

**KING'S LYNN & WEST  
NORFOLK LOCAL PLAN  
REVIEW EXAMINATION**

**MATTER 2: SPATIAL  
STRATEGY**

---

**WRITTEN STATEMENT**

**The Crown Estate  
17 November 2022**

**Carter Jonas**

## CONTENTS

---

<b>1.0</b>	<b>MATTER 2: SPATIAL STRATEGY</b>	<b>3</b>
	Introduction	3
	Matter 2 – Spatial Strategy (Policy LP01)	3

## 1.0 MATTER 2: SPATIAL STRATEGY

### Introduction

- 1.1 This Written Statement for Matter 2 has been prepared by Carter Jonas on behalf of The Crown Estate (TCE) to respond to the relevant Inspectors questions on the spatial strategy. This Statement responds to Question 31 relating to Criteria 8(a) of Policy LP01 and the strategy for the rural area including the Key Rural Service Centres.
- 1.2 TCE owns land north of Main Road in Clenchwarton and has promoted this site through the process for the Submission King's Lynn & West Norfolk Local Plan Review (draft KLWNLPR). The site was identified as a draft allocation in the 2019 Draft Consultation version of KLWNLPR - see Policy CLE1: Clenchwarton: Land to the north of Main Road – but was not taken forward into the Submission version. This Statement refers to the circumstances that exist at Clenchwarton to demonstrate that Policy LP01 is not sound in respect of the strategy for the rural area.
- 1.3 A separate Written Statement for Matter 5 has been submitted on behalf of TCE to address the proposed housing allocations in Clenchwarton and whether sufficient land has been allocated during the plan period (Question 199). In summary, it is requested in that Statement that the TCE land off Main Road should be allocated in draft KLWNLPR, based on the proposed policy requirements contained in Policy CLE1 of the 2019 Draft Consultation document.

### Matter 2 – Spatial Strategy (Policy LP01)

***31. Is criterion 8(a) of Policy LP01 positively prepared, effective and consistent with national policy in promoting sustainable development in rural areas and maintaining the vitality of rural communities as part of the spatial strategy for the Borough?***

- 1.4 No, Criteria 8(a) of Policy LP01 is not positively prepared or consistent with national policy, but this is primarily related to the outcome of the strategy for rural areas rather than the policy itself. It is considered that the strategy for the rural areas does not seek to meet the medium and long-term housing and affordable housing needs of villages and does not support the services and facilities in those villages. It is acknowledged that Criteria 8(a) makes reference to sustainable communities, sustainable patterns of development, support for economic activity, and directs development to the larger settlements. However, most of the proposed allocations in the Key Rural Service Centres were carried forward from the adopted Site Allocations and Development Management Policies document (SADMP), and the majority of those sites already have planning permission and would be delivered in the short term i.e. within five years. There is no effective strategy for the Key Rural Service Centres beyond the five-year period. The Key Rural Service Centres have a good range of services and facilities and are accessible by sustainable modes of transport.
- 1.5 Paragraph 62 of the NPPF expects different housing needs to be met through planning policies including for affordable housing. Paragraph 68 relates to the identification of land for housing and expects planning policies to identify deliverable sites for years 1 to 5, and to identify developable sites for year 6 to 10 and preferably for years 11 to 15. Paragraph 78 seeks to support sustainable development in rural areas including housing where it would enhance or maintain the vitality of communities. The decision to have no effective strategy in draft KLWNLPR for the Key Rural Service Centres beyond the five-year period is inconsistent with these national policies. As set out below,

Clenchwarton is an example where there is no strategy in draft KLWNLPR for the medium and long term.

- 1.6 There are three sites allocated in draft KLWNLPR in Clenchwarton - Site Refs. G25.1, G25.2 and G25.3. All three sites were allocated in SADMP. Site Refs. G25.2 and G25.3 both have outline planning permission and reserved matters approval, and the latest housing trajectory predicts that housing would be delivered at these sites within the five-year period and by 2025/26. Site Ref. G25.1 has previously had outline planning permission and reserved matters approval, but they are now lapsed. The latest housing trajectory predicts that housing would be delivered at Site Ref. G25.1 in 2028/29. As set out in TCE's Matter 5 Written Statement it is not clear why the planning permission at Site Ref. G25.1 was not implemented, and there is no evidence that the site is available for development. Therefore, since the proposed housing allocations would be delivered in the early years (Site Refs. G25.2 and G25.3) or delivery is uncertain (Site Ref G25.1), it is concluded that no housing or affordable housing is planned for Clenchwarton during the middle and later years of the plan period. This represents an inappropriate outcome for Clenchwarton. There will be affordable housing needs that will arise in Clenchwarton between 2027/28 and 2038/39, which are not taken into account in the strategy for rural areas. Clenchwarton contains a good range of services and facilities, including a school, convenience store, post office, public house, and other small retail facilities and employment uses. Clenchwarton is on a bus route providing connections to King's Lynn. The decision to not identify any significant land for housing in Clenchwarton during the middle and later years of the plan period provides no or very limited support for the existing services and facilities within the village. This outcome would be inconsistent with national policy that seeks to support rural areas.
- 1.7 No changes are requested to Criteria 8(a) of Policy LP01, but it is requested that additional land is allocated in Clenchwarton to meet future housing and affordable housing needs and to support existing services and facilities, which is an outcome that would actually deliver on the rural strategy. TCE's Matter 5 Written Statement provides a more detailed explanation for the requested change that land to the north of Main Road in Clenchwarton should be allocated in KLWNLPR i.e. consistent with Policy CLE1 in the 2019 Consultation Draft.

