



King's Lynn & West Norfolk Bicycle Users Group

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Planning Department
Norfolk County Council
County Hall
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Sunday 21 April 2024

Dear County Council

Re: Planning application - FUL/2024/0001 Development of 3.5km of new single lane access road known as the West Winch Housing Access Road (WWHAR) etc.

KLWNBUG The Norfolk and Fens Cycling Campaign objects to the proposed plan as currently submitted because it does not conform to current national, county or borough policies and guidance.

National Policy

This application does not conform to the National Planning Policy Framework Chapter 9. In detail:

Paragraph 108 requires "transport issues should be considered from the earliest stages" of development proposals and "opportunities to promote walking, cycling and public transport use are identified and pursued". This application does not identify any opportunities clearly and sustainable transport seems to be an afterthought, tucked into an additional document that mostly talks about changes suggested outside the planning application's "red line".

Paragraph 110 requires that the development should ensure "The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance" but the cycling and walking provision does not follow the guidance issued by the Department for Transport in Local Transport Note 1/20 and the examples provided by Active Travel England.

Paragraph 112 requires that the development should "Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas" but the number of "beg-button" crossings, deflections from desire lines and discontinuities clearly fail to give first priority.

Paragraph 114(b) requires that "safe and suitable access to the site can be achieved for all users" and 116(c) directs developers to "minimise the scope for conflicts between pedestrians, cyclists and vehicles" but this development would add numerous new conflicts with motor vehicles

Paragraph 116 also says "applications for development should: (a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas" but this application shows

no such priority anywhere in or around it. It seems very much a car-first development, with active travel added on the margins of some of it, in a discontinuous manner, deferring to motoring.

Contrary to the applicant's claims, the scheme as currently submitted conflicts with the NPPF and should be rejected unless it is substantially amended. The lack of cycleways from the southern roundabout to the southbound A10 and from the Hopkins roundabout to the Hardwick Interchange both represent an unacceptable impact on highway safety, so refusal would comply with NPPF Paragraph 111.

County Policy

Additionally, KLWNBUG objects to this planning application because it does not fit with the Norfolk County Council Local Transport Strategy 2021 -2036 (LTS). In particular:

LTS Policy 2 sets "The priority for reducing emissions will be to support a shift to more sustainable modes and more efficient vehicles, including lower carbon technology and cleaner fuels; this includes the facilitation of necessary infrastructure." The active transport infrastructure included in this application is not sufficient to negate the likely induced motor traffic.

LTS Policy 5 requires new developments to be "well connected to maximise use of sustainable and active transport options". This development does not connect well around the southern roundabout or along the A47.

LTS Policy 6 says the councils "will work with the development community and local stakeholders to ensure greener transport solutions are embedded in land-use planning to significantly reduce traffic generation by private car." This includes ensuring "that measures supporting an uptake of cycling and walking, or by bus, in communities are provided as part of the development." Contrary to assertions in the transport assessment and access statement, this proposed development does not seem to include more than the barest minimum of measures inside the red line and we saw no forecasts of cycling, walking and bus use included in the application, so there seems no evidence it complies with this policy.

LTS Policy 10 "will seek to improve connectivity between rural areas and services in urban centres". This application makes no such new connections or extensions despite having obvious opportunities to improve active travel connectivity between King's Lynn, North Runcton and Middleton.

Please refuse this application unless the above flaws are corrected.

Design Questions

In light of repeated assurances by Norfolk County Council officers that Local Transport Note 1/20 will be followed whenever possible, please could the applicant explain why it has not been followed in this application? In particular, starting at the southern end as in the STS Appendix 4:

Drawing 70100518-WSP-HGN-A10-SK-CH-001 rev P03

1. Why is the western shared use not continued south to at least the Gospel Hall at Willow Drive and a crossing provided there? The proposed plan would require any residents of the western part of Setchey or workers on the large Garage Lane Industrial Estate to make an uncontrolled crossing of a road which will be made busier by this development, or to ride along the carriageway between Willow Drive and the Coolstak entrance, which will obviously

come as a surprise to HGV drivers turning in. The whole arrangement proposed for the Setchey end seems likely to discourage and reduce active travel from there or anywhere south of it.

