn Transport Study and Strategy addresses these issues.
- Congestion, associated pollution and carbon emissions - comments were raised on how this needs to be addressed further. The development of a Climate Change Policy is in progress, as previously discussed with the Task Group.
- Sustainable transport and implications associated with this were raised e.g. the provision of charging points - EV.
- Ensuring new development will have transport links to health services.

The resulting changes recommended to the policy and supporting text are set out below.

Officer Recommendations to Task Group:

The Task Group is recommended to:

- 1) Amend para. 5.7.12 as follows “it is important for that the public transport network is to be maintained and improved on key routes to and within the main towns and service centres.”
- 2) Amend Policy LP12 Transportation 1. – to refer to ‘the New Anglia Transport Board’; and to make reference to other partners including: ‘the Department for Transport; and the Government’; 2.a.i – by noting ‘the A47 Alliance’ and by separating out the West Winch Housing Access Road; 2.a.iv – by adding ‘London Liverpool Street line’; 2.c – by adding ‘the King’s Lynn Air Quality Management Area’; 5. – by removing this paragraph as it repeats section 2. b.
- 3) Make the lists in 5.7.7 and 5.7.8 into numbered bullet points.
- 4) Add reference to the Heritage Action Zone (HAZ) parking study in para. 5.7.8.
- 5) Amend para. 5.7.16 – to mention the Coasthopper bus service. Note – this is now split and known as the ‘Coastliner’ operated by Lynx from King’s Lynn to Wells (and Fakenham) and the Coasthopper operated by Sanders from Wells to Cromer (with links to Mundesley and North Walsham).

Policy Recommendation:

Policy LP12 - Transportation

Strategic issues

1. The Council will work with partner organisations (including the New Anglia **Local Transport Board Body**, Transport East, Highways England, **the Department for Transport, the Government**, public transport operators, Network Rail, Norfolk County Council and neighbouring authorities) to deliver a sustainable transport network which improves connectivity within and beyond the borough, and reinforcing the role of King's Lynn as a regional transport node, so as to:
 - a. facilitate and support the regeneration and development priorities as identified in Policy LP02 Spatial Strategy;

- b. foster economic growth and investment;
- c. improve accessibility for all.

2. Priority will be given to:

- a. Improving the strategic networks serving passenger and freight movements to, from and through the borough (including via the port) and including the introduction of measures to reduce congestion, and improve reliability and safety of travel within the A10, A17, A134, and A47(T)/A148/9 corridors. This will include seeking:
 - i. bypasses for Middleton and East Winch working with the A47 Alliance; and
 - ii. the West Winch Housing Access Road;
 - iii. junction improvements at key interchanges including A47(T)/A149;
 - iv. ~~a new road at West Winch to enable access to the proposed housing Growth Area;~~
 - v. improvements to rail infrastructure, facilities, and services on the King's Lynn to Cambridge/Kings Cross and London Liverpool Street railway lines, aimed at achieving better frequency and quality of travel.
- b. implementing the King's Lynn Transport Study and Strategy (KLTSS) schemes including delivering a package of transport improvements within King's Lynn arising from the KLTSS. This will involve balancing ease of access, and car parking, with flows and highway safety, active travel and public transport.
- c. achieving improvements within the towns of King's Lynn, Downham Market and Hunstanton, particularly where there are air quality issues (the Gaywood Clock and King's Lynn Air Quality Management Areas).
- d. achieving a balanced package of highway, traffic management (including car parking), active travel and public transport improvements.
- e. maximising the use of alternative modes of freight movement via rail and the port.
- f. improving accessibility and connections between (and within) towns and villages; so helping to reduce social exclusion, isolation and rural deprivation. To do this the Council and its partners will seek to:
 - i. improve the quality of the bus network;

- ii. extend the choice of transport available for communities;
- iii. work with commercial providers of broadband to increase the accessibility of high speed connections within the borough;
- iv. provide integrated and safe routes for pedestrians and cyclists;

3. Recognise that in the rural areas the private car will remain an important means of travel.

Dealing with transport issues in new development

4. Development proposals should demonstrate that they have been designed to:

- a. reduce the need to travel.
- b. promote sustainable forms of transport appropriate to their particular location and related to the uses and users of the development. In order of preference this should consider:
 - i. walking
 - ii. cycling
 - iii. public transport
 - iv. private car
 - v. development proposals which are likely to have significant transport implications will need to be accompanied by a transport assessment and travel plan to show how car based travel can be minimised.
- c. provide for safe and convenient access for all modes.

5. ~~implementing the King's Lynn Transport Study and Strategy (KLTSS) schemes including delivering a package of transport improvements within King's Lynn arising from the KLTSS. This will involve balancing ease of access, and car parking, with flows and highway safety.~~

5.7.21 Policy LP12 contributes to Strategic Objectives 12, 13, 14, Environment, 19, King's Lynn, 22, Downham Market, 31 Rural Areas, 33 Coast.

