

South Norfolk Village Clusters Housing Allocations Plan Examinations

Matter B

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 B and provides comments on relevant questions raised. This Matter relates to consistency with the requirements of the GNLP, the process for allocating sites between and within clusters, and the criteria for defining settlement limits.

2 Comments on the Matter B Questions

2.1 Question 1

In general terms, does the submitted SNVCP fulfil the task envisaged by the provisions of GNLP Policy 7.4?

- 2.1.1 Greater Norwich Local Plan (GNLP) policy 7.4 sets the growth apportionment for the South Norfolk village clusters. Permitted and allocated growth in these villages clusters will account for a minimum of 3,883 homes and 9% of the total Greater Norwich figure, with an identified need to allocate a minimum of 1,200 homes through a South Norfolk specific allocations plan (i.e., the VCHAP). Locating this level of growth in village clusters aims to promote social sustainability by supporting rural life and services and to promote delivery of a variety of housing types and tenures, housing development will be supported in principle on a range of sites within the village clusters.
- 2.1.2 We consider the VCHAP fulfils the requirements of Policy 7.4. The VCHAP allocates a range of varying sized sites in various settlements and clusters. The allocated sites are sustainable and deliverable within the plan period. It is also important to note that Policy 7.4 emphasises the importance of allocations supporting rural life and services. This has translated into the emerging VCHAP as the preferred approach to allocations in areas which support and invigorate their rural services as well as placing allocations in the most accessible places.
- 2.1.3 The emerging VCHAP is deliverable and is consistent with the GNLP.

2.2 Question 4

Allocating a minimum of 1,200 dwellings over 48 clusters would suggest an average of at least 25 each. There are no allocations proposed in 11 clusters. Is this justified? Are some clusters more sustainable locations for development than others, and if so which ones, and why? Document B.11.2 states that during the GNLP process clusters were classified into red, amber and green capable of accommodating 12-20, 20-50 and 50-60 dwellings respectively. Has this classification been published and how does it compare with the allocations proposed in each cluster?

- 2.2.1 KCS support the general approach set out in the emerging plan and consider the approach is justified and will provide allocations in the most sustainable locations. Evidently some places are more sustainable than others and some villages may require additional growth to support existing services. Overall, it is vital that villages with services are supported by new development as these places often provide rural hubs for surrounding smaller villages.
- 2.2.2 Some villages should receive a higher number of dwellings than others, considering their respective sustainability and capability of accommodating housing growth. Therefore, a more nuanced approach which places new development in sustainable locations is a more sustainable approach than arbitrarily splitting dwellings equally between the village clusters.
- 2.2.3 For example, Spooner Row is in a highly sustainable cluster compared to other village clusters. This is due to the presence of a train station, good bus links and a primary school. Therefore, it is entirely sound and logical to allocate a greater amount of development in Spooner Row.

2.3 Question 5

How have sites *within* each cluster been selected in general terms? Are the selections justified by the evidence? Have the largest settlements in the cluster been prioritised? How has proximity to services and facilities e.g. primary schools, convenience shops and other facilities been taken into account?

2.3.1 The site assessment and selection for village clusters are outlined in the assessment criteria form that forms part of the evidence base for the emerging plan. This document outlines a number of criteria that each site has been given a red, amber or green score against which are listed below:

- Access to the site
- Accessibility to local services and facilities
- Utilities capacity
- Utilities infrastructure
- Better broadband for Norfolk (fibre installation progress)
- Identified ORSED cable route (to avoid these areas)
- Contamination and ground stability
- Flood risk
- Landscape
- Townscape
- Biodiversity and geodiversity
- Historic environment
- Open space transport and roads
- Neighbouring land uses
- Site visit observations
- Local plan designations
- Site ownership
- Marketing
- Timescales for development
- Evidence submitted to support site deliverability
- On-site/ off-site deliverability
- Viability of affordable housing

2.3.2 Our client generally concurs with the approach to the assessment and allocation of sites within village clusters. The assessment criteria pick up how sustainable the respective sites are and their distance to local services, if they provide an appropriate access, any plan designations and also any technical considerations on site. Further, only the assessment of sites put forward by interested parties ensures that there is impetus for the deliverability of the sites within the plan period. These are suitable criteria to gauge what the preferred sites are within the various village clusters, especially points regarding accessibility and proximity to services.

2.3.3 The assessment and its methodology of our client's site (SPO1REV) in Spooner Row is generally appropriate and it is concurred that the site, in comparison to others at the settlement, is one of the most suitable for housing development. This is given its close proximity to services and facilities and its form relating well to the existing settlement pattern.

2.4 Questions 9 and 10

Q9. Overall, subject to the outcome of the site-by-site discussion, does the plan satisfy the GNLP Policy 7.4 requirement to allocate sites for a minimum of 1,200 dwellings? Should further sites be allocated to allow for non-delivery, or does the GNLP already include sufficient flexibility in this respect?

Q10. Should it be concluded, following the site-by-site discussion, that the plan fails to allocate suitable sites for 1,200 dwellings, how should the shortfall be addressed?

2.4.1 On the face of it, the plan meets the housing requirement set out in the GNLP and it has flexibility in provision by identifying 1,330 homes in a range of settlements and on a range of types and sizes of sites, compared to a minimum requirement of 1,200 homes.

2.4.2 However, if the Inspector identified a failure to allocate suitable sites to meet the minimum requirement meaning there would be a shortfall through the VCHAP an appropriate response would be to consider whether existing allocated sites could deliver a greater number of homes. Such an approach would be both logical and sensible as it would mean the council is considering existing sites which it has already assessed as suitable allocations. It is entirely likely that some existing allocations could reasonably deliver additional new homes compared with those currently identified in the plan.

2.4.3 For example, land at Bunwell Road, Spooner Row (site VCSPO1 REV) in Spooner Row is one such site. The site has a draft allocation for 35 dwellings, and the allocation is supported in principle, however the site could deliver additional homes (potentially 45 homes) as per the current Outline planning application. Such an approach would represent an efficient use of land and would maximise existing allocated sites.

2.4.4 In the case of site VCSPO1 REV, the Outline planning application shows a development of approximately 45 homes is entirely deliverable and would be of an appropriate scale for the settlement. 45 homes could be delivered within the same developable area identified in the emerging plan.