

## Proposed Residential Development on land South of Station Road, Spooner Row

### Submission of Representations relating to South Norfolk Village Clusters Housing Allocations Plan – Pre-Submission Draft (Reg. 19)

Site Ref: VC SPO2

on behalf of  
**Alfred Charles Homes Ltd**

Our Ref: PP23/046295

## REPRESENTATIONS TO SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATIONS PLAN – PRE-SUBMISSION DRAFT (REG. 19) - MARCH 2023

### Land South of Station Road, Spooner Row (Site Ref: VC SP02)

#### 1. Introduction

**1.1** On behalf Alfred Charles Homes Ltd, Brown & Co are instructed to submit representations in respect of the Pre-Submission Draft of the South Norfolk Village Clusters Housing Allocations Plan (VCHAP). Alfred Charles Homes Ltd are promoting the site on the southern side of Station Road, Spooner Row – Site Ref: VC SP02.

**1.2** The Reg 19 VCHAP has the following draft policy for this site:

#### **Policy VC SP02: South of Station Road**

1.67ha of land is allocated for approximately 25 dwellings.

The developer of the site will be required to ensure that:

- Access from Station Road only with off-site highways works to include a pedestrian footpath along the site frontage and a crossing point to connect to Spooner Row Primary School;
- Protection and enhancement of the trees and hedgerows on the east and west site boundaries and an appropriate boundary to the south of the site, which both contains the site and integrates it with the wider rural landscape;
- Site Layout and design to include linear development facing Station Road frontage.

**1.3** Representations have previously been made during the ‘Call for Sites’ consultation as part of the Greater Norwich Local Plan (GNLP). The VCHAP has now reached Regulation 19 of its preparation, and the purpose of this consultation relates to the ‘Tests of Soundness’ and includes legal compliance as set out in the National Planning Policy Framework (Para 35).

**1.4** The purpose of this representation is to:

- a) **Support** the continued allocation of the site for residential development and to confirm that Alfred Charles Homes Ltd are committed to working with the Council to deliver the aspirations as set out in draft Policy VC SP02;
- b) **Object** to the specific wording of the proposed policy and propose alternative wording and seek amendments to the text to ensure that the policy is justified and effective; and
- c) **Respond** to other policies of relevance to delivering our proposals, where comment is necessary.

**1.5** The VCHAP sets out three objectives:

**Objective 1 – Meet housing needs.** Deliver housing in accordance with GNLP housing target for the South Norfolk Village Clusters through the allocation of suitable, viable and deliverable development sites housing. (1200 new homes). Provide an appropriate mix of house types, sizes and tenures to allow for residents at different parts of life cycle e.g., first time buyers, those seeking family housing and those looking to downsize or move to more suitable accommodation in later life. Provide opportunities for ‘self-builds’ through the extension or amendment of settlement boundaries to allow ‘in-fill’ development in appropriate locations.

**Objective 2 – Protecting village communities and support rural services and facilities.** Provide opportunities for new housing development in a range of settlements within the village clusters, meeting the needs of a range of occupiers with the potential to support different local services and facilities and infrastructure where justified and appropriate.

**Objective 3 – Protect the character of villages and their settings.** Ensure that the scale, location and density of housing is well related to the form and character of existing villages, protects the historic environment, including protected landscapes, and ensures appropriate landscaping measures are delivered as part of new development.

**1.6** The VCHAP identifies Spooner Row as part of a cluster with Sutton to the north-west of the A11. Of the two settlements the greater built form, and range of services, are to the south-east at Spooner Row.

**1.7** We believe that the draft VCHAP is basically sound, as the strategy proposed is essentially justified and effective and provides a range of sites by which growth can come forward. The site to the south of Station Road in Spooner Row, offers a very good opportunity to deliver growth in a manner that provides an appropriate to the sustainable objectives of the emerging VCHAP and NPPF. By undertaking this form of development on this site in a sustainable manner it would support the emerging VCHAP.

