



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:		
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)
MM35 & MM36		LP 14	Parking 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?		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 The wording which introduced a reduction in town centres to the standard off-road parking per new dwelling (broadly based on number of bedrooms, less 1) to be made wider to all developments subject to “taking into account local car ownership levels” and the Norfolk framework standard is, to the extent that does not only apply in town centres, welcome.
- 2 However, the link to (by implication, existing) local car ownership levels is not and will lead to ongoing breach of the NPPF high level definition of sustainable development in that it will tie future generations to standards from today and yesteryear. This is most evident in West Winch where the existing largely retired demographic will not be replicated in the new housing, whereas the newer, generally younger population there will be wedded to the former’s car ownership characteristics. This despite all the national evidence pointing to younger adults taking their driving tests and buying cars later, with a propensity to weigh alternative modes much more objectively than existing, especially older, generations.
- 3 This has a particular resonance in West Winch, where, residents’ focus groups have told the Borough of their frustrations with the multiple shortcomings in the public transport mode, and it is therefore self evident that this has caused existing car ownership to be higher than would otherwise be. The new development policies for the West Winch

Growth Area place an emphasis on promoting sustainable and public transport use, and therefore linking parking spaces to pre-existing circumstances is patently wrong.

- 4 It is strongly recommended that the wording is changed, and at the very minimum the words “taking into account local car ownership levels” are removed.

(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)	Ben Colson
Date:	24 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.