Supporting text:

LP12 Transportation (previously CS11)

Introduction

5.7.1 The borough sits at important junctions of the A10, A17 and A47 roads, which link West Norfolk to Norwich, Cambridge and Peterborough and more generally to the south and midlands. There are direct, electrified rail links between King's Lynn and Downham Market which provide frequent services to Cambridge and London. West Norfolk has an extensive system of inland waterways, and sea links to northern and eastern Europe.

5.7.2 The existing strategic transport links are vitally important in connecting settlements in West Norfolk to regional centres and the wider area. However, the borough is characterised as being more poorly connected than the regional economic centres of Norwich and Cambridge, which have connectivity scores well above the national average⁵. This is reflected in the low proportion of jobs taken by non-residents of the borough and of residents travelling out to work elsewhere.

5.7.3 In addition to connectivity, the borough faces some specific transport related issues. It is recognised that in such a rural borough, many people rely on the car as the main mode of transport. Issues relating to the use of vehicles include road accidents, pollution, congestion and parking which particularly affect areas in and around King's Lynn and the market towns. Vehicular related issues can be exacerbated during the summer tourist season and can cause a localised problem on coastal routes such as the A149, and through rural settlements. Whilst it is vital that West Norfolk is accessible by vehicle, the strategy will encourage the use of more sustainable transport methods, where possible, and will facilitate conditions for the reduction of vehicular traffic in the long term.

Norfolk Local Transport Plan (2011-2026)

5.7.4 Norfolk's third Local Transport Plan 2011-26 has been adopted.

5.7.5 This describes the county's strategy and policy framework for delivery up to 2026. It will be used as a guide for transport investment and considered by other agencies when determining planning or delivery decisions.

5.7.6 The plan reflects the views of local people and stakeholders, identifying six priorities;

- Maintaining and managing the highway network
- Delivering sustainable growth
- Enhancing strategic connections
- Reducing emissions
- Improving road safety

- Improving accessibility

King's Lynn Transport Study and Strategy

5.7.7 Norfolk County Council (NCC) and the borough council in partnership are carrying out transport study work leading to the development of a Transport Strategy for the town. The study will comprise a series of workstreams some of which will run in parallel:

- Traffic surveys during spring 2018;
- Analysis of the current and future transport problems and issues;
- Development of possible transport options identified by both BCKLWN and NCC to address the issues;
- Building a microsimulation traffic model of the central area of the town and using this to test possible transport schemes;
- Stakeholder consultation/workshop and identification of a preferred strategy for BCKLWN and NCC to pursue.

5.7.8 The project is to understand current and future issues and develop a preferred strategy, including modelling of the options available, to arrive at a series of implementable scheme proposals. It will provide a focus for activities in and around the town particularly with regard to ongoing initiatives by the **BCKLWN Borough Council** to improve the town:

- King's Lynn Riverfront Regeneration – Nelson Quay;
- Heritage Action Zone **including the HAZ Parking Study;**
- Declared Air Quality Management Areas;
- Local Plan review.

The study is intended to unlock the significant potential of King's Lynn by identifying transport barriers to growth and economic development and setting out a focus and direction for how this will be addressed following the direction of the Local Plan.

5.7.9 Parts of King's Lynn are designated as Air Quality Management Areas due to vehicle emissions. Congestion and associated pollution from vehicle traffic is a key issue in the town centre. Improvements to the public realm will prioritise pedestrian and cycle access, helping to make central King's Lynn less car orientated, as well as safer and more attractive. Congestion is also an issue on the outskirts of the town causing traffic to be held up between King's Lynn town centre and the A47 and A149, ultimately affecting the ability to connect the Sub Regional Centre to the wider area.

5.7.10 Road safety is a particular issue in the King's Lynn area. There has been a high proportion of road accidents on A roads and several corridors were identified as having large clusters of accidents, including the A148, A149, A1076, and B1144, which form the gyratory and its southern and eastern access routes. The Borough Council are continuing to work with Norfolk County Council and Highways England to improve road safety and reduce accident rates within the King's Lynn and West Norfolk area.

5.7.11 It is essential for residents and businesses of King's Lynn that the town remains accessible and that planned growth is adequately accessed. In the long term, reducing the necessity for vehicles to access the town centre by improving public transport could reduce congestion and pollution from vehicles.

Hunstanton, Downham Market and Growth Key Rural Service Centres

5.7.12 The priority for Hunstanton, Downham Market and the Growth Key Rural Service Centres is to increase connectivity between these centres and the surrounding settlements, to ensure people have access to the services they need. As part of this, it is important for that the public transport network to be is maintained and improved on key routes to and within the main towns and service centres.

5.7.13 Norfolk County Council is conducting Market Town Network Improvement Strategies. The strategies are transport focused, aimed at resolving issues and delivering local growth in jobs and housing. Downham Market is one of the market towns currently being studied.

5.7.14 The proposed scope of the study is to understand for each market town the current transport issues in areas such as cycle network, road traffic, parking and access to services and facilities; its future situation such as the impacts of any growth proposals on local transport network; the implications of future changes to the economy and what infrastructure requirements is required to help bring forward growth; and identify and develop appropriate implementation plan.

