



Representation Form

Consultation on Schedule of Main Modifications Part 1, August 2024

Closing date for submitting representations: 11:59pm, Wednesday, 2nd 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:	[REDACTED]	
Telephone:	[REDACTED]	
Email:	[REDACTED]	

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)
MM32		Norfolk LTP 4 and KLSS	

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: National Planning Policy Framework (publishing.service.gov.uk))?	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 This updates from Norfolk LTP3 to LTP4 and revises the objective and vision for the KLTSS.
- 2 KLTSS objective and vision has changed significantly yet this has neither been put to a stakeholder group (that meets on 3rd October, the day after the closing date for these comments) nor been adopted either by the Cabinet or Full Council. It therefore appears to me that it is prejudicial to outcomes of due process and for that reason may not be legally compliant.
- 3 There is no evidence of an updated objective assessment of the area’s needs for KLTSS, even though the revised wording (compared with that which emerged from the 2018 stakeholder group) is generally more aligned with thinking on climate change and air quality and is therefore welcome.
- 4 There is no evidence that reasonable alternatives have been assessed and that the new KLTSS objectives and vision is therefore justified.
- 5 It states that “the area-wide modelling is considered to demonstrate” that the road network can cope with the new development” yet earlier evidence indicated that this did not include 575 homes at Edward Benefer Way (the Transport Assessment was for the lower figure of 300 in the 2016 SADMP prior to Inspector revision) nor for the 950 homes to be built in Fakenham in the adjoining district of North Norfolk. Norfolk County Council has never published the modelling which showed that the road network can cope, and

anyway with the schedule showing A148 and A149 being at over-capacity at certain times of the day and with some 1200 new homes not accounted for in the original modelling which showed this capacity issue, it is self-evident that the new homes omitted from the model means that it is factually absolutely wrong for the Local Plan to repeat this inaccuracy, one which will have a major impact on the local economy and air quality. At the least, it should be omitted and no comment made rather than a wrong, misleading one to be included.

- 6 There is no evidence basis for believing that capacity enhancements outlined in the table will be delivered on time to meet demand growth. It shows the A149 King’s Lynn by pass enhancement study to be at scoping stage. This has been the case for some years and if it takes years just to scope the study, then modelling and writing the outcomes and recommendations, and for them to be adopted by two authorities, and funding sought from central government, will run years if not decades behind the developments coming on stream. The result will be to significantly negatively impact both local economic development and air quality in the area.

(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 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, 2nd 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.