
Representations to the South Norfolk Village Clusters Housing Allocations Plan Regulation 18

Prepared on behalf of KCS Development

July 2021

**Representations to the South Norfolk Village Clusters Housing Allocations Plan
Regulation 18 Consultation**

**Prepared on Behalf of
KCS Development**

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1.0 INTRODUCTION

- 1.1 Barton Willmore has been instructed by KCS Developments (“our Client”) to make representations to the South Norfolk Village Clusters Housing Allocations Plan (“the Allocations Plan”) which is currently subject to public consultation until 02 August 2021.
- 1.2 Our client controls five land parcels within Spooner Row, as shown on the accompanying plans included within Appendix A.
- 1.3 Part of our client’s land has been proposed as a draft housing allocation for 15 dwellings (Council reference: SN0444). The housing allocation covers part of Parcel 1 of our client’s landholdings. The remaining parcels have not been allocated for development within the emerging Allocations Plan.
- 1.4 The remainder of this report sets out our client’s representations to the Allocations Plan, outlining suggested amendments to inform the preparation of the emerging document. The representations specifically seek to respond to the questions 2, 3, 4, 120, 121 and 122 included within the emerging Allocations Plan.

Housing Allocations Plan

- 1.5 The Council is preparing the Housing Allocations Plan to identify sites to accommodate 1,200 homes across South Norfolk. The number of homes to be allocated is identified within the emerging Greater Norwich Local Plan.
- 1.6 The Council has assessed around 450 sites which were submitted as part of the Call for Sites for the Greater Norwich Local Plan. The plan identifies 66 ‘preferred sites’ which are capable of accommodating 1,200 dwellings (ranging from 12- 50 homes per site). 24 sites have also been shortlisted as ‘reasonable alternatives’.
- 1.7 Our client’s land parcels in Spooner Row are among the sites that have been assessed by the Council. Further details of the Council’s assessment of our client’s land are set out within the next section of this report.
- 1.8 The Council is now seeking views on the proposed distribution of housing. This includes the proposed housing allocations and settlement limits identified within the draft regulation 18 version of the Housing Allocations Plan.

Proposed Housing Distribution to Village Clusters

- 1.9 The emerging Greater Norwich Local Plan (GNLP) has been subject to a regulation 19 consultation, though the plan has not yet been subject to independent examination.

1.10 Table 6 within the emerging GNLP establishes the following in terms of the proposed distribution of housing throughout the local plan area. This is summarised in Table 1.1 below for reference.

Table 1.1: Emerging GNLP Housing Distribution

	Number of Homes		Council's Explanation
A	Local housing need (2018 to 2038)	40,451	The minimum local housing need figure has been identified using the Government's standard methodology using 2014-based projections.
B	Delivery 2018 / 2019 and 2019 / 2020	5,240	The number of homes built in 2018/2019 and 2019/20 (including student accommodation and housing for the elderly).
C	Existing commitment (at April 2020) to be delivered to 2038 (including uplift on allocated sites)	31,452	The existing commitment is the undelivered sites which are already allocated and/or permitted, with parts of or whole sites unlikely to be delivered by 2038 excluded. Uplifts on existing allocations are included here
D	New allocations	10,704	These are the homes to be provided on new sites allocated through the GNLP (9,107), the South Norfolk Village Clusters Housing Sites Allocation Plan (1,200) and the Diss and area Neighbourhood Plan (200).
E	Homes delivered through policy 7.5	800	Policy 7.5 provides for delivery of 3 to 5 homes on small scale sites adjacent to settlement boundaries or on small sites within recognisable group of dwellings.
F	Windfall allowance	1,296	There is a limited reliance on windfall sites. Evidence provides an estimated 4,450 homes resulting from windfall development during the remainder of the plan period. As windfall delivery is likely to remain robustly high it is appropriate to include a limited proportion as part of total potential delivery.
	TOTAL	49,492	

1.11 The proposed 1,200 homes to be allocated in the Village Clusters Allocation Plan are accounted for in Row D of the above table. The GNLP does not include a specific suggested distribution of the 1,200 homes to the village clusters, and it is instead left to the Allocations Plan to determine how and where housing sites should be allocated within the clusters.

Representations

1.12 In response to the regulation 18 consultation, our client has concerns relating to the following matters which are considered within the remainder of these representations:

- Section 2: Approach to the distribution of housing to village clusters across South Norfolk;
- Section 3: Assessment of sites within Spooner Row;

- Section 4: Approach to windfall allowance and extending settlement boundaries;
- Section 5: The proposed core policies.

2.0 HOUSING DISTRIBUTION

2.1 48 Village Clusters have been identified across South Norfolk within the emerging Allocations Plan. Our client's landholdings are within the Spooner Row and Sutton Village Cluster. The proposed distribution of housing across the Village Clusters is set out in Table 2.1 below.

Table 2.1: Emerging Allocations Plan Housing Allocations

Village Cluster	Proposed No. of Dwellings	Settlement Limit Extension
Alburgh and Denton	0	
Alpington, Yelverton and Bergh Apton	50	0.37 ha on Site SN0529SL
Aslacton, Great Moulton and Tibenham	50	0.37 ha on Site SN0529SL
Barford, Marlingford, Colton and Wrampingham	0	
Banham Broom, Kimberley, Carleton Forehoe, Runhall and Brandon Parva	0	
Bawburgh	35	
Bressingham	52	
Brooke, Kirstead and Howe	50	
Bunwell	25	
Burston, Shimpling and Gissing	0	
Carleton Rode	0	
Dickleburgh	0	
Ditchingham, Broome, Hedenham and Thwaite	25	SLE of 0.4 ha on Site SN2011SL
Earsham	35	SLE on Site SN0390
Fornsett St Mary and Fornsett St Peter	0	
Gillingham, Geldeston and Stockton	55	
Hales and Heckingham, Langley with Hardley, Carleton St Peter, Claxton, Raveningham and Sisland	35	
Hempland, Topcroft Street, Morningthorpe, Fritton, Shelton and Hardwick	35	
Heywood	35	
Keswick and Intwood	0	
Ketteringham	0	
Kirby Cane and Ellingham	49	
Little Melton and Great Melton	25	0.69 ha on Site SN1046REV
Morley and Deopham	0	
Mulbarton, Bracon Ash, Swardeston and East Carleton	60	
Needham, Brockdish, Starston and Wortwell	25	0.18ha on Site SN4069SL
Newton Flotman and Swainsthorpe	25	
Pulham Market and Pulham St Mary	70	
Rockland St Mary, Hellington and Holverston	50	
Roydon	0	
Saxlingham Nethergate	0	