Rural Areas

5.7.15 The rural nature of the borough means that the car will remain the key transport method for many people. The isolated nature of rural areas makes it difficult to promote or adopt more sustainable methods of transport. Improving communications technology, particularly access to high speed internet connections and broadband will allow people in rural areas to access some services, or even work at home, reducing the need to travel by car. In the long term, promoting behavioural change such as car sharing, as well as facilitating opportunities to operate from home will reduce the frequency of car usage.

The Coast

5.7.16 The strategy for the Norfolk Local Transport Plan seeks to protect the North Norfolk Coast by developing market towns as entrance points into the area and by seeking to build strategic links between these and the main urban areas in the county. Innovative schemes including quiet lanes and village traffic management schemes can also help to increase safety and reduce congestion. Any amendments to the transport infrastructure on the coast will need to make reference to environmental policies, particularly the European Habitats Directive. The Coastliner bus service (formerly part of the Coasthopper) is operated from King's Lynn to Wells (and Fakenham).

Overview

5.7.17 The Sustainability Appraisal recognised the importance of the strategic road network and rail links to the borough. These documents also support the enhancement of public transport, which will be particularly important in King's Lynn, Hunstanton and Downham Market and the Growth Key Rural Service Centres.

5.7.18 A key transport aim is to increase connectivity within the borough, particularly between Key Rural Service Centres and surrounding settlements but also increase overall connectivity to the wider area. In accordance with the Settlement Hierarchy Policy LP02, investment in transport infrastructure will be concentrated in those areas which will experience the highest population growth, aiming to reduce vehicular use in the long term and ensuring residents and workers can access jobs and services by public transport, cycling or walking. The transport strategy will aim to protect the coast and rural areas whilst maintaining the existing level of access.

5.7.19 The Norfolk Local Transport Plan highlighted that the increase in households could lead to unconstrained traffic growth. For this reason the strategic policy must work to decrease the vehicular traffic growth in the borough, by encouraging modal shift, promoting a wider coverage of high speed broadband networks and facilitating improvements to the infrastructure for public transport.

5.7.20 Significant levels of new growth are anticipated within the borough over the plan period, it is important that new development is well integrated with the transport and communications networks.

Sustainability Appraisal:

LP12 Transportation Policy

LP12: Transportation Policy																							
Policy	SA Objective:																				Overall Effect		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20		+	-
LP12	--	+	0	+/-	0	+/	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	+11	-5	Likely Positive Effect +6
Draft LP12	--	+	0	+/-	0	+/	0	0	+/-	0	0	+	0	0	++	++	0	0	++	0	+11	-5	Likely Positive Effect +6
No Policy	-	0	0	+/-	0	-	0	0	+/-	0	-	+/-	0	0	+	+	0	0	+	0	+6	-7	Likely Negative Effect -1

Appendix 1: Summary of Comments & Suggested Response:

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
STP Estates Group (inc. West Norfolk NHS Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust)	Support	When considering transport routes it is important to ensure that as much of the population as possible can access health facilities via public transport. As health and social care services move to a locality arrangement, whereby there is closer working between small groups of GP practices as part of a Primary Care Network, it is important that transport links from new developments are in place to ensure easy access to health services. It is important that public transport is available at times that health services are open; GP surgeries and the acute hospital routinely offer evening appointments and lack of available public transport is cited as a reason for no-show appointments. Alternatively patients may be able to travel to their appointment by public transport but find that public transport has stopped operating by the time their appointment is finished, leaving them effectively stranded. By ensuring health services are fully accessible not only contributes to the health of the population but ensures efficient use is made of health services in terms of reducing no-shows and the associated costs. Where the use of a private car is necessary parking should be available close to health care facilities, particularly in town centre locations where space is short and health partners may not be able to provide onsite parking.		Support is noted and welcomed.
Committee King's Lynn Hunstanton Railway Campaign	Object	The electrified railway from King's Lynn via Downham Market to Cambridge and London tops the list of the strategic assets that the Borough has and it is mentioned in paragraph 5.7.1 It is disappointing, therefore that the third Norfolk Local Transport Plan 2011- 2026 focusses entirely on road transport. Highways England has recently admitted that a £300 million traffic jam busting scheme has in fact increased journey times. Paragraph 122 of the	The fourth Norfolk Local Transport Plan should take a broader view of how people can travel from their homes to where they work, shop or play, incorporating all	The comment is noted but this is a matter for Norfolk County Council to address as they prepare the next Local Transport Plan. No change.

