

South Norfolk Village Clusters Housing Allocations Plan Examination

Matter C – Site SPO1REV

On behalf of KCS Development



Revision	Description	Author	Date	Quality Check	Date	Independent Review	Date



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1 Introduction

- 1.1.1 Stantec is instructed by KCS Development to submit a Hearing Statement to the South Norfolk Village Clusters Housing Allocations Plan Examination, in response to the Inspector's Matters Issues and Questions document (October 2025).
- 1.1.2 KCS Development has consistently promoted land west of Bunwell Road, Spooner Row, through various stages of the Local Plan, and the site is proposed as a housing allocation (SPO1REV) in the plan. The site benefits from an Outline planning application (2024/0879) for 45 homes, with the application being submitted in March 2024 and a positive decision anticipated in late 2025 or early 2026. The application has been subject to extensive consultation, including with technical consultees and South Norfolk Council. Through this collaborative process the main technical matters have been resolved and there is agreement on the principle of Development on all key points.
- 1.1.3 This Statement relates to the Inspector's Matter C, and provides comments on relevant questions raised. Matter C covers the allocations and settlement limits. Specifically, this statement is regarding Cluster 34 'Spooner Row and Sutton' and the 34a allocation SPO1REV, Land West of Bunwell Road, and associated settlement limits.

2 Comments on the Matter C Questions

Standard Questions for each Allocation

2.1 Question A

Has the site been allocated previously or is it a new allocation?

- 2.1.1 SPO1REV is a new allocation, in that it has not been allocated in previous local plan documents. However, it has been extensively promoted throughout the VCHAP process and has been a preferred allocation at every stage of the emerging plan process. The site was initially allocated for 15 homes, however, the allocation was increased to 35 homes at Regulation 18 consultation stage in response to changes in the sites which were considered suitable for allocation.
- 2.1.2 The site scores well and has no critical constraints as per the council's Housing & Economic Land Availability Assessment (HELAA). The council concluded the site should be allocated for 35 dwellings and has been progressed on this basis. We consider an allocation of 45 homes is more appropriate.
- 2.1.3 The proposed allocation is entirely sensible and the main developable area reflects the area proposed for allocation in the VCHAP.
- 2.1.4 Suitable site access can be achieved and flood mitigation enhancements can be delivered to benefit the site and wider area. Nutrient neutrality can be achieved and indeed the site has the potential to deliver surplus nutrient credits which could be used to offset the nutrient impact of other sites in the relevant catchment. Therefore, as concluded in the site assessment, a larger housing allocation on the site is deliverable, developable and achievable.

2.2 Question B

Does the site have planning permission and/or are there current applications under consideration?

- 2.2.1 The site is subject to an Outline planning application for 45 homes and associated works (reference 2024/0879), with the proposed access, layout, and landscaping having been submitted for approval. This 'informed' Outline planning application was submitted in March 2024 and is approaching a positive decision with all technical matters having been agreed in principle.
- 2.2.2 Comments raised on the application by statutory consultees have been addressed satisfactorily. This includes points raised in relation to the layout and access as well as technical considerations. The only remaining matters are; (1) a very minor point regarding the drainage assessment calculations, and (2) detail regarding the wetland design to deliver nutrient neutrality.
- 2.2.3 Therefore, a compliant and viable scheme can be delivered.

2.3 Question C

What is the land currently used for, what is the ownership position and is the site currently being promoted by a developer? Are there any site occupiers/leaseholders who would be affected, if so how?

- 2.3.1 The site currently comprises agricultural land located within the general built form of Spooner Row. KCS Development is under option and currently promoting the site on behalf of the landowner. There are also no legal constraints.
- 2.3.2 There are no agricultural tenants on site that would be affected by proposals.

2.4 Question D

Is the site sustainably located in relation to village services and facilities? Where is the nearest (a) primary school (b) convenience shop (c) village hall (d) recreation ground (e) other key facilities? How accessible are these for walkers and cyclists, in the case of walkers for example by continuous footways?

