

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



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:	Mrs	
First Name:	Lynn	
Last Name:	Devereux	
Organisation (where relevant):	Holme-next-the-Sea Parish Council	
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)
MM31, MM32 and MM34		LP13	Transportation 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?		
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: National Planning Policy Framework (publishing.service.gov.uk))?	with suggested changes	

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.

MM31 provides welcome clarification regarding the requirement for transport assessments and travel plans.

Of ongoing concern is whether the Borough’s Transport network will have the capacity to support the spatial pattern of growth and whether it is too dependent on car travel (see MIQs 20-28). Further will the A149 within and beyond the KLTS area support visitor accessibility to Hunstanton and the Coast or will seasonal congestion act as a constraint on the tourist economy?

The transport evidence base shows that under all forecast scenarios there is significant congestion along the A149 within the modelled area and this modelling excluded seasonal tourist traffic and ‘sugar beet campaign’ HGVs.

The MMs to the Transportation Policy (LP13) aim to address some of these issues by proposing a scoping a study of the A149 corridor (MM32) identified in Para 5.7.14 and by

identifying the A149/Queen Elizabeth Way as a priority location for transport improvements (MM34).

To be effective the scope of the A149 corridor study should be extended northwards to include the seasonally, heavily congested section between Dersingham and Hunstanton. This is needed to identify the economic and social impacts (costs) of this congestion so that transport solutions can be found and implemented which protect and promote the Borough's tourist offering.

The commitment in MM32 to upgrade the KLTS is welcomed but the modelling framework – in addition to incorporating all modes of sustainable transport needs to cover the entire Borough – Kings Lynn can't stand in isolation.

Under the proposed modifications the plan lacks clear proposals for active travel infrastructure directly linking new housing in the proposed urban growth area, the railway station, employment, schools and shopping destinations in Hardwick and Kings Lynn. There is no indication of how such infrastructure might reduce numbers of vehicles on the road network and to what extent the predicted congestion could/would be reduced.

The LCWIPS study includes a route to Hardwick and King's Lynn but this route currently fails to meet national guidance and standards (hostile user environments, dangerous junctions, shared carriageways for pedestrians and cyclists and no effective provision for users with accessibility needs).

MM34 needs to demonstrate a clear commitment and approach (lines on maps and numbers) to reducing car dependence and building appropriate infrastructure to support and encourage active travel and how this could complement the WWHAR scheme in reducing congestion and emissions.

Whilst it is accepted that this would increase infrastructure costs it would nevertheless bring the Urban Growth Area transport proposals into line with national guidance and should increase the chances of winning government funding and wider community support.

With these small alterations it is considered that LP13 addresses the Transport issues raising questions of soundness. The success of the plan going forward would depend on the success of completing and implementing the proposed studies.

(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 or 01553 616200.

Section 5: Signature and Date of Representation

Please sign and date below:

Signature: (electronic signatures are acceptable)



Date:	23/09/2024
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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.