#### Sandra Homcenko

To: Subject: Planning Policy email RE: Consultation Response on Borough Local Plan - Hopkins Development

From: Frank Dutton Sent: Wednesday, August 21, 2024 9:36 AM To: Michael Burton Cc: Planning Policy email <planning.policy@west-norfolk.gov.uk>

Subject: Fw: Consultation Response on Borough Local Plan - Hopkins Development

#### [External Email]

#### [Confirm the senders email address is genuine, before clicking on links and replying]

Dear Borough Local Plan Consultation Team and Secretaries of State for Transport, Housing and James Wild MP.

Below is my response to Main Modifications MM115 and 116 for West Winch Growth Area Policy E2.1, in which I conclude the King's Lynn and West Norfolk Local Plan is not legally sound, effective, justified or positively prepared and is unfit for purpose because the major development for West Norfolk has no funding for the essential highway infrastructure, the West Winch Bypass(West Winch Housing Access Road) as Government has not yet granted its £64 million contribution for the £84 million bypass and without the bypass in place first, the plan for West Winch will be heavily and already is car-dependent, environmentally unsustainable and against national policy with 1100 homes in a rat-run.

It is also totally wrong that the Local Plan consultation for the West Winch Growth Area, overlaps any decision on Hopkins Planning Permission scheduled for 28 August, so the public will not be able to have their comments considered by the Planning Inspectorate before the Hopkins planning decision is made. This deprives the Borough of improvements that can be made to the plan, is undemocratic and procedurally incorrect.

Any Planning Committee decision on Hopkins 13/01615/OM should be made after the consultation has ended and when funding has been received from Govt for the Bypass. It would seem to me that the BC is trying to push this through without proper allowance for representation from West Winch Parish Council or the residents of West Winch and the surrounding areas affected.

The new government is asking for planning for such developments to be pushed though quickly but that should not mean that the proper infrastructure is considered alongside the plan and in place before such estates are built.

#### **Representation Form**

Consultation on Schedule of Main Modifications Part 1, August 2024

Closing date for submitting representations: 11:59pm, Wednesday, 2<sup>nd</sup> October 2024

Part A

#### Section 1: Contact information

	Respondent details	Agent details (where applicable)
Title:	Vice Chair and Parish Councillor for West Winch	
First Name:	Frank	
Last Name:	Dutton	
Organisation (where relevant):	West Winch Parish Council & resident .	
Address:		
Postcode:		
Telephone:		
Email:		

# Part B

Please fill in a separate form for each site and/ or policy

# Section 2: Representations

#### Which Main Modification are you responding on?

Main Modification (MM) ref	Local Plan Paragraph ref	Local Plan Policy ref (if applicable)	Policy title (as applicable)
MM115	MM Schedule	West Winch Policy E2.1	West Winch Growth Area
And MM116	Pages 86,87,89		

#### To which test of soundness does your representation relate?

The Local Plan 2021-2040 is currently under examination by Planning Inspectors, appointed by the Secretary of State). The Inspectors will assess the proposed Main Modifications against the soundness tests. Please indicate whether you consider the proposed Main Modification about which you are responding is:

[Please tick appropriate box]	YES	NO
Legally compliant?		х
Complies with the Duty to cooperate?		
Positively prepared (i.e. seeks to meet the area's objectively assessed needs)?		х
Justified (an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence)?		х

Consistent with national policy (National Planning Policy Framewor	ˈk:
National Planning Policy Framework (publishing.service.gov.uk))?	

Х

Summary of Comments:

Please give details of why you consider the proposed Main Modification that you are commenting on is sound ("Yes") or unsound ("No"), with reference to the tests above. Please be as precise as possible.

- Objecting to Main Modification 115 Page 86 Policy E2.1 which permits 2,030 new homes in West Winch before 2040 and up to 4,000 in total in West Winch. This is environmentally unsustainable, without the bypass first in place to take traffic and HGV's off the A10 to provide an Active Travel-friendly environment through West Winch on this currently high-accident, highly congested, worst-performing stretch of the A10 with its dangerous bends and poor sightlines, sub-standard width.
- Objecting to Main Modification 116 Page 87 and 89 Policy E2.1 which allows 300 houses on the A10 without any highways intervention; then 300-1100 with a "link road" (not the bypass but a narrow road from the Winch Public House east to the A47) so potentially all 1100 homes with no bypass, and 600 new homes before a new Primary School is built (up from 300 homes before a new Primary School) This means all the new residents would drive their children on the A10 to West Winch Primary every day. This extra traffic was **not** taken into account in Hopkins Highways Study in concluding no intervention is necessary before 300 homes.
- I object to these Main Modifications, as Hopkins Transport Study is not positively prepared and does not meet West Winch's needs –its conclusion that the A10 can take 300 houses before highways intervention does not allow for the Holiday Traffic, the Sugar Beet Traffic, or the need for parents to drive children to school to West Winch Primary on the A10, the current congestion on this worst-perfoming section of the A10 according to the Mayor of Cambridgeshire's study, the likely increase in accidents on Junctions and dangerous detours through North Runcton, Setchey and Saddlebow to avoid the A10 congestion in future, or the Mott Macdonald Study of 2014 that predicted 1000 car tail-backs on the A10 with development but no bypass.

