

NORTH RUNCTON PARISH COUNCIL

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Norfolk County Council Highways Project Team
Planning Services
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Dear Sir or Madam

FUL/2024/001 Development of 3.5km of new single lane access road known as the West Winch Housing Access Road (WWHAR) at West Winch: Land to the east of West Winch Village, King's Lynn.

Preamble:

The West Winch Housing Access Road (WWHAR) will be the largest and most expensive road building project in West Norfolk for a number of years and will affect 64 hectares of land, taking most of that permanently out of agricultural usage. If constructed it will very quickly be carrying 20,000 vehicles a day – and we suspect considerably more in future.

The scheme will bring a major road within 200 metres of the edge of the settlement of North Runcton and within 300 metres of Coronation Avenue in West Winch – where both sets of residents will have previously considered the setting of their homes to be mainly rural in character. It will fundamentally alter the landscape setting. It will permanently sever or alter historic access links between North Runcton and West Winch, remove veteran trees, destroy ditches and field patterns and have a significantly adverse impact on the local environment in general.

That is a short way of saying – this road is a BIG DEAL! We are frankly alarmed at the inane and in some cases inaccurate responses offered by statutory consultees as part of this consultation!

When the West Winch Growth Area was allocated it was clear that to provide access for so many new houses, the A10 (already at the time carrying 18,000 vehicles a day), would simply not be able to cope with the anticipated additional traffic. Constructing a second parallel road was an inevitable response simply to provide an alternative access for the new estate.

However, to state that this new road will somehow provide a 'missing link' in local transport infrastructure, as set out in Section 3.0 of the Planning Statement, is simply ludicrous. A much-needed route to the port?! A bypass to West Winch?! Supporting economic growth in East Anglia?! These 'suggestions' are simply unfounded. The proposed scheme will provide a 3.5km loop back to the same road, featuring along the route five busy roundabouts and a signalised crossing. It will be surprising if it is faster than the existing A10 corridor and will only be preferable if traffic management along the existing A10 corridor actively restricts through-traffic. That traffic management is not part of this scheme.

The 2500 new houses proposed in the period to 2040 are likely to generate around 11,000 extra local car journeys a day – and in that period local residents will have to contend with significant

disruption and ongoing construction traffic. Therefore, we feel strongly that the growth area and the road will exacerbate local traffic congestion as well as creating several new sections of dangerous road and a number of new gridlocked junctions.

Truly - there is only one need for the WWHAR and the clue is in the name. It is a housing access road to prevent a misguided housing allocation becoming an enormous cul-de-sac.

We also refute the assertion at 2.3.1 of the Planning Statement that the scheme has been the 'subject of comprehensive community engagement over a number of years'. In fact, further to a discussion between Parish Councillors and WSP representatives in 2018, there had been almost complete silence on the details of the road design until it was briefly disclosed at a public exhibition at West Winch Primary School in January of this year. The first opportunity to review the plans in detail was when they were validated and uploaded to this portal at the end of March.

In that respect we have done our best to review the main documents and solicit local residents opinion in order to prepare this response by the required date. But with Easter falling in the period, and the Local Plan examination hearings also occurring this month, we doubt that we have managed to identify all of the concerns. As noted above, it would appear that various paid statutory consultees have not even bothered to give this major proposal more than a cursory glance. **We therefore request that we are able to come back with further comments at a later date.**

Principal Concerns:

Our main concerns are:

- Extent of land take
- Unclear impacts on existing landscape resource
- Lack of consideration of impact to routes outside the red line area
- Need for additional pedestrian linkage
- Noise
- Concerns about A47 and Hardwick road design.
- Lack of landscape mitigation on southern section.

Until we can conclude appropriate discussion and resolution of these concerns we must object to the current plan.