Scole	0	
Seething and Mundham	32	0.46 ha on Site SN0406SL 0.36 ha on Site SN0587SL
Spooner Row and Suton	40	
Stoke Holy Cross, Shotesham and Caistor St Emund & Bixley	25	
Surlingham, Bramerton and Kirby Bedon	0	
Tacolneston and Forncett End	20	
Tasburgh	30	
Tharston, Halton and Flordon	12	
Thurlton and Norton Subcourse	12	
Thurton and Ashby St Mary	0	
Tivetshall St Mary and Tivetshall St Margaret	25	0.18ha on Site SN3002SL
Toft Monks, Aldeby, Haddisco, Wheatacre and Burgh St Peter	37	0.18ha on Site SN4015SL
Warton	0	
Wicklewood	42	
Winfarthing and Shelfanger	40	
Woodton and Bedingham	40	0.47 on Site SN0268SL
Wrenningham, Ahwellthorpe and Fundenhall	37	
TOTAL	1,178	Not specified

- 2.2 As can be seen from the above table, the Village Clusters have been allocated between 0 and 70 dwellings. Some villages are proposed to be subject to a Settlement Limit Extension to allow for future windfall housing, however, an indicative dwelling range is not specified within the settlement extension areas.
- 2.3 Neither the GNLP nor the emerging Housing Allocation Plan identifies the Village Clusters in a hierarchy in terms of their size or sustainability. The Council's approach has been to assess individual sites submitted as part of the Call for Sites process, rather than identifying a target amount of housing for individual Village Clusters based on the sustainability merits of that cluster.
- 2.4 The Allocations Plan does however include a paragraph within each Village Cluster chapter identifying which services and facilities are available within the cluster. As 40 dwellings are proposed within the Spooner Row and Suton Village Cluster, Table 2.2 below sets out a comparison of the Village Clusters where 40 or more houses have been allocated to compare the facilities which are within each cluster. The Council's assessment does not take into account that the Spooner Row village cluster has a pub, a preschool (Hummingbird Preschool), a recreation ground, employment opportunities at Turnpike Business Centre and Wymondham Business Centre and bus services. These facilities have therefore been set out in the table for reference to compare with other Village Clusters where an equal amount or more housing has been allocated.

Table 2.2: Comparison of Village Cluster Facilities

	No. of Dwellings Allocated	Village Hall	Shop	Post Office	GP Surgery	Social Club	Recreation Areas	Pub(s)	Preschool	Primary School	Bus Service	Rail Service	Employment Areas	Garage	Petrol Station	Fast food Takeaway
Alpington, Yelverton and Bergh Apton	50	✓	✓						✓	✓	✓					
Aslacton, Great Moulton and Tibenham	50	✓					✓	✓		✓	✓					
Bressingham	52	✓	✓							✓	✓		✓			
Brooke, Kirstead and Howe	50	✓	✓					✓		✓	✓		✓			
Gillingham, Geldeston and Stockton	55	✓	✓				✓	✓		✓	✓				✓	✓
Kirby Cane and Ellingham	49	✓	✓						✓	✓	✓		✓			
Mulbarton, Bracon Ash, Swardeston and East Carleton	60	✓	✓		✓	✓			✓	✓				✓		✓
Pulham Market and Pulham St Mary	70	✓	✓	✓	✓		✓	✓	✓	✓	✓					
Rockland St Mary, Hellington and Holverston	50	✓	✓	✓	✓			✓		✓	✓					
Spoooner Row and Suton	40	✓					✓	✓	✓	✓	✓	✓	✓			
Wicklewood	42	✓					✓	✓	✓	✓	✓					
Winfarthing and Shelfanger	40	✓						✓		✓						
Woodton and Bedingham	40	✓	✓	✓			✓	✓	✓	✓	✓					

✓	Council's Assessment	✓	Additional Facilities
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- 2.5 As set out in the table above, the Council have not identified certain facilities within the Spooner Row cluster. The Council's assessment of Spooner Row is therefore flawed, having missed five services from its assessment. Spooner Row has a similar level of services as the cluster of Pulham Market and Pulham St Mary where 70 houses are allocated.
- 2.6 Furthermore, one of the key sustainability benefits of Spooner Row is its rail station, which offers transport connections to Norwich and is a benefit the other Village Clusters do not possess feature.
- 2.7 Therefore, the number of dwellings allocated in the village should therefore be increased from 40 dwellings up to 90 dwellings within Spooner Row, to account for the more sustainable nature of the village than as currently assessed.

Council's Preferred Housing Allocations in Spooner Row

- 2.8 Within Spooner Row, the Council are currently proposing to allocate Site SN0444 for 15 dwellings (on part of our Client's land) and to allocate Site SN0567/SN2082 or 25 dwellings.
- 2.9 We **support** the partial allocation of Site SN0444, however the full land parcel should be allocated for housing to accommodate either up to 65 or up to 40 dwellings as shown on the potential layout plans in Appendices B and C. Further details regarding this justification are set out within the next section of this report.
- 2.10 We **object to the allocation of Site SN0567/SN2082** along Station Road. The Council acknowledge that only Site SN0567 which lies adjacent to Station Road at the front of the site and has previously had the benefit of planning permission is preferable, and the wider area to the rear of this land (comprising Site SN2082) is not preferred.
- 2.11 The previous permission on this land was for 8 dwellings (Council reference:). Another application on the site which is pending determination (Council reference: 2018/2071) entails a similar layout and also proposes 8 dwellings. Permission 2017/1321 has not been implemented and was only approved in outline form. The below approved indicative site layout shows the proposed 8 dwellings along the Station Road frontage. The area shown in yellow is the Council's preferred housing allocation for the site. It is clear that the Council's preference for linear development along Station Road and the provision of 25 dwellings cannot be achieved on this site.

Figure 2.1: Approved Layout for Site SN0567/SN2082



- 2.12 The development of Site SN0567/SN2082 would therefore result in an extension of the village form that would not be in keeping with its character. The development of this site would have a detrimental impact on the landscape given its location on an open agricultural field. Site

SN0444 on the other hand is more enclosed by existing development (on three sides of the site) and only the western boundary adjoins agricultural land which is screened by planting.

- 2.13 It is therefore clear that the proposed number of 25 dwellings cannot be accommodated on Site SN0567/SN2082 without having a detrimental landscape impact. Therefore, our client **objects to the allocation of Site SN0567/SN2082.**
- 2.14 The remainder of these representations set out why additional dwellings can be accommodated in Spooner Row and which land parcels within Spooner Row are the most suitable to accommodate this proportionate growth.

