



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:	Mr	
First Name:	Ben	
Last Name:	Colson	
Organisation (where relevant):	n/a	
Address:	[REDACTED]	
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)
MM5		LP01, LP02	Spatial policy and settlement hierarchy policy (replacement of the two with a single new policy)

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?		Yes	
Complies with the Duty to cooperate?		Yes	
Positively prepared (i.e. seeks to meet the area’s objectively assessed needs)?		Yes	
Justified (an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence)?			No
Effective (i.e. deliverable over the plan period)?			No
Consistent with national policy (National Planning Policy Framework: <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/432424/NPPF_2019.pdf">National Planning Policy Framework (publishing.service.gov.uk)</a> )?			No

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.

- 1 Reasonable alternatives are limited mainly due to flood risk around King’s Lynn, the only alternative would be to develop in Tiers 4 to 6 and the countryside, all of which have limited potential within existing development boundaries. But this does not mean that it is justified as development could be split more evenly between Tiers 1 and 2, thereby making Tier 2 towns more sustainable in their own right.
- 2 The focus on West Winch Strategic Development Area means it is less likely to be delivered over the plan period whereas a spread of development between Tier 1 and Tier 2 would be more appropriate.
- 3 It is broadly consistent with NPPF except NPPF section 9 on sustainable transport. The Local Plan does not give sufficient emphasis to the inclusion of this from the outset and the recent Outline Planning approval of Hardwick Green phase 2 (1100 homes) without Section 106 funding for transport services shows the extent of the gap between NPPF and the Borough’s compliance with it. This is important: nationally, 28% of greenhouse gas emissions come from transport (the only sector not to have reduced since 1990), in Transport East area that is 42%. King’s Lynn has three times the AQMA per head of

population than Transport East average. It is therefore essential that this shortcoming is addressed in the Local Plan.

(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

No

Adoption of Local Plan (anticipated February 2025)?

Yes

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 [lpr@west-norfolk.gov.uk](mailto:lpr@west-norfolk.gov.uk) or 01553 616200.

### Section 5: Signature and Date of Representation

Please sign and date below:	
Signature: (electronic signatures are acceptable)	Ben Colson
Date:	21 September 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.