



Representation to Local Plan Review Pre-Submission Document 2021

Borough of Kings Lynn and West Norfolk

Representation on behalf of Elm Park Developments

Job No: 21/L/004

Version: 1

Prepared by: Stuart Booth

Written Representation

- 1.1 This document forms a representation on behalf of Elm Park Holdings to the Kings Lynn and West Norfolk Borough Council Local Plan Review Pre-Submission document. The comments relate principally to the settlement of Clenchwarton on the Proposals Map, which we consider has been incorrectly defined. We consider this error should be corrected to make the plan sound and that any direct assessments made on the basis of the incorrectly drawn settlement boundary should be undertaken again to ensure the evidence used to inform the plan is correct and therefore policies in the plan are justified.
- 1.2 The Development Boundary of the village of Clenchwarton is shown as a single irregular shaped area drawn around areas of existing housing and their curtilages, principally where these include houses adjacent to Main Road in a continuous form or around cul-de-sac estate and connecting roads. There are some additional houses to the west of the defined settlement area that are somewhat sporadic in nature, being separated by large gaps, and more ribbon-type development on one side of the road such as along Station Road, that are not defined as part of the settlement boundary. These areas being excluded is perhaps understandable. However, and significantly, there are large areas of housing to the east of the Clenchwarton defined settlement that are clearly part of the village, but that have somehow been excluded from the settlement boundary of the village. We see no plausible reason why these areas are not defined as part of the village of Clenchwarton on the Proposals Map.
- 1.3 This error has come to our attention as the map also omits a committed housing site within this part of Clenchwarton, one that our client is in the process of constructing and which itself should also be included within the settlement boundary. This is standard practice for Local Plan proposals maps that are positively prepared. Application 17/01632/RMM is an extant planning permission for 40 new residential dwellings off Main Road, Clenchwarton. Evidence of the extant permission is provided at Appendix A. The site is located outside what the Council have deemed the settlement boundary of Clenchwarton, adjacent existing areas of housing between Main Road and Coronation Road that are also excluded.

- 1.4 The development boundary of Clenchwarton is clearly incorrectly drawn and should be amended to reflect what housing areas exist in the village and include the commitment for 40 new dwellings being added to the village. Policy LP04 defines these development boundaries and supporting text states that “the development boundaries are used to indicate the distinction between largely built up areas of settlements where development is generally acceptable, and areas of the countryside and areas of more sporadic buildings considered generally less suitable for new development, and where a more restrictive approach will be applied”. Areas outside these boundaries are considered countryside, clearly an inappropriate designation for such areas. We consider there are almost 200 houses (including the committed site) excluded from the development boundary of Clenchwarton.
- 1.5 We have provided at Appendix B a number of plans showing the areas we believe should be included as part of the settlement boundary of Clenchwarton. These areas should be included as part of the settlement, either connected to the existing boundary or as a separate defined area of the village. Other rural areas across the district have more than one defined settlement shown on the proposals map unconnected to one another: for example Congham, Roydon which has three settlement boundaries, and also Stowbridge and Terrington St Clement to name a few. There is no clear reason why these houses that are part of the village should be excluded from the defined boundary.
- 1.6 Those existing houses and the area of those with extant consent are in some instances closer to the facilities in the village such as the convenience store and Clenchwarton Community Primary School on Main Road than the proposed site allocations at the extreme edge of the existing settlement boundary.
- 1.7 The Development Boundary Changes document that forms part of the Evidence Base for the Local Plan clearly shows that in most instances where existing development connects houses and their curtilage to one another they are defined within the development boundary of that village.
- 1.8 Clenchwarton is a key rural service centre within the settlement hierarchy. These villages are identified within the hierarchy as suitable for accommodating a high level of development which will help to sustain the wider community, selected on the basis of the presence of a primary

school, healthcare facilities, a range of services that can meet basic day-to-day needs and a level of public transport that can enable access to and from the settlement. The hierarchy qualifies that a key rural service centre settlement must first link with a school, as village schools are core facilities. Additionally a convenience store should be present, and preferably a doctors' surgery. The above is taken from the Consideration of the Settlement Hierarchy document. The Further Consideration of the Settlement Hierarchy document shows Clenchwarton having a primary school, a convenience store and public transport, and a population of 2,171.

