

# Erewash Core Strategy Review

Examination Hearing Statement

Matter 6

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

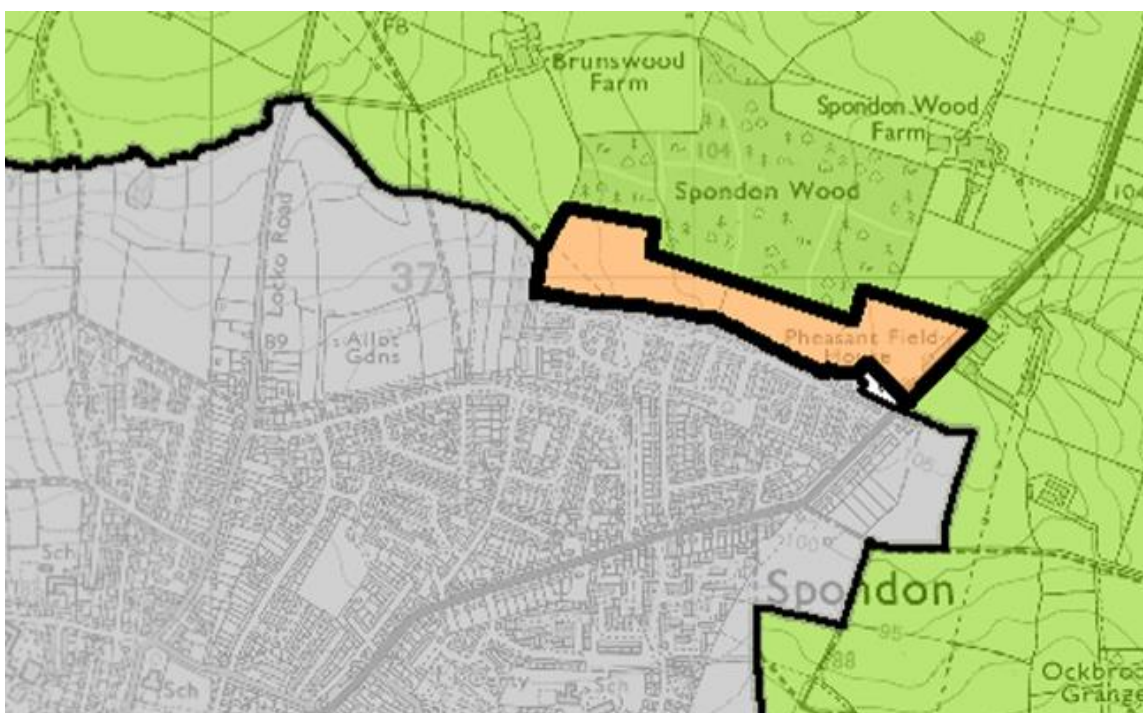
LE65 2UZ

[James.Beverley@fishergerman.co.uk](mailto: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 6: Housing Allocations

Issue: Whether the proposed housing site allocations are justified, effective and consistent with national policy.

**2. In Strategic Policy 1.1 is the requirement to provide at least one off-street parking space per new dwelling served by an electric vehicle charging point justified?**

- 1.4 Yes, particularly given its compliance with the Building Regulations (Part S), namely Requirement S1 and regulation 44D: Electric vehicle charging provisions for new residential buildings, which requires this in any event. Given the presence of the regulations, the need for this to be embedded in planning policy is questioned, particularly as the Government's preference is to minimise unnecessary duplication (NPPF Para 16f).

**3. Should Strategic Policy 1.1 include any of the following requirements? What are the reasons for this?**

- 1.5 We provide our comments in relation to each requirement below.

a. Sustainable surface water management and the drainage hierarchy?

- 1.6 This is broadly covered within criterion 3 of Strategic Policy 1.1. We have no strong opinion as to whether additional detail as suggested by the question is beneficial, given such considerations would be captured by the usual development management practice and are captured adequately by retained Core Strategy Policy 1: Climate Change and the NPPF.

b. Overhead lines?

- 1.7 Again, we have no strong view on this. We are aware that not all sites are, or are likely to, impacted by overhead lines. Where overhead lines do impact a site, such as our client's land allocated under Strategic Policy 1.4, it has been addressed through the design of the site and in accordance the operator's guidance. Clearly such a requirement could be included in any relative site specific policy, but it will by its nature form a key requirement of the development management process irrespective of whether it is written into policy.

c. Public transport requirements?

- 1.8 Again, this considered a usual requirement for consideration through the development management process and is actively covered by extant retained Core Strategy policies and the NPPF.

d. Historic environment, heritage assets or their settings?

