



Land at Bunwell Road, Spooner Row (Draft housing site SPO1)

**Draft South Norfolk Village Clusters Housing Allocations Plan
Alternative Site & Focused Changes (Reg. 18) Consultation**

Representations on behalf of KCS Development Ltd

On behalf of **KCS Development**



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1 Introduction

- 1.1.1 These representations are submitted, on behalf of KCS Development, to the Draft Village Clusters Housing Allocations Plan ('VCHAP') 'Alternative Site & Focused Changes'.
- 1.1.2 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. Previous representations set out the context for the site and of Spooner Row, and outlined the benefits of development in this sustainable location. These points remain relevant but are not repeated in this latest representation.
- 1.1.3 Since the previous VCHAP consultations the site has been subject to ongoing positive discussions with the local planning authority, including a pre-application response which confirms the intention to allocate the site and that there are no major technical matters to address. The latest proposed layout (as submitted alongside these representations) has been reviewed and updated in line with technical consultee comments and officer advice received through the pre-application process. An Outline planning application will be submitted based on this agreed layout and technical parameters.
- 1.1.4 KCS has consistently supported the principle of new housing on the site, albeit previous representations have been clear that the site can deliver a larger development than proposed in the previous draft plans. We welcome the proposed changes in this latest consultation.
- 1.1.5 The latest consultation proposes a larger allocation area and increased number of units, from 15 unit in the previous Draft Plan to 35 units in this focussed consultation. KCS fully supports the entirely sound allocation of this site for housing and specifically supports the larger allocation area. However, the site could readily accommodate up to 45 homes to meet local needs, as shown in the latest layout, and this should be reflected in the allocation.
- 1.1.6 The 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, further highway improvements (such as footpath links), and improvement to the existing watercourse. A larger development can provide measurable benefits for the community, and is deliverable.
- 1.1.7 The draft plan and supporting evidence demonstrate Spooner Row is a sustainable settlement, and the site is a sustainable location for growth both within Spooner Row and the wider area. It is entirely logical to allocate this site, and the scale and location of the allocation are entirely in accordance with the overall aims of the plan.
- 1.1.8 Importantly, unlike many other sites in the South Norfolk (and Greater Norwich) area, Nutrient Neutrality does not present an obstacle to development as there are opportunities for onsite mitigation which can also provide additional nutrient credits for other sites in the area. Nutrient Neutrality would be demonstrated through future planning application(s) at the site.
- 1.1.9 It is entirely correct for the council to conclude a larger development can be delivered in line with the draft plan aspirations.

2 Comments on the Draft Plan

2.1 Draft Plan evidence base comments

- 2.1.1 The Draft Plan evidence base recognises the site as a sustainable location, and that Spooner Row is a sustainable settlement.

Sustainability Appraisal

- 2.1.2 The Interim Sustainability Appraisal re-confirms the conclusions of the previous Sustainability Appraisal, and confirms:

‘Spooner Row stands-out on account of rail connectivity, albeit there is a very limited service, and there is not thought to be any potential for an improved service, in the context of the current plan. The village is also close to the A11, but regular bus services do not pass through the village.’ The report also flagged Spooner Row as: “... one example of a village where the potential for higher growth to consolidate the built form, and potentially deliver-on place-making objectives, might be envisaged. However, this is highly uncertain, as there is a need to give weight to protecting the existing character...”

- 2.1.3 We welcome these continued conclusions that Spooner Row, and the site, are sustainable.

Site specific technical considerations

- 2.1.4 The Council's further 'Updated Site Assessments for Consultation Sites' concludes the site is suitable, available, achievable and deliverable. We agree with these conclusions.
- 2.1.5 The site is not subject to any 'absolute constraints' as listed in the Site Assessment and the development area is free of any notable constraints.
- 2.1.6 The Site Assessment scores each site with a Red / Amber / Green scoring against a range of technical and site specific matters. The site has no 'Red' scores, with the 'Amber' scores being where potential mitigation is required. However, the required mitigation is considered to be entirely proportionate and deliverable for a site of this nature.
- 2.1.7 Amber scored criteria, and the developer response are noted below.