- 2.4.1 The site is sustainably located within walking distance to a range of facilities including the below:

Facility	Name	Distance from site
Primary school	Spooner Row Primary School	540 metres
Village hall	Spooner Row, Suton and Wattlefield Village Hall	440 metres
Pub	The Boars	100 metres
Train station	Spooner Row	390 metres

Table 2.1: Facilities within Spooner Row

- 2.4.2 These facilities are safely and easily accessible on foot and via bicycle from the site due to a footpath on Bunwell Road, and adjacent footpaths can be improved as part of the current planning application for the site.
- 2.4.3 Spooner Row train has services to Cambridge and Norwich (and intermediate stations such as Wymondham and Attleborough) as main regional scale centres. Attleborough and Wymondham train stations are also within an acceptable travel distance and provide regional and national rail links to locations including Stanstead Airport, Manchester, Liverpool, Sheffield, Nottingham and Peterborough. Spooner Row also benefits from local bus services, with additional services on the A11.
- 2.4.4 The Site is also within close proximity of the A11 which connects Norwich and Cambridge, along with wider regional and national destinations.
- 2.4.5 There are further services and amenities located in Attleborough and Wymondham located approximately 4 miles respectively to the southwest and northeast of Spooner Row. These settlements include main shops and supermarkets, civic and cultural uses, along with a variety of other services, leisure facilities shops, pubs and cafes.
- 2.4.6 Therefore, the site is a suitable and accessible place for development within Spooner Row and the settlement itself is sustainable and can accommodate housing growth.

2.5 Question E

Would the landscape and other physical impacts of the housing allocation be acceptable? Would it be acceptable in relation to the character and appearance of the area? How does it relate to the existing built-up area of the settlement? Are there any other significant constraints?

- 2.5.1 The site is a logical and contained location for growth in Spooner Row, with built development to the north, south, and east, with the field boundary to the west providing a suitable edge to the built form. Notably there is existing new build development on two sides. There are no overriding technical constraints on the site that would preclude acceptable and deliverable development coming forward.
- 2.5.2 It is an agricultural site with a largely unremarkable landscape setting and profile. It has well defined boundaries and can comfortably accommodate the proposed development.
- 2.5.3 There is an area of flood risk to the north east of the site, and the main developable area of the site is outside the flood zone. The proposed development envisages a wetland and flood storage area within the northern part of the site, and this can deliver flood mitigation enhancements, nutrient neutrality, accessible green space, recreational space, biodiversity net gain, and new publicly accessible routes. These improvements would both benefit the site and the wider area.
- 2.5.4 Nutrient mitigation is itself a significant benefit to the development, with the potential the proposed wetland can mitigate both the proposed development and create surplus nutrient neutrality credits which could be used to offset the nutrient impact of other developments in the catchment. These conclusions being set out in the Nutrient Assessment and Wetland design submitted with the planning application and reviewed by Natural England. Whilst there are remaining queries regarding the final wetland design it is agreed in principle that a wetland is both appropriate and deliverable.
- 2.5.5 The submitted application at the site shows that an acceptable scheme can be brought forward here that has been 'landscape led' and can respond to the wider context of Spooner Row. Further, it should be noted that an efficient density can be achieved on site that is in-keeping with the settlement.
- 2.5.6 There are no design, landscape, heritage, or other technical concerns, and no unresolved statutory consultee objections.

2.6 Question F

Is the access and site acceptable in highway terms?

- 2.6.1 Discussions with Norfolk County Council have refined the access design and the access has been updated to address consultee comments. It is agreed (in both the planning application and local plan site assessment) there is sufficient highways capacity and suitable pedestrian and cycle access is entirely deliverable.
- 2.6.2 Therefore, the proposed site access and highways effects are acceptable in highways terms.

2.7 Question G

Is the estimate of site capacity justified?

- 2.7.1 The VCHAP capacity of allocation SPO1REV is stated to be 35 dwellings. However, this should be a minimum figure as the site has the capacity for up to 45 dwellings, as demonstrated in the Outline

planning application. To ensure that housing numbers are met, allocation numbers should be maximised on suitable and sustainable sites.