Without the bypass there first to remove the traffic, the traffic-calming measures cannot be implemented, the A10 will not be pedestrian or cyclist friendly, residents will not be able to cross the road, buses will be inadequate until they are deemed " commercially sustainable" so the development will be heavily car dependent. New development that are heavily car dependent are against national policy. It does not meet West Winch's objectively assessed needs to reduce chronic congestion through the village and the high accident rate, but will increase accidents. In addition to my comments above I walk along the A10 several times a week and I would challenge anyone on the BC to do the same and not fear how quickly someone could be killed or injured with the current state of traffic.

I also frequently witness traffic jams along the A10. Particularly in the summer and holiday season.

The current speed camera does nothing to calm traffic. Instead they slow down, pass the camera then speed up.

Further our drainage system in West Winch is often overloaded and the additional housing will add to that problem. No decent proposal has been made to improve the drainage plan objected to by Anglian Water to deal with run off and sewage..

The Modifications should be amended to say " West Winch Housing Access Road must be fully built out before Hopkins Development commences"

Frank Dutton: Vice Chair West Winch Parish Council and resident of West Winch

(Continue on a separate sheet if necessary.)

Please note you should cover succinctly all the information, evidence and supporting information necessary to support/justify your comments.

# Section 4: Data Protection

The Main Modifications consultations form the final stage(s) of the plan-making process for the Local Plan 2021-2040. Do you wish to be notified further about the Local Plan, at either of the following stages?

Publication of Inspector's Report (anticipated January 2025)?	Yes	х	No	
Adoption of Local Plan (anticipated February 2025)?	Yes	Х	No	

In complying with the General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, King's Lynn and West Norfolk Borough Council confirms that it will process personal data gathered from this form only for the purposes relating to the consultation. It is intended to publish responses to this consultation on the Borough Council's website. However, it should be noted that all personal information (except for names and organisation name, where appropriate) will not be published.

When you give consent for us to process data, you have the right to withdraw that consent at any time. If you wish to withdraw your consent, you must notify us at <u>lpr@west-norfolk.gov.uk</u> or 01553 616200.

# Section 5: Signature and Date of Representation

Please sign and date be	elow:	
Signature: (electronic		
signatures are		
acceptable)		

Date:
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#### 21st August 2024

Please note the following:

- To be considered, your representation will need to be received by 11:59pm on Wednesday, 2<sup>nd</sup> October 2024.
- The Main Modifications are being consulted upon in two parts. The Part 1 consultation covers all aspects of the Local Plan except Gypsies, Travellers and Travelling Showpeople, which will be subject to a separate Main Modifications (Part 2) consultation during autumn 2024.

Ends -

From: Michael Burton Sent: Wednesday, August 7, 2024 4:16 PM Subject: Borough Council of King's Lynn and West Norfolk Local Plan 2021-2040 - Consultation on Main Modifications (August - October 2024)

> Borough Council of King's Lynn & West Norfolk



By email

Geoff Hall

Executive Director

Stuart Ashworth

Assistant Director Environment and Planning

7 August 2024

Planning and Compulsory Purchase Act 2004 (as amended)

Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

# King's Lynn and West Norfolk Local Plan 2021-2040: Main Modifications Part 1 consultatio (August –October 2024)

Dear Sir/ Madam

The replacement King's Lynn and West Norfolk Local Plan 2021-2040 was submitted to the Secretary of State in March 2022 and has since been under examination by appointed Plann Inspectors. Examination hearings took place over 4 separate weeks, in December 2022, January

2023, March 2024 and April 2024. Following these hearings, the Inspectors have now given th go-ahead for the Borough Council to consult upon proposed Main Modifications to the Local Plan.

We are now publishing the following documents for consultation:

# 1. Schedule of Main Modifications Part 1 [F117]

- 2. Schedule of Main Modifications Part 1 Inset Map changes (Appendices 1-5) [F117a-F117e]
- 3. Schedule of Main Modifications to Policies Map [F118]; and
- 4. Schedule of Additional Modifications [F119].

These are supported by updates to the Local Plan <u>Sustainability Appraisal</u> [B12], Habita Regulations Assessment [F120] and the updated (2023-2024 housing trajectory [F121].

The Main Modifications consultations are the final stages in the Local Plan ex process. Consultation responses (representations) will need to relate to indivic Modifications, as set out in the schedule.

Where minor (e.g. factual/ grammatical corrections or updates) or Additional Modifications (as se out in the Additional Modifications schedule), or presentational issues are identified regarding the Policies Map (e.g. cartography), the consultation also provides an opportunity to highlight these and allow for corrections or amendments to be made.

Full details of the consultation, including all consultation documents [F117-F121], are set out in the Local Plan examination web page.

The consultation will run for 8 weeks, starting on Wednesday, 7 August. The consultation ends at **11.59pm on Wednesday, 2 October 2024**. Please note that only comments received by this time can be taken into account. Any comments made after the consultation period m considered.

Please do not hesitate to contact the Planning Policy team (<u>planning.policy@west-norfolk.gov.uk</u>) if you have any further queries.

Yours faithfully

Michael Burton

Principal Planner (Planning Policy)

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