## 2. Comments on the proposed strategy

### *Justified*

**2.1** The NPPF indicates that, to be justified, a Plan should set an appropriate strategy based on robust and credible evidence, with suitable consideration given to reasonable alternatives. It is considered that the proposed strategy is compatible with the overall purpose of the plan, in particular, the delivery of sustainable development which meets the challenges of climate change and supports ambitious local and national targets for carbon neutrality. The proposed distribution of growth is considered to be basically correct and suitably forward thinking to facilitate the transition to a post-carbon economy, and the emergence of the region as the UK leader in clean growth. In particular, we believe the proposed strategy is considered suitable to deliver beautiful places or spaces.

**2.2** The NPPF also seeks to promote sustainable development in rural areas to maintain the vitality of rural communities and allow them to grow and thrive (para 79). We consider, therefore, that the strategy for the VCHAP should focus on delivering a range of opportunities for development that will connect and enhance existing local services and access areas of open space and access to the countryside.

**2.3** In order to significantly reduce travel by way of private vehicles, and therefore emissions, a place-based approach is essential (RTPI, Net Zero Transport: The role of spatial planning and place-based solutions (2021) page 2). This would further provide a catalyst for better placemaking in order to deliver healthier, happier, and more resilient communities. The RTPI report echoes the Building Better, Building Beautiful Commission in their assertion that creating walkable neighbourhoods is key, stating that the “20 minute neighbourhood” concept is one of the key foundations upon which net zero transport networks can be built.

**2.4** As previously referred to in earlier representations, Spooner Row is a nucleated village and the site benefits from accessibility to a range of shops, services, and community facilities. The site is adjacent to a primary school and Spooner Row has a frequent bus service but also accommodates a public house, village hall and train station on the Norwich to Cambridge line. As also suggested in the assessment a development of this scale presents the opportunity to deliver services including expansion of the existing school and local services and facilities in the form of a local shop / local centre or potential employment. The potential for employment creates a key opportunity just off the A11 and within the Cambridge to Norwich Tech Corridor.

**2.5** Proximity to the A11 and larger settlements including Attleborough, Wymondham and Norwich should also be factored into the assessment, reflecting modern-day connectivity and movement of

the population. The provision of broadband and the use of home delivery for shopping, should also be a consideration. Spooner Row is well served by Broadband, which is a key opportunity for both residential and employment development.

**2.6** In order to meet climate change targets, housing need, and support sustainable employment and economic growth, more is required than delivering housing units. Rather, the focus is shifted to the creation of beautiful places and vibrant, resilient communities. Residential development on this site can deliver a range of housing opportunities as well as significantly contribute to the green infrastructure and enhance the ecological value of the area.

**2.7** The creation of a residential development on this site would assist a modal shift from car reliance to walking and cycling through the creation of truly walkable neighbourhood. It would provide a suitable option for development now and represents the most effective way to significantly reduce transport emissions, and to create truly beautiful places and spaces. By creating a neighbourhood predicated on a green infrastructure network, supported by public transport links (including bus and train) it would ensure that walking and cycling form the primary modes of transport throughout the settlement, therefore, significantly reducing transport emissions whilst creating beautiful spaces.

### *Effective*

**2.8** In order to be considered effective, the NPPF states that the proposed strategy should be deliverable over the plan period. We believe with a suitably designed scheme, which recognises the constraints of the site could be delivered in such a way as to minimise landscape harm with the ecological and recreational benefits it potentially would bring. The site is deliverable as it is available now and has a realistic prospect of delivering housing within five years.

**2.9** The site is being advanced by a local builder/developer who is keen to deliver residential development and construct this site. There are no significant physical constraints to the development of the site, and we remain confident that this site can deliver housing units early in the lifetime of the Plan.

