



Erewash Borough Council: Examination in Public into  
the Core Strategy Review

Hearing Statement of Varsity Town Planning on behalf  
of Green 4 Developments

Matter 5: The Housing Requirement / Overall Housing  
Provision

7<sup>th</sup> December 2023

## Issue

**Paragraph 61 of the National Planning Policy Framework identifies that to determine the number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance (the PPG) unless exceptional circumstances justify an alternative approach that also reflects current and future demographic trends and market signals.**

*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?*

Green 4 Developments are satisfied that the standard methodology has been correctly applied.

However, the PPG advises that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method. Circumstances where this may be appropriate include situations where there are growth strategies for an area, where strategic infrastructure improvements are proposed or where an authority is taking on unmet housing needs from elsewhere.

Consequently, to fully conform with the PPG, Erewash Borough Council need to provide additional information to support their housing evidence that we would expect to see as part of a transparent and inclusive Plan preparation process, which would include:

- A. A review of the housing trajectory to project growth to 2039
- B. Signed Statements of Common Ground with neighbouring authorities to establish mutual levels of unmet need. This is particularly important in the relationship with Derby City and Nottingham City where a 35% 'cities and urban centre' uplift will be applied to their standard methodologies. This goes to the heart of the Duty to Cooperate, and we cannot find any meaningful evidence that this has been properly undertaken.
- C. Evidence of the assumptions around windfall numbers, and especially how and where these might be expected to be accommodated in a District with a significant Green Belt and very tightly drawn settlement boundaries.

*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?*

No. As stated in our response to Q1, there is additional evidence that needs to be provided relating to unmet need and the 15 year trajectory which could influence the overall housing figure.

*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?*

Green 4 Developments are satisfied with the application of the standard method to calculate local housing need. Supplementary evidence should show how growth will be planned to 2039 rather than 2037.

*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?*

Green 4 Developments are satisfied that a 20% buffer is all that can be applied to the housing figures using the standard methodology. This does not allay the concern about the non-delivery of housing.

*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?*

Green 4 Developments will rely on Erewash Borough Council to respond to this question.

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

No. The failure to consider unmet need from the neighbouring authorities is a significant concern. Green 4 Developments are also concerned with the unjustified assumptions around the windfall figures.