

# **Representations to the South Norfolk Village Clusters Housing Allocations Plan (Regulation 19 Publication Draft) (2023)**

**Land west of Bunwell Road, Spooner Row  
(Draft Village Clusters Housing Allocations Plan site SP01)**

**on behalf of KCS Development**

February 2023

**Representations to the South Norfolk Village Clusters Housing Allocations Plan (Regulation 19 Publication Draft) (2023)**

**Land west of Bunwell Road, Spooner Row, Norfolk  
(Draft Village Clusters Housing Allocations Plan site SPO1)**

**Prepared on Behalf of KCS Development**

<b>Status:</b>	Draft	Final
<b>Issue/Rev:</b>	01	02
<b>Date:</b>	23 February 2023	23 February 2023
<b>Prepared by:</b>	SP	SP
<b>Checked by:</b>	NP	NP
<b>Authorised by:</b>	NP	NP

**Barton Willmore, now Stantec**

1st Floor  
14 King Street  
Leeds  
LS1 2HL

Tel: 0113 2044 777  
Email: [nick.pleasant@bartonwillmore.co.uk](mailto:nick.pleasant@bartonwillmore.co.uk)

Ref: 31465/A5/SP  
Date: March 2023

**COPYRIGHT**

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil - based inks.

**Contents**

**Page**

1.0 INTRODUCTION ..... 1

2.0 NATIONAL POLICY BACKGROUND ..... 3

3.0 SITE CONTEXT AND DEVELOPMENT IN SPOONER ROW ..... 5

4.0 COMMENTS ON THE DRAFT PLAN ..... 7

5.0 CONCLUSIONS ..... 12

**Appendices**

- Appendix 1: Proposed Layout Plan (15-unit scheme)
- Appendix 2: Proposed Layout Plan (45-unit scheme)
- Appendix 3: Heritage Appraisal
- Appendix 4: Highways & Access Appraisal
- Appendix 5: Flood Risk & Drainage Appraisal

## 1.0 INTRODUCTION

- 1.1 Barton Willmore, now Stantec ('BWnS') is instructed by KCS Development to submit representations to the South Norfolk Village Clusters Housing Allocations Plan Regulation 19 Publication which is currently subject to public consultation until 6 March 2023.
- 1.2 KCS is promoting land west of Bunwell Road, Spooner Row ('the Site') and therefore has a key interest in the delivery of a sound Local Plan.
- 1.3 Part of our client's land off Bunwell Road has been proposed as a draft housing allocation for 15 dwellings (Policy VC SPO1: Land west of Bunwell Road). KCS fully supports the allocation of this site for housing; however it is considered the site could readily accommodate up to 45 homes to meet local needs and the council's own evidence demonstrates a larger allocation is appropriate.
- 1.4 Indeed, a larger allocation can deliver a wider range of benefits to the village such as the provision of more extensive open space, a larger quantum of affordable housing, greater highway improvements (such as footpath links), improvement to the existing watercourse, etc. Such benefits may not be realised from a smaller allocation and, indeed, the council will be aware that smaller planning permissions in the village have not unlocked any particular additional benefits locally. Conversely, a larger development on this site can provide measurable benefits for the community.
- 1.5 Therefore, whilst the allocation of the site is sound, the extent of the allocation is unsound, and a larger area should be allocated.
- 1.6 The Plans enclosed at **Appendix 1** (the 15-unit scheme) and **Appendix 2** (the 45-unit scheme) show the site is deliverable. The plan at Appendix 2 shows the larger development can be accommodated entirely outside of the flood zone.
- 1.7 This representation is structured as follows:
  - Section 2.0 sets out the national policy position in respect of local plans.
  - Section 3.0 details the site and development context in Spooner Row.
  - Section 4.0 provides commentary on the policies contained within the South Norfolk Local Plan Publication Version including the overall spatial strategy, site-specific policy and development management policy.
  - Section 5.0 summarises our Client's position and draws conclusions.

## 2.0 NATIONAL POLICY BACKGROUND

- 2.1 The National Planning Policy Framework (2021) sets out the Government's clear expectations for a plan-led system.
- 2.2 Paragraph 16 of the Framework states that plans should be prepared with the objective of contributing to the achievement of sustainable development and in a way which is aspirational but deliverable. Policies should be clearly written, unambiguous and have a clear purpose.
- 2.3 The Plan's preparation should be underpinned by relevant and up-to-date evidence. The Framework (paragraph 31) sets out that the evidence should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned and should consider relevant market signals.
- 2.4 The Framework is clear that the production of development plans must be prepared in accordance with all legal and procedural requirements and must meet the tests of **soundness**. For avoidance of doubt, the tests of soundness are set out in Framework paragraph 35 and are reiterated below:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
  - b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
  - c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
  - d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.
- 2.5 A key thread running through the revised Framework, and relevant to these representations, is the key objective to "*significantly boost the supply of homes*", as set out in NPPF paragraph 60. It is absolutely critical that a sufficient amount and variety of land can come forward where it is needed.
- 2.6 Paragraph 61 of the Framework introduces the standard methodology, and it explicitly

states that it should be used unless there are exceptional circumstances which can justify an alternative approach which reflects current and future demographic trends and market signals.

- 2.7 As set out in the Planning Practice Guidance (PPG), assessing housing need is the first step in the process of deciding how many homes need to be planned for and provides evidence and justification for policies such as site allocations. The standard method only identifies a minimum annual housing need figure and is not used to produce a housing requirement figure.
- 2.8 Paragraph 67 makes it clear that Local Authorities must identify a sufficient supply and mix of sites, which takes account of their availability, suitability, and likely economic viability.
- 2.9 Paragraph 69 notes the importance of small and medium sized sites in contributing to meeting housing needs, particularly in terms of the ability to deliver those sites quickly. This paragraph also encourages Councils to have Local Plan policies which support windfall development on non-allocated sites.
- 2.10 Paragraph 79 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.

### 3.0 SITE CONTEXT AND DEVELOPMENT IN SPOONER ROW

3.1 Spooner Row is situated close to the A11 within the Cambridge to Norwich Tech Corridor. It is a sustainable settlement which benefits from a range of services including:

- Railway Station
- Bus routes
- Primary school and pre-school
- Village hall
- Church
- Public house and restaurant
- Recreation ground

3.2 The village has developed as four general groupings of houses and facilities in a generally linear pattern along the main roads through the village with more modern development extending back from the main roads, with the Norwich to Ely railway line and agricultural land separating the groups of development.

3.3 Spooner Row also benefits from being close to the higher level of services/facilities and job opportunities in Wymondham and Attleborough. Wymondham is the largest settlement in South Norfolk and is an approximate 10-minute drive from Spooner Row. It benefits from a variety of shops, services and facilities including a train station and community facilities such as parks, sports pitches and library. Improved services and facilities including the expansion of the town centre, enhanced public transport and new education provision is proposed as part of the planned growth of Wymondham.

#### **The site**

3.4 The subject site is a logical location for further growth, located west of Bunwell Road, and is approximately 3.64ha. The site is predominantly located within Flood Zone 1, with the northern area of the site located within Flood Zone 2 and Flood Zone 3. A watercourse runs alongside Bunwell Road along the eastern and south-eastern site boundaries.

3.5 The plans enclosed at **Appendix 1** and **Appendix 2** show how the site can be developed in a way which responds to the known constraints.

3.6 The broadly triangular site is enclosed by existing development on two sides (north and east / south-east), and only the western boundary adjoins agricultural land which is screened by planting. Development extends along Bunwell Road and Queen's Street adjacent to the site.

3.7 In terms of accessibility, the village is well connected by road to the A11 providing access

to Attleborough, Wymondham and Norwich. Wymondham and Attleborough lie within a 10-minute drive-time from Spooner Row and Norwich lies within a 25-minute drive-time.

3.8 The A11 corridor is within the Cambridge to Norwich Tech Corridor which is an initiative to attract new businesses to the area and build technology-based clusters between Cambridge and Norwich. The Council's aim (through the joint strategic plan) is to deliver growth in and around the Tech Corridor recognising that towns and villages in this area will be vibrant places to live with good access to services and facilities.

3.9 In addition to road connectivity from Spooner Row, there is existing public transport accessibility with bus stops located within the village heart, along with a railway station which is served by Norwich to Cambridge services.

3.10 Our Draft Plan representations identifies the site:

- Has no significant constraints.
- Causes no loss of the best agricultural land.
- Causes no loss of public open space.
- Would relate to the existing settlement in terms of landscape.
- Has good access to services and employment.
- Has no known physical/infrastructure constraints.
- Main utilities are all available.
- Site is within an area already served by broadband and phone technology.
- No known contamination or ground stability issues
- Would not impact a heritage asset or its setting.
- Has no protected sites in close proximity.
- Is not within an Ancient Woodland or scheduled ancient monument.
- Is not within Flood Risk Zone 3b.
- Is not within a Locally Designated Green Space.
- Would create an opportunity for an open space asset to be created or improved.

