



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

**South Norfolk Village Clusters Housing Allocations Plan  
Regulation 19 Pre-Submission Addendum Consultation**

**Representations on behalf of KCS Development Ltd**

On behalf of **KCS Development**



## Document Control Sheet

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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') 'Regulation 19 Pre-Submission Addendum'.
- 1.1.2 KCS is promoting land west of Bunwell Road, Spooner Row (VCHAP site SPO1) which is one of the larger allocations in the plan and therefore has a keen interest in the delivery of a sound 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 representation, although the latest planning position regarding the site is set out in the following sections.
- 1.1.3 The site benefits from a current Outline planning application for 45 dwellings which shows how that quantum of development could be comfortably delivered alongside all necessary infrastructure (application 2024/0879). A range of consultee comments have been received on the application, with the development layout and technical details being updated in line with these comments and officer advice. The planning application, and progress made to date, demonstrates all perceived technical constraints can be overcome.
- 1.1.4 The site has also been consistently promoted through the Draft VCHAP, and the emerging plan continues to support the principle of development on the site. Notably, the VCHAP '*Alternative Sites and Focused Changes*' consultation in early 2024 increased the proposed SPO1 allocation from 15 to 35 dwellings, in response to changes in housing need and to reflect previous KCS representations.
- 1.1.5 We continue to support the principle of the allocation but considered the site could deliver approximately 45 dwellings, for the reasons set out in these and previous representations.
- 1.1.6 A larger, 45 home, allocation can deliver a wider range of benefits to the village such as more extensive open space, additional affordable housing, further highway improvements (such as footpath links), wider flood risk mitigation, and improvements to the existing watercourse flow. A larger development can provide measurable benefits for the community, and is deliverable.
- 1.1.7 The pre-submission 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 the Greater Norwich area), Nutrient Neutrality is not an obstacle to development as there are opportunities for onsite nutrient mitigation which can also provide additional 'nutrient credits' which can help unlock other sites in the area.
- 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 Site context

### 2.1 Introduction

- 2.1.1 The Site has been extensively promoted, initially through the emerging Local Plan and now through an Outline planning application submitted in March 2024.
- 2.1.2 The site is sustainably located and the developable area is unconstrained. There are no Listed Buildings or Scheduled Monuments located on the site and the site is not within a Conservation Area, nor is the developable area subject to other environmental designations (noting the adjacent areas of flood zones 2 and 3 which are within the site but outside of the developable area). There are no Public Rights of Way on or adjacent to the site.
- 2.1.3 Although the site is within a defined nutrient neutrality area and catchment (of the River Yare), the proposals can demonstrate nutrient neutrality meaning it is not a constraint on development. Indeed, the potential wetland within the site can generate surplus nutrient credits which could unlock other stalled development sites.

### 2.2 Local Plan promotion

- 2.2.1 The site has consistently been promoted to the various stages of the emerging Local Plan. The various consultations are set out below alongside the site allocation details:
- VCHAP Regulation 18 Draft Plan (August 2021). The southern portion of the site was allocated in this plan under reference SN0444 for up to 15 dwellings. KCS's representations outlined the allocation should be increased in size and number.
  - VCHAP Regulation 19 Pre-Submission Draft (March 2023). The southern portion of the site was allocated for 15 dwellings. KCS's representations again outlined the allocation should be increased in size and number.
  - VCHAP Regulation 18 Consultation on Alternative Sites and Focussed Changes (December 2023). The site size and number of units allocation included at the site for 35 dwellings under reference VC SPO1 REV. KCS's representations confirmed support for the extended allocation but outlined that the site had scope to accommodate 45 dwellings.
- 2.2.2 The above demonstrates that the principle of development at the site has been supported by the council and this now includes a larger allocation on the site.

### 2.3 Planning application

- 2.3.1 The Outline planning application for up to 45 dwellings was submitted in March 2024 (reference 2024/0879) and is subject to ongoing and positive discussions with the council.
- 2.3.2 Details of matters of access, layout, and landscaping were submitted for approval, meaning only scale and appearance remain for future Reserved Matters. The application therefore includes various technical matters including the means of access, new cycle and footpaths, drainage infrastructure and layout, public open space, play space, green infrastructure, nutrient neutrality options, and associated landscaping.

