



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:	Councillor Chair of Planning Committee	
First Name:	Terence	
Last Name:	Parish	
Organisation (where relevant):	Borough Council of Kings Lynn and West Norfolk	
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)
MM1			

MM5			
MM6			
MM7			
MM8			

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)?			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)?			
Consistent with national policy (National Planning Policy Framework: National Planning Policy Framework (publishing.service.gov.uk))?			

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.

Note: the soundness tests mean little to anybody excepting, presumably, planning inspectors. Whether a change is beneficial; or not is simpler to understand.

MM1

Note extending plan period has repercussions on number of houses needed. However, the extension does not mean the houses have to be built now. Additional house requirements should be restricted until 2030 at the earliest.

MM5 New Spatial Strategy

It seems the relative common sense demonstrated by the original spatial strategy has been discarded in favour of this.

I note that the spatial strategy now seeks to distribute the majority of growth within and around the 3 towns, including Hunstanton. Only those not familiar with the nature of Hunstanton would do this. It is, effectively, a town at the end of a long cul-de-sac, the A 149 resolves into a narrow twisting riad beyond Hunstanton. The town has no significant 'industry' beyond tourism. It is a town of older people, retirees, and increasing second home ownership. It is also a town that has had extensive new development under the current plan. No further housing development should be allowed in or near Hunstanton without principal residency being a requirement of ownership. Otherwise, housing NEED will be replaced by housing DESIRED, it will not address the government's 'Housing Crisis'.

The same limiting factors apply to the nearest Key Rural Service Centre to Hunstanton, Heacham. It sits almost at the end of the A149 as a significant road, it has significant development in place through the current Plan – more than was originally allocated – and reducing local services including the impending loss of the post office. Both Hunstanton and Heacham Neighbourhood Plans insist on the retention of settlement gaps, including the challenged one between the two communities.

MM6 New Policy on Windfall Development Tiers 1-4

I do not find the assertion that development will be permitted outside development boundaries 'positive'. A boundary is just that and local planning including Neighbourhood Plans, currently recognises that. Boundaries ensure open spaces, vistas, the natural environment, provide a break from the built environment and places which people, within the boundary can enjoy. They also prevent piecemeal development with extensions to boundaries becoming the new boundary and the spaces between such extensions being deemed 'infill'. Such boundary incursions are also likely to utilise existing road infrastructure and, consequently, adversely impact residents within the boundary. Internal road structures for, say, key rural service centres can be very constricted and do not lend themselves to add on developments – new accesses to new housing have to be found. It should also be noted that Neighbourhood Plans have been developed and are in place which acknowledge the development boundary and authors have not been tasked with identifying development outside of that, supposed, sacrosanct, line.

MM7 New Policy -Neighbourhood Plans

I find this a little confusing. If it means that an allocation will be imposed on top of allocations accepted and integrated into Neighbourhood Plans, then I am opposed to it.

MM8 amendment to LP03 – presumption in favour of sustainable development

Point one means that Planning Committee will be removed from decisions if a proposed development receives 'ticks' against appropriate policies. 'Unless material considerations indicate otherwise' has been removed. This is a retrograde step. Local conditions are not always taken into account by policies in the NPPF. For example, the nature of local residents adjoining the proposed development – a significant proposal in Downham Market which ticked all the NPPF boxes was refused by planning committee due to its likely impact on existing residents; it went to appeal and inspectors agreed with the planning committee decision. Under the amendment, this correct decision would have been impossible. There are also numerous occasions when local traffic conditions have overruled a presumption in favour of development – despite NCC Highway giving no objections (they rarely do). So, DO NOT remove provision for the application of common sense over the dictat of policy numbers.

MM10 Amend Criteria 9 of Policy LP05

Agree with this. Permission is often granted with, for example, the proportion of affordable housing understood. After permission, viability is questioned and the developer seeks to reduce commitments.

(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"/>
Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Adoption of Local Plan (anticipated February 2025)?

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)	<p style="text-align: center;">X _____</p> <p>Terence Parish</p>
Date:	23/09/2024

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.