3.11 The Site has no particular constraints, is suitable for residential development, and is in a highly sustainable location. The site is suitable, available, viable, and ultimately deliverable for up to 45 units, and will make a significant contribution to meeting local needs. Despite this, the Site is only partly allocated (for 15 units) in the draft plan due to areas of Flood Zone 2 and 3a in the northern area. However, no development is



proposed in the northern area and a larger development (45 units) can be delivered in the areas within Flood Zone 1 (i.e., flood risk is not a constraint on development).

- 3.12 Growth in Spooner Row is essential to the long-term future of the settlement and without growth the settlement will stagnate. In turn this puts existing services at risk as the local population move to other settlements. A lack of growth in Spooner Row is unsustainable.
- 3.13 Development of this site would be logical and would not encroach into the countryside given the existing development surrounding the site and that existing development in Spooner Row extends significantly beyond the linear village boundaries. It is an entirely logical location for growth.

#### **Benefits of a larger allocation on the site**

- 3.14 It is demonstrated Spooner Row is an entirely sustainable location where further growth can be appropriately located, hence a larger allocation on the site is justified in those terms. Notwithstanding the fundamental appropriateness of a larger allocation, only a larger allocation can realistically deliver wider benefits to the local community on the basis a larger allocation is able to withstand a larger financial requirement for planning gain items than would be the case for a smaller development.
- 3.15 The additional benefits of a 45 unit scheme over a 15 unit scheme include:
- Additional affordable housing delivery (viability dependant; 15 affordable units compared with 5 affordable units for the smaller allocation).
  - Other contributions towards local services and facilities, such as improvements to schools, GP facilities, etc.
  - Larger areas of green and public open space.
  - More comprehensive flood management areas, which benefit the site and Spooner Row as a whole by providing greater levels of mitigation.
  - Opportunities for nutrient neutrality which benefit the wider watercourse.
  - More extensive highway improvements, potentially including greater footway enhancements to the village centre.
  - Additional expenditure in the local economy from the greater number of residents.
  - A more extensive CIL and s106 offer.
  - Greater job creation including direct, indirect and spin-off employment in the local area as a result of the construction phase.
- 3.16 These measurable benefits are significant and can only be realised through a larger development, and in turn will benefit the wider community.

## 4.0 COMMENTS ON THE DRAFT PLAN

### **Spatial development Strategy and purpose of the Village Clusters Plan**

- 4.1 We generally support the intention and aspiration of the spatial vision for Spooner Row, although it is imperative the plan maximises the delivery of housing in suitable locations that the village needs. The plan, as drafted, does not deliver a sufficient supply of homes in identified sustainable locations.
- 4.2 Housing is a key component of economic growth, not least in terms of the jobs and investment it generates, but also in providing places for those working in the village and surrounding areas to live. Good quality housing attracts residents to an area and retains existing residents, and this is a key issue for Spooner Row not least due to the long term decline of the resident working age population (see: [Labour Market Profile – Spooner Row](#)).
- 4.3 An ageing population does not lend itself to stable long term economic growth and vitality. As such, housing delivery is required to reverse these trends and support the economic aspirations of the Village. Hence, in addition to supporting economic growth, new housing will meet local needs and address a decline in the working age population.
- 4.4 Economic growth and housing delivery go hand in hand. The draft Greater Norwich Local Plan (GNLP) requires development to occur on smaller sites in the Village Clusters, as described in the GNLP such provision is made as it has the benefit of supporting small-scale builders, providing choice for the market and helping to ensure the delivery of housing in popular village locations.
- 4.5 Overall, 5.5% of the GNLP growth is assigned to the Village Clusters in South Norfolk. To meet the remaining requirements of the GNLP, the South Norfolk Village Clusters Housing Allocations Plan (VCHAP) identifies sites for at least a further 1,200 new homes with the delivery focussed on sites of up to 50 units and a windfall allowance.

### **Site allocations in Spooner Row**

- 4.6 The site (SPO1) is allocated for 15 units in the VCHAP. Other allocations in Spooner Row are: SPO2 (25 dwellings); SPO 3 (7 dwellings); and SPO4 (14 dwellings).
- 4.7 When considering these sites in Spooner Row it is important to note that site SPO4 (Chapel Lane) has been subject to several planning permissions as part of linked development with land east of Bunwell Road for a combined 39 units. Whilst development east of Bunwell Road has commenced, development on the Chapel Lane parcel has stalled due to site specific constraints including an underground gas pipeline at a shallow depth on the site frontage. This brings in to question the potential delivery.

**Sustainability of Spooner Row and the site**

Spooner Row

- 4.8 It is relevant to consider how growth is distributed across the South Norfolk Village Clusters and the sustainability of settlements. The Plan has been supported by a range of documents including a Sustainability Appraisal ('SA') which evaluates the plan.
- 4.9 The SA assesses two development options:
  - Option 1 – the emerging plan preferred approach; and
  - Option 2 – an alternative approach with a greater emphasis on accessibility.
- 4.10 Of note the Sustainability Appraisal recognises that on a number of sustainability outcomes, Option 2 scores equally to or better than Option 1 – not least in respect of biodiversity, climate change mitigation, and transport. Indeed, the SA specifically recognises in Table A of the Non-Technical Summary there is 'strong argument' for 'higher growth' in Spooner Row given the train station.
- 4.11 In this regard the plan is considered **unsound** as (1) it does not take account of or assess reasonable alternatives and (2) is not positively prepared.

The site

- 4.12 It is then relevant to consider the SA in the context of the site, including the proposed allocation (15 units) and the alternative larger allocation (45 units). The SA at Table A (in the SA Appendices) assess each of the allocated sites and alternative (non-allocated sites). The Table therefore considers the allocation (SPO1) alongside the alternative of a 45 dwelling allocation on a larger site area (noted as site SN0444).

	Agricultural land	SPA	SAC	SSSI	Priority habitat	Broads NP	Conservation area	G1 listed building	G2 listed building	G2* listed building	Flood Zone 2	Surface water	Primary school	Secondary school	GP surgery
<b>Spooner Row - VCSP01 - Land West Bunwell Road</b>	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
Spooner Row - SN2101 - Spooner Row	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
Spooner Row - SN0445 - Land At Spooner Row	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
Spooner Row - SN2157 - North West Of London Road	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
Spooner Row - SN0447 - Land At Spooner Row	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
Spooner Row - SN0488 - Land At Spooner Row	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green
Spooner Row - SN0444 - Land At Spooner Row	Green	Green	Green	Green	Green	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green

**Table 1: Extract from the plan Sustainability Appraisal**

- 4.13 The above table shows the sustainability outcomes for the allocation site and the larger alternative option are identical aside from the matter of flood risk and surface water

drainage, presumably as the SA assumes the 45-unit scheme would encroach in to the flood zone. However, as demonstrated in our Regulation 18 representations and the layout plans provided with these Regulation 19 representations a larger development can be accommodated without encroaching in to the flood zone and indeed a larger development can create better quality flood mitigation and open space.

- 4.14 Therefore, in sustainability terms the larger development can deliver a more sustainable outcome and this should be robustly assessed to address matters of soundness.

#### **Site Specific technical matters**

- 4.15 KCS consider the principle of the allocation to be **sound**, however the size of the allocation is **unsound** as a larger development has not been appropriately assessed by the local planning authority. The following matters relate to conclusions with the council's Site Assessment document which supports the Publication Plan consultation.
- 4.16 Further detail on the above matters is set out in the appended technical notes covering heritage (**Appendix 3**), highways (**Appendix 4**), and drainage (**Appendix 5**).

#### Scale of the allocation

- 4.17 We consider the council has not provided any meaningful evidence to discount the 45-unit scheme, whereas our evidence shows a larger development can be reasonably accommodated and at the same time remain in line with the terms of the VCHAP which allocates sites of less than 50 units. Indeed, paragraph A.1 of the Draft Plan is clear:

*'The Plan allocates a series of smaller sites, typically within the range of 12 to 50 homes, across the 48 Village Clusters in South Norfolk, to accommodate at least 1,200 new homes in total.'*

- 4.18 Paragraph A.7 and A.15 of the plan then refers to a 'windfall allowance'. The plan does not cap windfall sites nor does it direct windfalls to a particular location. Therefore, it is entirely feasible that under the VCHAP a settlement may benefit from allocations and windfalls which exceed 50 units. And this is relevant when considering development in Spooner Row where the SA accepts that a larger amount of development than that currently being planned for could be sustainably accommodated.
- 4.19 Therefore, it is entirely realistic to conclude in basic sustainability terms that a 45-unit allocation is entirely justified and appropriate.