Consultee	Nature of Response	Summary	Consultee Suggested Modification	Officer Response / Proposed Action
		House of Lords Committee on Seaside Towns says that "Bus Users UK highlighted the 'root and branch' review of the rail network, which was announced by the Department for Transport in September 2018, as an opportunity to review the connectivity of seaside towns. It suggested that: "One option would be to use the root and branch review of the rail industry to develop a requirement for all those who bid for a franchise (or whatever model replaces this) to take a holistic view of transport within the region of operation, rather than limiting itself to where rail lines currently exist. In that way, the accessibility of entire journeys, including the "last mile" should be planned in from the outset. This should also link with and extend the scope of the Inclusive Transport Strategy to enable truly accessible end-to-end journeys."	modes of travel.	
Committee King's Lynn Hunstanton Railway Campaign	Object	The objective of the King's Lynn Hunstanton Railway Campaign is to restore a reliable, relatively fast public transport service between King's Lynn and Hunstanton which would also serve the villages between the two places. This will alleviate some of the problems noted in 5.7.3 The traffic census on the A149 near Heacham shows that there has been a 48% increase in motor vehicles from 11305 in 2000 up to 16696 in 2017 putting it on a par with the density on the A10 at West Winch. It is envisaged that a railway will enable people to commute from Hunstanton into King's Lynn and beyond and at the same time enable others to commute in the opposite direction. A new railway would achieve the aim for Hunstanton of "improving visitor accessibility and public transport so the town may benefit from the growth proposals for King's Lynn', likewise it would 'increase the connectivity' between the main towns described as a priority in 5.7.12 and decrease the vehicular traffic growth described in 5.7.19 As noted in 5.7.20, it is anticipated that there will be	Add in a new sentence - 2 a v. Facilitate a full appraisal of the potential that a new railway line from King's Lynn to Hunstanton might provide. (Other schemes around the country have progressed because they have been given the support of District and County authorities, been included in the Local Plans, even if that support has not been financial.)	Disagree - a report to Norfolk County Council's Infrastructure and Development Select Committee on 11 September 2019 said the county council's current policy was that it was "not seen as feasible to consider reopening due to, amongst other things, the cost of reinstating the line, that it is compromised by development, and an unproven business case." It added: "As the county

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		<p>significant growth within the Borough during the plan period. In addition there are proposals for considerable growth in Cambridgeshire and Peterborough. A new rail link would open up access so that people living in those areas can enjoy some of their leisure time at the coast so boosting the tourism industry and the economy of the area. The introduction of the House of Lords Committee on Seaside Towns published in April 2019 states that "Seaside towns, by which we principally mean coastal settlements that emerged as leisure and pleasure resorts in the nineteenth century, have been neglected for too long. They should once again be celebrated as places that can provide attractive environments for residents and visitors alike. Their location on the periphery of the country places them on the periphery of the economy, bringing consequential social problems." In the 2011 census, 28.3% of households in Hunstanton did not have a car or van. The costs of owning and insuring a car have increased significantly in the past 20 years so that many young people, particularly those living in urban areas do not and will not own a vehicle. Rail usage amongst young people in on the increase. With the closure of the sixth form at Smithdon High School, pupils are required to travel to King's Lynn for their higher education. Young people in seaside towns are being let down and left behind by poor standards in existing provisions, limited access to educational institutions and a lack of employment opportunities, resulting in low levels of aspiration. The lack of facilities for young people, poorly paid seasonal employment, poor access to further education and affordable homes leads to people in the 20 to 36 year age group leaving the area, this contributes to the serious age imbalance of the population structure. This outward migration of talented young people might be stemmed if there were significant improvements in connectivity in terms of transport and digital. In Scotland, the</p>		<p>council has not undertaken detailed technical work on the issue, Select Committee is asked to note that officers are commissioning high level technical work to assess current evidence on the likely merits of a business case for reopening. Until this technical work is undertaken it would be premature to agree to a policy for reopening the railway." Policy LP11 deals with the safeguarding of trackways including King's Lynn to Hunstanton.</p> <p>No change.</p>

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		<p>reopening of the Borders railway from Tweedbank to Edinburgh has transformed the local economy and negated the need for young people to move out of the area. Since 1960 more than 400 stations and 950 km of track have been re-opened in the UK and there is a resurgence of interest in rail transport. Over 200 further railway re-opening projects have been identified across the country and are being actively promoted by local, county and regional authorities. The respected Campaign for Better Transport (CBT) group has recently proposed a national plan for reopening several railway lines, funded at national level as railway lines should be viewed as a national infrastructure network. The rail industry is currently looking at plans for a “rolling Reopening Programme” rather than the current stop-start system. Costs would be reduced significantly and the financial burden would be removed from local authorities. King’s Lynn to Hunstanton and Wisbech to King’s Lynn are both included in the CBT list!”</p>		
<p>Town Clerk Hunstanton Town Council</p>	<p>Object</p>	<p>Is this an aspiration? Connectivity - physical and digital needs to be improved. Many seaside towns only have a catchment arc of 180 degrees but because of the shape of the north Norfolk Coast, Hunstanton’s arc is only about 110 degrees. The Beeching era cuts often left coastal communities well beyond the ‘end of the line’. Improved digital connectivity presents a significant opportunity to overcome the challenges of peripherality in coastal areas, and would help existing businesses, encourage new businesses, and enable people to work more flexibly from home without the need to commute. Assistance in delivering ultra-fast broadband in seaside towns should be the highest priority for the Government if the regeneration of these areas is to be achieved. (H o L Seaside Towns paras 125, 129)</p>	<p>Amend 5.7.12.... it is important that the public transport network is maintained and improved on key routes to <u>and within</u> the main towns and service centres.</p>	<p>Agree – amend 5.7.12 as follows: “it is important for the public transport network to be maintained and improved on key routes to <u>and within</u> the main towns and service centres.”</p>