3.0 SITE ASSESSMENTS

3.1 The five land parcels set out in Figure 3.1 below have been promoted on behalf of our client as potential housing allocations within the emerging Allocations Plan. The site boundary plans are included in Appendix A. The figure identifies the site parcels as per the Council’s site assessment references (e.g. Site SN0444).

Figure 3.1: Proposed Development Parcels within Spooner Row



3.2 The following summarises the proposed status of Parcels 1 to 5 within the draft version of the Allocations Plan.

Table 3.1: Council’s Assessment of KCS Land Parcels in Spooner Row

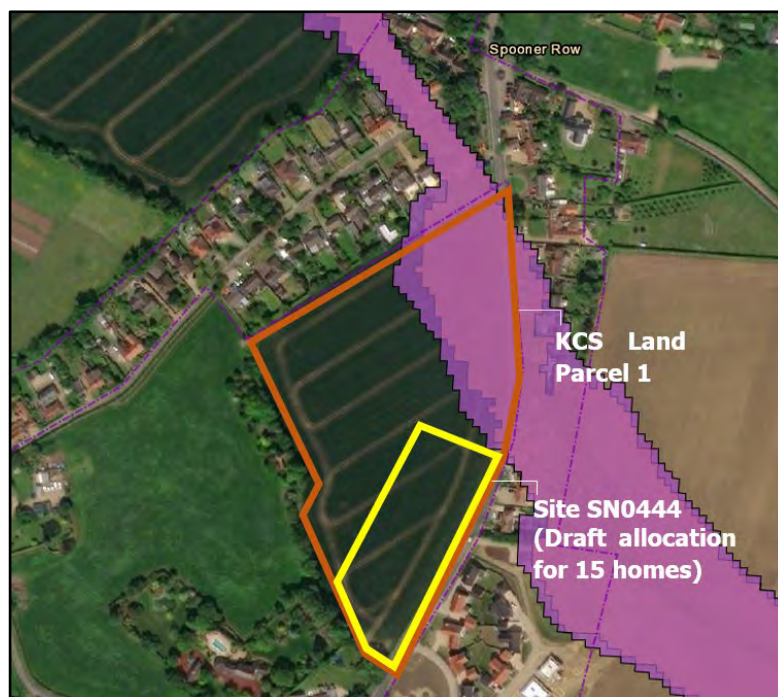
Site	KCS Land Promotion	Council Assessment
Site SN0444 (Parcel 1)	3.64 ha 44-61 homes	<ul style="list-style-type: none"> Part of the site (0.7ha) is proposed as a housing allocation for 15 dwellings. The northern part of the site has been excluded to avoid flood risk areas.

Site SN0445 (Parcel 2)	4.08 ha 39-54 homes	<ul style="list-style-type: none"> • Site is excessive in scale however it could be reduced in size. • Flood zones 2 and 3a constrain developable area. • Significant offsite highway works are necessary. • Detrimental landscape impact.
Site SN0446 (Parcel 3)	0.94 ha 4-5 homes	<ul style="list-style-type: none"> • Impact on designated and non-designated heritage assets. • Detrimental impact on the settlement character. • Landscape impact from loss of hedgerow and mature trees. • Smaller development area is not considered to address these concerns adequately due to the prominent location of the site.
Site SN0447 (Parcel 4)	6.84 ha 59-88 homes	<ul style="list-style-type: none"> • Due to areas of flood risk, development could be concentrated to the north of the site. • Off-site highway works would be required. • Impact on heritage assets and loss of hedgerow and mature trees.
Site SN0448 (Parcel 5)	4.13 ha 27-38 homes	<ul style="list-style-type: none"> • School Lane is constrained in highways terms and is not considered appropriate for further development (following development of the existing allocation site SCO2). • Site relates reasonably well to the settlement, however development of the scale proposed is not considered to be compatible in either form or character with the existing linear pattern of development.

Site SN0444 (Parcel 1)

- 3.3 As set out above, part of Parcel 1 is proposed as a draft housing allocation for 15 dwellings. The Council's preferred housing allocation is shown in Figure 3.1 for reference in relation to our client's landholdings within Parcel 1.
- 3.4 The Council's reasoning for excluding the rest of the Parcel 1 is principally to avoid areas of higher flood risk. The extract below shows the Council's mapping of Flood Zones 2 and 3 in the emerging Greater Norwich Local Plan (GNLP). The indicative masterplan submitted on behalf of KCS to promote the site reserved the areas in Flood Zone 2 and 3 for flood attenuation features and as open space rather than for housing. Therefore, there is no need to exclude this area from the site allocation as it will be retained as non-developable space but will be landscaped to improve the integration of the site within the wider area and provide open space for the village where currently there is only agricultural land.
- 3.5 Furthermore, the Council have also excluded a large part of the site which is not in Flood Zones 2 and 3, but is within flood Zone 1 (land which is subject to a very low risk of flooding – less than 1 in 1,000 annual probability).

Figure 3.2: Extract from the Emerging GNLFP Flood Risk Map



- 3.6 The area to the north of the current allocation should therefore be included within the site allocation, given that it is not subject to constraints in terms of flood risk.
- 3.7 The Council also cite a potential ‘detrimental landscape impact’ as a justification for excluding the northern part of the site from the housing allocation. However, the northern edge of the site is located adjacent to existing housing, and there is also a landscaping buffer along the western boundary which would reduce the impact of the development of the site on the landscape to the west.
- 3.8 The land parcel is largely enclosed by existing development, to the north, east and south. Development of the wider site (shown as Parcel 1) would not lead to a merging of the four significant settlement groupings within Spooner Row which are seen as an important part of the character of the village, as cited by the Council in the emerging Allocations Plan (page 213):

The village has developed as four significant settlement groupings, with the Norwich to Ely railway line and agricultural land separating the groups. The large open spaces between these settlement groups contribute to the character of the village.

- 3.9 These four settlement groupings are shown in Figure 3.3 below for reference.

