

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

**MATTER 5:
SETTLEMENTS AND
SITES**

WRITTEN STATEMENT

The Crown Estate

6 December 2022

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1.0 MATTER 5: SETTLEMENTS AND SITES

Introduction

- 1.1 This Written Statement for Matter 5 has been prepared by Carter Jonas on behalf of The Crown Estate (TCE) to respond to the relevant Inspectors questions on the proposed site allocations in Clenchwarton. This Statement responds to Question 199 which asks whether sufficient land is allocated in Clenchwarton for the plan period.
- 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 predicted housing delivery timetable for the three proposed housing allocations in Clenchwarton to demonstrate that housing and affordable housing would not be provided in the middle and later years of the plan period i.e. between 2028/29 and 2038/39. In summary, it is requested in 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 5 – Key Rural Service Centres

Site Allocations in Clenchwarton

199. Is sufficient land allocated for housing within Clenchwarton for the Plan period in respect of Policy G25.1 Clenchwarton – Land between Wildfields Road and Hall Road (at least 10 dwellings); Policy G25.2 Clenchwarton – Land north of Main Road (at least 20 dwellings); and Policy G25.3 Clenchwarton – Land south of Main Street (at least 20 dwellings)?

- 1.3 No. TCE does not raise any objections to the three allocations in Clenchwarton, but it is likely that housing and affordable housing would be delivered at these sites in the short term. There are no allocations in Clenchwarton to meet future housing and affordable housing needs that would arise during the middle and later years of the plan period, which is an inappropriate outcome for a Key Rural Service Centre.
- 1.4 The three allocated sites in Clenchwarton - Site Refs. G25.1, G25.2 and G25.3 – are existing allocations in the adopted Site Allocations and Development Management Policies document. The latest housing trajectory dated October 2022 [Doc Ref. F22] provides the predicted delivery timetable for these sites. Site Ref. G25.3 has outline planning permission and reserved matters approval, development has started, and it is predicted that development would be completed by 2023/24. Site Ref. G25.2 was granted outline planning permission in April 2016 and reserved matters were approved in December 2019, and housing trajectory indicates that development has not yet started. It is predicted that development at Site Ref. G25.2 would be completed by 2024/25. It appears from the decision dates of the outline and reserved matters that the planning permission might have lapsed; the Council will be able to confirm. It is not clear why Site Ref. G25.2 has not come forward yet, and it appears that delivery is uncertain. Site Ref. G25.1 has previously had outline planning permission and reserved matters approval, but they have now lapsed. The latest housing trajectory predicts that housing would be delivered at Site Ref. G25.1 in 2028/29. It is not clear why the planning permission

at Site Ref. G25.1 was not implemented, and there is no evidence to demonstrate that the site is available for development.

- 1.5 Therefore, Site Ref. G25.3 would be delivered by 2023/24. The delivery of Site Ref. G25.2 is uncertain, but housing delivery is predicted to be complete by 2024/25. The delivery of Site Ref. G25.1 is also uncertain, and housing delivery is predicted to be complete by 2028/29. Despite the concerns about the delivery of Site Refs. G25.2 and G25.1, it is predicted in the housing trajectory that there would be no planned delivery of housing and affordable housing in Clenchwarton between 2028/29 and the end of the plan period in 2038/29. This represents an inappropriate outcome for Clenchwarton because affordable housing needs exist now and will arise in the future during the middle and later years of the plan period.
- 1.6 In conclusion, Site Ref. G25.3 is the only allocation in Clenchwarton where there is any certainty about housing delivery. If Site Refs. G25.2 and G25.1 are delivered, then it is predicted that those sites would be completed by 2028/29. There is no planned delivery of housing and affordable housing in Clenchwarton between 2028/29 and 2038/39. In these circumstances that proposed allocations in Clenchwarton are not sufficient to meet future housing and affordable housing needs. It is considered that additional deliverable allocations should be identified in Clenchwarton.