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Ben Colson	Object	<p>The transport hierarchy</p> <p>Recognising the impact of traffic growth on local economies and air quality, government advice to, and the County Council (NCC) (as the highway and transportation authority) has adopted a preferred transport hierarchy, designed to ensure maximum longer term sustainability of new developments. Transport modes are ranked in order of their sustainability, with walking at the top, then cycling, then public transport, then shared car and finally single user car. Vans and trucks are also included but not relevant to this report. As an approach, it makes complete sense. There is ample evidence that traffic congestion costs the national and local economy heavily (in 2018 independent research in 2018 calculated the national annual cost as £37.7bn, or £1.2k per car driver). It is self-evident that the more congested the roads the more stop-start movement, the greater the air pollution.</p> <p>Public transports (in this case we mean buses) are regarded by many as dirty and polluting yet that is far from the case. Modern diesel buses are about ten times less polluting than modern diesel cars (fact) and of course carry more people, on average throughout the country about ten times more people, so have the potential to be 100 times less polluting. Further, annual satisfaction surveys amongst users, rate them in the low 90%, a figure higher than John Lewis, and well higher than railways.</p> <p>Nationally, fewer young adults below the age of 30 are now taking a driving test, and those that do are leaving it until their later twenties to do so. Research shows that nationally, opposition to using the bus for short journeys (two miles or less) is falling – from 45% in 2006 to 36% in 2017.</p>		The transport hierarchy is set out in part 4b of the policy. It would be useful in this respect to move Policy LP12 to appear before policies LP10, 11 and 13.

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		<p>All of this indicates that King's Lynn itself (postcode PE30) is ideally suited to greater use of public transport instead of the car, yet research carried out for the King's Lynn Transport Study (initial findings report issued September 2018, final recommendations report was due to be published in February but is still awaited) shows that the greatest growth of traffic in the King's Lynn area originates from homes in the PE30 postcode. That is the clearest indication that there are negative impacts of Borough's parking and / or planning policies.</p> <p>How transport impacts of development are considered</p> <p>The government's National Planning Policy Framework (NPPF) was updated last year. It sets out how development applications should be considered. The update included Appeal decisions. Following it is not compulsory, but Councils ignore it at their own risk.</p> <p>The NPPF requires that, for a larger development, a Transport Assessment (TA) is carried out, and how that should be done. The Borough Council is the planning authority, but it is NCC that carries out the TA with the developer. However, NCC is only a statutory consultee, no more than a Parish Council. The Borough can therefore accept or reject NCC's advice (just as it can that from a Parish Council), but it usually blandly accepts it. That was so in the Knights Hill case, but Borough Councillors overturned their officers' recommendation due to the groundswell of public opinion, showing that concerted public opposition can win the day.</p> <p>NCC's Infrastructure Development Manager's team provides the TA advice to the Borough's planners. Unless the Local Plan has any criteria over and beyond the NPPF minimum requirement (which it</p>		<p>A King's Lynn Transport Study and Strategy is being prepared. The County Council is preparing a Local Transport Plan. These will address some of the issues raised.</p> <p>If the NPPF requires a Transport Assessment and states how that should be done there is no need for the Local Plan to repeat these requirements.</p>

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		<p>can, and most do) then the County will assess impacts only against the NPPF baseline, that the local road accident rate should not be severely impacted by the new development. In the Knights Hill case the A148 Grimston Road (a straight open road) had no accidents in sample months over the past seven years, so it was deemed that a new junction to the development could not have a severe impact, and the application was supported.</p> <p>Has the Local Plan Review document included extra criteria?</p> <p>The current Plan only requires developers to consider a number of criteria, of which public transport is one. Considering something (and by implication rejecting its relevance) is permissible, yet is very different from considering, taking account of and acting on it. The current Plan is therefore one of the causes of the growing traffic difficulties people living in the Borough face, as well as the negative economic and air quality impacts it brings.</p> <p>So does the LPR change anything? Written before the Knights Hill decision, it has included no new Borough-wide criteria. Strategic Policy LP12 states (para 5.5.3) that the Borough will “ensure that the most important roads in the area do not have their safety and reliability [presumably meaning the flow of traffic, i.e. congestion] degraded by ill-designed or located development.” This appears to be a nod to a slight change in policy but nothing more than that and for most, the failing policies of today will continue.</p> <p>Oddly, in the case of developments in the market towns, criteria have been added into site specific policies (such as Policy E2.1 Part B in respect of the major Growth Area at West Winch, Policy LP35(2) at Downham Market and LP36(2b) and (6b) at</p>		<p>Para. 5.5.3 is part of Policy LP10’s supporting text not LP12.</p> <p>Should we make similar references to bus service improvements in the South Wootton allocations</p>