#### Flood risk

- 4.20 The northern section of the Site is within Flood Zone 2 and 3a. As a result, the Council

maintains that development of the Site would need to avoid these areas and a smaller allocation is proposed as a result. However, as demonstrated above, this conclusion does not account for the fact a larger development can avoid Flood Zones 2 and 3 in their entirety whilst also creating flood management areas as part of the development. This reinforces the point that a 45-unit scheme is entirely appropriate and sound.

- 4.21 A flood risk and drainage note is provided at **Appendix 5**.

Townscape, landscape and visual impact

- 4.22 The Council previously cited 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 a landscaping buffer along the western boundary which would reduce the impact of the development of the site on the landscape to the west.
- 4.23 The land is enclosed by existing development and development of the wider site 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 Plan (paragraph 34.1). 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.
- 4.24 Furthermore, the council's own site assessment recognises that; '*Development to south of site would relate to new development in allocation on opposite side of road*'. In this context it should be noted the aforementioned development on the opposite site of Bunwell Road extends back from the main road frontage and removes much of the lineation of development in this area of Spooner Row. Therefore, development extending back from Bunwell Road into the allocation site could be similarly acceptable.
- 4.25 However, the council's Landscape Visual Appraisal for the site only considers the options for a 15-unit scheme and does not consider if or how a larger development could be accommodated. This is a flaw in the site assessment process and is unsound, particularly given other officer conclusions that a larger allocation could be justified.
- 4.26 Indeed, a larger allocation on the site is implicitly supported by the council's Senior Heritage & Design Officer who, in the site assessment concludes:

*'a large area and will make the settlement more clustered – however there is an argument that the village should perhaps be becoming more clustered rather continuing long stretches of linear development in terms of being in closer proximity to village services. It could also provide a useful sized public space to also serve*

*existing housing.'*

- 4.27 We agree with this conclusion, a larger allocation is entirely appropriate and can deliver a range of benefits to Spooner Row as a whole in addition to providing much needed housing in the immediate area.

#### Heritage

- 4.28 The adjacent listed buildings and heritage assets are noted. However, the development of this site would have no impact on the setting of the listed building. We would therefore conclude that heritage effects are 'green' rather than 'amber'. This reinforces that a larger (45 unit) development can be accommodated.

- 4.29 A heritage technical note is provided at **Appendix 3**.

#### Access

- 4.30 An 'amber' rating is given in the site assessment following comments by Norfolk County Council which state:

*'Site access likely subject to improvements to continuous frontage footway (2m wide) to connect with existing facilities, c/w widening to 5.5m, extension of local speed limit and review of associated gateway features. 2 points of access onto Bunwell Road. Removal of all / most of existing frontage hedge likely. Footway improvements likely around junction with Station Road.'*

- 4.31 Following further review, whilst localised highways work will be required the works are no more significant than for any housing development in this area (for example the adjacent development on Bunwell Road). For example, carriageway and footway improvements can be considered yet this would not necessarily require the removal of significant frontage hedge (as show in the plans at Appendix 1 and Appendix 2).

- 4.32 Indeed, a larger allocation on the site could create a proportionately larger sum which could be spent on infrastructure improvements which benefit the village (such as new and/or wider footpaths in the immediate area).

- 4.33 A highways technical note is provided at **Appendix 4**.

## 5.0 CONCLUSIONS

- 5.1 These representations on behalf of KCS Development common on the draft South Norfolk Village Clusters Housing Allocations (Regulation 19) Plan.
- 5.2 KCS is promoting land west of Bunwell Road ('the Site') and therefore has a key interest in the delivery of a sound Plan. Land west of Bunwell Road is a suitable and deliverable site for up to 45 homes to meet local needs and support the long-term vitality and vibrancy of Spooner Row as a settlement.
- 5.3 We are working in a positive manner with the council to seek to deliver this site for the most sustainable and optimum quantum of development in a layout which provides a high-quality scheme that is befitting of the area.
- 5.4 Spooner Row is a sustainable settlement which benefits from key services meaning the village can accommodate growth and indeed new housing is essential if the village is to thrive. The council's own Sustainability Appraisal is clear that settlements such as Spooner Row can accommodate a larger quantum of development and also that the site can sustainably deliver a greater number of homes than is currently planned.
- 5.5 Despite the evident settlement sustainability and a need for new housing, the draft plan allocates the site for only 15 dwellings due to perceived townscape (clustering) and flood risk concerns. These representations demonstrate a larger development of 45 units can be delivered without compromising the existing flood zones or townscape.
- 5.6 A larger allocation can deliver a wider range of benefits to the village benefits such as the provision of more extensive open space, a larger quantum of affordable housing, greater highway improvements (such as footpath links), improvement to the existing watercourse, etc. Such benefits may not be realised from a smaller allocation and, indeed, the council will be aware that smaller planning permissions in the village have not unlocked any particular additional benefits locally. Conversely, a larger development on this site can provide measurable benefits for the community.
- 5.7 Therefore, whilst the allocation of the site is sound in principle the failure to allocate the site for a larger quantum of development is **unsound** as it is not positively prepared and does not deliver sufficient development in the identified suitable areas it is needed.
- 5.8 In light of the above, additional sites are required in order to deliver sustainable growth in the village. Our client's site in Spooner Row is one such site which already has a draft allocation and is available and viable for up to 45 dwellings.
- 5.9 These comments are made to assist the Council in preparing a sound and robust Plan.

## **APPENDIX 1**





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  
 This drawing is the property of Ellis Healey Architecture and copyright is reserved by them. The drawing is not to be copied or disclosed by or to any unauthorised persons without the prior written consent of Ellis Healey Architecture.  
 NOTES

Site layout subject to detail design and full topographical survey and engineers levels review.

Landscaping shown indicatively.

Landscaped walkways

Attenuation basin subject to engineers design

Line of flood zone 2 shown indicatively

Play area

New development access refer to highway engineers drawings for details

SCHEDULE OF ACCOMODATION		
TYPE 1A - 1 BED SEMI BUNGALOW - 485 SQ FT (45 SQ M) 2 no. off street parking space	4	9%
TYPE 2A - 2 BED BUNGALOW- 968 SQ FT (90 sq m) (3 person) - 2 no. off street parking spaces	4	58%
TYPE 2B- 2 BED SEMI-DETACHED- 775 SQ FT (72 sq m) (3 person) - 2 no. off street parking spaces	14	
TYPE 2C - 2 BED SEMI-DETACHED - 850 SQ FT (82 sq m) (4 person) - 2no. off street parking spaces	8	
TYPE 3A - 3 BED SEMI-DETACHED - 1,031 SQ FT (95.8 sq m) (5 person) - 2 no. off street parking spaces	11	24%
TYPE 4A - 4 BED DETACHED - 1,382 SQ FT (128.3 sq m) (8 person) - 2 no. off street parking spaces and detached garage	4	9%
<b>TOTAL</b>	<b>45</b>	<b>100%</b>

SITE AREAS	
SITE AREA	3.63 HA
DEVELOPMENT AREA	2.25 HA
<b>20 dwelling per hectare</b>	NOTE- BASED ON DEVELOPMENT AREA
PUBLIC OPEN SPACE	1.37 HA

Rev C	Updated to comments	30.09.2022	DPE
Rev B	Highways access updated.	30.09.2022	DPE
Rev A	Amended to comments.	22.09.2022	DPE
Designation	Details of Revision	Date	Initials/Sign



**SKETCH**

PROJECT: PROPOSED DEVELOPMENT  
 BUNWELL ROAD  
 SPOONER ROW

TITLE: SITE 1  
 PROPOSED LAYOUT  
 (45 DWELLINGS)