'Amber' technical matter	Consultee comment	Developer response
Site access (including transport and roads)	<p>Highways</p> <p>Site access subject to improvements to continuous frontage footway (2m wide) to connect with existing facilities, carriageway widening, extension of local speed limit and review of associated gateway features.</p> <p>2 points of access onto Bunwell Road.</p> <p>Removal of all / most of existing frontage hedge likely. Footway improvements likely around junction with Station Road.</p>	<p>Proposed access arrangements and design have been agreed in principle with the local highways authority, which incorporates the highway officer comments on matters such as 2 points of access to Bunwell Road and footway improvements.</p> <p>Hedgerow loss will be minimised, and offset by new hedgerows within the site and elsewhere on Bunwell Road.</p>

Accessibility	Distance to Spooner Row Primary School 540 metres Distance to bus service or railway station 390 metres	The site is within reasonable walking distance of local services, and the proposed development can improve access along Bunwell Road by providing new footways.
Utilities	Sewerage network is likely to require upgrades	A dedicated foul treatment plant can be provided on site, which means there will be no additional pressure on the sewerage network.
Flood risk	North-eastern part in flood zones 2 and 3a, with surface water flood risk along entire length of highway past site.	The proposed layout shows the areas of Flood Zones 2 and 3 are outside the main developable area. Furthermore, the development will improve the existing watercourse and provide a wetland and flood storage area which provide an overall betterment.
Landscape	Development would relate to existing settlement in landscape. No loss of high grade agricultural land. Landscape officer comments: Short length of hedgerow; relatively open site; could achieve something to complement dwellings on the opposite side of Bunwell Road.	The site is not in a protected landscape area and there are only very limited immediate/local views of the site. It is not constrained in visual impact terms. A landscape led approach has been taken to the site, and the layout shows extensive areas of green space and landscaping. Additional hedgerows are proposed, including on Bunwell Road. The overall design and landscaping approach would complement the existing adjacent development.
Townscape	Senior Heritage Officer comments: Within existing mixed pattern of development. Mix of linear and (new) estate development. Large area and will make the settlement more clustered – however there is an argument 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.	We consider a ‘Green’ rating is more appropriate in this instance as there will be no adverse impact on townscape. The Heritage & Design Officer comments are noted and we also conclude there are notable benefits from some clustering of development. Publicly accessible space and walking routes are provided within the site, along with formal and informal play space, which can benefit the settlement as a whole.
Heritage	Grade II listed house to south of site	The development will have no adverse effect on the setting of adjacent listed buildings or other heritage assets. A Heritage Assessment will be submitted with future planning application(s).
On-site / off-site improvements required?	Footway improvements, carriageway widening, extension of speed limit and review of associated gateway features would be required by highway authority.	As noted above, these improvements can be delivered as part of the development. Many of the principles have been agreed with key consultees.
Viability	Promoter has stated affordable housing will be provided but confirmation of viability for a smaller site than they are promoting would be required	The site is currently viable.

Table 2.1 – Technical responses to ‘Amber’ ratings

- 2.1.8 We have not commented against 'Green' scores as further mitigation is not necessary.
- 2.1.9 It should also be noted that, unlike many other sites in the South Norfolk (and Greater Norwich) area, Nutrient Neutrality does not present an obstacle to development. There are opportunities for onsite mitigation within the land to the north which can also provide additional nutrient credits for other sites in the area.
- 2.1.10 Additionally, the site has been subject to positive discussions with the local planning authority in which the principle of development was agreed and it was confirmed there are no insurmountable technical constraints. An updated proposed site plan, which is submitted with this representation and will inform a forthcoming planning application, responds to officer advice received at pre-application stage.