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		<p>Hunstanton). In these cases development will be assessed against additional traffic-related criteria, but not elsewhere, especially postcode PE30.</p> <p>It is significant that in the West Winch case, para 9.4.1.50 specifically notes “The need to improve the existing bus connectivity was identified in responses to earlier consultations” and “the developers should provide subsidies for the new services.” Nowhere else, no matter how large the proposed development (but it is acknowledged none are as large as West Winch) has a similar requirement, suggesting it is only because of earlier public reaction.</p> <p>In other words, the Borough has had to bend a knee to public opinion in the case of West Winch but only because there had been consultation on the outline idea due to the size of the proposed development. It therefore seems that the Borough had no option but to listen to the public – the implication being that if it had consulted similarly in other cases (most noticeably the cluster of substantial developments in South Wootton) it would have received similar responses.</p>		<p>supporting text? In some ways this would be too late to make a difference as the Hall Lane site has outline permission and the Knights Hill appeal is being heard shortly. Should we make similar references to transport criteria in the King's Lynn/Woottons allocation policies? In this case a number of the King's Lynn allocations have already been developed (i.e. Marsh Lane and Lynnsport).</p>
Chairman East Winch Parish Council	Object	<p>The 'priority' of the council to build bypasses for Middleton, East Winch and West Winch is one over which the Council has little or no control, NCC and the Highways Agency being the organisations which decide roadwork priorities. There is no possibility of even starting work on bypasses before 2023, by which time it seems it is planned that the majority of projected housing will have been built. As a consequence, building up to 4000 houses east of West Winch and North Runcton will add immeasurably to congestion on the A47 and A10. We suggest a much more relaxed timetable for</p>	<p>Priority: to liaise with Highways England and NCC to produce a clear timetable for the building of bypasses for East Winch, Middleton and West Winch, and not to build more than 500 houses on the</p>	<p>The County Council liaises with Highways England on the Roads Investment Strategy. The Borough Council is part of the A47 Alliance which discusses these priorities.</p> <p>Disagree - the suggested</p>

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		<p>house building in this area, and more clarity on the ability of WNBC to implement these 'priorities' within the time scale intended for housebuilding. WNBC might also consider making a road to the railway line and a new station at West Winch. Another priority which WNBC might have more control over is the creation of a cycle track between West Winch and King's Lynn.</p>	<p>North Runcton/West Winch site until the roads have been built.</p> <p>Priority: Concurrently with the building of the new housing, to create a cycle track to King's Lynn.</p>	<p>phasing is not appropriate. No change.</p> <p>Disagree - the West Winch policy does provide for cycle links all the way to King's Lynn Town Centre. No change.</p>
Ben Colson	Object	<p>How the Borough LPR policies apply the transport hierarchy</p> <p>The West Winch Growth Area apart, the Borough appears to adopt a different hierarchy to that adopted by government and NCC, one which generally omits recognition of the role that public transport (the bus) can play in enhancing life style choices (and this is about choices), improving local economies (the evidence is clear) and reducing air quality impacts (the evidence is growing). It follows a hierarchy of walking and cycling (equal first) then car (whether multi-occupancy or not).</p> <p>As a result, all of PE30 development (including The Woottons) site allocations do not require public transport mitigation as a policy. There are no criteria as to road widths and layout to enable public transport to use the roads, nor funding streams (from developers) to pump-prime the service. Most other authorities across the country take a different approach. Section 5.7 and Strategic Policy LP10 covers traffic and transport issues. It states that a TA is only required in respect of infrastructure requirements, and as public transport is seen as a service, NCC and developers will not be</p>		<p>A King's Lynn Transport Study and Strategy is being prepared. The County Council is preparing a Local Transport Plan. The hierarchy is set out in the strategic Transportation Policy LP12. It would be useful in this respect to move it to appear before policies LP10, 11 and 13.</p>

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		<p>required to routinely include it in their TA. This is a major failure of the policy.</p> <p>Para 5.7.3 is significant. It states “many people rely on the car as the main mode of transport” and “whilst it is vital that North West Norfolk is accessible by vehicle, the strategy will encourage the use of more sustainable transport methods, where possible, and will facilitate conditions for the reduction of vehicular traffic in the long term.” 5.7.9 states “improvements to the public realm will prioritise pedestrian and cycle access helping to make central King’s Lynn less car orientated” but at 5.7.11 “it is essential for residents and businesses of King’s Lynn that the town remains accessible.....in the long term reducing the necessity for vehicles to access the town centre by improving public transport could reduce congestion and pollution from vehicles”.</p> <p>Para 5.7.19 refers to the Norfolk Local Transport Plan. It states “The increase in households could lead to unconstrained traffic growth. For this reason the strategic policy must work to decrease the vehicular traffic growth in the Borough by encouraging modal shift.....and facilitating improvements for infrastructure for public transport.” None of these requirements are met in the LPR, with the sole exception of the West Winch Growth Area. This is all really important. Paras 5.7.3, 5.7.9, 5.7.11 and 5.7.19 face in different directions sending conflicting signals. What they mean is that a developer can in effect choose the one to suit his circumstances best.</p> <p>The Borough is signalling no change of approach during the period of the LPR (at the least up to 2026) but then may – or may not – consider alternative, more sustainable, approaches. There are two</p>		