2. Why does the southern roundabout not have cycleways to it and an orbital cycleway around it, similar to one of DfT Local Transport Note 1/20 Figure 10.39, 10.41 or 10.47? There seems to be plenty of space for this to be achieved between the roundabout, lagoon and retained roads. The proposed plan attempts to create a large deflection from the desire line between the West Winch Housing Access Road (WWHAR) and A10 south which will obviously be ignored, probably with brave but inexperienced teenage walkers and riders bumping the kerbs or jumping the WWHAR verge on the roundabout approach, possibly contraflow if travelling southbound.
3. Should the signalised crossing south of the southern roundabout have a wider turning radius onto it northbound from the existing cycleway? The turning radii for cycle traffic are clearly set out in LTN 1/20 and could easily fit between the new carriageway and the lagoon, enabling cycle traffic to enter the carriageway at right angles, allowing easier assessment of whether approaching motorists will comply with the signals and reducing the risk of skidding or crashing due to having to turn on the carriageway. The submitted vehicle swept paths only seem to cover articulated motor vehicles, not the cycle design vehicle. Could the applicant please provide cycle design vehicle swept paths at relevant junctions including this one?
4. Could the southern roundabout connect to Gravelhill Lane primarily instead of Main Road? Through motor traffic using the existing A10 could be reduced further by connecting the roundabout to Gravelhill Lane and providing a bus gate off that to Main Road, which would also encourage some residents from the southern end of King's Lynn travelling towards Norwich to use the WWHAR.
5. Why is Main Road signed as 40mph north of the southern roundabout? We were told at consultation that it would become 30mph with a long 20mph central section.
6. Why is there no access/exit from the cycleway opposite the new exit from Gravelhill Lane? Cambridgeshire and Suffolk now both seem to routinely build them, so could Norfolk build one here, and similarly at the other opposite side roads.
7. Could the cycleway crossing of Gravelhill Lane be moved east away from the property boundaries, where it has minimum possible visibility, and be given priority as the Blue primary cycle corridor in the King's Lynn Cycling and Walking Implementation Plan? The submitted visibility splays do not seem to consider this junction.
8. Could the signalised crossing of Main Road north of the southern roundabout be located further south to provide both sides of the crossing with decent radii?
9. Does provision of a signalised crossing at this end of Main Road instead of a zebra with parallel cycle crossing suggest the applicant doesn't expect to reduce through traffic enough?
10. Why is the Blue cycleway being merely tied into existing provision and not being brought up to current standards, taking the opportunity of reclassification to redistribute space from

motor traffic to active travel, in line with NPPF Paragraph 108? Should it be a primary corridor in the LCWIP if it will not be brought up to standard in the foreseeable future?

