

South Norfolk Village Clusters Housing Allocations Plan Examinations

Matter A

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 Matter A and provides comments on relevant questions raised. This Matter relates to the duty to co-operate and other legal requirements.

2 Comments on the Matter A questions

2.1 Questions 1 to 4

- 2.1.1 KCS consider these are matters for the Council, however, there are no apparent issues of soundness.

2.2 Question 5

Have the likely environmental, social and economic effects of the plan been adequately addressed in the Sustainability Appraisal? Does the appraisal test the plan against reasonable alternatives for the distribution of housing allocations amongst the clusters? How have the reasonable alternatives been identified and their merits assessed?

- 2.2.1 The Sustainability Appraisal (SA) addresses the environmental, social and economic effects of the plan. It has considered a range of options including alternative options which considered only accessibility of villages in the allocation of sites. The SA then rightly considers a wider assessment approach which reflects the range of criteria which inform the SA process, and reflects the variety of sites needed in different village clusters to ensure appropriate sites are assessed.
- 2.2.2 The preferred approach is to ensure *'a good geographic spread of new housing growth such that very locally arising housing needs are met'* and that *'it is recognised that larger sites can be better suited to ensuring delivery of a good housing mix, to include delivering a policy compliant quota of affordable housing'* (SA paragraph 6.2.60).
- 2.2.3 Furthermore, the increased housing numbers on sustainable emerging allocation sites is important in ensuring the efficient use of land and boosting housing supply. This increase of housing delivery on allocated sites picks up shortfalls from issues with a couple of previously suggested allocations, alongside new allocations coming forward.
- 2.2.4 In that context it is entirely correct that Spooner Row is identified as a sustainable and accessible settlement with opportunities for an apportionment of allocations. The settlement benefits from a railway station and frequent bus links to Wymondham and Attborough, along with a proportionate range of other facilities and services. The SA correctly recognises the role of rail infrastructure and in the case of Spooner Row concludes the railway station makes Spooner Row unique in terms of accessibility and public transport.
- 2.2.5 Overall, the SA is robust. It considers the likely effects of the plan, tests reasonable alternatives, and concludes accordingly.

2.3 Question 6

Does the Habitats Regulations Assessment identify the likely significant effects of the plan on the various European nature conservation sites and carry out the necessary appropriate assessment? In relation to the appropriate assessment of the water impacts and recreation impacts of the SNVCP, are suitable and effective mitigation measures in place? Does Natural England agree with the HRA findings?

- 2.3.1 The Council's Habitats Regulations Assessment (HRA) is a robust document which considers the effects of the plan and correctly notes the strategic level HRA which underpins the adopted Greater Norwich Local Plan. The HRA recognises that nutrient neutrality is a constraint.

- 2.3.2 The wider Greater Norwich Local Plan (GNLP) (2024) includes policy 3 which deals with nutrient neutrality and ensures that requirements surrounding it are secured through the relevant planning permissions for individual development. And the GNLP (policy 7) establishes the principle of smaller housing sites in South Norfolk being progressed through a separate allocations plan (i.e., the VCHAP). Therefore, the GNLP HRA assesses the principle of smaller sites being progressed through a separate plan and the relevant recommendations have been incorporated into the adopted plan. Notably, the relevant GNLP policies were modified during the GNLP examination process to address this particular issue. The VCHAP sits under the GNLP and in that regard the strategic matters are addressed in the GNLP, and GNLP policies will apply to all planning applications including those on sites which are identified in the VCHAP.
- 2.3.3 The nutrient impact of development set out in the VCHAP has therefore been previously considered through the GNLP plan making process and supporting nutrient neutrality evidence base. These have secured an overarching mitigation policy framework to allow development to come forward.
- 2.3.4 Policy 3 of the GNLP requires evidence to be submitted to show that mitigation has been secured to achieve nutrient neutrality. Further, the plans must cover the lifetime of the development and should be accompanied by a monitoring framework (paragraph 212). Measures include dedicated onsite mitigation or the purchasing of credits. Onsite include nature based solutions, runoff management measures, wastewater management measures and demand management measures.
- 2.3.5 Therefore, during the planning application process for any housing site within the affected nutrient neutrality areas including sites allocated in the VCHAP, a mitigation plan and Shadow HRA would be submitted in line with GNLP requirements. During the application process, Natural England should be consulted to ensure that documents and plans are satisfactory and would lead to nutrient neutrality.
- 2.3.6 Notably, there is no outstanding Natural England objection to the VCHAP.
- 2.3.7 HRA matters, and specifically nutrient neutrality, are satisfactorily addresses.