

**Borough Council of King's Lynn  
and West Norfolk Local Plan  
2021-2039**



**Representation Form**

Consultation on additional evidence base documents, September 2023

Closing date for submitting representations: **11:59pm, Friday, 20<sup>th</sup> October 2023**

**Part A**

**Section 1: Personal Details**

<b>Title:</b>	Mr
<b>First Name:</b>	Terry
<b>Last Name:</b>	Davies
<b>Job Title (where relevant):</b>	
<b>Organisation (where relevant):</b>	
<b>Address:</b>	[REDACTED]
<b>Postcode:</b>	[REDACTED]
<b>Telephone:</b>	
<b>Email:</b>	[REDACTED]

**Section 2: Agent Details (if applicable)**

Please supply the details below of any agent you have working on your behalf.

<b>Agent name:</b>	
<b>Address:</b>	
<b>Postcode:</b>	
<b>Telephone number:</b>	
<b>Email:</b>	

## Part B

Please fill in a separate form for each document

### Section 3: Representations

Which Document are you responding on?

Examination Library ref	Document name	Paragraph No(s)
F47/47a	Topic Paper – Spatial Strategy and Settlement Hierarchy (August 2023)	

#### Summary of Comments:

Please be as precise as possible as to why you support or object to the evidence and/or any suggested main modifications to the Plan contained in the document, providing the relevant paragraph and/or policy number for each point.

F 47/47a

APPENDIX 3 Proposed Main Modifications to Policy LP01

I oppose the revised local authority Plan to allocate of 642 new houses to Downham Market at this moment in time.

Paragraph 82 of the NPPF specifies that planning policies must seek to address potential barriers to investment, such as inadequate infrastructure.

The allocation of a further 642 houses to the town will further stress the infrastructure. The local authority previously recognised the need to slow growth in the town to let it catch up. There in no evidence that the infrastructure has caught up in any meaningful way. Without evidence of improvements it is impossible for the local authority to comply with the NPPF. The Plan itself will hinder much needed investment in a town. It is not justified or consistent with national policy.

The town has doubled in size in recent years without sufficient investment in infrastructure. There is now a significant shortfall. 600 houses are currently under construction at the moment. Matters will only get worse. Money accrued though contributions towards infrastructure from corporate developers was not spent on the town. It went cross border to other authorities.

Local authority arrangements with the largest corporate developer in the area means that they will not be charged a Community Infrastructure Levy on nearly 300 houses they are building now. That corporation also owns the majority of land enveloping the town. Matters can only get worse. The Plan is not positively prepared.

There are shortfalls in electricity and water supplies. Regular power outages, burst water mains and low pressure.

The Sewage Treatment Works cannot cope and there are regular odour problems as lorries are required to carry effluents away. Regular seeding of water locally with 'fresheners' is required. This is bad for the environment. The works cannot physically expand due to border constraints.

Doctors and dentists have seen the ratio of residents to practitioners rise year on year. Most recently residents have been advised that the nearest available NHS dentist are Ely or even Spalding. Travelling tens of miles is not sustainable. This is not consistent with national policy.

The town has only one secondary school. It is one of the largest in the county. There are no longer enough secondary school places. Children are transported for miles out of town to be educated. This is not sustainable. The NPPF states; "It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education". The Plan is not consistent with national policy.

New employment opportunities have not kept pace with growth. The increased drain on our infrastructure caused by further housing development will stifle significant investment in the local economy. This is not consistent with national policy.

Without new investment in employment the new houses proposed will be beyond the reach of local people. The town will be populated by people travelling to work and spend elsewhere. This is not sustainable. Failing infrastructure deters investment. Failure to address this is against national policy. This is not sustainable.

National policy requires the local authority seek 'reasonable alternatives'.

During working hours parking in the town is difficult. The car parks are full. The town centre has reached its full capacity. Residents already travel to King's Lynn and other towns to access facilities. More housing will make matters worse. Far from being a hub the town no longer has a Post Office, just a counter in a newsagents. The last bank is about to close. Social clubs, pubs and venues have closed. There is now a net movement out of the town. This is not sustainable and against national policy.

It has been argued that Downham Market can absorb 642 more houses because it has a railway station. And yet the rail service is PART of the failing infrastructure. This service is infrequent and very unreliable with standing room only at key times. It's waiting room and cafe have closed. The ticket office is under threat. It is on the very outskirts of town and inaccessible. The new housing will not be within a reasonable distance. Parking is very limited and affects local streets. Rather than bringing a benefit the railway service now has a net negative impact. It contributes to the 'dormitory' status of the town. People do not travel from Kings Lynn or Ely to access local shops or facilities.

Without investment in the rail service, local infrastructure and employment nothing will change.

In light of the above the Plan fails on the following;

- a) Positive preparation – The plan does not meet objectively assessed needs. Previously objectively assessed infrastructure shortfalls are now ignored. There is no evidence that deficits have or will be met in the Plan period. They have been glossed over.
- b) Justified – This is not an appropriate strategy as it is not based on proportionate evidence.
- c) Effective – There is no evidence that the problems of the town can be overcome in the short term. The allocation is unlikely to be deliverable within the Plan period. Cross-boundary strategic matters have been avoided. Infrastructure monies raised have disappeared ‘cross boundary’ to other authorities leading to shortfalls. The local authorities are required to co-operate.
- d) Consistent with national policy – The plan cannot deliver sustainable development for Downham Market in accordance with national planning policies. For the reasons highlighted above it fails to adhere to policy.

In 2013 local residents voiced their concerns during a local consultation. Their concerns regarding the destruction of specific sites were heard and those sites dropped from the Local Plan. This latest revision does not recognise the areas previously considered important to the community. There are provisions within the NPPF designed to address this. The policy states; ‘Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements’. The old WWII airfields alongside the A10 would mitigate negative impacts if developed at the right time. Records show this was the majority preference in 2013.

(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: Examination Hearings

This consultation may be followed by further Examination Hearing sessions, at the discretion of the Planning Inspectors. Do you consider it necessary to participate in Examination Hearing sessions? *(Please select one answer)*

No, I do not wish to participate at the Examination Hearing

Yes, I wish to participate at the examination hearing

#### Section 5: Data Protection

Do you wish to be notified further about the Local Plan Examination process, at any of the following stages?

Schedule of Main Modifications stage (following hearings)	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Publication of Inspector's Report	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Adoption of Local Plan	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](mailto:lpr@west-norfolk.gov.uk) or 01553 616200.*

#### Section 6: Signature and Date of Representation

<b>Please sign and date below:</b>	
<b>Signature: (electronic signatures are acceptable)</b>	Terry Davies
<b>Date:</b>	17 <sup>th</sup> October 2023

Please note that, to be considered, your representation will need to be received by **11:59pm on Friday, 20<sup>th</sup> October 2023.**