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		<p>problems with this. Firstly that development design and location now influences, and reduces, options for the future, just as past developments have done (for example Kings Reach in King's Lynn and parts of Downham Market which are, by design, inaccessible to buses), and secondly today's politicians (and officers) are "kicking difficult decisions down the line" for future generations to sort out. That is irresponsible.</p> <p>Site specific policies E1.4 to E1.15 all relate to housing allocations in the PE30 postcode area. Some are for small scale developments or those in the town centre core area, and excluding those, all have a planning criteria for the provision of infrastructure, specifically highlighting the provision of new primary and secondary school places (note, this is not the same as primary and secondary schools). Not one requires any consideration to be given to traffic or transportation issues as a matter of policy. The Borough's view must, therefore, be that nothing requires to be done unless the TA shows a need, but then the developer can fall back on the contradictions in the LPR, and as the Borough provides no criteria for the county to use, it has to use the only criteria available, namely whether there will be a severe impact on road traffic accidents.</p> <p>Thus the proposal is that about one thousand new homes should be built in PE30 (excluding West Winch and the failed Knights Hill development proposal) without any coherent policy to take traffic mitigation measures whatsoever.</p> <p>The consequence: locking in car dependency</p> <p>There is a growing view nationally that development should be</p>		

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		<p>designed to offer future generations their own lifestyle choices, and how they get around is one such choice. They should not be locked in to the choices that an older generation might make. Government is coming to this point of view, and it accords with fewer young adults choosing to learn to drive and those that do, doing so later in their twenties.</p> <p>The current and previous Local Plans in the Borough have delivered housing which does precisely the opposite, and it is disappointing and not fair on the next generation of adults that their choices are, even today, being constrained by development design. It is difficult to find more than one larger scale housing development in the last twenty years which has been accessible to any form of travel other than bicycle (not practical for many) or the private car.</p> <p>The LPR is a major and key opportunity to change this. However, it does not do so, and future generations in West Norfolk will continued to be locked into car dependency for decades to come unless a decisive change is made, and made now. Paras 5.7.3 and 5.7.11 refer to reform in the long term, but the time to make changes that will have positive impacts in the long term is right now.</p>		
Parish Clerk Castle Rising Parish Council	Object	Section 5.7.9 states that ‘congestion and associated pollution from vehicle traffic is a key issue in the town centre. Improvements to the public realm will prioritise pedestrian and cycle access, helping to make central King’s Lynn less car orientated...Congestion is also an issue on the outskirts of the town causing traffic to be held up between King’s Lynn town centre and the A47 and A149’. Whilst congestion and pollution reduction might be a stated aim, the distance of the proposed development at Knights Hill from the		The Knights Hill allocation is dealt with in that section. No change.

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		town centre would inevitably rule out pedestrian or cycle access. Consequently, with the dearth of public transport and no commitment to improve the position, residents would be obliged to use their cars to access the Town Centre, bringing a significant unwanted increase in both congestion and pollution and reduction in air quality in the AQMA.		
Parish Clerk Castle Rising Parish Council	Object	Knights Hill would increase congestion and pollution reducing air quality in the AQMA.		Comment is noted but there is no evidence to support the statement made. The Knights Hill allocation is dealt with in that section. No change.
Norfolk County Council (Infrastructure Dev, Community and Env Services)	Object		<p>Policy LP12 Transportation 1. – The document refers to the New Anglia Local Transport Body - this should be amended to the New Anglia Transport Board; and reference should be made to other partners including: the Department for Transport; and the Government.</p> <p>Policy LP12 Transportation 2.a.i –</p>	Agree - make the suggested changes.

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			<p>May be worth noting the A47 Alliance and separating out the West Winch Housing Access Road.</p> <p>Policy LP12 Transportation 2.a.iv – add London Liverpool Street line.</p> <p>Policy LP12 Transportation 2.c – add the King’s Lynn Air Quality Management Area.</p> <p>Policy LP12 Transportation 5. – remove this paragraph as it repeats section 2. b.</p>	
Lord Howard, Castle Rising Estate	Object	Knights Hill would increase congestion and pollution reducing air quality in the AQMA.		Comment is noted but there is no evidence to support the statement made. The Knights Hill allocation is dealt with in that section. No change.
Historic Environment	Object	Object - Are these lists intended as bullet points? Should the	Make lists into	Agree - make lists into

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Planning Adviser, East of England Historic England		parking study that formed some of the Heritage Action Zone work be referenced in this section?	numbered bullet points Add reference to HAZ parking study.	numbered bullet points. Add reference to the HAZ parking study.
Norfolk Coast Partnership (AONB)	Object	5.7.16 – there could perhaps be a mention of the popular Coasthopper service which is an important transport asset to people who live and work on the coast as well as visitors.		Agree amend 5.7.16 – to mention the Coasthopper bus service. Note – this is now split and known as the ‘Coastliner’ operated by Lynx from King’s Lynn to Wells (and Fakenham) and the Coasthopper operated by Sanders from Wells to Cromer (with links to Mundesley and North Walsham).
Parish Clerk Holme-Next-The-Sea Parish Council	Object	A better understanding of area-wide traffic movements is required to support the effectiveness of this type of policy in the north of the Borough. This area is almost totally dependent on road-based travel for most journeys and the A149 Coast Road suffers major fluctuations in seasonal tourist traffic and is destined for significant housing growth in the Hunstanton area - a clear obstacle to tourism and to those wishing to access employment opportunities in the main towns along this route and the A10 Corridor. A multi-modal study linked to proposed land use changes could bring major benefits to the Borough and would complement the detailed area Kings Lynn Traffic study. Please give some thought to including provision for charging points for electric vehicles.		The King's Lynn Transport Strategy is currently being developed and is likely to be adopted early in 2020. Reference will be made to electric vehicle charging points in the appropriate policy in the Plan.
Planning Secretary	Object	In Policy LP12 – Transportation - we strongly support 4 a,b and c		The King's Lynn Transport

