

Erewash Core Strategy Review

Examination Hearing Statement

Matter 5

Representations prepared by Fisher German LLP
on behalf of Bloor Homes



Project Title:

Spondon Woodside

Author:

James Beverley MRTPI

Contact Details:

The Estates Office

Norman Court

Ashby de la Zouch

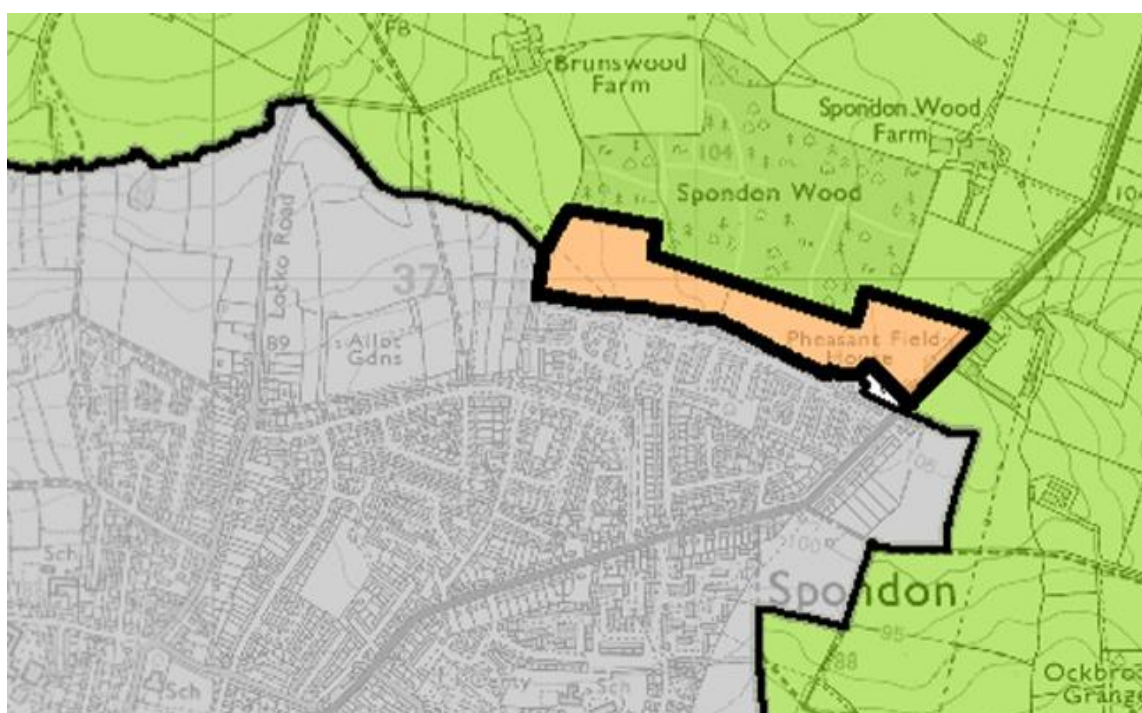
LE65 2UZ

James.Beverley@fishergerman.co.uk

07580323822

01 Introduction

- 1.1 These representations are prepared by Fisher German on behalf of Bloor Homes East Midlands in respect of their land interests at Woodside, Spondon. The site is identified for release from the Green Belt and allocation within the submitted Erewash Core Strategy Review; Strategic Policy 1.4 – North of Spondon. The site is a proposed allocation of “around 200 dwellings”, with site specific criteria and identified on the supporting policies map, extract below.



Erewash Core Strategy Review Policies Map Extract

- 1.2 In September 2023 a full planning application on the proposed allocation site for 263 dwellings, associated landscaping, open space, infrastructure and enabling earthworks (application reference - 0923/0024) was validated by Erewash Borough Council. This application is currently awaiting determination, but clearly given the full nature of the application, and the site being under the control of a major housebuilder, it offers the opportunity to expedite delivery of homes on the site and assist the Borough Council in being able to demonstrate a five-year housing land supply.
- 1.3 The site is sustainably located adjacent to the Derby City Urban Fringe. It is well connected to existing services and facilities and can take advantage of existing public transport connections.

02 Matter 5: The Housing Requirement/Overall Housing Provision

Issue: Whether the Core Strategy Review has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the housing requirement and overall housing provision.

1. What is the minimum number of new homes needed over the plan period calculated using the standard method? Has the calculation of Local Housing Need been undertaken appropriately using the standard method and correct inputs reflecting the methodology and advice in the PPG?

- 2.1 Paragraph 61 of the NPPF confirms that LPAs should utilise Local Housing Need as derived from the Standard Method to inform the minimum homes needed. The PPG is clear that the Local Housing Need is the minimum starting point for establishing a housing requirement. The PPG confirms that the Government is committed to “*ensuring that more homes are built and supports ambitious authorities who want to plan for growth*”. There are a number of scenarios, not exhaustive, which would justify an increase in housing requirement from base Local Housing Need, including growth strategies, the need to fund strategic infrastructure improvements and meeting unmet need from neighbouring authorities. We have no reasons to believe there are specific arguments in Erewash that would necessitate a need for a higher housing requirement to be adopted in order for the Plan to be sound. We have set out in relation to Matters 2 and 4 that there is no current justification for unmet need of any other authority in the HMA to be met in Erewash at present, albeit we accept that position is fluid and may be pertinent in respect of future reviews of the Erewash Core Strategy.
- 2.2 The PPG confirms at Paragraph: 008 Reference ID: 2a-008-20190220 that once calculated for a submitted Plan, Local Housing Need can be considered robust for a period of 2 years. The submitted Plan relies on a Local Housing Need figure of 386 dwellings as calculated in April 2022, and thus should be considered robust until April 2024.