2.2 Draft Plan comments

- 2.2.1 KCS support the allocation of the site for housing and in particular support the principle of a larger allocation which takes in the entire developable area. However, the site can accommodate approximately 45 units (rather than 35 units as proposed in the draft plan).
- 2.2.2 The quantum proposed in the draft policy would result in an inefficient use of a sustainable site, and a development of approximately 45 units could be delivered whilst still mitigating perceived technical constraints. Therefore, the draft site specific policy should recognise that approximately 45 dwellings can be delivered.
- 2.2.3 A larger development would not require additional land, i.e., the 45 units can be comfortably delivered at an appropriate density within the larger proposed allocation area. As such, a larger development would not expand the developable area and would be entirely in accordance with the emerging plan evidence base and would not change the overall evidence base conclusions in respect of the suitability of the site.
- 2.2.4 The reasoned justification for the site concludes:

'During the Regulation 19 publication, a larger site continued to be promoted for a higher number/density than was being supported by the Council. Whilst the promoted numbers were considered to be quite high due to the relatively limited services available in the area, as well as raising potential landscape and townscape concerns, the Council considers that a smaller increase in numbers would be appropriate and would result in a more effective use of land on a relatively well contained site. An area to the north of the site would remain outside of the allocation, due to the identified flood risk here and would help maintain the separation between groups of buildings, which is characteristic of Spooner Row.'
- 2.2.5 We agree that a larger development would result in a more efficient use of a well contained site. This conclusion applies equally to a development of 45 units, meaning it is entirely reasonable to allocate the site accordingly.
- 2.2.6 A larger allocation would make best use of the site. In turn it would deliver additional homes which meet local need and provides further resilience and flexibility to the housing land supply position for the authority.
- 2.2.7 The recent pre-application advice and forthcoming planning application demonstrate that a larger allocation of 45 dwellings is entirely sound, appropriate and deliverable.

2.3 Summary

- 2.3.1 The larger allocation of the site is entirely logical and can support sustainable growth in Spooner Row which will support the long-term vitality of the settlement.
- 2.3.2 KCS supports this larger allocation, as proposed in the Regulation 18 Consultation on Alternative Sites and Focused Changes, however the site is capable of accommodating approximately 45 units rather than the 35 units proposed in the allocation.
- 2.3.3 Recent pre-application advice has confirmed there are no insurmountable technical matters, that the principle of development on the site is agreed, and that a larger development could be reasonably justified.

3 Conclusions

- 3.1.1 These representations on behalf of KCS Development comment on the draft South Norfolk Village Clusters Housing Allocations Plan Regulation 18 Consultation on Alternative Sites and Focused Changes.
- 3.1.2 KCS is promoting land west of Bunwell Road (VCHAP site SPO1) and 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.
- 3.1.3 Since the previous VCHAP consultations the site has been subject to positive discussions with the local planning authority, including a pre-application response which confirms the intention to allocate the site and that there are no major technical matters to address. The latest proposed layout (as submitted alongside these representations) has been reviewed and updated in line with technical consultee comments and officer advice received through the pre-application process. An Outline planning application will be submitted based on this agreed layout and technical parameters.
- 3.1.4 KCS continues to support the proposed allocation of the site, and the principle of an allocation is entirely sound. In particular, KCS welcomes the larger allocation as proposed in this latest consultation. However, we conclude the site is suitable for approximately 45 dwellings rather than the 35 dwellings as proposed in the revised plan.
- 3.1.5 Importantly, unlike many other sites in the South Norfolk (and Greater Norwich) area, Nutrient Neutrality does not present an obstacle to development as there are opportunities for onsite mitigation which can also provide additional nutrient credits for other sites in the area.
- 3.1.6 The site is unconstrained and any matters can be addressed through largely typical design changes or technical reports. For example, access works can be accommodated and as a further benefit the proposed layout can improve pedestrian accessibility with new walking routes and footways.
- 3.1.7 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.
- 3.1.8 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. It is entirely logical to allocate this site, and the scale and location of the allocation are entirely in accordance with the overall aims of the plan.
- 3.1.9 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.