Figure 3.3: Spooner Row Settlement Groupings

- 3.10 As can be seen from the above, Parcel 1 is largely enclosed by existing development. There is some existing planting along the western edge of the site, beyond which there is an agricultural field, however this is also adjacent to the built form of the village. As such, the development of the northern part of the site (except for the areas in Flood Zones 2 and 3 which will be retained as open space) can be achieved without having a detrimental landscape impact.
- 3.11 Site SN0444 is also a more suitable housing site than Site STN0567 and SN2082, which is adjacent to Station Road and shown in Figure 3.1. The Council acknowledge in their assessment of Site STN0567 / SN2082 that there would be a landscape impact that would need to be addressed by an appropriate landscaping scheme on this site.
- 3.12 Site SN0444 is more closely related to the existing settlement form its development would be more in keeping with the character of the village. The site is therefore preferable in terms of the impact on the surrounding landscape.
- 3.13 The site is a logical village infill site and can accommodate more dwellings than is currently proposed within the emerging Allocations Plan. The 25 dwellings currently proposed on Site STN0567 and SN2082 (Land South of Station Road) should be redistributed to Site SN0444, which is a more suitable and logical housing site within the village.
- 3.14 The housing allocation for Site SN0444 should therefore be increased from 15 dwellings (on 0.7 hectares) up to either 65 or up to 40 dwellings on the full site of 3.64 hectares. The potential layout plans included in Appendices B and C show the site has capacity for this

increased number of dwellings. By increasing the size of the allocation, this would allow the following benefits to be delivered:

- Provision of public open space including a play area;
- Retain and enhance the majority of hedgerows and the delivery of wildflower and tree planting to contribute towards biodiversity net gain.
- Increase the number of affordable homes from 5 homes up to 22 homes (based on the emerging requirement of 33% affordable housing in the GNLP and on the site layout showing 65 dwellings).

3.15 In response to Question 120 within the draft Allocation Plan, we **support** the allocation of part of Site SN0444, however we request that the site area is increased to include the whole of Parcel 1 to deliver more community benefits.

3.16 In response to Question 121, we **object** to the allocation of Site STN0567 and SN2082 and the 25 dwellings which are proposed to be allocated on this site should instead be allocated to Site SN0444.

Site SN0445 (Parcel 2)

3.17 The Council's assessment of Site SN0445 sets out that the site is 'excessive in scale however it could be reduced in size'. The main constraint identified by the Council is the location of Flood Zones 2 and 3a which constrain the developable area of the site. However, this area only covers a very small portion of the site in the north eastern corner. The indicative masterplan submitted as part of the Call for Sites process excluded the higher risk flood areas from the developable area and instead showed the areas in Flood Zones 2 and 3 as being retained for open space. This is also shown in the updated layout for the site which is shown in Figure 3.4 below and Appendix D for reference. The proposed housing is located within Flood Zone 1 which is a low-risk flood area. The housing allocation could show the designation of this area for public open space or as undeveloped land to address the Council's concern.

Figure 3.4: Site SN0445 Framework Plan



- 3.18 The areas within Flood Zones 2 and 3 could be used as open space. Landscaping could be used to create a green infrastructure corridor through the village, allowing public access where there is currently none.
- 3.19 Therefore, the site should not be discounted in terms of the flood risk areas which only affect a small area of the site and can be addressed through an appropriate site layout and landscaping.
- 3.20 The Council concludes that there would be a 'detrimental landscape impact' associated with the development of the site. However, as shown on the indicative masterplan for the site, a green buffer is proposed along the western part of the site. This buffer will provide green space to prevent the merging of the four settlement groupings in Spooner Row, in keeping with the character of the village. This could also function as a community orchard if there is a local desire for this.
- 3.21 The Council also identify that 'significant offsite highway works are necessary' however it is unclear what is meant by this. A vehicular access is proposed off Station Road and the provision of the access is not anticipated to involve any significant off site highway works.
- 3.22 Therefore in response to Question 122, we **object** to the omission of Site SN0445 and the Council's assessment of the site.

Site SN0447 (Parcel 4)

- 3.23 The Council's assessment of Site SN0447 concludes that the site should not be allocated for housing. The key reasons for not allocating the site include the Flood Zone areas within the site and the potential impact on nearby listed buildings.
- 3.24 The Council sets out that 'Due to areas of flood risk, development could be concentrated to the north of the site'. As shown in Figure 3.5 below and Appendix E, the indicative masterplan for the site shows proposed dwellings on the northern half of the site, with the southern portion kept open as public open space with play areas. We therefore do not consider that the location of the flood risk areas is a significant constraint that would prevent development on the site. Housing can still be accommodated through an appropriate layout, landscaping and drainage solution.

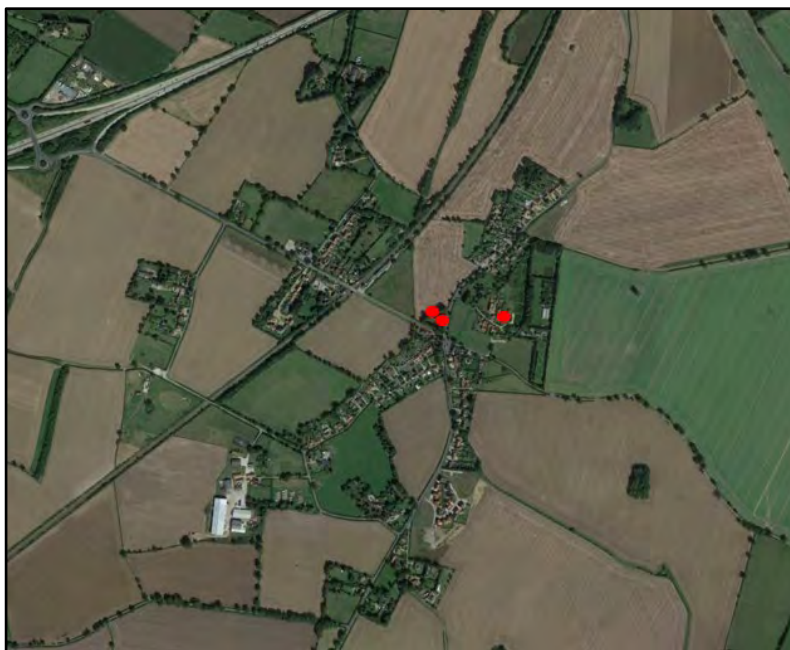
Figure 3.5: Site SN0447 Framework Plan



- 3.25 The Council confirm that concentrating development in the northern part of the site would 'lessen the erosion of the gap between the two distinct areas of the settlement but would impact on identified heritage assets and result in the loss of hedgerow and mature trees along Chapel Road'.

- 3.26 In terms of heritage assets within Spooner Row, there are no Conservation Areas and no Scheduled Ancient Monuments. There are however three Grade II listed buildings located within the village; Spooner Row Church, Spooner Row War Memorial and Pilgrim's Farmhouse. The buildings are shown in the figure below for reference.