- 1.9 This figure is repeated in the Local Plan at paragraph 12.4.1 in policy defining the village. This figure was derived from the Parish Area Boundary of Clenchwarton, the boundary of which (shown at Appendix C) includes all of the properties we are presenting in this statement as forming part of Clenchwarton. It is clear therefore from the evidence of the village that the Council have used to justify the settlement hierarchy, and how other villages boundaries are defined, that the properties and the area of the extant permission should all be included within the village of Clenchwarton and defined as such on the Proposals Map.
- 1.10 The Council has undertaken its Housing and Economic Land Availability Assessment update and assessed whether potential housing sites are within existing villages or adjacent to existing settlement boundaries. Indeed, a site being less than 25 metres from a development boundary is an 'absolute constraint' that meant potential development sites were excluded from further assessment. Clearly therefore, assessments need to be reviewed again where the development boundary is found to be incorrect as potentially suitable sites could be excluded through the methodology and not assessed.
- 1.11 We consider the Local Plan would not be sound without these amendments being made as it would be based on incorrect evidence and not adequately justified.
- 1.12 As part of this reassessment of sites in this part of Clenchwarton, we wish to present our clients land to the north of the extant site as a potential housing allocation, at Appendix D. This site adjoins existing residential dwellings to the north, east and south being bordered by the rear of properties on Jubilee Bank Road, Queens Road, Coronation Road and Ferry Road. The land can readily be connected to the extant site to the south, providing excellent non-vehicular

connections to the main services of the village. We would like to discuss the site with the Council prior to submission of the Plan to the Secretary of State, or to present evidence to the Examination on the basis that the site should not be excluded simply for being away from the incorrectly drawn boundary of Clenchwarton, as discussed above.

1.13 We wish to reserve the right to make further comment throughout the local plan process once the Council has read and responded to this statement.

APPENDICES

A - Extant Site - Application 17/01632/RMM

B - Site Maps - Development Boundary and Areas to Reconsider

C - Parish Area Boundary

D - Proposed Site to Consider for Development

APPENDIX A - Extant Site - Application 17/01632/RMM

ENVIRONMENT AND PLANNING

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Borough Council of
**King's Lynn &
West Norfolk**



NOTICE OF DECISION - APPROVAL OF RESERVED MATTERS

Elm Park Holdings Limited
c/o Wallis Design Associates
Mr Alan Wallis
Howard Town Mill
10 Victoria Street
Glossop
Derbyshire
SK13 8HL

Reference No: 17/01632/RMM
Application
Registered: 13 September 2017
Parish: Clenchwarton

Details: **RESERVED MATTERS: Residential development for 40 dwellings at Fosters Sports Ground Clenchwarton King's Lynn Norfolk PE34 4BP**

The Town and Country Planning Act 1990 (as amended)
The Town and Country Planning (Development Management Procedure) (England) Order 2015)

Approval is granted for the reserved matters specified above and in plans submitted in accordance with the grant of outline permission Reference No. 13/01123/OM
subject to compliance with the following conditions:

1. The development hereby permitted shall be carried out in accordance with the following approved plans:

Location Plan
RM:SL:02:E
RM:10:A
RM11:B
RM:12:D
RM:13:D
RM:14:A
RM:15:B
RM:16:B
RM:17:A
RM:18:A
RM:20
RM:SS:02:A
RM:SS:03:A
P17-0940_02B
P17-0940_03B
P17-0940_04B
P17-0940_05B
P17-0940_06B

RM:SL:02 B insofar as Property Schedule only.
Cotswold Wildlife Surveys Tree Survey Report dated 9th June 2017
Midland Survey R1

2. All on- site (land identified in red) and off-site (land identified in blue) hard and soft landscape works shall be carried out in accordance with the approved details. The works shall be carried out prior to the occupation or use of any part of the development or in accordance with a programme to be agreed in writing with the Local Planning Authority. Any trees or plants that within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species as those originally planted, unless the Local Planning Authority gives written approval to any variation.

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B - Site Maps - Development Boundary and Areas to Reconsider



C - Parish Area Boundary

MENU (1/19) x

- Proposed Housing Allocations
- Housing Allocations
- Employment Sites
- Development Boundary
- West Winch Countryside
- Strategic Road Network
- Disused Railway Trackway
- Coastal Change Management
- Gaywood Clock Area
- Kings Lynn Retail Extension
- Port Operational Area
- Town Centres Boundary
- Stoke Ferry Car Park
- TSC* Proposed Buffer Area
- Fenland District Council Site
- A148 Rudhams Bypass
- Parish boundaries
- Ward boundaries
- Borough boundary

D - Proposed Site to Consider for Development





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