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Kings Lynn Civic Society		(supporting sustainable forms of transport). However, much of the rest of this policy sounds like ‘build more roads’. Surely this will not and cannot lead to a carbon neutral, sustainable economy? A new road at West Winch will be an expensive way of shifting one queue to the next queue, a little more than a mile away. What is the KL Transport Strategy? Nobody seems to know?		Strategy is currently being developed and is likely to be adopted early in 2020. No change.
Parish Clerk West Winch Parish Council	Support	West Winch Parish Council agrees with STP Estates Group (inc. West Norfolk NHS Clinical Commissioning Group, Queen Elizabeth Hospital King's Lynn NHS Foundation Trust, Norfolk Community Health and Care NHS Trust, Norfolk and Suffolk NHS Foundation Trust) statement as above. It is very important for health facilities and hospital medical services to be accessible at all times for residents which are essential to human health and wellbeing. Transport (cars and public) is a fundamental part of the health provision as people accessing facilities are not feeling well or disabled in some way. Local health facilities are essential. A lot of stress is caused to patients, families and carers trying to access healthcare.		The comment is noted.
Climate Emergency Planning and Policy (CEEP)	Object	LPR – LP12 - Transportation Policy. This is covered in pages 74 – 79. We have highlighted above that the January 2018 CCC response to the Clean Growth Strategy recommends a 44% reduction in transport emissions between 2016 and 2030 to help bridge the policy gap shortfall to the UK carbon budgets up to 2030. There have been minimal reductions in BCKL&WN absolute transport sector emissions between 2005 and 2016 (see emissions graphs in “SASR – CCmitig, baseline assessment” section). The graph below shows the per-capita transport sector emissions for the Borough and national average (from the same data set displayed above). The graph shows both		A Climate Change policy will be included in the Plan. Reference will be made to electric vehicle charging points in the appropriate policy.

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		<p>national and Borough emissions rising in recent years, and that the Borough has higher transport emissions which may be expected due to its rural nature. Reducing emissions should be a key issue under LP12, but has been completely ignored, again due to the lack of Climate Change policy. Policy LP12 should be carbon footprinted with annual carbon forecasts for the transport sector, and planned transport interventions, that are annually monitorable. Whilst there is mention of public transport in the LP12 narrative, no indication is given of priority and funding. Priority 2a of LP12 lists 3 new road schemes: the business-as-usual approach in Norfolk has been to prioritise road schemes over all other transport, so CEPP remains deeply sceptical that these words mean anything at all. Significant reduction of the current transport footprint of over 2.5 tonnes of CO₂eq per year will not simply occur if this business-as-usual approach carries on.</p> <p>Priority 2a (iv) for rail improvements is welcomed.</p> <p>No mention is made of encouraging electric vehicles and providing electric vehicle charging; this is a serious omission which needs to be added.</p>		
Climate Emergency Planning and Policy (CEEP)	Object	<p>6.4 LPR – LP12 - Legal and Policy Framework: Public Transport NPPF2, section 9, 102-111 on “Promoting sustainable transport” is stronger than the former NPPF1, section 4, 29-41, particularly on plan making, and engagement at the earliest stages of plan making. Note, the following wording in NPPF2:</p> <p>i. NPPF2/102 “Transport issues should be considered from the earliest stages of plan-making ...”</p> <p>ii. “... opportunities to promote walking, cycling and public</p>		Disagree – in relation to the NPPF requirements: i. transport issues have been considered throughout the process of preparing both the Core Strategy and the SADMP, running through to the local plan review process.

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		<p>transport use are identified and pursued”</p> <p>iii. NPPF2/103 “The planning system should actively manage patterns of growth in support of these objectives. ...”</p> <p>iv. “... Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”</p> <p>v. “... However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”</p> <p>vi. NPPF2/108 “In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; ...”</p> <p>These requirements of the NPPF have not been considered, nor demonstrated, in LP12 and other aspects of the Local Plan review. LP12 requires rewriting to meet the critique above and brought back for a re-run Regulation 18 consultation. See also comments on the HELAA methodology and public transport later.</p>		<p>ii. the KLTSS identifies opportunities to improve walking, cycling and public transport. This will form a supporting document to the local plan.</p> <p>iii. The pattern of growth is controlled through the plan’s settlement hierarchy.</p> <p>iv. The settlement hierarchy and strategic growth corridor seek to focus development in more sustainable locations.</p> <p>v. The settlement hierarchy does distinguish between urban and rural areas.</p> <p>vi. The site assessments take account of the availability of public transport, proximity to transport networks, especially public transport, cycle and footway provision/availability for practical access and reduction of car use.</p>