



Erewash Core Strategy Review

Hearing Statement

On behalf of William Davis Homes

Matter 7: Housing Land Supply

December 2023

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

Confirmation should be sort on the approach used by the LPA to establish what is a completion for the purposes of monitoring housing delivery. Some LPAs have been noted to assume that homes where the roof, windows and doors have been provided are classed as complete despite the need for internal finishes. Homes should only be classed as completions when they have received building control/NHBC approval.

Q 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

No site-by-site breakdown of the sites that make up the housing trajectory has been provided; this makes it difficult to understand the various components of the supply and their led in times and build out rates.

Comments have been provided for each of the strategic sites regarding the assumptions used on lead in times, timing and annual build rates in our Matter 6 written statements. In summary, a start date in 2024/25 is considered highly optimistic where sites do not already have at least outline planning permission.

Q4 – Would there be an adequate supply of housing land for the whole plan period?

No. The trajectory shows a total supply of 5843 homes. This only provides a buffer of 1% over the housing target of 5790 set by Strategic Policy 1 of the Core Strategy Review. This is inadequate even before consideration is taken of the likelihood that the strategic sites are unlikely to deliver the total number of dwellings identified in the trajectory (as set out in our Matter 6 written statements) due to an overestimation of capacity and a delayed start date. As set out elsewhere in our written statements additional deliverable housing sites should be allocated in sustainable locations.

Q8 – 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?

No site-by-site breakdown of the sites that make up the housing trajectory has been provided; this makes it difficult to understand the various components of the supply and whether the sites are deliverable.

The trajectory includes a category of “Deliverable and developable sites from the 2022 SHLAA”; details should be provided of the sites, any demolitions required, planning application references and the justification for their inclusion in the trajectory in relation to the definition in the NPPF.

The trajectory also includes a category for “surplus land from EBC asset review”. No information is provided regarding these sites to enable an assessment of whether they are suitable for development and deliverable/developable. Information should be provided on their planning status as delivery is predicted from 2024/25 onwards (i.e. within the first five years post adoption).

Q9 - 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?

Paragraphs 20 to 24 of the Five-Year Housing Land Supply Position Paper (Nov 2022) (EBH3) set out the position with windfall. This refers to the Joint SHLAA Methodology Report 2022 (EBH9). It is noted that the figure provided for Erewash in EBH9 (193dpa) covers the period 2013-2019 while the trajectory includes an average of 60dpa for the years 2027/28 to 2036/37, a total over the plan period of 600 dwellings. There is no breakdown of the sites that have been classed as windfall nor details of their size, mix of house sizes/types or other relevant details; this makes commenting on the proposed windfall allowance difficult. There is also no explanation as to why the average of 60dpa has been selected and how it relates to the figure identified in EBH9.

It is also noted that the LPA do not consider that the provision of the proposed allocations will affect the delivery of windfall particularly in the south of the district as no strategic allocations are provided to serve this area (EBH3 paragraph 21). However, given the evidence of ongoing demand in the south of the district it is considered more appropriate to provide housing allocations in this area rather than relying on windfall sites, which are usually small scale and ad-hoc, that are unlikely to provide the s106 contributions to support the necessary infrastructure nor provide the high-quality family homes required in the District.