Main observations:

The WWHAR carriageway is generally 9.6m wide (including 1m hard shoulders). There is generally then a 5m 'verge' separating the road from a 4m wide 'dual use path' on the west side of the road. We are disappointed there is no dual use path on the east side of the road as requested in the adopted Neighbourhood Plan (Policy GA04). However, we recognise that between Chequers Lane and Sheep's Course Wood there is substantial amount of landscape mitigation planting proposed that could (and in our view should) be continually linked with pedestrian access pathways. We would like to see the plans developed to include that linkage as a public access corridor.

The road appears to be at grade or in shallow cutting for much of the route. Cutting should allow for some noise deflection. We would like to ensure that the detailed road design does allow for low banking or cutting that will deflect noise away from nearby housing (and the wider setting) as much as possible. We have found no mention of low noise surfacing (see also Neighbourhood Plan policy GA04, fourth bullet).

We are also disappointed that the originally proposed cycle/pedestrian at Chequers Lane has been scrapped. We felt that that would be a benefit for multi modal transport as well as minimising traffic flow interruptions on the new road. The Scout Hut is next door and many of the children come from West Winch. The signalised crossing proposed is one of only two crossing points of the 3.5km road, the other being the Rectory Lane flyover which will be a circuitous route, and perhaps not especially conducive to cyclists and pedestrians. (See again NP Policy GA04).

We note the private southbound access provided for Manor Farm Bungalow at Chequers Lane. See issues raised under 'Off site impacts' below.

The southern section of the route south of Chequers Lane has a corridor that is only about 60 metres wide (10m of 'woodland' either side) for about 350 metres. This section is in shallow cutting south of Chequers Lane, before turning to a low embankment near Gravelhill. We are concerned that this will make the road prominent from the south-east (from Setch Road and the Nar long distance footpath) and we believe the landscape mitigation works need to be wider. We are also concerned that the embanked section will help to disperse noise into the wider setting – which is essentially open tranquil countryside at present.

The Gravelhill interchange with the A10 appears to be vast – apparently affecting a 600m section of the existing A10, and, with slip roads, attenuation basins and landscaping, taking an area of over 7 hectares! It seems a surprising amount of space for what is essentially a new roundabout.

Noise:

The whole of North Runcton will be impacted by an increased level of noise associated with the road, especially as the prevailing wind is from the southwest. Within the village the 5dBa estimated average increase will result in a discernible increase in background noise from the current baseline. For those properties closer to the road the impact is deemed significant according to your estimates, sufficient for some form of abatement. The current design does not include any sound reduction measures as “the number of properties impacted does not warrant the expense”. This we find unacceptable. Building banking to deflect the sound away from the village will be using materials that would otherwise need to be removed from site and would provide some noise reduction for those properties significantly impacted as well as providing some form of visual screen. The land is available as it is needed for the environmental impact remediation.

The council request that such banking is built into the design.

The Rectory Lane overbridge:

This will be 270 metres long (mainly on embankment) and the footprint of the embankment will be 40 metres wide at the widest point and around 5 metres tall. The road over it is shown as 5.5m wide with a 3m wide 'shared use' footpath beside it. With verges the top of the embankment is shown at 14m wide (the bridge itself about 11m wide). The total footprint for this feature (included re-directed footpath will be something like 3.5 hectares (plus another approximate 1 Ha area between the new road and Burwick House which appears to be recommended as 'Country Park?').

This will be a massive feature in the setting, dominant for the adjacent housing and blocking a number of local views. It will eradicate a country lane and the hedgerows beside it. We do think it will be necessary because the alternative would be another very busy roundabout and substantial barrier between North Runcton and West Winch.

There is a footpath over the bridge but it doesn't look to a footpath along Rectory Lane in either direction. This is an omission that needs to be rectified. The road is already used by many pedestrians and even with speed limits we have found that 30% of vehicles break the limit, some travelling at 70mph or more. The road will get busier and we are quite sure will become even more notorious rat run in future. We think we must object to the scheme until the red line is extended to allow for a footpath to link to the existing footpath to the west and to at least the gateway to 'The Grange' in the east. We consider this an important safety requirement for future residents.