- 1.9 This is considered adequately covered by existing policy contained in the NPPF and Core Strategy Policy 11: The Historic Environment which is a retained Core Strategy policy.

**4. Does the policy effectively protect ecological assets?**

- 1.10 The policy is read alongside the wider retained policies of the extant Core Strategy, in particular Policy 17: Biodiversity, with national policy and legislation, including BNG requirements. On this basis, the Plan effectively protects ecological assets. Further, the emerging requirement to deliver 10% Biodiversity Net Gain will provide for ecological enhancements going forward.

**7. Strategic Policy 1.4 North of Spondon**

- 1.11 We provide our comments in relation to each question below.

A. What is the background to the site allocation and how was it identified?

- 1.12 A description of the site's inclusion in the Plan is provided at EBC05 Green Belt Technical Paper. However, for completeness from the promotor's perspective, we provide the below.

- 1.13 Representations were made in June 2020 during the Strategic Growth Options consultation. At this time, the representations focused on concerns with elements of the emerging Plan Review, including the Lock Lane, Sawley proposal and its suitability and deliverability. At the time the Council were undertaking a Call for Sites and Land North of Spondon was submitted to this as a suitable and sustainable location for development should the Council need to find additional land to meet its needs.

- 1.14 The Council decided to delete the Lock Lane, Sawley site from the Plan, with wider amendments to retained sites and their capacities, including increasing the size of South West Kirk Hallam, reducing provision at Cotmanhay Wood from 600 to 250. These changes left a shortfall of 180 units, thus creating a need for new allocations. The Council undertook further assessment of sites

in the Borough and prepared the Strategic Growth Area Assessments, Revised Options for Growth (March 2021) (EBH1).

- 1.15 The Council consulted on the Revised Options for Growth (Regulation 18) in March 2021 where the site was identified for release from the Green Belt and allocation for residential development. At that time, it was indicated that the site would deliver approximately 240 dwellings.
- 1.16 In May 2022 the Plan Publication (Regulation 19) consultation was undertaken with the site being proposed for release from the Green Belt and for allocation of approximately 200 dwellings.
- 1.17 There has been some variation in the site's capacity within the Plan, from 240 originally in the Revised Options for Growth, to 200 dwellings in the Regulation 19 Plan. This does not however change the principle of development which has been consistent since its initial proposed allocation. The Full application as submitted and reflecting detailed technical site specific evidence demonstrates that the site can deliver 263 dwellings.

#### B. What would be the effect of developing the site on the purposes of the Green Belt?

- 1.18 It is clear on the totality of evidence that there is limited impact on the wider Green Belt through the site's sensible development. This is the opinion of both the Council's officers, and also the conclusions of evidence provided to the Council in support of the submitted full application, provided at Appendix 1. However, for ease of reference our key arguments in respect of the site are provided below.
- 1.19 The site is currently within the Green Belt. The NPPF sets out at paragraph 138 that the Green Belt serves 5 purposes. These are:
- a) To check the unrestricted sprawl of large built-up areas;
  - b) To prevent neighbouring towns merging into one another;
  - c) To assist in safeguarding the countryside from encroachment;
  - d) To preserve the setting and special character of historic towns;
  - e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

To check the unrestricted sprawl of large built-up areas

- 1.20 The site is highly contained, by the wood to the immediate northern boundary of the site and mature tree belts and vegetation to the east and west. The southern boundary comprises existing residential development. This containment naturally restricts further growth beyond the site and the delivery of the site does not create any additional opportunities for further development.
- 1.21 As such, it is considered that the site scores poorly against this purpose of the Green Belt.

To prevent neighbouring towns merging into one another

- 1.22 The development of the site would have a negligible impact on the coalescence of neighbouring settlements, as demonstrated in submission document EBH2 (Strategic Growth Area Assessments map book – Pages 36 and 37). As set out above, the wood provides a strong defensible boundary to the north of the site. To the east, the development of the site would not reduce the separation of Spondon to Ockbrook beyond that which exists at present. Furthermore, the proposals would have a limited impact on the coalescence between Spondon and Stanley/West Hallam. The site would see the separation between Spondon and Stanley reduced from c.3.55km to 3.4km, a reduction of less than 5%, negligible in all respects. Such a separation would be even more negligible in terms of perception, given the function of Spondon Wood in severing intervisibility between the site and further afield.
- 1.23 The site is therefore considered to score poorly against this purpose of the Green Belt.