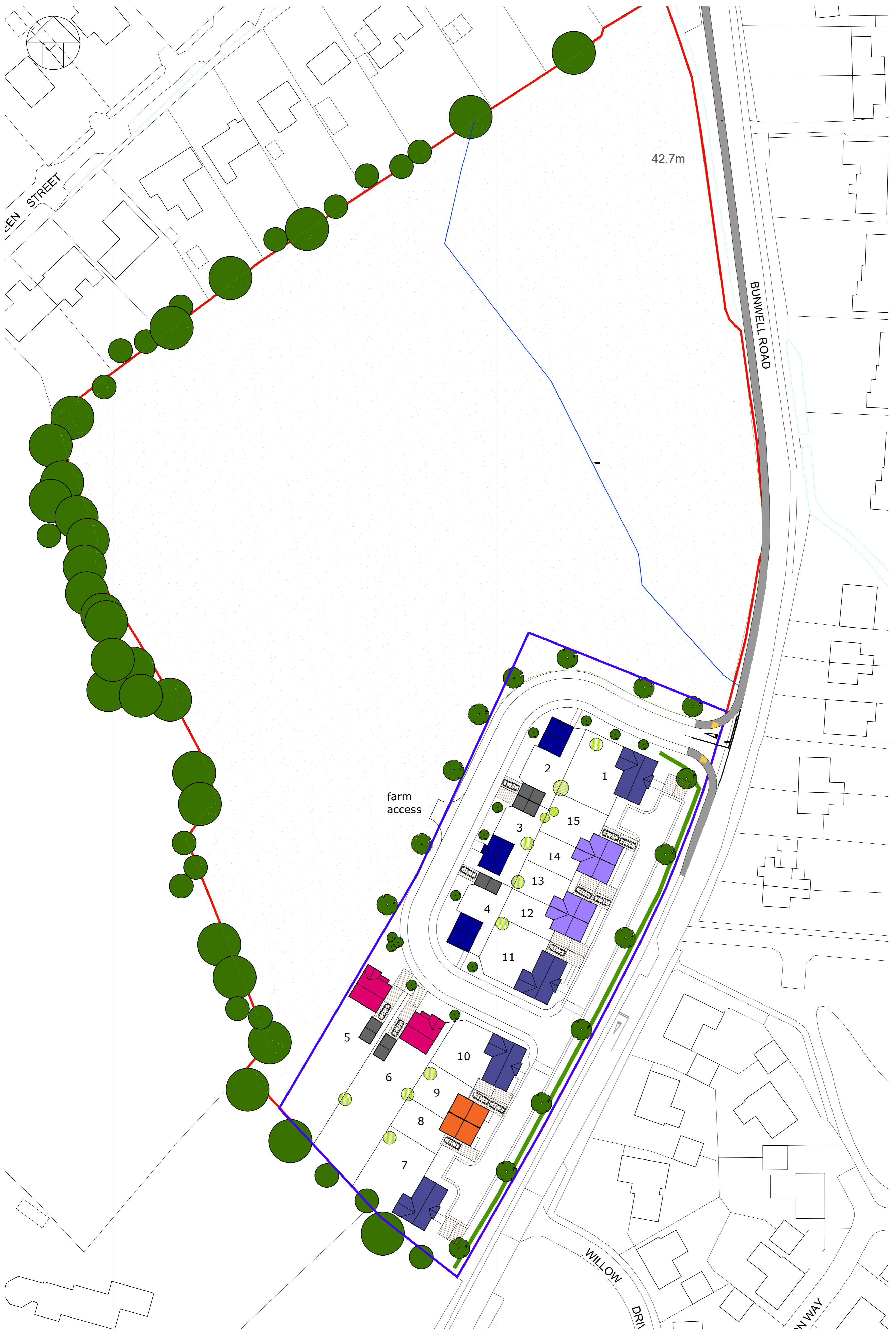
DRAWING NO: 2050 SK 20C

BY/CHECKED: DPE DATE: SEPT 2022

SCALE @A1: 1:500 OR 1:1000 @A3

Tower Works, Globe Road, Leeds, LS11 5QG  
 Tel: 0113 3453399 E-mail: info@ellishealey.com

## **APPENDIX 2**



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

This drawing is the property of Ellis Healey Architecture and copyright is reserved by them. The drawing is not to be copied or disclosed by or to any unauthorised persons without the prior written consent of Ellis Healey Architecture.

NOTES

Site layout subject to detail design and full topographical survey and engineers levels review.

Landscaping shown indicatively.

Line of flood zone 2 shown indicatively

New development access refer to highway engineers drawings for details

SCHEDULE OF ACCOMODATION		
TYPE 1A - 1 BED SEMI BUNGALOW - 485 SQ FT (45 SQ M) 2 no. off street parking space	4	27%
TYPE 2A - 2 BED BUNGALOW- 968 SQ FT (90 sq m) (3 person) - 2 no. off street parking spaces	4	40%
TYPE 2C - 2 BED SEMI-DETACHED - 850 SQ FT (82 sq m) (4 person) - 2no. off street parking spaces	2	
TYPE 3A - 3 BED SEMI-DETACHED - 1,031 SQ FT (95.8 sq m) (5 person) - 2 no. off street parking spaces	3	20%
TYPE 4A - 4 BED DETACHED - 1,382 SQ FT (128.3 sq m) (8 person) - 2 no. off street parking spaces and detached garage	2	13%
<b>TOTAL</b>	<b>15</b>	<b>100%</b>

SITE AREAS	
SITE AREA	3.63 HA
DEVELOPMENT AREA	0.92 HA
<b>16 dwelling per hectare</b> NOTE- BASED ON DEVELOPMENT AREA	
existing farm land	2.74 HA

Rev C	Updated to comments	30.09.2022	DPE
Rev B	Highways access updated.	30.09.2022	DPE
Rev A	Amended to comments.	22.09.2022	DPE
Designation	Details of Revision	Date	Initials/Sign

**ellis healey**  
 architecture

**SKETCH**

PROJECT: PROPOSED DEVELOPMENT  
 BUNWELL ROAD  
 SPOONER ROW

TITLE: SITE 1  
 PROPOSED LAYOUT  
 (15 DWELLINGS)

DRAWING NO: 2050 SK 21C

BY/CHECKED: DPE DATE: SEPT 2022

SCALE @A1: 1:500 OR 1:1000 @A3

Tower Works, Globe Road, Leeds, LS11 5QG  
 Tel: 0113 3453090 E-mail: info@ellishealey.com

## **APPENDIX 3**

---

# Spooner Row, Norfolk

The allocation site comprises a roughly triangular piece of land to the south of Spooner Row, Norfolk. It lies between Bunwell Road to the east and Queen Street to the west, centred on TM09589711. It is located to the north of a Grade II Listed Building, The Orchards, Queen Street (NHL 1196690). The site is partially a preferred allocation for housing development. Feedback from the planning authority has identified the impacts on the setting of this listed building as a potential constraint on development.

## **The Orchards, Queen Street (NHL1196690) Listing description**

*House. Late C17. Timber-framed, plastered and whitewashed. Thatched roof. One storey and dormer attic. One C20 French door to left with side lights. One 3-light C19 casement centre and a door and window to right. Gabled roof with 2 eaves dormers under sloping thatched roofs. Dormer to right with C20 details. Rebuilt ridge stack left of centre.*

The house is positioned within extensive lawned gardens bordered by mature hedging and trees to the north, east and west. The southern boundary appears to be recently replanted hedging associated with improvements made to the property itself. The listed property faces to the south-east towards the junction of Queen Street with Bunwell Road, and Bunwell Road with Hill Road. A number of properties lie between Hill Road and Bunwell Road, giving the appearance of a hamlet from at least the later 19<sup>th</sup> century and it would appear that the focus of settlement with which The Orchards can be most closely associated lay in this direction and not the north.

To the north, the listed building is entirely enclosed by mature hedging and trees and cannot be seen from within the proposed development site or from Bunwell Road. The land is largely level and there is no suggestion that new buildings in this area would overlook or dominate the setting of the listed building.

This initial assessment concludes that the development of this site would have no impact on the setting of the listed building. The Orchards is both heavily screened by mature planting and has a primary focus to the south, not the north. It does not rely on its northern setting for its significance.

Nansi Rosenberg BA (Hons), MA, MCifA  
Prospect Archaeology Ltd

October 2022

## **APPENDIX 4**

## **Bunwell Road, Spooner Row**

### **Proposed Residential Site Allocation**

#### **Access Appraisal**

##### **1.1 INTRODUCTION**

1.1.1 Optima Highways and Transportation Consultancy Ltd (Optima) has been appointed by KCS Development Ltd to produce this Access Appraisal in relation to the proposed allocation of land off Bunwell Road, Spooner Row, Norfolk ('the Site') as part of the Norfolk Local Plan.

1.1.2 Image 1.1 below shows the extent of the Site edged in red.

**Image 1.1 - Title Plan**



1.1.3 This report focuses on assessing the Sites potential in relation to access opportunities.

1.1.4 Part of the Site has been identified as a preferred residential allocation under Site reference SN0444 and has an indicative capacity of 15 dwelling, however a larger Site with a capacity for circa 45 dwellings has been considered for the purpose of this assessment.

1.1.5 Norfolk County Councils Highway team commented on the proposed allocation and raised the following:

*“Site access likely subject to improvements to continuous frontage footway (2m wide) to connect with existing facilities, c/w widening to 5.5m, extension of local speed limit and review of associated gateway features. 2 points of access onto Bunwell Road. Removal of all / most of existing frontage hedge likely. Footway improvements likely around junction with Station Road”.*

1.1.6 The above points are considered within this report.

## 1.2 COLLISION DATA

1.2.1 A review of the Crashmap website has been undertaken to provide a high-level review of any collision clusters or highway safety concerns on the local highway network.