- 2.3.3 It is therefore an 'informed' Outline planning application whereby a greater level of detail is provided to give the local planning authority further certainty on these key matters.
- 2.3.4 The planning application was informed by detailed pre-application discussions with the council and stakeholders and the submitted details reflect the pre-application advice provided by the council. Furthermore, public consultation was undertaken and involved liaison with Spooner, Sutton and Wattlefield Community Council as well as consultation with local residents. Additionally, local representatives are provided with regular progress updates and the community council have been made aware of the planning application.
- 2.3.5 Overall, the proposed development has been subject to detailed pre-application discussions with South Norfolk Council, stakeholders, and local residents. These discussions shaped the finalised proposals resulting in a high-quality development.
- 2.3.6 Further, in the post-submission stage of the outline application, a variety of consultee comments have been received which raise no insurmountable issues and provide positive feedback on layout and design matters.
- 2.3.7 The ongoing Outline application demonstrates the site is entirely suitable and deliverable, and can make a meaningful contribution to the council's immediate housing land supply. There are no insurmountable technical constraints, and a high quality development can be delivered.

## 3 Comments on the Draft Plan

### 3.1 Draft Plan evidence base comments

- 3.1.1 The Draft Plan evidence base continues to recognise the site as a sustainable location, and that Spooner Row is a sustainable settlement. We welcome these continued conclusions which show the site to be an entirely logical location for growth.

#### Sustainability Appraisal

- 3.1.2 The updated 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 of the settlement...”*

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

#### Site specific technical considerations

- 3.1.4 As part of the evidence base, an updated Site Assessments document for the latest Regulation 19 Pre-submission Addendum is provided. There are no changes to the Site Assessment of SPO1, and we agree with the continued robust conclusions that the site is suitable, available, achievable and deliverable.
- 3.1.5 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.
- 3.1.6 The Site Assessment scores each site with a Red / Amber / Green scoring against a range of technical and site specific matters, based on the methodology within the Norfolk Housing and Economic Land Availability Assessment. Within the Assessment, ‘Red’ ratings refer to absolute constraints where sites would be discounted, ‘Amber’ ratings where constraints require mitigation, and ‘Green’ where there are no expected impacts. The site has no ‘Red’ ratings, with the ‘Amber’ ratings showing where potential mitigation is required. The suggested mitigation relevant to SPO1 is considered to be entirely proportionate and deliverable for a site of this nature.
- 3.1.7 Amber ratings, and the developer response are noted below.

<b>‘Amber’ technical matter</b>	<b>Consultee comment</b>	<b>Developer response</b>
<b>Site access (including</b>	<b>Highways</b> Site access subject to improvements to continuous frontage footway (2m wide)	Proposed access arrangements and design have been agreed in principle with the local highways authority, which incorporates the highway officer



<b>transport and roads)</b>	<p>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>comments on matters such as access to Bunwell Road and footway improvements. The site can be served from a single main point of access, with a secondary access to properties along Bunwell Road to soften the site entrance and create a linear development frontage.</p> <p>Hedgerow loss will be minimised, and offset by new hedgerows within the site and elsewhere on Bunwell Road.</p>
<b>Accessibility</b>	<p>Distance to Spooner Row Primary School 540 metres</p> <p>Distance to bus service or railway station 390 metres</p>	<p>The site is within reasonable walking distance of local services, and the proposed development can improve access along Bunwell Road by providing new footways.</p>
<b>Utilities</b>	<p>Sewerage network is likely to require upgrades</p>	<p>A foul treatment plant can be provided on site, meaning there will be no additional pressure on the sewerage network.</p>
<b>Flood risk and drainage</b>	<p>North-eastern part in flood zones 2 and 3a, with surface water flood risk along entire length of highway past site.</p>	<p>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 land drains whilst also providing a wetland and flood storage area which provide an overall betterment.</p> <p>Further detailed drainage work is ongoing, with the scope of work having been agreed with the LLFA and LPA.</p>
<b>Landscape</b>	<p>Development would relate to existing settlement in landscape. No loss of high grade agricultural land.</p> <p><b>Landscape officer comments:</b></p> <p>Short length of hedgerow; relatively open site; could achieve something to complement dwellings on the opposite side of Bunwell Road.</p>	<p>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.</p> <p>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.</p> <p>The overall design and landscaping approach would complement the existing adjacent development.</p> <p>Landscape Officer comments on the current planning application concur with the above and accept the landscape scheme as acceptable.</p>
<b>Townscape</b>	<p><b>Senior Heritage Officer comments:</b></p> <p>Within existing mixed pattern of development. Mix of linear and (new) estate development.</p> <p>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</p>	<p>A 'Green' rating is more appropriate as there is no adverse impact on townscape.</p> <p>The Heritage &amp; Design Officer comments are noted and we also conclude there are notable benefits from clustering of development in the village.</p> <p>Publicly accessible green and open space and walking routes are provided within the site, along with formal and informal play space, which can benefit the settlement as a whole.</p>

	provide a useful sized public space to also serve existing housing.	There are no Heritage Officer objections on the current application, and recent comments note the development and proposed landscaping and screening is acceptable.
<b>Heritage</b>	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 Statement and Geophysical Survey has been submitted with the application.  There is no Heritage Officer objection on the current planning application, and the comments note that the development and screening is acceptable.
<b>On-site / off-site improvements required?</b>	Footway improvements, carriageway widening, extension of speed limit and review of associated gateway features would be required by highway authority.	These improvements can be delivered as part of the development. Many of the principles have been agreed with key consultees.
<b>Viability</b>	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 viable.

