



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

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

Matter 7: Housing Land Supply

21<sup>st</sup> December 2023

## Issue

**Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach to housing land supply.**

### Total Supply

*1. What is the up-to-date situation regarding housing completions so far in the plan period?*

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

*2. For each of the following sources of housing land supply for the whole plan period in turn, what are the assumptions about the overall scale, lead in times, timing and annual rates of delivery? What is the basis for these assumptions, are they realistic and justified and supported by evidence? a. Sites with planning permission and under construction b. Sites with planning permission and not started (split by outline and full permissions) c. Sites identified in land availability assessments d. Sites identified in the brownfield register e. Adopted Core Strategy allocations without planning permission f. Windfall sites g. Housing site allocations in the Core Strategy Review*

Based on the most recent data, Stanton North (E) is the sole strategic allocation currently in the construction phase, having obtained planning permission for a Class B2 factory building (ERE0308/0035). Notably, North of Spondon holds an EIA Screening Opinion (0923/0024), while others, such as South Stanton and South West of Kirk Hallam do not benefit from current planning activity. It is noteworthy that South Stanton's application (0213/0001) has been withdrawn.

Green 4 Developments endorse the appropriateness of the standard method for calculating local housing need in the CSR from 2022 to 2037. In line with our response to Matters 2 and 5, we acknowledge the requirement for supplementary evidence concerning unmet need and the 15-year trajectory. Thus propose the presentation of additional evidence extending the strategic planning to 2039.

*3. What is the basis for a 6% non-implementation rate on deliverable and developable sites from the 2022 SHLAA? Is this justified and supported by Evidence?*

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

*4. Would there be an adequate supply of housing land for the whole plan Period?*

No. In their Hearing Statements for Matters 5 and 6, Green 4 Developments have expressed their concerns in this regard relating to undeliverable allocations and a shortened plan period.

Further justification is needed to showcase in-depth examination of the progress of planned allocations, potential challenges affecting delivery, and strategies to address any gaps in the housing land supply. Such an investigation would provide essential insights into the adequacy of the current housing land supply and help inform strategic planning decisions for

the future. We recommend that the council considers additional evidence and takes proactive steps to address any identified issues, ensuring a robust and reliable housing land supply throughout the plan period.

*5. Overall, would at least 10% of the housing requirement/ target be met on sites no larger than one hectare in order to comply with paragraph 69 of the National Planning Policy Framework (NPPF) which, amongst other things requires local planning authorities to accommodate at least 10% of their housing requirement on sites no larger than one hectare unless it can be shown that there are strong reasons why this target cannot be achieved?*

This question mirrors Matter 5 (Q5), and Green 4 Developments will rely on Erewash Borough Council to respond.

#### 5 Year Housing Land Supply

*6 What is the relevant 5 year period on adoption and what is the 5 year housing land requirement?*

Green 4 Developments would have expected a Housing Topic Paper to be published that sets out the relevant 5 year period.

*7 Based on the housing trajectory, how many dwellings are expected to be delivered in the first 5 years following adoption of the Core Strategy Review?*

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

*8 Where sites in the Strategy do not have planning permission is there clear evidence that housing completions will begin within 5 years, as is required by the NPPF?*

Green 4 Development argue that there is not. The deliverability of the strategic sites is questioned and a specific example is given in the Matter 6 Hearing Statement regarding South Stanton. Further, the Core Strategy Review advances a spatial strategy that the Council itself admitted had failed in their findings of the Housing Delivery Action Plan.

*9 What allowance has been made for windfall sites as part of the expected 5 year housing land supply and is there compelling evidence to demonstrate that windfall sites will come forward over the plan period, as is required by paragraph 71 the NPPF?*

Green 4 Developments address this question in their Hearing Statement from Ms Cottle.

*10 With reference to paragraph 74 of the NPPF, is a 20% buffer for the 5 year land supply appropriate?*

This question mirrors Matter 5 (Q4), Green 4 Developments are satisfied that a 20% buffer is appropriate. However, this does not allay the concern about the non-delivery of housing.

*11 What would be the supply for this period (in total and by each source of supply)?*

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

*12 Are the assumptions on sources of supply for this period realistic and Justified?*

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

*13 What flexibility is there within the Core Strategy Review should some of the housing allocations not come forward in line with the expected timescales?*

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

*14 Would there be a 5 year supply of housing land of deliverable sites on adoption of the Core Strategy Review?*

Green 4 Developments have concluded that there will not. Significant concerns over the delivery of the strategic sites has been set out in their response to other matters.

#### Affordable Housing

*15 Are the policy requirements of the housing allocation policies with regards affordable housing still up to date following the publication of the viability study?*

No, it would appear not. Table 6.4 and paragraphs 6.16-6.17 of the Erewash Borough Council Viability Study (EBC04) state, “The table shows a strong viability for all the sites without exception up to 10% Affordable Housing (Cotmanhay here finely balanced) and including the Council’s required infrastructure. In the case of the SW Kirk Hallam, North of Spondon and Acorn Way sites, Affordable Housing requirements up to 30% are not unreasonable.”

These viable figures have not been translated into criteria of the strategic policies.

*16 Based on the policy requirements of the Core Strategy Review, how many affordable homes is the Core Strategy Review expected to deliver? How does this compare to the identified need? If need will not be met what alternative options has the Council considered?*

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