**2.10** Demonstrating deliverability is fundamental to achieving a sustainable, well-planned development. As has been evidenced with Local Plans across the country, proposed allocations, particularly those for large-scale housing, can falter where it is considered that sufficient work has not been undertaken to robustly demonstrate their viability or deliverability. In order to provide an effective strategy that would deliver the requisite housing within the plan period to meet local needs, it is considered necessary to provide a range of sites to create a number of outlets for growth to ensure growth is achieved through the Plan period.

**2.11** This site is being promoted by a locally based developer who has a track-record of delivering housing development in the area and can develop appropriate, green-led proposals for the site. The proposal site is within a single landownership, as a result there would be no disputes regarding which elements of the development come forward first, no time-consuming discussions around equalisation, and no negotiations over the distribution of infrastructure cost, all of which can cause significant delay and even permanently stall projects.

**2.12** We currently have an outline planning application for the site (Council Ref: 2018/2071), which addresses a significant number of the issues raised by the emerging policy including; flooding and drainage; design; contamination; landscaping; and highways. We do not believe there are any serious obstacles in delivering this site and we have had a positive response from officers at the District Council. Attached as an appendix to these representations is an amended indicative layout that illustrates the proposed development which has been submitted as part of the current planning application.

### 3. Proposed amendments to Policy

**3.1** We wish to see the following changes to the wording of the policy (for ease of reference the replacement wording is highlighted in yellow below) :

#### Policy VC SP02: South of Station Road

1.67ha of land is allocated for **at least** 25 dwellings.

The developer of the site will be required to ensure that:

- Access from Station Road only with off-site highways works to include a pedestrian footpath along the site frontage **or within the site** and a crossing point to connect to Spooner Row Primary School;
- Protection and enhancement of the trees and hedgerows on the east and west site boundaries and an appropriate boundary to the south of the site, which both contains the site and integrates it with the wider rural landscape;
- Site Layout and design to include linear development facing Station Road frontage.

**3.2** We are seeking amendments to the policy as we believe they are necessary for the development of the site. Whilst we appreciate that a calculation has been made in terms of the number of units on the site, in our experience the number of units can vary according to the manner in which it is undertaken. We would, therefore, seek to amend the wording to include 'at least'.

**3.3** We also seek the option of providing a footpath link through the site rather than along the site frontage in order to preserve as much of the frontage hedge as possible.

### 4. Conclusions

**4.1** The VCHAP in its current form is considered to be sound as the strategy adequately delivers on the overall purpose of the plan in providing a range of development, in particular addressing the challenges of climate change and supporting ambitious local and national targets for carbon neutrality. We would support the distribution of growth insofar as it seeks to support the rural communities and sustain them for the foreseeable future and facilitate the transition to a post-carbon economy or to create truly beautiful places or spaces. The draft VCHAP recognises the need to deal with the challenges of climate change and carbon neutrality and adapt accordingly, and this is supported.

**4.2** The proposed development would make a positive contribution to the provision of market and affordable housing in the area. The proposal would also add to the range of housing sites available in the locality, providing flexibility and a wider choice of development opportunities to the market, and thus strengthening the local supply of housing land. By providing sufficient land of the right type in the right place to support growth, the development would address the economic dimension of sustainable development, as defined in the NPPF.

