

**Borough Council of King’s Lynn  
and West Norfolk Local Plan  
2021-2040**

Borough Council of  
**King’s Lynn &  
West Norfolk**



**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**

	<b>Respondent details</b>	<b>Agent details (where applicable)</b>
<b>Title:</b>	Mrs	
<b>First Name:</b>	Lynn	
<b>Last Name:</b>	Devereux	
<b>Organisation (where relevant):</b>	Holme-next-the-Sea Parish Council	
<b>Address:</b>	[REDACTED]	
<b>Postcode:</b>		
<b>Telephone:</b>		
<b>Email:</b>		

**Part B**

Please fill in a separate form for each site and/ or policy

**Section 2: Representations**

**Which Main Modification are you responding on?**

<b>Main Modification (MM) ref</b>	<b>Local Plan Paragraph ref</b>	<b>Local Plan Policy ref (if applicable)</b>	<b>Policy title (as applicable)</b>
MM41, MM42 AM52, AM54		LP17	Coastal Change Management Area (Hunstanton to Dersingham)

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?			
Complies with the Duty to cooperate?			
Positively prepared (i.e. seeks to meet the area’s objectively assessed needs)?			
Justified (an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence)?			
Effective (i.e. deliverable over the plan period)?			
Consistent with national policy (National Planning Policy Framework: <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/431424/NPPF_2019.pdf">National Planning Policy Framework (publishing.service.gov.uk)</a> )?			

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.

The Parish Council objected to this policy at the hearing sessions on the grounds that the NPPF requires designation of a CCMA where change to the coastline is expected. Holme is a parish where 40% of its land area (including c 80 houses) is expected to be lost to the sea under the policies of SMP5 (managed realignment) but no CCMA was designated in the plan. Furthermore, according to the NPPF, LPAs should pursue a policy of Integrated Coastal Zone Management when dealing with this type of issue but despite MoU’s with neighbouring authorities no evidence of such a policy was indicated in the proposed plan. It appears that the BC has taken steps to address some of these issues but there is considerable confusion arising from the proposed policy amendments (AMs and MMs). This stems in part from AM52 which changed the title of Policy LP17 as follows:

LP17 Coastal Change Management Area (Hunstanton to Dersingham Policy) Management of Development Within the Coastal Change Management Area

This is almost consistent with the title referred to in MM41 (ie “Coastal Change Management Area”). However, MM42 makes the following change –

Policy LP17 – Coastal Change Management Area (Hunstanton to Dersingham)  
Management of development within the Coastal Area...

This is particularly confusing because Policy LP15 is the “Coastal Areas Policy” so if MM42 is taken at face value it refers to the areas covered by LP15. The PC has previously asked for a map plus a clear definition of what is meant by ‘Coastal Areas’ as referred to in LP15 (see separate representation on Policy LP15).

To add to this confusion AM54 refers to the original title of LP17 as Coastal Change Management and suggests the following change

LP17 COASTAL CHANGE MANAGEMENT – MANAGEMENT OF THE DEVELOPMENT WITHIN COASTAL CHANGE MANGEMENT AREA

It is clear that the scope of policies LP15 and LP17 overlap substantially and in light of the proposed modifications it would simplify the plan if they could be merged into a single policy where the spatial areas and provisions applicable to each are clearly defined.

If the proposed changes made by the BC are correctly understood, then the PC welcomes:

1. The extension to the CCMA on the Policies Map (PM1/1) to include Holme – but a reference to the map in the relevant policy (LP17?) explaining what it shows and why it is drawn at some distance from the land is needed.
2. The commitment to a policy approach of Integrated Coastal Zone Management in the supporting text to LP17 (para 6.3.6) as proposed in MM41 - but this should be part of the policy.

Looking to the future, it would be helpful if the supporting text to LP17 signalled a commitment to updating the provisions of LP17 under the policy of Integrated Coastal Zone Management so that they better reflect the issues and needs of the entire coastal frontage of the CCMA.

Clearly, the wording and titles of this policy (possibly alongside LP15) need checking and correcting in order to make it sound

(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)	
Date:	23/09/2024

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.