Figure 3.6: Listed Buildings in Spooner Row



- 3.27 The submitted indicative masterplan for the site shows public open space on the southern half of the site and a vehicular access is off Chapel Lane.
- 3.28 With a suitably tailored design, including appropriate materials to ensure the character of the dwellings on the site is in keeping with the nearby listed building, the impact on the setting of these assets can be suitably managed. The location of these buildings is therefore not considered to overly constrain the development potential of the site and should not be used as a reason to discount the site as a housing allocation.
- 3.29 The Council also consider that 'off-site highway works would be required'. Other than the proposed vehicular access off Chapel Lane, no further highway works will be required.
- 3.30 **Therefore, in response to Question 122, we object to the omission of Site SN0447.**

4.0 SPOONER ROW BOUNDARY AMENDMENTS AND WINDFALL ALLOWANCE

- 4.1 The Allocations Plan proposes to extend the settlement limits of certain villages in the district, as set out within Table 2.1 of this report.
- 4.2 The Council's approach is to extend the settlement limits of some villages in South Norfolk to allow for future housing in these extension areas, whilst not proposing a specific number of dwellings within these sites. **This is not a sound approach and does not accord with the National Planning Policy Framework (NPPF).**
- 4.3 The NPPF does not advocate the use of development limits around settlements and sets out that a windfall allowance should only be allowed where there is compelling evidence (paragraph 70).
- 4.4 Draft Policy 1 in the emerging GNLP allows for windfall housing growth at appropriate scales and location where it would not have a 'negative impact on the character and scale of the settlement, and subject to other local plan policies'. Within the emerging GNLP, there is a windfall allowance of 1,296 across the local plan area. As set out in Table 1.1 of this report, this figure is separate to the 1,200 dwellings that need to be allocated in the South Norfolk Village Clusters.
- 4.5 The Council's current approach shows there is insufficient land within the built area throughout the district to meet the housing need. 1,178 dwellings are proposed to be allocated out of the total requirement for 1,200 homes in the South Norfolk Village Clusters. The windfall allowance cannot make up for the shortfall in dwellings.
- 4.6 As required by the GNLP, the Council should instead allocate housing sites in the Allocations Plan, rather than proposing 'windfall sites' which is not advocated by the NPPF and is not a sound approach to plan making.
- 4.7 By extending settlement limits, the Council are effectively allocating land for housing, without undertaking the same necessary tests to ensure the land is suitable for housing, as is the case for housing allocations which are subject to review in the Sustainability Appraisal and independent examination that accompanies the plan making process. The Council should therefore allocate housing sites rather than making room in settlement limits for windfall housing, to ensure sites are subject to a thorough review process and certainty is provided regarding how many homes are allocated on individual sites.
- 4.8 To ensure the emerging Allocations Plan is found sound, there are two ways to resolve the Council's approach to windfall development:
- Allocate at least 1,200 dwellings in the Village Clusters; and / or

- Amend the Council’s approach to allow development in or adjacent to settlement limits subject to establishing the development would not result in adverse impacts.

4.9 A number of local authorities have introduced policies which allow development inside or adjacent to settlement boundaries provided there are no adverse impacts associated with allowing development in those locations. The Hambleton and Selby Local Plans in particular have recently incorporated this. Therefore, this approach is sound and should be taken in South Norfolk.

Proposed Spoooner Row Settlement Limit Extension

4.10 Notwithstanding the above, if the Council decides to continue to pursue its approach to extend settlement limits to allow for windfall development, the settlement boundary around Spoooner Row should be extended as shown on Figure 4.1 below. This would allow for an appropriate windfall allowance in Spoooner Row which can accord with the requirements of GNLP Policy 1. This would allow for windfall development to come forward on appropriate smaller sites such as. Development of sites SN0446 and Site SN0448 could therefore be brought forward in a linear form which is in keeping with the character of the village at an appropriate time in the future.

Figure 4.1: Proposed Amendments to Spoooner Row Settlement Boundary



5.0 CORE POLICIES

- 5.1 In addition to representations on the Council's site specific assessments, we also wish to comment on the proposed core policies and make suggested amendments to ensure the plan moves forward to become sound.

Draft Policy SNVC1 – Standard Requirements

Question 2: Do you agree that the Village Clusters Plan should include a policy on 'Standard requirements'? If so, do you agree that the criteria suggested are appropriate, or should they be amended and / or should additional criteria be added?

- 5.2 The suggested requirements set out within this draft policy are unnecessary and as such we **object** to the inclusion of Draft Policy SNVC1.
- 5.3 The requirements are too vague and are likely to be misinterpreted. For example, the policy requires the 'provision of open space on sites of 15+ dwellings' however there are no specific requirements to determine how much open space or what form of open space would be required, such as play equipment, sports facilities or informal open space.
- 5.4 The requirement to provide 'relevant supporting surveys and studies, such as ecological surveys or flood risk assessments' is also unnecessary as this is covered by the Council's validation list which sets out which documents and plans are required for different types of applications.
- 5.5 Therefore, Draft Policy SNVC1 should be removed as it is not necessary and will lead to an unnecessary duplication of requirements.

Draft Policy SNVC2 'Design'

Question 3: Do you agree that the Village Clusters Plan should include a policy on 'Design'? If so, do you agree that the criteria suggested are appropriate, or should they be amended and / or should additional criteria be added?

- 5.6 We are not opposed to a design policy that requires proposals to take achieve a high quality design, however, the design policy needs to be worded to be sufficiently flexible to allow proposals to respond to the individual site circumstances and context.
- 5.7 The policy refers to the need for development to be of an appropriate density, layout and massing of the locality taking into account relevant design guidance documents. We support the need to achieve high quality design, however the policy should not be overly specific in terms of achieving housing densities or providing a certain amount of open space per dwelling.

Draft Policy SNVC3 'Housing Mix'

Question 4: Do you agree that the Village Clusters Plan should include a policy on 'Housing Mix'? If so, do you agree that the criteria suggested are appropriate, or should they be amended and / or should additional criteria be added?

- 5.8 The Council is proposing a housing mix policy that will require development to meet the affordable housing and housing mix requirements of the most up to date Strategic Housing Market Assessment (SHMA). This will include the need for single storey development and housing for older people. It is also suggested that information in a relevant Neighbourhood Plan could also be used to provide steer for the proposed housing mix on individual sites.
- 5.9 Our client recognises the need to provide a sufficient range and type of housing to meet the needs of local communities, particularly in Spooner Row.
- 5.10 However, the latest SHMA is from 2017 and is therefore not based on the most up-to-date data. There should therefore be provision within the policy to discuss and agree a proposed housing mix for sites with the Council as part of any application for the site to allow flexibility and to accommodate changing needs and circumstances that might not necessarily be accounted for in the latest SHMA given the document is out of date.
- 5.11 Our client also supports the principle of using information from a Neighbourhood Plan to inform the proposed housing mix of sites, provided the Plan has been subject to independent examination and has reached a sufficiently advanced stage to have been agreed in principle by an inspector. This is to ensure the proposed housing mix is based on robust data that will meet the needs of the community.
- 5.12 Therefore, the housing mix policy should not be overly onerous and should be sufficiently flexible to adapt to individual site circumstances and the needs of individual villages.

