



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)
MM29		LP 11	Strategic and Major Road Network

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?		X	
Complies with the Duty to cooperate?		X	
Positively prepared (i.e. seeks to meet the area’s objectively assessed needs)?			X
Justified (an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence)?			X
Effective (i.e. deliverable over the plan period)?		X	
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> )?			X

**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 The changed wording to include development on roads accessing directly onto the Strategic and Major Roads network is welcome.
- 2 However, the existing builds at Edward Benefer Way in South Wootton and Knights Hill do not conform, nor will the major developments at West Winch as they are accessed via side roads off the A10 (old or new).
- 3 Therefore in all these cases, especially the West Winch examples, the new test should be applied that development will be permitted “providing that it will not result in any unacceptable impact on highway safety, capacity, access or that the residual cumulative impacts on the existing road network would be considered severe.”
- 4 Going forward, the problem lies with the wording. What is unacceptable? What would be considered severe? By whom? By what objective measure or modelling?
- 5 For these reasons I do not believe it complies with the NPPF and recommend that the old wording from that document replaces this, and very importantly including its requirement for the developer(s) to fund agreed mitigation measures, something that is entirely omitted from this version.

(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	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Adoption of Local Plan (anticipated February 2025)?	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

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
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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.