- 2.7.2 A larger development of 45 units would have no greater adverse effects than a 35 unit development. The submitted 45 unit development as part of the planning application has an almost identical developable area to that envisaged in the emerging local plan allocation (for 35 units) meaning the only real difference between a 35 unit and 45 unit scheme is the proposed density. There would be no additional effects on the local highway, nor on local services (such as schools and GP services), similarly a larger development would not impact the appearance of the settlement or the local townscape. Further, benefits such as affordable housing and nutrient credit provision would be maximised by a larger scheme.

2.8 Question H

Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?

- 2.8.1 Our client generally concurs with the requirements set out in allocation Policy SPO1REV as being justified and consistent with national policy. However, the current dwelling number of 35 should be increased to 45 as the site has the capacity to sensitively deliver the higher number and the plan needs to ensure the efficient delivery of sites. Further, the allocation currently does not include land to the north east as this is within an area of flood risk. The allocation should expand to include this land as this would catalyse the delivery of more comprehensive flood management areas that would benefit the allocated site but also Spooner Row as a whole.
- 2.8.2 We also query the specific nature of comments and required location of the landscaping. It is stated that landscaping to the north and west is required to integrate the development with the wider countryside. However, there is built form to the north of the development and so this requirement does not make sense and is overly prescriptive.
- 2.8.3 Further, there is a requirement for the developer to protect and enhance the existing vegetation along the south west boundary, including outside the site itself. Protection can be achieved on and off site through the landscaping and construction scheme. However, enhancement outside the red line of a planning application site may not be achievable and so this should be removed from the policy.
- 2.8.4 An amended policy is below with strikethrough indicating text to be deleted and text in bold to be added to the policy:

Policy VC SPO1REV: Land west of Bunwell Road

~~2.31ha~~**3.62ha** of land is allocated for approximately ~~35~~ **45** dwellings.

*The developer of the site ~~will be required~~ **should seek** to ensure:*

- *Appropriate landscaping of the ~~north and western~~ boundaries, to contain the development and integrate it with the wider countryside,*
- *Protection ~~and enhancement~~ of the existing vegetation along the south west boundary, including outside of the site itself. **This is** 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 site-specific Flood Risk Assessment (FRA) and strategy, to inform the layout of the site, which has regard to the requirements of the Stage 2 VC Strategic Flood Risk Assessment;*
- *Early engagement with Anglian Water (AW) regarding connecting to the local water recycling network;*
- *Highway works to include improvements to the existing carriageway as well as the pedestrian footway between the site and Station Road **are considered**; and*
- *Historic Environment Record **to-be is** consulted to determine the need for any archaeological surveys prior to development*

2.8.5 The allocation site boundary should then be updated to include the full extent of the site (i.e., the developable area and the areas of flood zone to the north which form part of the development through flood mitigation and nutrient neutrality) as shown in the Outline planning application. The proposed flood mitigation, wetland, and associated works to the north of the main developable area (i.e., the area north of the draft allocation) are part of the development and should be included within the site allocation boundary and settlement limits in turn.

2.9 Question I

Would development of the site be viable, including the delivery of policy compliant affordable housing?

2.9.1 Delivery of housing at the site would be viable and a sensitive and appropriate scheme can be achieved making an efficient use of land. The submitted planning application and supporting documentation show that there are no overriding technical constraints that would preclude the development from coming forward. The submitted planning application shows that affordable housing can be delivered in a policy compliant way.

2.10 Question J

Overall, is the site deliverable within the plan period? When is development likely to commence? Has the landowner/developer confirmed this?

2.10.1 The site is deliverable within the first five years of the plan period as demonstrated in the Site Assessment update provided by KCS.

Standard Questions for Settlement Limits

2.11 Question A

Are the settlement limits proposed suitable and justified given their policy function?

2.11.1 The proposed settlement limits for Spooner Row are not suitable and are not applied consistently and so do not, in their current form, fulfil their policy function and are not justified.

2.11.2 The proposed settlement limits are inconsistent in that they include some allocations within the new settlement boundary/limits but excludes others. Sites VCSPO3 and VCSPO4 are shown within the settlement limits yet sites SPO1REV and VCSPO2 are outside of the limits. For consistency, all allocated sites should be included within the settlement limits as they should extend around built form and the proposed allocations. The settlement limit should be redrawn to include all allocated sites.