6.0 SUMMARY

- 6.1 The Council's assessment of Spooner Row within the emerging Allocation Plan has not taken into account services which are available in the Village Cluster and as such the number of dwellings allocated in the village should be increased from 40 dwellings up to 90 dwellings.
- 6.2 **We object to the allocation of Site STN0567/SN2082** which is currently allocated for 25 dwellings. As set out in section 2 of this report, the site is less suitable than Site SN0444 and cannot accommodate the proposed 25 dwellings without having a detrimental landscape impact. As such the 25 dwellings should be redistributed to Site SN0444.
- 6.3 **Whilst we support the draft allocation for 15 dwellings on Site SN0444 within Spooner Row, the allocation should be increased to include the wider land parcel that was previously submitted in order for the allocation to deliver up to 65 dwellings.** This will enable the provision of open space and more affordable housing which is not currently possible within the current boundary line for Site SN0444 as there is not enough room to deliver these community benefits. The allocation of smaller sites will not deliver the same level of community benefits. A suitable and deliverable layout is shown for 65 dwellings on the site in Appendix B.
- 6.4 **If the Council do not consider this option to be suitable, then the allocation on Site SN0444 should instead be increased to 40 dwellings.** The potential site layout shown in appendix C shows that a suitable and deliverable layout can be accommodated on the site for 40 dwellings.
- 6.5 **If the Council disagree with both of these options, then it is considered that the 25 dwellings currently allocated on STN5067/SN2082 should be distributed between the following sites; Site SN0445 (Parcel 2) or Site SN0447 (Parcel 4) (both of which have been shown as having a capacity for up to 61 dwellings).**
- 6.6 The land promoter is fully supportive of engaging in meetings with the Council and local community leaders to discuss and agree matters such as the proposed housing mix and design for the land parcels in Spooner Row. It is considered that this engagement would assist with securing residential development which reflects local housing needs and preferences as well as commencing a dialogue about affordable housing need and what local services might benefit from new development. The ambition would be that the wording of any future allocation would reflect these discussions to ensure that development targeted at local need is delivered.
- 6.7 The Council's approach to windfall allowance and extending settlement limits should be amended to either: allocate at least 1,200 dwellings in the Village Clusters rather than 1,178 dwellings with a windfall allowance; and / or amend the Council's approach to allow

development in or adjacent to settlement limits subject to establishing the development would not result in adverse impacts. Notwithstanding this, if the Council continue to pursue the approach to extending settlement limits, the development boundary around Spooner Row should be amended to include provision for windfall sites over the plan period as shown in Figure 4.1.

- 6.8 We trust that our clients comments will be duly considered and that we are able to discuss our **objections** and concerns further during the next stage of public consultation on the emerging Allocations Plan.

APPENDIX A
Site Location Plans

Total Site Area: 3.64 ha (approx.)



Project
Land at Spooner Row
 South Norfolk

Drawing Title
Location Plan - Parcel 1

Date	Scale	Drawn by	Check by
30.07.2021		JRH	SN
Project No	Drawing No	Revision	
31465	MA-11	-	

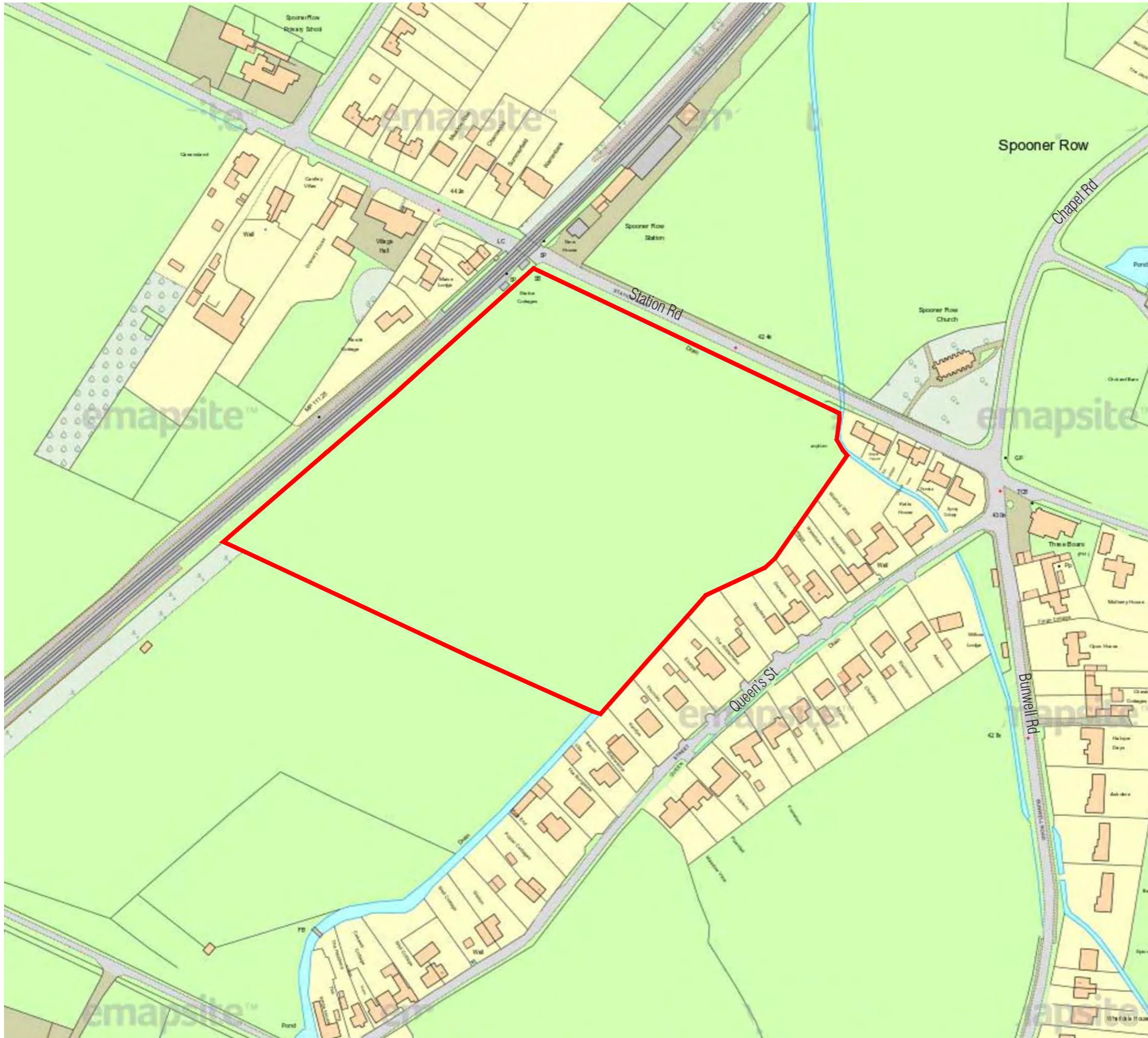
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Offices at: Reading London Bristol Cambridge Cardiff Ebbsfleet Edinburgh Leeds Solihull



Total Site Area: 4.08 ha (approx.)