1.2.2 Crashmap uses validated Department for Transport data for collisions where a Personal Injury Accident has occurred (where Police attended). Data outlined below is from the most recent available period covering from 2017 to 2021.

1.2.3 The study area includes a significant length of Bunwell Road adjacent to the Site boundary, the full extents of Queens Street and the junction of Bunwell Road/Station Road.

1.2.4 Analysis of the available data shows that there have two slight collisions recorded within the study area in the last five years. A summary is listed below:

- One collision was on Bunwell Street (to the north of the Site) which involved one vehicle and resulted in one casualty; and
- One collision was recorded on Station Road which involved three vehicles resulting in one casualty.

1.2.5 The data obtained from Crashmap is attached in Appendix A.

1.2.6 Based on the above assessment, no highway safety concerns have been identified.

## 1.3 PROPOSED SITE ACCESS

1.3.1 The Site forms a generous frontage onto Bunwell Road, which provides a degree of flexibility to position the access to tie into the design of the internal layout.

1.3.2 The proposed access has been located circa. 130m north of the Willow Drive, to tie in with the indicative masterplan layout.

1.3.3 Based on the scale of development, a single point of access can safely and efficiently serve circa 45 dwellings.

1.3.4 The access comprises of a 5.5m wide carriageway with 10m kerb radii in order to accommodate access by refuse vehicles. It may be possible to reduce the radii to 6m if Bunwell Road is widened to 5.5m. However, it is considered the existing highway width is suitable to serve the proposed development. Further discussions with the local highway authority will confirm the package of highway works.

1.3.5 For the purpose of this initial access appraisal the carriageway along Bunwell Road has not been widened to 5.5m and the speed limit has been retained on the basis that widening the carriageway is not necessarily required to accommodate the proposed development and in fact



is likely to result in increased speeds. It is also unclear why development of this Site would necessitate the extension of the 30mph speed limit since the access is situated wholly within the 30mph zone and appropriate visibility splays can be achieved (see Section 1.4).

1.3.6 The current footway, on the western side of Bunwell Road is narrow at around 0.6m wide. It is proposed to widen the footway to the north of the access point whilst extending the footway north beyond the Site boundary and connecting with the existing footway on the western side of Bunwell Road. This new extended 2.0m footway will help to prevent residents from crossing in order to access the nearby services and amenities.

1.3.7 The footway to the south has been widened over the extent of the visibility splay.

1.3.8 The proposed Site access arrangements are provided in Appendix B with the highway adoption boundary shown in Appendix C.

#### 1.4 VEHICLE SPEED SURVEY

1.4.1 A vehicle speed survey has been undertaken on Bunwell Road in order to identify whether suitable visibility can be achieved from the proposed access.

1.4.2 Vehicle speeds were recorded on Thursday 18<sup>th</sup> August 2022 in free-flowing conditions when the road surface was dry. Full details of the speed survey are contained at Appendix D, with a summary provided in Table 1.1.

**Table 1.1 Vehicle Speed Survey – Bunwell Road**

Bunwell Road	Northbound 50 readings	Southbound 50 readings
Mean Speed (mph)	36.1	32.7
85th percentile speed (mph)	39.3	34.8
<b>85th percentile wet weather speed (mph)</b>	<b>36.8</b>	<b>32.3</b>

1.4.3 As can be seen in Table 1.1, 85<sup>th</sup> percentile wet weather vehicle speeds along Bunwell Road are within the 40mph speed limit to the south and slightly over the 30mph speed limit in the north.

1.4.4 The proposed Site access drawing (Appendix B) demonstrates that suitable visibility can be achieved in both directions in full compliance with guidance set out within MfS, based upon the 85<sup>th</sup> percentile wet weather speeds recorded within Table 1.1.

## 1.5 CONCLUSIONS

1.5.1 A suitable access from Bunwell Road can be achieved into the proposed allocation Site which would provide the required geometric parameters.

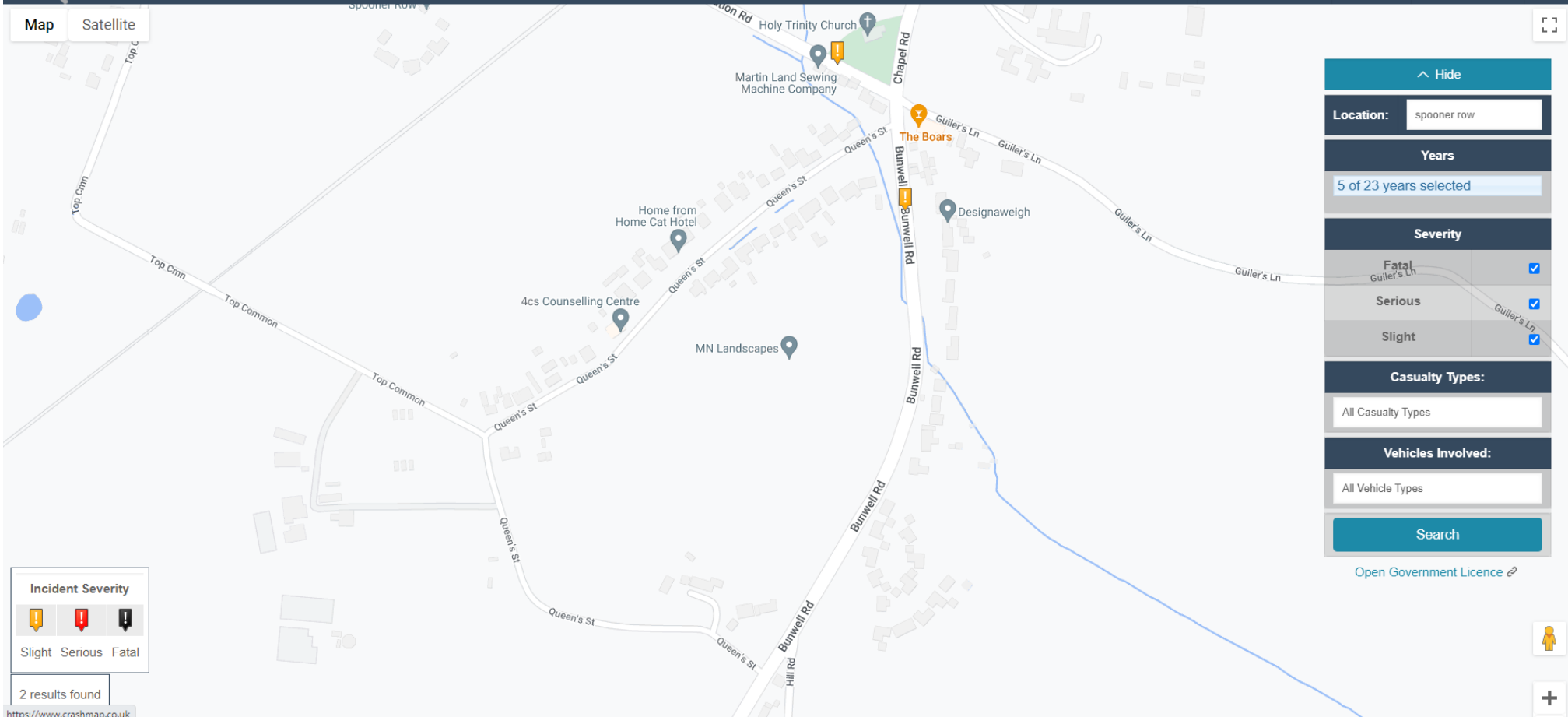
1.5.2 No highway safety concerns have been identified on the local highway network and the allocation of this Site for residential development is unlikely to alter this situation.

1.5.3 Highway adoption records show that access can be achieved and to identify the extent of the pedestrian footway improvements to the north of the Site.