We also request that Rectory Lane has a 30mph speed limit along its whole length, with speed management measures built in where the bridge starts and ends on Rectory Lane.

Hopkins site:

The WWHAR will be on embankment across the eastern edge of the Hopkins site. A wedge of approximately 1.5-2.0 hectares of existing secondary woodland will be retained west of Sheeps Course Wood. It will be important that this area is safeguarded from contractors throughout the works.

We note that the Hopkins roundabout will be lit, as will the widened A47. This will be a significant impact on the local setting. We have not had time to interrogate all of the ecological data, but clearly we have a significant bat population including Barbastelle and we are not clear how this urbanisation will impact on the adjacent woodland environment.

The A47:

The works appear to remove the whole existing eastbound layby and all the bank and veteran oaks on the bank. This impact does not show up the Arboricultural Plans as far as we can ascertain and needs to be confirmed. We would be very sorry to lose these features which we suggest are historically relevant.

There appears to be a land take for mitigation works which is 250 metres wide in fields north of the existing A47 – which seems vast. However, we agree that the impact of the roadworks, Hopkins development and loss of existing trees (and cottages) will be substantial and adverse when viewed from the north and that this amount of mitigation is therefore likely to be required.

The new section of A47 will rise up onto embankment as it meets the new roundabout. West of the new A47/WWHAR roundabout the road corridor is around 200 metres wide (with nearly 100m of woodland). The A47/Hardwick Roundabout works seem to cover 8-9 hectares – which again seems vast.

As residents of North Runcton who try to exit or enter New Road will confirm, there is regularly a queue of traffic behind slower moving vehicles coming west from Norwich, where they have probably followed vehicles from the dual carriageway at Swaffham. We expect that such motorists will seize the opportunity to speed past slower moving traffic as soon as they hit the new section of dual carriageway – before realising that they are in the wrong lanes for the Hardwick flyover/roundabout slip road. We therefore believe this will make for a very dangerous section of road, exacerbated by all the traffic likely to be entering it at the new WWHAR roundabout.

The new junction onto the roundabout if you are going into town appears potentially dangerous, as views right will be partially obscured by the flyover embankment. Residents know that motorists regularly jump the lights on this roundabout. As we understand it, no lights will be proposed at the A10 but will be introduced at the Hardwick Narrow junction – which seems counter intuitive. ‘Lost’ motorists wandering between lanes is a daily risk for locals at this junction and the changes seem likely to make the situation more problematic. North Runcton residents are likely to have to navigate these problems every time they travel into Lynn. We have not yet studied the proposals for cyclists but it would appear to require yet another light controlled crossing in order to navigate the Hardwick roundabout.

The existing old railway tunnel under the A47 will be lengthened to (supposedly) allow cycle and pedestrian access under the road, which is something we have promoted in the Neighbourhood Plan. However – as yet this proposal is an uncostered and undesigned concept and we know of no firm plan to bring it forward. In recent winters the tunnel has flooded. A crossing under the A149 would provide a similar drainage challenge.

Off site impacts:

For residents of North Runcton wishing to head south on the A10 they will presently use either Rectory Lane, Chequers Lane or perhaps the Twisty Twiney (a narrow lane connecting to Setch Road). In future the plan is to close Chequers Lane and using Rectory Lane will involve going over the new overbridge, back up the old A10 and then onto the new road at the new roundabout – which in time is likely to be a crowded and somewhat circuitous route. Therefore, we confidently expect that the majority of villagers and many other local people ‘in the know’ will begin to use the Twisty Twiney as a preferred short cut when wishing to head south – and again to use it when they are coming back into the village. This lane is not suitable for this level of use (as has been demonstrated when accidents have occurred on the A10 and the police have directed all the traffic up it!).

The WWHAR scheme has not factored this impact into the proposals. We suggest either.

