

17 October 2023
Delivered by email

Local Plan Evidence Base Consultation
Planning Policy Team
Borough Council of King's Lynn & West Norfolk
King's Court
Chapel Street
King's Lynn
Norfolk
PE30 1EX

Ref: SILC3006

Dear Sir / Madam

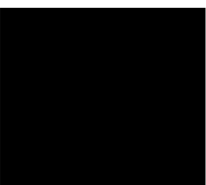
KING'S LYNN & WEST NORFOLK - CONSULTATION ON ADDITIONAL EVIDENCE BASE DOCUMENTS 2023

This further representation to the Local Plan consultation on additional evidence base documents has been prepared by Turley for Silverley Properties Ltd on behalf of, Judy Patricia Matthews Nana (the 'landowner'). This representation principally relates to their land interest, which is the allocated MAR1 site in Marham. The site has been promoted to date through the course of the Local Plan preparation, and this letter provides further support for the inclusion of the site as an allocation within the Local Plan Review, with reference to the consultation material, specifically the F47 - Topic Paper Spatial Strategy and Settlement Hierarchy document.

Response to F47 - Topic Paper Spatial Strategy and Settlement Hierarchy

In response to the Inspectors' comments dated 30th January 2023, the Council have chosen to remove the 'Growth Key Rural Service Centres' category from the settlement hierarchy. It is understood that the reasoning for the concerns raised was due to the lack of growth proposed at Downham Market and Watlington. Therefore, instead of proposing greater housing delivery in Watlington, the Council have decided to remove the 'Growth Key Rural Service Centres' category from the settlement hierarchy and redesignate as 'Key Rural Service Centres', which is consistent with the existing categorisation in the adopted Local Plan. Marham had been listed as one of the two 'Growth Key Rural Service Centres' alongside Watlington, which was a new category of settlement proposed in the emerging Local Plan. In their comments, the Inspectors' did not raise any concerns around the positioning or delivery of homes in Marham specifically.

Whilst it is disappointing that the Council have chosen to propose this change, it is understood that MAR1 will remain an allocated site, as originally specified by the Plan, and as such, we have no specific objection to the amendment. We therefore strongly support the continued allocation of MAR1 as part of this additional evidence base. Whilst MAR1 is not referenced specifically in the Topic Paper, 'Table 3 Indicative Housing Requirement for Future Potential



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Neighbourhood Areas' sets out that there would be 85 dwellings from allocated sites in Marham (understood to be 35 units at MAR1 and 50 units at G56.1) which is also referenced in the proposed amended wording of Policy LP01.

Despite the removal of the categorisation, it is positive that the position of Marham in the hierarchy remains the same in relative terms, i.e. behind King's Lynn, the main towns and adjacent settlements. This demonstrates that Marham is clearly a sustainable settlement for growth, and as set out in the revised subtext wording of Policy LP01, 'these are considered the most sustainable villages outside the urban area. They are large enough to sustain a range of local facilities. These services and facilities help meet the day-to-day needs of their residents, but also provide services to other nearby smaller settlements. Key Rural Service Centres will provide some growth to support their roles as 'service centres' and to enhance local service and public transport provision.'

To reiterate previous representations, the site is within a sustainable location within the village, conveniently located towards the centre, benefitting from the services and facilities offered. Marham has schools, a medical centre, a village hall, a place of worship, a mobile Post Office and a take-away. There are also other services accessible to the public close to the RAF Base. Within Marham there are bus stops providing services to King's Lynn, from Monday to Saturday. The RAF Marham Airbase also provides a significant amount of employment, being one of the largest employees in the area.

As has been referenced in previous documentation submitted in relation to MAR1 and its promotion, the site is not subject to any significant constraints. The site has also already been through productive pre-application discussions with the Council and is a highly deliverable site that can come forward quickly in the plan period, in accordance with the Council's updated Housing Land Supply trajectory for this site. There are no legal, physical or other abnormal constraints to early delivery and so the main determining factor which governs when this site will be delivered is the planning application process itself.

Modifications

At this juncture the Council are reminded of the discussion at the hearing session related to MAR1. As part of this, Silverley Properties objected to the proposed wording modification to MAR1 under Main Modifications October 2022 which stated that:

'1. Subject to safe access, including provision of a continuous, all weather, off carriageway footpath/footway between the site and Cherry Tree Academy infant school at Cedar Road, being achieved to the satisfaction of Norfolk County Council as the local highway authority'

This matter was discussed at the hearing at it was agreed unfair for MAR1 to carry the burden of the footpath requirement, and that the wording should be amended to provide a contribution. Following subsequent correspondence the Policy Officer it was understood that they would agree the following wording with the Highways Officer:

'1. Subject to safe access, including a financial contribution towards improvements to the footpath between the old village and the airbase, being achieved in consultation with Norfolk County Council as the local highway authority;'

This is in addition to the change in site name which has already been noted by the Council in their Schedule of Suggested Main Modifications in Plan Order, October 2022, and should be changed from 'Land off School Lane' to 'Land south of The Street'. As set out in previous representations, Silverley Properties Ltd support the change to the site name because School Lane is not adjacent to the site. This error was likely a wording hangover from the previously proposed MAR1 allocation, which was for a different site in the village, that has since been discounted.

I trust that this response provides helpful feedback to the Local Plan consultation on additional evidence base documents, but should you require any further information, please do not hesitate to contact me.

Yours sincerely
Ella Murfet
Associate Director