Table 2.1 – Technical responses to ‘Amber’ ratings

3.1.8 We have not commented against ‘Green’ scores as further mitigation is not necessary.

### Benefits of development summary

3.1.9 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.

3.1.10 Furthermore, the latest Sustainability Appraisal (June 2024) again outlines that Spooner Row has higher growth opportunities due to the settlement having a train station. This reinforces the benefits of development in the village and particularly this site, which can provide a genuinely sustainable and accessible solution to meeting local needs.

3.1.11 Additionally, the site has been subject to positive pre-application discussions with the local planning authority in which the principle of development was agreed and it was confirmed there are no insurmountable technical constraints. And the current Outline planning application further reinforces that this is a suitable and deliverable site.

3.1.12 KCS consider that the site can accommodate more dwellings, and this is supported by the consultee comments received on the current planning application which do not raise objections or concerns with a 45 unit development.

## 3.2 Draft Plan comments

3.2.1 KCS support the allocation of the site for housing and in particular the principle of a larger allocation which takes in the entire developable area. However, the developable area of the

site can accommodate approximately 45 units (rather than 35 units as proposed in the draft plan) and the plan should be updated accordingly.

3.2.2 The reasoned justification for the site in the previous Alternative Sites consultation concluded:

*‘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.’*

3.2.3 The quantum proposed in the draft policy (35 units) would still result in an inefficient use of a sustainable site, whereas a development of approximately 45 units could be delivered and make a more efficient use of available land. This is acknowledged in the evidence base, specifically the Sustainability Appraisal. Therefore, the draft site specific policy should recognise that approximately 45 dwellings can be delivered.

3.2.4 A larger development would not require additional land, i.e., the 45 units can be comfortably delivered at an appropriate density within the same 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.

3.2.5 Hence it is welcomed that a larger allocation has been carried forward to the Regulation 19 Pre-submission Addendum and 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.

3.2.6 Furthermore, the red line of the allocation should be expanded to include the adjacent areas of higher flood risk to the north-east of the site. Mitigation methods on this land can then be used within the allocation red line to aid with the nutrient neutrality credentials of the site and surrounding area alongside flood risk mitigation.

3.2.7 The pre-application advice request and recently submitted planning application demonstrates that a larger allocation of 45 dwellings is entirely sound, appropriate and deliverable.

### 3.3 Summary

3.3.1 The larger allocation of the site is entirely logical and can support sustainable growth in Spooner Row which in turn will support the long-term vitality of the settlement.

3.3.2 KCS supports a larger allocation, as proposed in the Regulation 19 Pre-Submission Consultation, however the site is capable of accommodating approximately 45 units rather than the 35 units proposed in the allocation.

3.3.3 Pre-application advice and recent consultee comments on the planning application have 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.

## 4 Conclusions

- 4.1.1 These representations on behalf of KCS Development comment on the Village Clusters Housing Allocations Plan ('VCHAP') 'Regulation 19 Pre-Submission Addendum'.
- 4.1.2 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.
- 4.1.3 Since the previous VCHAP Regulation 18 consultation an Outline planning application has been submitted at the site which has garnered a positive response from the Council alongside no insurmountable technical constraints being raised. The layout submitted has taken into account previous feedback from the Council and technical consultees.
- 4.1.4 KCS continues to support the proposed allocation of the site, and the principle of an allocation is entirely sound. In particular, KCS welcomes a 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. Further, the red line of the allocation boundary should be extended north-eastwards in line with the Outline application submitted, as even though the built development will not extend into the high flood risk areas, the inclusion of the north-eastern portion would bring areas for flood risk and nutrient neutrality mitigation fully within the allocation boundary.
- 4.1.5 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.
- 4.1.6 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.
- 4.1.7 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.
- 4.1.8 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 Sustainability Appraisal is clear that settlements such as Spooner Row can accommodate growth and also that the site can sustainably deliver a greater number of homes than is currently planned.
- 4.1.9 It is entirely logical to allocate this site, and an allocation of 45 homes would be entirely in accordance with the overall aims of the plan.