Project
Land at Spooner Row
 South Norfolk
 Drawing Title
Location Plan - Parcel 2

Date 06.07.16	Scale 1:2000	Drawn by JL	Check by CA
Project No 26248	Drawing No MA-21	Revision -	

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Total Site Area: 0.94 ha (approx.)



Project
Land at Spooner Row
 South Norfolk
 Drawing Title
Location Plan - Parcel 3

Date 06.07.16	Scale 1:2000	Drawn by JL	Check by CA
Project No 26248	Drawing No MA-31	Revision -	

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Offices at: Reading London Bristol Cambridge Cardiff Ebbsfleet Edinburgh Leeds Solihull

Total Site Area: 6.86 ha (approx.)



Project
Land at Spooner Row
 South Norfolk
 Drawing Title
Location Plan - Parcel 4

Date 06.07.16	Scale 1:2000	Drawn by JL	Check by CA
Project No 26248	Drawing No MA-41	Revision -	

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Total Site Area: 4.13 ha (approx.)



Project
Land at Spooner Row
 South Norfolk
 Drawing Title
Location Plan - Parcel 5

Date 06.07.16	Scale 1:2000	Drawn by JL	Check by CA
Project No 26248	Drawing No MA-51	Revision A	



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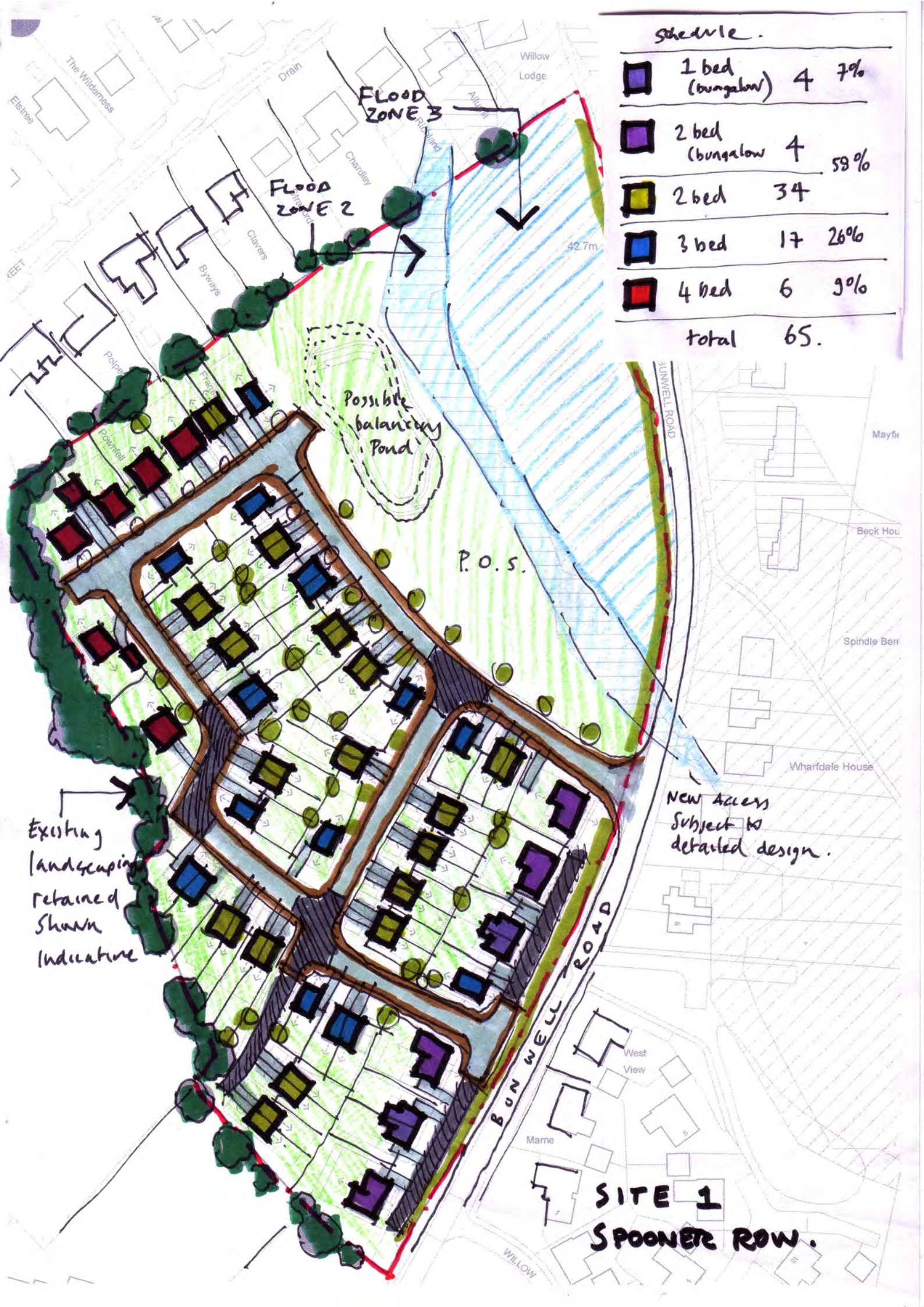
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APPENDIX B

Site SN0444 – Option 1 (65 Dwellings)



schedule.

	1 bed (bungalow)	4	7%
	2 bed (bungalow)	4	59%
	2 bed	34	
	3 bed	17	26%
	4 bed	6	9%
		total	65.

Existing landscaping retained shown indicative

New Access Subject to detailed design.

SITE 1 SPOONER ROW.

APPENDIX C

Site SN0444 – Option 2 (40 Dwellings)



Shedule

	1 bed (bungalow)	4
	2 bed (bungalow)	4
	2 bed (semi)	22
	3 bed (detached)	11
	4 bed (detached)	4

Total 45

EXISTING LANDSCAPING TO BOUNDARY RETAINED SHOWN INDICATIVE

NEW ACCESS SUBJECT TO DETAILED DESIGN

SITE 1 SPOONER ROW

White Hart Lodge

46.0m

42.7m

P.O.S.