---

## Appendix A Personal Injury Collision Data

Map Satellite



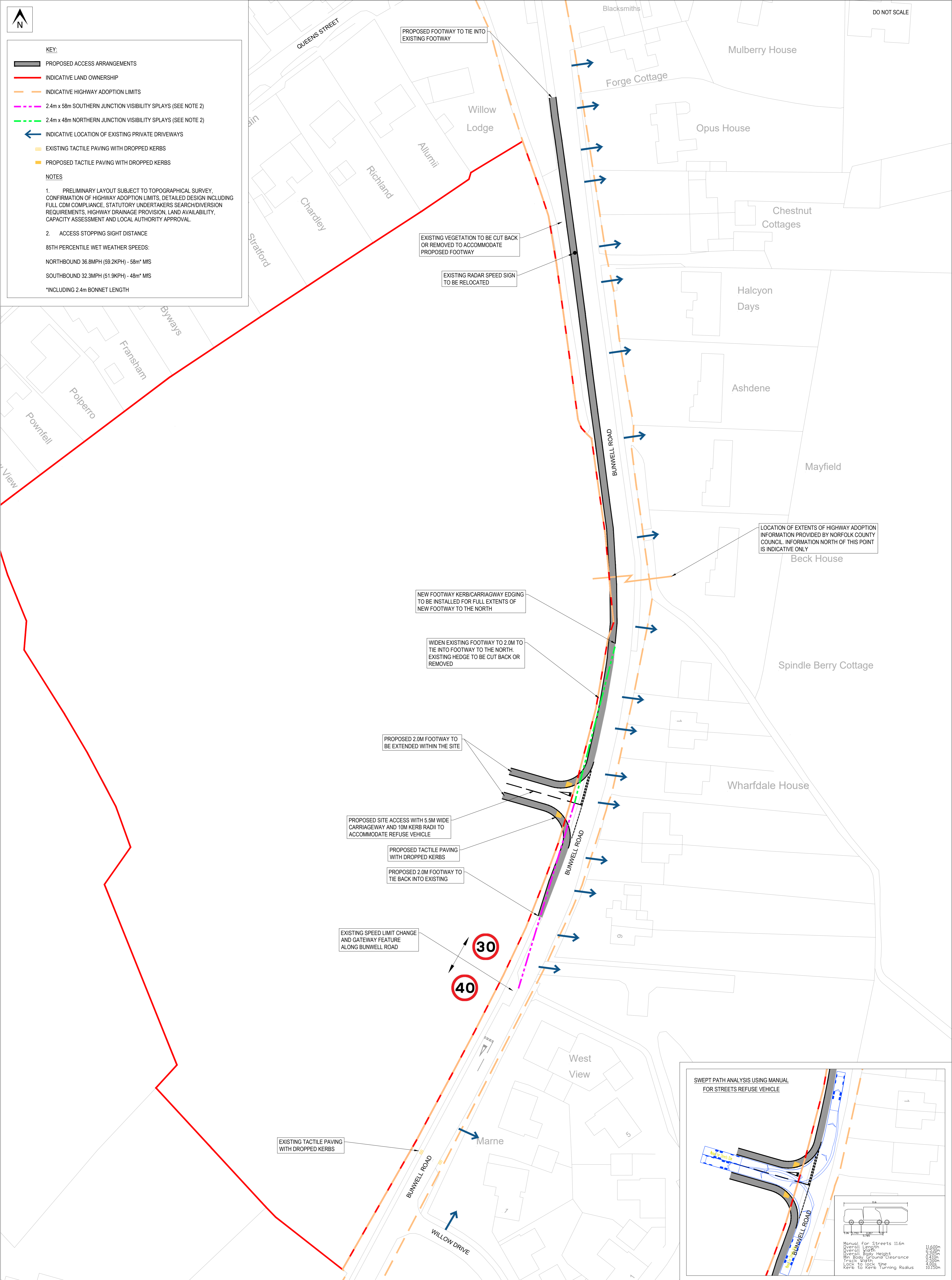
**Incident Severity**

Slight Serious Fatal

2 results found

https://www.crashmap.co.uk

## Appendix B Potential Site Access Arrangement



REV	DATE	BY	DESCRIPTION	CHK	APP
A	23/09/22	SG	MINOR AMENDMENTS	MEW	MEW
-	09/09/22	SG	INITIAL ISSUE	MEW	MEW

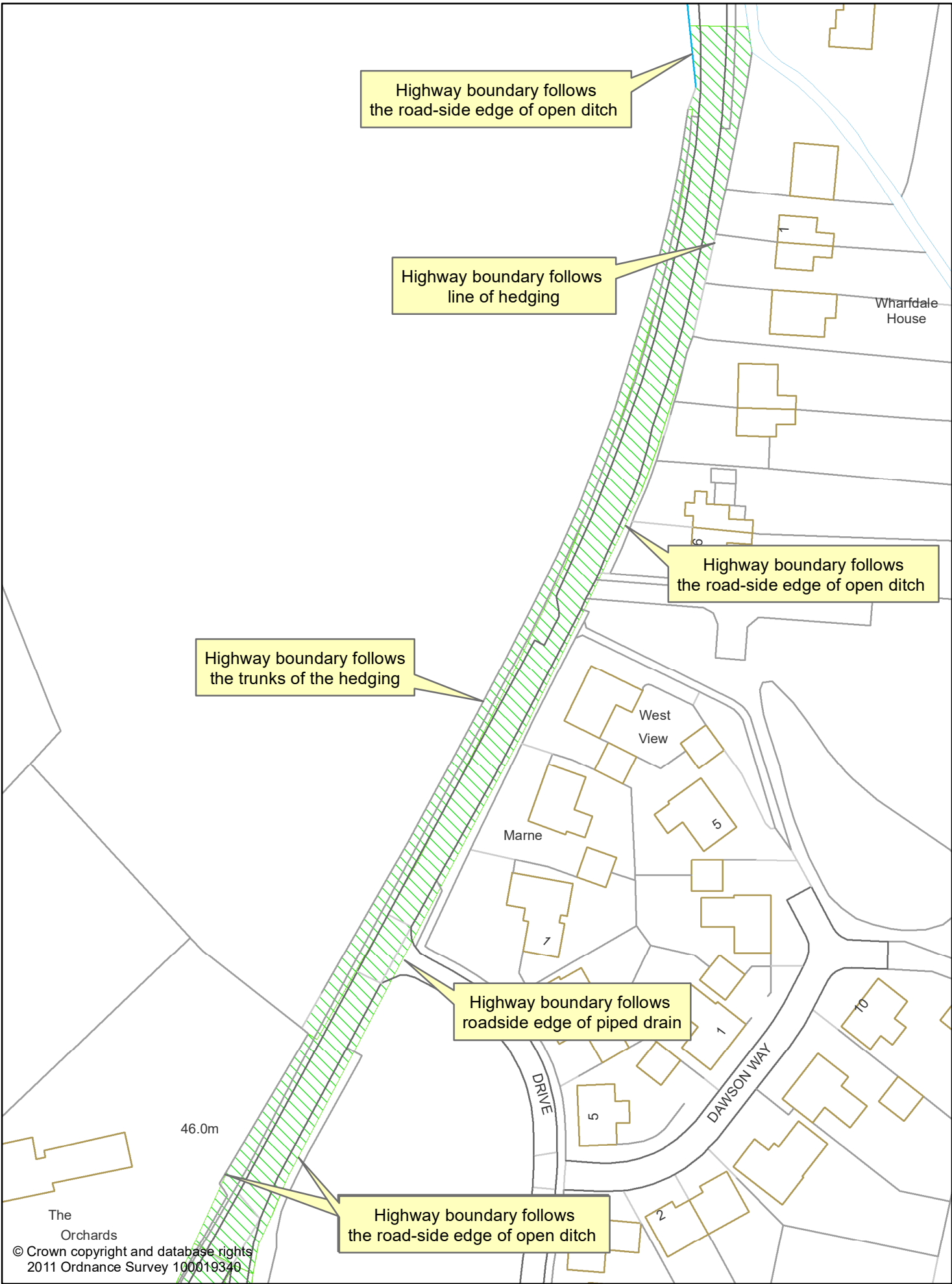
PROJECT	BUNWELL ROAD, SPOONER ROAD
CLIENT	KCS DEVELOPMENT LTD
DRAWING TITLE	POTENTIAL SITE ACCESS ARRANGEMENT
STATUS	PRELIMINARY

CHECKED	MEW	APPROVED	MEW	DRG No.	22106/GA/01
DRAWN BY:	SG	SCALE @ A1	1:500	DATE	SEPTEMBER 2022
REV.	A				



---

## Appendix C Highway Adoption Boundary



Highway boundary follows the road-side edge of open ditch

Highway boundary follows line of hedging

Highway boundary follows the road-side edge of open ditch

Highway boundary follows the trunks of the hedging

Highway boundary follows roadside edge of piped drain

Highway boundary follows the road-side edge of open ditch

Wharfdale House

West View

Marne

46.0m

The Orchards

© Crown copyright and database rights 2011 Ordnance Survey 100019340

DRIVE

DAWSON WAY

Norfolk County Council  
Grid Ref: 609,625.4580 297,013.7386

 Public highway hatched green

**Bunwell Road,  
Spooner Row**

Date created:  
23/09/22

Scale:  
1:1,000





## Appendix D Speed Survey

# Spooner Row Speed Survey, Bunwell Road

Road Data Services Ltd.

