

From: [Annette Feeney](#)
Sent: 12 April 2024 18:50
To: [Stuart Ashworth](#); [Alex Fradley](#)
Cc: [Sandra Homcenko](#)
Subject: FW: BCKLWN LP Examination Policy LP02 Amendments - Response by The Crown Estate

]Dear Annette,

I set out below The Crown Estate's response to the proposed amendments to Policy LP02, which relate to a new policy on windfall sites.

Can I ask the Inspector to read The Crown Estate's representations to Doc. F47: Topic Paper Spatial Strategy and Settlement Hierarchy (August 2023) because these are relevant to the proposed amendments to Policy LP02.

The Crown Estate promoted land north of Main Road in Clenchwarton and has promoted this site through the KLWNLPR process. The site was identified as a draft allocation in the 2019 draft version of KLWNLPR - see Policy CLE1: Clenchwarton: Land to the north of Main Road, but this draft allocation was not taken forward into the submission version. The site is immediately adjacent to the settlement boundary. Clenchwarton is a Key Rural Service Centre, which falls within Tier 4 of the settlement hierarchy. The proposed amendments to Policy LP02 would only support additional housing within the settlement boundary of these villages, or on allocated sites, or on sites allocated in a neighbourhood plan.

There were three proposed allocations for Clenchwarton in the submission version of KLWNLPR: G25.1 - Land between Wildfields Road and Hall Road; G25.2 - Land north of Main Road; and G25.3 - Land south of Main Road. Site G25.1 is completed. Site G25.3 has been deleted as an allocation. As highlighted in The Crown Estate's representations to Doc. F47 the delivery of Site G25.2 is uncertain, on the basis that previous permissions on the site have lapsed, there is no evidence of landowner support for the allocation, and the predicted housing delivery at the site is regularly moved to later years of the plan period in the housing trajectory. There is no neighbourhood plan being prepared for Clenchwarton that might allocate additional land for housing in the future. There is limited capacity for additional development within the settlement boundary of the village, and any sites that do come forward would be small and not required to deliver affordable housing. The proposed amendments to Policy LP02 would remove any opportunity for small scale additional housing at Clenchwarton at suitable locations adjacent to the settlement boundary of the village. The previous version of Policy LP02 would have allowed developments of up to 10 dwellings on sites adjacent to the settlement boundary of Key Rural Service Centres.

It is considered that the proposed amendments to Policy LP02 would not deliver any additional housing in Clenchwarton during the remainder of the plan period. This is an inappropriate strategy for Clenchwarton, which is a Key Rural Service Centre and contains a good range of services and facilities including a primary school, convenience store and bus services, and is very well related to King's Lynn. Paragraph 78 of the NPPF (2019) states that "*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby*". The proposed amendment to Policy LP02 would be inconsistent with this national policy, because the housing and affordable housing needs of Clenchwarton during the middle and later years of the plan period would not be met, and existing services and facilities in the village would not be supported.

As set out in previous representations by The Crown Estate, it is requested that:

- **Policy CLE1 in the draft 2019 version of KLWNLPR is reinstated as an allocation; or**
- **Policy LP02 is further amended so that residential development outside of, but immediately adjacent to, existing development boundaries of Tier 4 settlements is permitted subject to criteria (a) to (e).**

The Crown Estate does not intend to appear at the resumed hearing sessions.

Please let me know if the Inspector has any questions about the above comments.

Regards
Brian

Classification L2 - Business Data

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