Drawing 70100518-WSP-HGN-A10-SK-CH-002 rev P03

11. Could the priority of Main Road be changed at the junctions south of Chapel Lane? More through traffic could be discouraged if traffic entering and exiting Chequers Lane, Long Lane, Rectory Lane and Chapel Lane from/to the King's Lynn direction had priority over through traffic. I understand this has been done successfully in some villages in Northamptonshire.
12. Should the uncontrolled crossing proposed for a no-man's-land position between Long Lane and Watering Lane be relocated next to one or the other?
13. Why is the current signalised crossing being relocated to be further away from the shop, post office, church, church hall and school footpath and thereby less useful to anyone walking or cycling from the direction of Long Lane?
14. Should the 20mph area be more than 450m in length? NCC's Speed Management Strategy January 2023 says that yo-yoing speed limits are to be avoided on page 12: "In order not to confuse motorists with too many speed limit changes over a short distance it is suggested that they should be of at least 800m in length."
15. Relatedly, away from this drawing, should the village core of Setchey around Garage Lane be changed to 30mph as part of this development, in line with page 13 of the NCC Speed Management Strategy? There is well over 400m of frontage development and Garage Lane Industrial Estate should be expected to generate significant pedestrian/cycle activity if the active travel targets are achieved, as well as the problem junctions around the speed camera.
16. Why are the cycleways from the bridleway to Archdale Close to the Rectory Lane northbound bus stop and from Chapel Lane uncontrolled crossing incorrectly shown as pavement? Are NCC records up-to-date?
17. Why is a pavement shown as existing from Chapel Lane to Dairy Farm's drive? There is only a broken-up disused carriageway surface in poor repair.
18. Are the locations of signalised crossings on Dairy Farm's drive and Babingley Place correct? If these are to be closed to motor traffic, what alternative access is proposed for their residents?
19. Is the existing continuous cycleway across the mouths of Brook Meadow, Millfield Lane and Willow Drive North Runcton being proposed for removal across them? If so, why is that proposed instead of making the cycleway continuous across all side roads?

Drawing 70100518-WSP-HGN-A10-SK-CH-003 rev P03

20. Should the uncontrolled crossing proposed for a no-man's-land location south of Eastview Park Homes be located adjacent to their access or at the southern end of that section of footway on the western side of road?

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21. Could the land freed up by the closure of the layby by the northern end of the A10 be used to provide an accessible turning radius onto the new signalised crossing?
22. What will the signal timings be on the crossings? At the moment, waiting for the signals punishes cyclists by slowing them to walking speed (8 minutes to do 800m between the A10 and Scania Way) and requests for improved signal synchronisation are answered by pointing out that cyclists may treat red man lights as a give-way.
23. Shouldn't the Hardwick Roundabout be included in the scheme red line to address the substandard narrow bottleneck stretch of cycleway between the western A47 eastbound slip road and the A149 Hardwick Road? There seems no good reason to exclude part of the junction.
24. Could the cycleways between the A10 and A47 flyover be widened? They currently have an effective width narrower than some e-bike handlebars, so are clearly unsuitable for two-way cycling.
25. Generally, could the Hardwick Roundabout walking and cycling provision be improved to look like Local Transport Note 1/20 Figure 10.39, 10.41 or 10.47? There seems to be plenty of space for this to be achieved.

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26. The General Arrangement drawings are very low resolution. To enable fuller comments on the detail, please can you upload drawings of at least 150dpi lossless and allow us to comment further?
27. Why is there no cycling and walking provision along the reconstructed part of the A47? If we are ever to have competitive active travel connections to North Runcton, Middleton, Blackborough End and beyond, it seems important to seize opportunities like this to build the first section.
28. Could does the A47 / WWHAR roundabout be made to look like a figure from LTN 1/20?

Drawing 70100518-WSP-HML-HAR-DR-CH-001 rev P05

29. Shouldn't the WWHAR cycleway continue between Residential Access Roundabout Junction 1 and the A47? While it is hoped that cycleways will be provided through the new development, it will be a building site for many years and the direct route through to Hardwick Roundabout will not be available until after the final phase, according to the last phasing plan we saw, which will be long after habitual motoring will have become entrenched, so it is vital that active travel links along the WWHAR and A47 are provided.
30. Where is the foot-cycle link across the WWHAR to the landscape buffer between the A47 and the WWHAR north of North Runcton, shown in Figure 1-2 of NCC/4.01.00/WWHAR?

Drawing 70100518-WSP-HML-HAR-DR-CH-002 rev P05

31. Shouldn't the cycleways into the Metacre Development be at least the minimum width from LTN 1/20 instead of narrowing?
32. Should the cycleway along the southern side of the Metacre access be continuous across the lagoon maintenance road?
33. Could the Rectory Lane vehicular overbridge have a cycleway across it?
34. Does it fit with NCC's Vision Zero on road safety to have a junction turning on/off a bridleway near the foot of the overbridge on the inside of a bend?