Weather:  
Dry

Thursday 18th August 2022  
09:30 - 16:30

Northbound							
	Speeds (mph)	51	Speeds (mph)	101	Speeds (mph)	151	Speeds (mph)
1	27	51	34	101	36	151	38
2	29	52	34	102	36	152	38
3	29	53	34	103	36	153	38
4	30	54	34	104	36	154	39
5	31	55	34	105	36	155	39
6	31	56	34	106	36	156	39
7	32	57	34	107	36	157	39
8	32	58	34	108	36	158	39
9	32	59	34	109	36	159	39
10	32	60	34	110	36	160	39
11	32	61	34	111	36	161	39
12	32	62	34	112	36	162	39
13	32	63	34	113	36	163	39
14	32	64	35	114	36	164	39
15	32	65	35	115	36	165	39
16	32	66	35	116	36	166	39
17	32	67	35	117	37	167	39
18	32	68	35	118	37	168	39
19	32	69	35	119	37	169	40
20	32	70	35	120	37	170	40
21	32	71	35	121	37	171	40
22	32	72	35	122	37	172	40
23	32	73	35	123	37	173	40
24	32	74	35	124	37	174	40
25	32	75	35	125	37	175	40
26	32	76	35	126	37	176	40
27	32	77	35	127	37	177	40
28	32	78	35	128	37	178	40
29	32	79	35	129	37	179	40
30	33	80	35	130	37	180	41
31	33	81	35	131	37	181	41
32	33	82	35	132	37	182	41
33	33	83	35	133	37	183	41
34	33	84	35	134	38	184	41
35	33	85	35	135	38	185	41
36	33	86	35	136	38	186	41
37	33	87	35	137	38	187	41
38	33	88	36	138	38	188	41
39	33	89	36	139	38	189	41
40	33	90	36	140	38	190	41
41	33	91	36	141	38	191	41
42	33	92	36	142	38	192	41
43	33	93	36	143	38	193	41
44	33	94	36	144	38	194	41
45	34	95	36	145	38	195	42
46	34	96	36	146	38	196	42
47	34	97	36	147	38	197	43
48	34	98	36	148	38	198	43
49	34	99	36	149	38	199	43
50	34	100	36	150	38	200	43

ROAD SURFACE - DRY

Average (mph)	36.1
Standard Deviation (mph)	3.1
85th Percentile (mph)	39.3
Wet Weather 85th Percentile (mph)	36.8
% > Speed Limit	10.5

SPEED LIMIT 

All speeds are recorded from free flowing vehicles

Southbound							
	Speeds (mph)	51	Speeds (mph)	101	Speeds (mph)	151	Speeds (mph)
1	26	51	31	101	33	151	34
2	29	52	31	102	33	152	34
3	29	53	31	103	33	153	34
4	29	54	31	104	33	154	34
5	30	55	31	105	33	155	34
6	30	56	31	106	33	156	34
7	30	57	31	107	33	157	34
8	30	58	31	108	33	158	34
9	30	59	31	109	33	159	34
10	30	60	31	110	33	160	34
11	30	61	32	111	33	161	34
12	30	62	32	112	33	162	35
13	30	63	32	113	33	163	35
14	30	64	32	114	33	164	35
15	30	65	32	115	33	165	35
16	30	66	32	116	33	166	35
17	30	67	32	117	33	167	35
18	30	68	32	118	33	168	35
19	30	69	32	119	33	169	35
20	30	70	32	120	33	170	35
21	30	71	32	121	33	171	35
22	30	72	32	122	33	172	35
23	30	73	32	123	33	173	35
24	30	74	32	124	33	174	35
25	30	75	32	125	33	175	36
26	30	76	32	126	33	176	36
27	30	77	32	127	33	177	36
28	30	78	32	128	33	178	36
29	30	79	32	129	33	179	36
30	31	80	32	130	33	180	36
31	31	81	32	131	33	181	36
32	31	82	32	132	33	182	36
33	31	83	32	133	33	183	36
34	31	84	32	134	33	184	36
35	31	85	32	135	33	185	36
36	31	86	32	136	33	186	36
37	31	87	32	137	33	187	36
38	31	88	32	138	33	188	36
39	31	89	32	139	33	189	36
40	31	90	32	140	33	190	36
41	31	91	32	141	33	191	36
42	31	92	32	142	33	192	36
43	31	93	32	143	33	193	36
44	31	94	32	144	33	194	36
45	31	95	33	145	34	195	37
46	31	96	33	146	34	196	37
47	31	97	33	147	34	197	37
48	31	98	33	148	34	198	37
49	31	99	33	149	34	199	38
50	31	100	33	150	34	200	38

ROAD SURFACE - DRY

Average (mph)	32.7
Standard Deviation (mph)	2.0
85th Percentile (mph)	34.8
Wet Weather 85th Percentile (mph)	32.3
% > Speed Limit	85.5

SPEED LIMIT 

## **APPENDIX 5**

Our ref: Y22037

05 September 2022

*For the attention of the Richard Morton*

KCS Developments Limited  
3<sup>rd</sup> Floor Goodbard House  
15 Infirmary Street  
Leeds  
LS1 2JS

Dear Richard

**RE: Spooner Row, Norfolk – Flood Risk and Drainage Review**

RWO have been instructed by KCS Developments Limited to undertake a flood risk and drainage review of a proposed residential development site at Spooner Row, Norfolk

**Flood Risk**

The site under consideration is located within Flood Zone 1, 2 & 3 on the latest version of the Indicative Floodplain Maps produced by the Environment Agency [EA]. A copy of the flood map is appended.

It is proposed to develop only within the land designated as Flood Zone 1.

Flood Zone 1 is defined in Planning Practice Guidance Technical Guidance as a low-risk area, which comprises land assessed as having less than 1 in 1,000 annual probability of river or sea flooding (0.1%).

Planning Practice Guidance Technical Guidance states that all uses of land are appropriate in Flood Zone 1.

The proposed residential site usage falls within the 'more vulnerable' category as identified in the Planning Practice Guidance Table 2: Flood Risk Vulnerability Classification. As such the exception test, will not need considering based on the Planning Practice Guidance Table 3: Flood risk vulnerability and flood zone 'compatibility'.

**Drainage**

Geological maps indicate the site to be underlain with '*slightly acid loamy and clayey soils with impeded drainage*,' therefore the disposal of surface water via infiltration techniques is unlikely to be viable. Soakaway testing in accordance with BRE Digest 365 shall be undertaken on the site to confirm the viability of infiltration type drainage, A copy of the geological map is appended.

A watercourse passes through the northeast of the site. Reviewing the Environment Agency maps the watercourse is not identified as a 'Main River', as such will be classed as an 'Ordinary Watercourse'. The site is within the catchment of the watercourse.

It is proposed that surface water from the proposed development site shall discharge to the watercourse to the northeast on a 'like for like' basis at a greenfield discharge rate. As this is an 'Ordinary Watercourse' the discharge rate will need to be agreed with the Lead Local Flood Authority [Norfolk Council].

As the discharge from the site will be restricted on site surface water attenuation will be required.

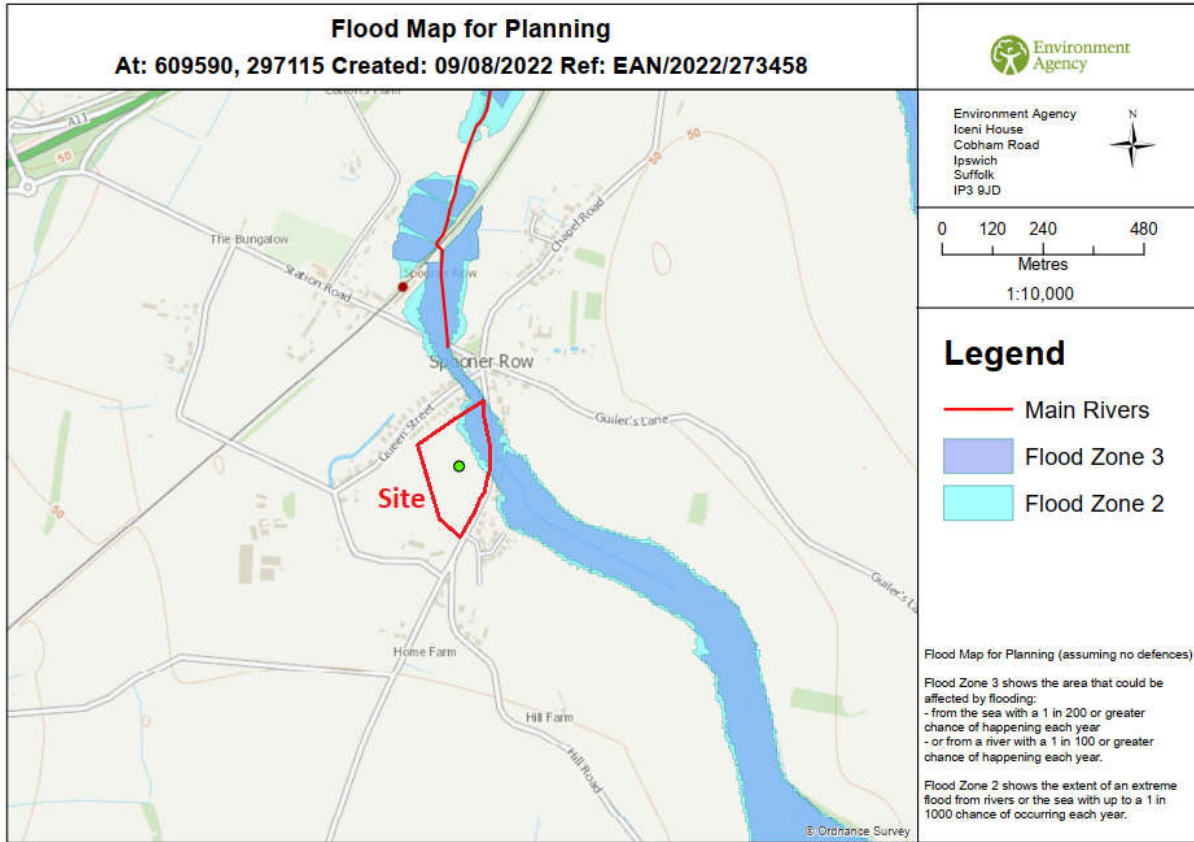
Sustainable Urban Drainage System (SUDs) may be used in conjunction with conventional drainage systems to improve water quality as well as manage surface water discharge. SUDs should be considered at the detailed drainage design stage of the project.

