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Project/File: 333135051

South Norfolk Council,
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To whom it may concern,

**South Norfolk Village Clusters Housing Allocations Plan - Main Modifications
Land at Bunwell Road, Spooner Row (Residential Allocation VCSP01REVA)
Representations on behalf of KCS Development**

These representations are submitted on behalf of KCS Development to the Village Clusters Housing Allocation Plan (VCHAP) Main Modification document consultation.

Context

KCS is promoting land west of Bunwell Road, Spooner Row (VCHAP site SPO1) which is a proposed allocation. The site has a current Outline planning application for 45 dwellings and progress made to date demonstrates all perceived technical constraints can be overcome. Our client is therefore supportive of the allocation being brought forward.

The site has also been consistently promoted through the various stages of the VCHAP consultation, from Regulation 18, Regulation 19 and in Local Plan examination hearing statements.

Proposed modifications to site SPO1REVA

Following the Examination, and as agreed with the Inspector, the Council has proposed a number of modifications to allocation VCSP01REVA under Main Modification reference MM45 as shown on the proposed policies map and the site allocation policy. These modifications:

- Increase the site allocation from 35 to 45 dwellings;
- Increase the site allocation area to match the Outline planning application (i.e., including land in the flood zone proposed for landscaping and drainage works); and
- Modify the settlement boundary of Spooner Row so to include the allocation.

KCS fully supports these modifications to allocation VCSP01REVA as they ensure an efficient use of land for housing on a suitable site as well as making sure that the settlement boundary of Spooner Row incorporates a future area of built form. These modifications also reflect previous KCS representations which seek to ensure the allocation is deliverable.

Reference: Land at Bunwell Road, Spooner Row

Reference to offsite vegetation

KCS consider a further Modification should have been made relating to offsite works, as previously raised by KCS. Regarding landscaping and vegetation work, the allocation wording states the allocation will include:

- *Protection and enhancement of the existing vegetation along the south west boundary, including outside of the site itself*

The requirement for enhancement of existing vegetation on land outside of the site is questionable given the clear ownership points relating to offsite land and the ability of the applicant to undertake works on land outside of their control. The applicant would, of course, seek to ensure vegetation outside of the site is not impacted by works on the site (such as through protection measures), however, it is not reasonable to require 'enhancement' to vegetation outside of the site. Therefore, the allocation wording in relation to landscaping should be amended as follows

- *Protection ~~and enhancement~~ of the existing vegetation along the south west boundary, including outside of the site itself, in order to integrate the site with the wider landscape and to protect the significance of the setting of The Orchards to the south of the site.*

A further modification should be made for soundness.

Summary

KCS supports the modifications to allocation VCSP01REVA in relation to dwelling numbers increasing alongside the allocation site area and the inclusion of the allocation within the settlement boundary of Spooner Row. However, the allocation wording in terms of offsite vegetation enhancement should be reconsidered to ensure it can be achieved.

We trust that these representations will be fully considered. If you have any queries please do not hesitate to contact us.

Best regards,

Stantec UK Limited

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