Drawing 70100518-WSP-HML-HAR-DR-CH-003 rev P05

35. Shouldn't the cycleways into the Zurich Development be at least the minimum width from LTN 1/20?
36. Should the cycleway along the southern side of the Zurich access be continuous across the lagoon maintenance road?
37. Could the proposed Toucan Crossing between the two parts of Chequers Lane be sited on the desire line, at an angle to the carriageway? There seems little reason not to serve the desire line and it seems obvious that deflection will lead to verge damage by people taking a more direct line, plus they may trip or crash on the proposed central kerb, possibly then being seriously injured or worse by approaching motorists.

Drawing 70100518-WSP-HML-HAR-DR-CH-004 rev P05

We believe our comments on the higher-resolution STS drawings cover this drawing.

Transport Assessment

The Foreword to the Transport Assessment says that the document should be read in conjunction with the Sustainable Transport Strategy. As such, we ask that you include the STS Suggested Schemes along the current A10 as part of the application, in full, to be secured by conditions. Alternatively, if you are minded not to do so, please reject the application and instruct the applicant to resubmit, either with a red line containing the whole current A10, or without so much unrelated distracting material about matters not being determined as part of the application.

In general, we do not understand why the South East King's Lynn Expansion Zone is being provided for by an old-fashioned "Impact Assessment and Mitigation" reactive method instead of the "Decide and Provide" proactive one now used by the best developers.

Figure 1-2 in the Transport Assessment shows a foot-cycle link between the new development and the landscape buffer north of Rectory Lane, but this appears to be completely missing from the application and there is not even passive provision for it. Please secure this link by condition.

Section 1.11.2 refers to creating a mobility hub in the centre of the village, but no detail is provided either in the Transport Assessment or Appendix 4 of the STS that suggests the hub will be provided

as part of this application, either directly or through section 106 or 278 agreements, nor how that mobility hub will meet the NCC definition of a travel hub. Please secure this hub by condition.

Section 5.4.2 describes the A10 cycleway as “wide”, apparently ignoring that it is below current standard width for its entire length and especially narrow at a number of pinch points, such as Hardwick Interchange, near the windmill and across the River Nar. As such, no width improvement is considered in the plan, thereby not meeting NPPF paragraph 108.

The numbers in the traffic flow diagrams do not seem plausible. For example, the AM Peak in 2027 Do Minimum scenario shows 907 northbound and 644 southbound across the southern boundary of the scheme, while Do Something 1 shows 903 and 628: why would there be a small fall in motor traffic when extra carriageway capacity is provided? That would be contrary to all experience of induced traffic. It seems extremely likely that a freer-flowing A10 would result in some train and bus commuters from the Downham Market and Airfield wards switching to driving.

The 2037 numbers are even less plausible: Do Minimum has 941 northbound and 668 southbound, while Do Something 1 has 972 and 656, again contrary to findings on induced traffic, and Do Something 2 has 871 and 814, suggesting maybe some commuters relocating from places south of the study area but basically no net increase in motor commuting on the A10 south.

Looking at the northern edge, 2027 Do Minimum has 1234 leaving the A10 and 670 entering in the AM peak and nothing on the WWHAR, while Do Something 1 has 382 and 107 plus 888 and 566 on the WWHAR, giving totals of 1270 and 673. Again, this is a totally incredible suggestion that almost doubling road capacity will induce no extra motor traffic.

2037 sees Do Minimum modelled as 1079 northbound and 682 southbound at the top of the A10, while Do Something 1 has 365 and 102 on the A10 plus 987 and 591 on the WWHAR, giving totals of 1352 and 693, which again suggests almost only out-commuting from the Hopkins development to King's Lynn and no significant increase in motoring from the A10 south.

I believe that the transport assessment based on these figures is flawed and urge you to refuse permission until the applicant provides realistic forecasts of the damage it will do to achieving modal shift targets away from private motoring and the pollution it brings to local Air Quality Management Areas.

Thank you for your attention to these details.

Yours faithfully,

[sent electronically]