- 2.11.3 Once the allocations are delivered they will evidently form development within the village and therefore the sites which currently form these allocation should be within the settlement limits for consistency.
- 2.11.4 Regarding site SPO1REV, previous KCS representations and indeed other MIQ Hearing Statements for the examination have noted the site allocation boundary should include the land to the north of the main developable area which is within the planning application boundary but currently shown outside of the proposed allocation boundary. Therefore, the site allocation boundary should be reviewed and the settlement boundary adjusted accordingly.
- 2.11.5 The site is clearly defined on all sides and therefore including the site within the settlement boundary would be logical and justifiable.
- 2.11.6 The suggested revised settlement boundary relevant to site SPO1REV is set out below.

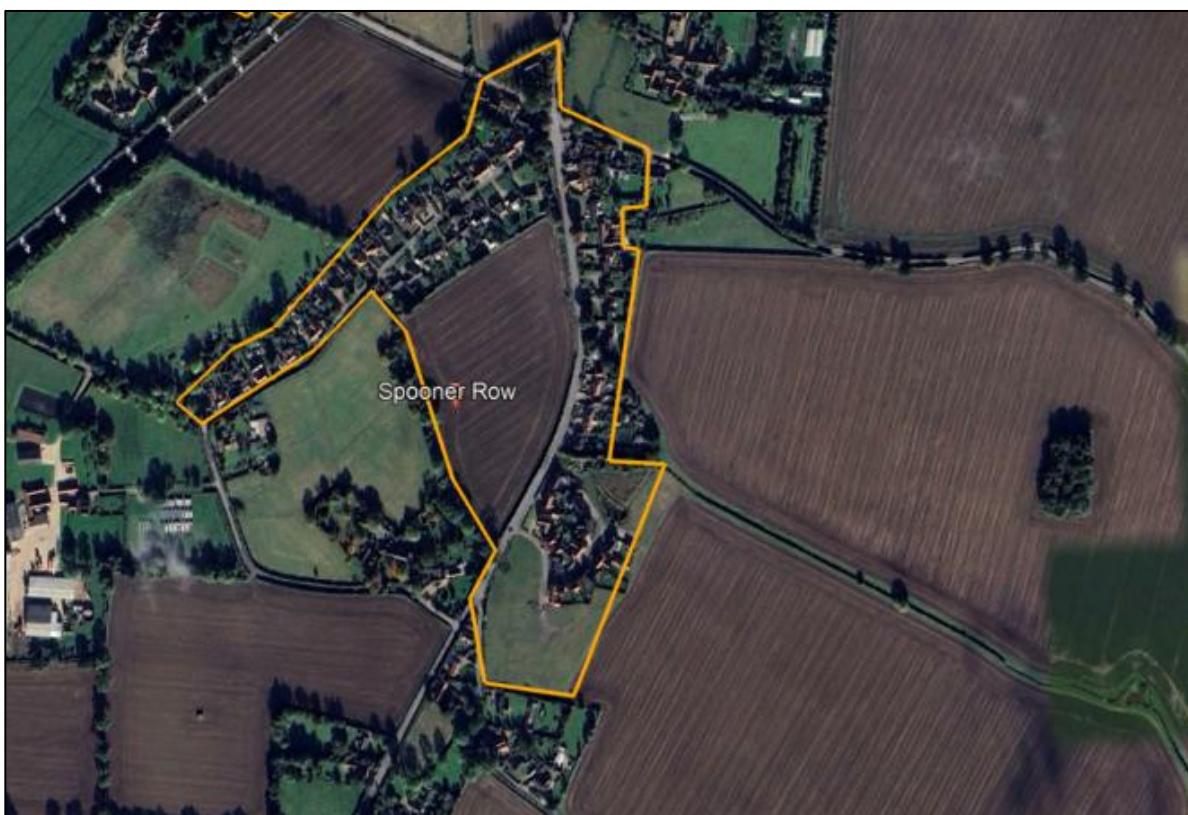


Figure 2.1: Settlement boundaries