Request for Additional Allocation at Clenchwarton

- 1.7 The site promoted by TCE at land off Main Road in Clenchwarton was assessed for suitability in the Housing and Economic Land Availability Assessment January 2019 (HELAA) and assessed against sustainability objectives in the Draft Sustainability Appraisal January 2019 (Draft SA) – the site reference in these assessments is H039. The site was identified as a draft allocation in the 2019 Draft Consultation version of KLWNLPR - see Policy CLE1. There were no objections to that allocation.
- 1.8 The overall conclusion of the site assessment in the HELAA was that the site is suitable for development, and any constraints can be overcome or mitigated. It is noted that in terms of the suitability of the site for development it scores mainly 'green' and 'amber', with no 'red' scores. The assessment identified no constraints at the site associated with accessibility, utilities infrastructure, contamination, landscape, townscape, biodiversity, open space or neighbouring uses. The site scored 'amber' for historic environment, but there are no listed buildings, conservation areas or scheduled monuments within close proximity of the site, so there would be no impact on heritage assets. A safe and suitable vehicular access to the site will need to be provided for the promoted development, but it should be noted that there is good visibility, and the speed limit is 30mph in this section of Main Road, and so access is not a constraint to development at the site.
- 1.9 The key issues for development at the site, and in Clenchwarton generally, are flood risk and drainage. The site assessment in the HELAA concluded that for flood risk the site scores 'amber' with the site falling within Flood Zones 3a and 2. The Environment Agency Flood Maps show that the site is located in Flood Zone 3 but benefits from flood defences. It should be noted that similar flood risk and drainage issues arise at the three allocated sites in Clenchwarton (Site Ref. G25.1, G25.2 and G25.3), which either have planning permission or permission has been granted previously. These site allocations demonstrate that flood risk and drainage issues can be satisfactorily addressed for sites in Clenchwarton, and the same applies to the site promoted by TCE at land off Main Road.
- 1.10 The site was assessed in the Draft SA against a range of sustainability criteria and against other potential alternative site options in Clenchwarton. The site scored best against the sustainability objectives when compared against the alternative options. It is noted that all of the site options score 'very negative' for flood risk, but as set out above this matter can be satisfactorily addressed as it has at other development sites in Clenchwarton.

- 1.11 The assessment of the TCE site in the HELAA and in the Draft SA demonstrated that the allocation of the site in the 2019 Consultation Draft of KLWNLPR was appropriate and justified. The site has already been assessed and subject to consultation in those supporting documents. There were no objections submitted against the allocated at Policy CLE1. For all of the reasons set out above, Policy CLE1 should be reinstated as an allocation in KLWNLPR for 10 dwellings including affordable housing. Policy CLE1 included requirements to address flood risk, drainage and access matters, which were highlighted in the site assessments as matters that require mitigation.
- 1.12 It is requested that Policy CLE1 in the 2019 Consultation Draft of KLWNLPR is reinstated as an allocation. The policy for the site allocation is set out below.

Policy CLE1 Clenchwarton - Land to the north of Main Road

Land amounting to 0.4 hectare to the north of Main Road, as shown on the Policies Map is allocated for the residential development of at least 10 dwellings.

Development will be subject to compliance with all of the following:

- 1. Submission of a Flood Risk Assessment (FRA) that should address all forms of flood risk (coastal inundation, fluvial, pluvial and groundwater). The FRA should explain how surface water drainage will be managed. The FRA must demonstrate how the development would provide wider sustainability benefits to the community that outweigh the risk associated with flooding and that the development would be safe for its lifetime without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. The FRA should also suggest appropriate mitigation (flood resiliency measures);*
- 2. Submission of details showing how sustainable drainage measures will be incorporated into the development to avoid discharge to the public surface water network, and also to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the Sustainable Drainage System (SUDS) should be included with the submission;*
- 3. Provision of safe access from Main Road to the satisfaction of Norfolk County Council as the Local Highway Authority;*
- 4. Provision of affordable housing in line with the current standards.*