To assist in safeguarding the countryside from encroachment

- 1.24 Most development on greenfield land on the edge of a settlement would have an impact on encroachment into the countryside. The site is however bound to the north by Spondon Wood. The woodland ensures a strong defensible boundary to development safeguarding against further encroachment into the countryside beyond. Having regard for the shape of the site, it is also a benefit that the development will only extend the settlement by circa 150m at its widest points. This will in effect extend Spondon from 3.2km (assuming the southernmost point of Spondon is currently on the SmartParc estate) to 3.35km, equivalent to only 4.7%.
- 1.25 The site therefore scores poorly against this purpose of the Green Belt.

To preserve the setting and special character of historic towns

- 1.26 The development of the site will have a negligible impact on the more historic centres of Spondon or Derby. The site is highly contained, immediately adjacent to a modern 20<sup>th</sup> century housing estate. The site will not have an impact on any designated asset within Spondon.
- 1.27 The site is therefore considered to score poorly against this purpose of the Green Belt.

To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 1.28 As established through the consultation document, there is no further available brownfield land available for development. The available brownfield sites have been identified and are proposed for allocation within the emerging Plan. Releasing this site from the Green Belt therefore will have no impact on urban regeneration.
- 1.29 The site therefore scores poorly against this purpose of the Green Belt.

Compensatory Measures

- 1.30 Paragraph 002 of the PPG (Reference ID: 64-002-20190722) confirms the ways in which the impacts of loss of Green Belt land can be remedied in strategic policies. The list of compensatory matters provided is not exhaustive, however they can still be assumed to represent good examples of suitable compensatory measures that could be provided to compensate for the loss of Green Belt land. Of those referenced in the PPG, the following will be incorporated into the Woodside Spondon scheme as demonstrated by the full planning application (0923/0024):
- 1.31 **new or enhanced green infrastructure** – The proposed scheme sees the loss of intensively farmed arable land which provides limited immediate environmental benefit. The development includes significant open space which will be publicly accessible, and as referred to below, will connect in to new a new Public Right of Way (PRoW) providing access to the wider PRoW network. The scheme makes provision for new SUDS, which will provide valuable amenity and ecological betterment. Whilst there would be a net loss in inaccessible green infrastructure, the quality and accessibility of such Green Infrastructure would be increased significantly.
- 1.32 **improvements to biodiversity, habitat connectivity and natural capital** – The scheme provides a betterment in ecological habitat as demonstrated by the BNG improvements. (habitat units



(41.14% gain) and hedgerow units (181.25% gain)).

- 1.33 **new or enhanced walking and cycle routes** – The proposal includes a new pedestrian link across land to the west of the site which will connect into the Dale Abbey Footpath (58) Public Right of Way. This improves and enhances the connectivity in this area, and access to the wider countryside improving pedestrian permeability and encouraging walking.
- 1.34 **improved access to new, enhanced or existing recreational and playing field provision** – The site currently provides no recreational function. Post completion however the scheme will provide public access, a new connection to the PRoW network to the west of the site and two areas for play, which will be for the benefit of both new and existing residents and represent a significant improvement in recreational value.

**C. Are there exceptional circumstances to alter the Green Belt in this particular case? If so what are they?**

- 1.35 Erewash is highly constrained by the Green Belt, with over 70% of the Borough covered by the designation. The evidence to support the Core Strategy Review demonstrates the lack of availability of non-Green Belt sites or even other Green Belt sites which are preferable (in Green Belt terms). Further, delivery of homes through the limited non-Green Belt sites has actually diminished due to the amendments to the Stanton Ironworks proposals, reducing the number of dwellings by 1,000, in lieu of employment provision.
- 1.36 There is currently a substantive and worsening shortfall of land supply. The Council recently (June 2023) concluded that the supply is just 2.65 years (PINS Appeal Ref: APP/N1025/W/23/3319160), a reduction from the 3.43 years set out in the 2019 housing land supply position. This position has been created by the lack of availability of deliverable non-Green Belt sites and the complexity of bringing forward the available brown field sites in the Borough. It is clear without significant intervention the position is not likely to improve. To demonstrate a five-year housing land supply, the Council's evidence requires the approval of emerging allocations in the Core Strategy Review which are located within the Green Belt. Due to lack of monitoring information, it is unclear for how long the Council have been unable to demonstrate a housing land supply, but it is evidently a persistent issue.