- a) The Twisty Twiney surface is improved and passing places are provided as part of the WWHAR scheme, and/or
- b) The slipway proposed from Manor Farm bungalow is in fact designed as a southbound slip road for Chequers Lane.

Either way we confidently predict traffic along Common Lane will increase because locals are using this 'short cut' to the A10 to avoid a longer route – and that this increase will begin as soon as the construction works begin and stopping up of roads commences.

We remain unclear of the proposals for Rectory Lane traffic whilst the overpass is constructed.

Gas main diversions:

These will presumably be undertaken before the road works. They seem to require a large amount of temporary construction land. For the main on Chequers Lane a requirement of approximately 4 hectares appears to be needed and for the main diversion south of Sheep's Course Wood approximately 5.5 hectares in all! We are not clear that these works have been taken into account in the arboricultural impact assessment. We would wish to see as little impact to trees and hedges as possible from these works. The proposal for the Chequers Lane works appears to be on an out of date plan showing the cycle bridge.

Archaeology and heritage assets:

We believe the potential for buried archaeology is in the locality (including Neolithic and Bronze Age artefacts or features), is undervalued. Archaeological investigation work is required to appropriately sample and record these non-designated heritage assets.

We are very concerned about the loss of historic landscape features – where our commons are generally believed to be Anglo Saxon or older and lanes and field patterns are probably equally old. We note the proposed condition by the historic environment officer but we would like that extended to include landscape characterisation work and a detailed record of what we have got and what will be lost. Already in recent years agricultural practice has removed several key ditches in the locality and this erosion of landscape pattern is ongoing.

In the recent Local Plan Review examination the piecemeal approach to landscape impact studies and historic impact studies was discussed at some length. There has not been an overall comprehensive assessment of impact for all aspects of the proposed WWGA – and these roadworks are again being taken as an isolated development when the implications (as set out elsewhere in this response) will go well beyond the red line site.

Designated and potentially designated heritage assets within the setting also need to be properly considered. For example there are listed buildings on Rectory Lane and along the A10 that could be affected by changes to roads, junctions and levels of traffic.

Ecological and arboricultural impacts:

As noted elsewhere in this response, we have not been able to interrogate all of the documents submitted on these matters in detail as yet. However we note that some species that we know to frequent the route or its immediate setting (eg Woodcock and Polecats at the Hopkins site and Grasshopper Warbler and Stonechat along the Twisty Twiney in recent years) do not appear to be picked up.

Most importantly we have previously raised our concerns that this mainly undeveloped route is used as part of a longer wildlife corridor between the Nar valley and Middleton valley/Bawsey. There is an unfortunately high level of road kill every year along the A47 adjacent Sheep's Course Wood and we believe the proposed works will greatly exacerbate this problem. We have already asked the ecologists to consider wildlife tunnels under the widened A47 near Sheep's Course and we are unclear what bat crossings may also be required.

As noted above – we would like the Tree Protection information to be reviewed as we are not clear it is picking up all the phases of the proposed works.

Consultees:

We are appalled that Natural England state that they are ‘unable to provide advice on this application’ and that the King’s Lynn IDB have said it doesn’t affect them – when clearly the north end of the site is in their catchment. Unsurprisingly the Highways Authority (who are effectively the applicant?) have breezily stated that the scheme will ‘be to the benefit of existing and future residents’ which we would suggest is an extremely contestable statement. They do however state that proposals for the old A10 ‘need to be considered’. Residents do pay for all these organisations and their officers, and we deserve better than this blasé nonsense!

The Active Travel England response is attached in a format that cannot be accessed and we would wish to see it. We have not seen a response from the Norfolk Wildlife Trust (there are two County Wildlife Sites either side of the scheme).

Kind regards

A black rectangular redaction box covering the signature of Mrs Rachel Curtis.

Mrs Rachel Curtis, Clerk to the Council