POSSIBLE BALANCING POND

FLOOD ZONE 3

FLOOD ZONE 2

SUNWELL ROAD

WILLOW DRIVE

BUNWELL ROAD

West View

Mare

Wharfedale House

Spind

tier

DAI

APPENDIX D

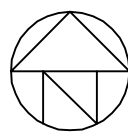
Site SN0445 – Proposed Site Layout

All site dimensions shall be verified by the contractor on site prior to work commencing.
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 Only work to written dimensions.

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NOTES

Site layout subject to detailed topographical survey and full engineers levels review. Landscaping shown indicatively



SITE AREAS	
— SITE AREA	4.11 HA
— DEVELOPMENT AREA	2.70 HA
22.5 dwelling per hectare <small>NOTE- BASED ON DEVELOPMENT AREA</small>	
— PUBLIC OPEN SPACE	1.20 HA

SCHEDULE OF ACCOMODATION		
■ TYPE 1A - 1 BED SEMI BUNGALOW - 485 SQ FT (45 SQ M) 2 no. off street parking space	6	10%
■ TYPE 2A - 2 BED BUNGALOW- 968 SQ FT (90 sq m) (3 person) - 2 no. off street parking spaces	7	40%
■ TYPE 2B- 2 BED SEMI-DETACHED- 775 SQ FT (72 sq m) (3 person) - 2 no. off street parking spaces	18	
■ TYPE 3A - 3 BED SEMI-DETACHED - 931 SQ FT (86.5 sq m) (4 person) - 2no. off street parking spaces	16	35%
■ TYPE 3B - 3 BED SEMI-DETACHED - 1,031 SQ FT (95.8 sq m) (5 person) - 2 no. off street parking spaces	5	
■ TYPE 4A - 4 BED DETACHED - 1,318 SQ FT (122.4 sq m) (7 person) - 2 no. off street parking spaces and integral garage	5	15%
■ TYPE 4B - 4 BED DETACHED - 1,382 SQ FT (128.3 sq m) (8 person) - 2 no. off street parking spaces and detached garage	4	
TOTAL	61	100%



Existing trees retained shown indicatively

Landscaped buffer to railway line

MP 111.25

2,000 sq ft Multi purpose building with offstreet car parking

Flood Zone 2

Flood Zone 3

Area for attenuation

Existing trees retained shown indicatively

Existing trees retained shown indicatively



SKETCH

PROJECT: PROPOSED DEVELOPMENT LAND OFF STATION ROAD SPOONER ROW

TITLE: SITE PLAN

DRAWING NO: 2050 SK 02

BY/CHECKED: DPE DATE: JAN 2021

SCALE @A3: 1:1250

Tower Works, Globe Road, Leeds LS11 9DS
Tel: 0113 3430990 E-mail: h@ellishealey.com

APPENDIX E

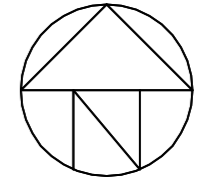
Sites SN0446 and SN0447 – Proposed Site Layouts

All site dimensions shall be verified by the contractor on site prior to work commencing

Do not scale from this drawing
Only work to written dimensions

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NOTES



SITE 3

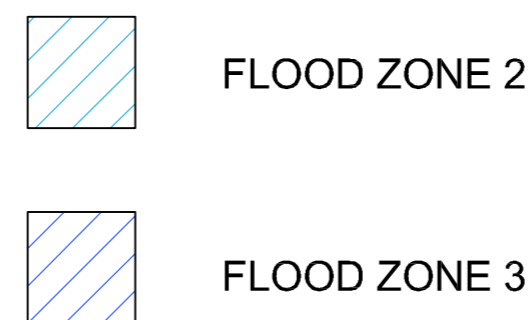
SITE 4

SCHEDULE OF ACCOMODATION		
TYPE 1A - 1 Bed bungalow - 485 SQ FT (45 SQ M) 2 no. off street parking spaces	2	40%
TYPE 2A - 2 BED BUNGALOW - 968 SQ FT (90 sq m) (3 person) - 2 no. off street parking spaces	1	20%
TYPE 3A - 3 BED SEMI-DETACHED - 1,031 SQ FT (95.8 sq m) (5 person) - 2 no. off street parking spaces	1	20%
TYPE 4A - 4 BED DETACHED - 1,318 SQ FT (122.4 sq m) (7 person) - 2 no. off street parking spaces and integral garage	1	20%
TOTAL	5	100%

SITE AREAS	
SITE AREA	0.94 HA
PUBLIC OPEN SPACE	0.32 HA

SCHEDULE OF ACCOMODATION		
TYPE 1A - 1 BED SEMI BUNGALOW - 485 SQ FT (45 SQ M) 2 no. off street parking spaces	6	10%
TYPE 2A - 2 BED BUNGALOW - 968 SQ FT (90 sq m) (3 person) - 2 no. off street parking spaces	3	35%
TYPE 2B - 2 BED SEMI-DETACHED - 775 SQ FT (72 sq m) (3 person) - 2 no. off street parking spaces	18	
TYPE 3A - 3 BED SEMI-DETACHED - 931 SQ FT (86.5 sq m) (4 person) - 2 no. off street parking spaces	20	38%
TYPE 3B - 3 BED SEMI-DETACHED - 1,031 SQ FT (95.8 sq m) (5 person) - 2 no. off street parking spaces	3	
TYPE 4A - 4 BED DETACHED - 1,318 SQ FT (122.4 sq m) (7 person) - 2 no. off street parking spaces and integral garage	6	17%
TYPE 4B - 4 BED DETACHED - 1,382 SQ FT (128.3 sq m) (8 person) - 2 no. off street parking spaces and detached garage	4	
TOTAL	61	100%

SITE AREAS	
SITE AREA	6.98 HA
DEVELOPMENT AREA	2.79 HA
21.5 dwelling per hectare <small>NOTE: BASED ON DEVELOPMENT AREA</small>	
PUBLIC OPEN SPACE	4.19 HA



Rev A	Updated to comments	15.02.2021	DPE
Designation	Details of Revision	Date	Initials/Sign



SKETCH

PROJECT: PROPOSED DEVELOPMENT
STATION ROAD
SPOONER ROW

TITLE: PROPOSED SITE PLAN
SITE 3 & 4

DRAWING NO: 2050 SK 04A

BY/CHECKED: DPE DATE: FEB 2021

SCALE @A1: 1:1000 OR 1:2000@A3