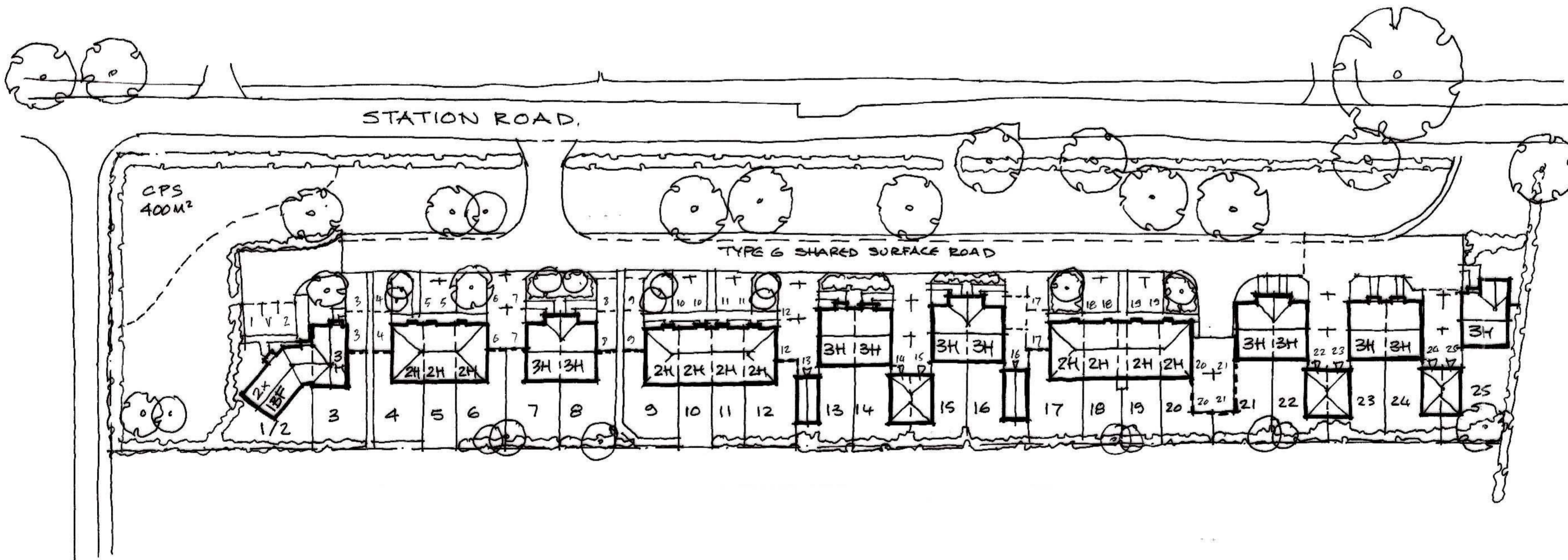
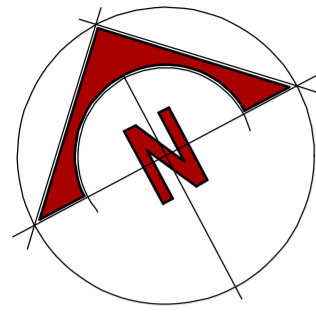
**4.3** Alfred Charles Homes are a respected local developer, currently delivering schemes in Watton and Ickburgh. Their high-quality designs and attention to detail result in exquisite homes, which pay homage to the local character whilst creating their own identity. Alfred Charles Homes are keen to develop this site as soon as possible in order to meet local needs and demand, should the site be allocated then the development could be delivered quickly.

**4.4** We consider this form of development that is part of the draft allocation for this village, led by the green credentials of the locality would result in tangible benefits for the community and provide housing in a holistic and sustainable way in order to create a vibrant and resilient community and support the move to a post-carbon economy. Government has recognised the role that residential

development can have in achieving sustainability and creating communities, where there is no choice between quality and quantity and green spaces amount to more than token verges and squares.

## **Appendix 1**

**Indicative layout that illustrates the proposed development which has been submitted as part of the current planning application**



Plots 1-8 to be affordable.

**NOTES**

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Drawing subject to planning and drainage strategy.  
 Sketch subject to detailed topographic survey.

**REVISIONS**

REV	DATE
A	15.07.21
Revised to clients comments.	

CLIENT:  
 ALFRED CHARLES HOMES

PROJECT:  
 RESIDENTIAL DEVELOPMENT,  
 STATION ROAD,  
 SPOONER ROW,  
 NORFOLK.

DRAWING TITLE:  
 PROPOSED SITE LAYOUT

DRAWING STATUS:  
 For Comment

SCALES - 1:500 @ A2      DATE - JULY 2021



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