2. In response to the Inspector's Initial Questions, the Council concluded that there are no circumstances that justify a higher housing figure. Is this conclusion reasonable and supported by evidence?

- 2.3 The starting point for assessing a Borough's housing requirement is that the Local Housing Need starting point should be considered robust, and then if evidence or circumstances dictate, a higher housing requirement should be pursued. In that context, it can be difficult to demonstrate that a higher quantum should not be sought, in the same vein as it is difficult to prove a negative. Thus, in decisions as to whether an increase on base Local Housing Need is justified, the burden of proof on the evidence is to demonstrate that a higher quantum is justified and should be pursued. We are not aware of any such evidence that would lead us to the conclusion that an increase in base Local Housing Need is a pre-requisite for soundness at this time in Erewash. That may be a conclusion which is different in 5 years, once identified unmet needs of other authorities are fully quantified, evidenced and justified through their respective examinations and distribution agreed through signed Statements of Common Ground.
- 2.4 If the Inspectors were to find an increased housing requirement is required in order for the Plan to be found sound, and not something rectifiable by early review (which is fairly standard practice in modern Plan making), then this issue can be dealt with through main modifications and the provision of additional sites.

3. The Core Strategy Review identifies a minimum housing requirement of 5,800 net dwellings over the period 2022-2037. Is this justified? If not, what should the housing requirement be?

- 2.5 We consider a housing requirement of 5,800 dwellings to be justified, being broadly in accordance with Local Housing Need requirement of 5,790 over the Plan period when utilising a current and robust Local Housing Need figure as derived from the Standard Method (with the 10 dwelling increase to round the nearest hundred considered de minimis).

4. Will the proposed supply of dwellings set out in Strategic Policy 1 incorporate a sufficient 'buffer' to allow for non-delivery as well as providing choice and flexibility in the supply of housing land?

- 2.6 The Plan makes provision for circa 5,800 dwellings, which does not provide a significant buffer for non-delivery (beyond that inclusive of the SHLAA lapse rate of 6%). Our view is that any increase in supply would be welcome in Erewash, and the Council should be proactive in approving windfall development arising to provide as much of a buffer as possible in supply throughout the Plan period. On the above basis however, it is noted that in respect of the Woodside Spondon site, a planning application has been submitted equating to 263 dwellings, equating to a 30% increase in

supply likely deliverable. Whilst this does not improve choice and competition in the market, it does improve overall supply and if similar increases are provided on other allocations this may buffer the Plan against some non-delivery, though as set out in relation to Matter 4 these measures do not expedite delivery, instead increase overall Plan delivery.

- 2.7 Again, as per previous questions, if the provision of a buffer is considered necessary, of circa 5%-10%, this could be made through Main Modifications to the Plan. Your attention is brought to the initial conclusions in respect of the Amber Valley Examination, wherein the Inspector had commenced the process of additional sites (including Green Belt) being included in the Plan via main modifications.

5. Would at least 10% of the housing requirement be accommodated on sites no larger than one hectare as set out in paragraph 69 of the National Planning Policy Framework? Does this include sites that have already been completed?

- 2.8 The overall percentage of housing that will be delivered on small sites (smaller than 1ha) is not clear, however it is clear that a number of such sites are available within Erewash as demonstrated in document EBH4 (Erewash SHLAA). This states that 339 dwellings are available on sites under a hectare, which are assessed as suitable, available, achievable and deliverable. It is not a requisite for compliance with the NPPF for sites to be allocated, simply that suitable sites should be identified through the Plan and brownfield register. Clearly this amount is less than 10%, however given Erewash's constraints it was always going to be the case that such sites, which are in finite supply, would be used given the lack of opportunities for growth given the authority's prevalence of Green Belt. Moreover, this is not a requirement for the Plan to be found sound particularly where there is strong rationale for why it is not sensibly deliverable. Erewash has already set out in principle that such sites are expected to come forward and thus this will support SME businesses and help to create a balanced portfolio of sites moving forward.

6. In overall terms is the approach to the housing requirement justified?

- 2.9 Yes, having regard for the requirements of both the NPPF and PPG, and also Erewash's site specific constraints and context, we consider the Council's approach is overall justified and should be considered sound. Whilst we appreciate there may be some areas for slight improvement, including the creation of a buffer for example, such issues can best be resolved via main modifications to include additional land now, or, alternatively through the inclusion of a commitment to an immediate and comprehensive review of the Core Strategy. In either case, this

would be greatly preferable to a significant delay in Plan delivery in Erewash, as such an approach will serve to only further frustrate housing delivery to the immediate detriment to the many in housing need in Erewash.