A public sewer plan has been obtained from Anglian Water Services which identifies there are no public sewers within the vicinity of the site. It is therefore proposed to discharge foul water from the site to a Biodisk-type package sewage treatment plant, with treated effluent from the plant taken to the watercourse to the northeast of the site. A permit may be required for the installation of the sewage treatment plant, this shall be discussed and agreed upon with the Environment Agency.

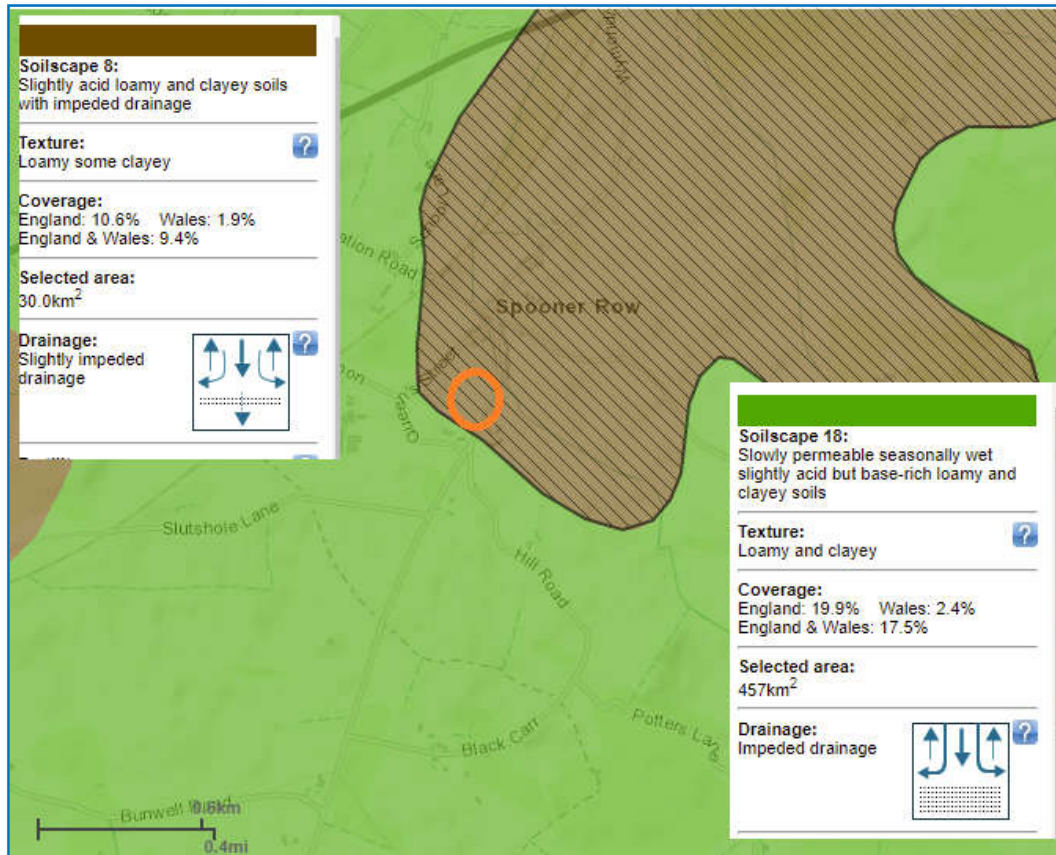
Yours sincerely



**Andrew Fairburn**  
For and behalf of RWO Associates (Yorkshire) Limited



**Environment Agency Flood Map for Planning**



Soilscape Geological Map.





**Representations to the South Norfolk Village Clusters Housing  
Allocations Plan (Regulation 19 Publication Draft) (2023)**

**Land west of Bunwell Road, Spooner Row, Norfolk  
(Draft Village Clusters Housing Allocations Plan site SPO1)**

**Prepared on Behalf of KCS Development**

<b>Status:</b>	Draft	Final
<b>Issue/Rev:</b>	01	02
<b>Date:</b>	23 February 2023	23 February 2023
<b>Prepared by:</b>	SP	SP
<b>Checked by:</b>	NP	NP
<b>Authorised by:</b>	NP	NP

**Barton Willmore, now Stantec**

1st Floor  
14 King Street  
Leeds  
LS1 2HL

Tel: 0113 2044 777  
Email: [nick.pleasant@bartonwillmore.co.uk](mailto:nick.pleasant@bartonwillmore.co.uk)

Ref: 31465/A5/SP  
Date: March 2023

**COPYRIGHT**

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil - based inks.

## Contents

## Page

1.0	INTRODUCTION.....	1
2.0	NATIONAL POLICY BACKGROUND .....	3
3.0	SITE CONTEXT AND DEVELOPMENT IN SPOONER ROW .....	5
4.0	COMMENTS ON THE DRAFT PLAN .....	7
5.0	CONCLUSIONS .....	12

## Appendices

Appendix 1: Proposed Layout Plan (15-unit scheme)

Appendix 2: Proposed Layout Plan (45-unit scheme)

Appendix 3: Heritage Appraisal

Appendix 4: Highways & Access Appraisal

Appendix 5: Flood Risk & Drainage Appraisal

## 1.0 INTRODUCTION

- 1.1 Barton Willmore, now Stantec ('BWNs') is instructed by KCS Development to submit representations to the South Norfolk Village Clusters Housing Allocations Plan Regulation 19 Publication which is currently subject to public consultation until 6 March 2023.
- 1.2 KCS is promoting land west of Bunwell Road, Spooner Row ('the Site') and therefore has a key interest in the delivery of a sound Local Plan.
- 1.3 Part of our client's land off Bunwell Road has been proposed as a draft housing allocation for 15 dwellings (Policy VC SPO1: Land west of Bunwell Road). KCS fully supports the allocation of this site for housing; however it is considered the site could readily accommodate up to 45 homes to meet local needs and the council's own evidence demonstrates a larger allocation is appropriate.
- 1.4 Indeed, a larger allocation can deliver a wider range of benefits to the village such as the provision of more extensive open space, a larger quantum of affordable housing, greater highway improvements (such as footpath links), improvement to the existing watercourse, etc. Such benefits may not be realised from a smaller allocation and, indeed, the council will be aware that smaller planning permissions in the village have not unlocked any particular additional benefits locally. Conversely, a larger development on this site can provide measurable benefits for the community.
- 1.5 Therefore, whilst the allocation of the site is sound, the extent of the allocation is unsound, and a larger area should be allocated.
- 1.6 The Plans enclosed at **Appendix 1** (the 15-unit scheme) and **Appendix 2** (the 45-unit scheme) show the site is deliverable. The plan at Appendix 2 shows the larger development can be accommodated entirely outside of the flood zone.
- 1.7 This representation is structured as follows:
- Section 2.0 sets out the national policy position in respect of local plans.
  - Section 3.0 details the site and development context in Spooner Row.
  - Section 4.0 provides commentary on the policies contained within the South Norfolk Local Plan Publication Version including the overall spatial strategy, site-specific policy and development management policy.
  - Section 5.0 summarises our Client's position and draws conclusions.