- 1.37 Similarly, with regard to the housing delivery test, there has been persistent failure to satisfy the housing delivery test, having achieved 66%, 62%, 69% and 79% from 2018 to 2021 respectively. Whilst the recent increase to 79% does show an improvement, it is still over a 20% shortfall.
- 1.38 The Housing Trajectory which supports the Core Strategy Review submission indicates that the development of the Woodside Spondon site can commence delivery during the 2024/25 monitoring year, with delivery of 60 dwellings. Bloor Homes consider this is deliverable. Given the chronic land supply position it is important that deliverable applications are determined quickly. It should be noted that this application has been made in full to enable expedited delivery of the site and give the Council the confidence that this scheme can deliver quickly. Clearly any delay in determination of this application will have a subsequent impact on delivery on site. The higher quantum of delivery now proposed for the site will further benefit the Council's land supply position and help demonstrate a 5-year land supply can be achieved on adoption of the plan, providing additional headroom in the supply position.
- 1.39 With regards to affordable housing, the Greater Nottingham Housing Needs Assessment 2021 report concludes that Erewash has a significant affordable housing need equating to 271 dwellings per annum. It is clear that with the viability issues associated with the Borough's brownfield sites, that they are highly unlikely to make a significant contribution to affordable housing, if any at all. Greenfield sites however on the whole do not suffer from the same viability constraints due to the lack of contamination and remediation required to bring them forward, and this allows them to make significant S106 contributions, including policy compliant levels of affordable housing. To deliver any quantum of affordable housing some greenfield development is required; the majority of which is located in the Green Belt. The 30% equivalent contribution providable on our client's land interests as Spondon Wood, including 10% on-site affordable housing and a further 20% financial contribution towards the provision of affordable housing elsewhere, is a significant benefit of the scheme. The financial contribution allows the Borough to be pragmatic about how to utilise such monies, so they can be spent in areas where there is greatest need or where greatest public benefit in terms of values can be realised. Without Green Belt utilisation, the amount of affordable housing deliverable will be reduced significantly, thus further adding weight to the exceptional circumstances in this case.
- 1.40 The Statement of Consultation (Page 25) sets out the approach adopted by Erewash in respect of meeting housing needs in the Plan, spurred on by "Erewash's notably deficient current housing

land supply". This confirms that detailed work over several years was undertaken to "firstly identify and then encourage development to take place on brownfield land opportunities across Erewash". However, despite a clear drive to deliver as much development needs on brownfield land as possible, the reality was there simply not sufficient deliverable land using brownfield land only to meet identified needs. The council confirmed that many sites suffered from significant issues with contamination and remediation which rendered sites undeliverable or unviable. The Council recognised as there was a need to increase delivery in the short term, sites with quicker delivery trajectories would be needed to ensure a 5-year housing land supply could be demonstrated. As such, limited release of Green Belt land accounting for circa 1% of the Green Belt land was considered to be entirely justified.

- 1.41 The site can deliver a significant Biodiversity Net Gain, equivalent to 41.14% habitat units and 181.25 hedgerow units should again be a material consideration in favour of the application and a supporting factor when determining if exceptional circumstances exist for the site's release from the Green Belt.

**D. Should the policy set out what compensation measures will be expected where there is Green Belt release for development and how it will be calculated?**

- 1.42 As detailed in response to Question 7 and reflected in the full planning application (0923/0024), the site will deliver compensation measures including a new footpath connection into the wider PRow network. We have no objection to the inclusion of these measures within the Policy, but would question, based on the commitment shown in the full application, whether this is required for soundness

**E. What is the basis for the scale of development proposed and is this justified?**

- 1.43 Technical work in support of the full planning application confirms that the 200 dwellings proposed in the emerging Plan underestimates the true capacity of the site. The submitted full application is for 263 dwellings, and whilst this remains subject to review through the development management process, it is considered to better represent the actual capacity of the site.
- 1.44 The NPPF makes clear that development sites should make an effective use of land. Paragraph 124 sets out that planning decisions should support development that makes efficient use of land, taking into account "*the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it*"

- 1.45 The submitted scheme makes provision for 4.84ha of Open Space, including significant landscape buffer to Spondon Wood and delivers a gross density of only 21.1 dwellings per hectare (dph), which is considered entirely acceptable for the site's location and context. The scheme delivers an attractive and well-designed development, inclusive of incidental green fingers, large areas of amenity space and two play areas.
- 1.46 The use of the term 'about' within the policy is supported and indicates that the figure contained within allocations is not a strict target, but instead a broad figure. Regardless, the best avenue for realising full site capacity is through the detailed design and evidence process that comes with the preparation of a planning application, not high-level, capacity estimations employed in the preparation of almost all strategic development plan documents. However, in respect of Woodside Spondon we are in the fortunate position to have a better estimation of capacity informed by a robust full application, so in the interests of transparency a higher quantum should be identified within the Policy, which has the wider benefit of improving the Council's supply buffer, assisting the Council in meeting its housing targets in full. As such, we consider a capacity of c.255-275 dwellings is closer to what will be delivered on the site, albeit we would not object to 263 dwellings given that is the current best evidence to delivery.

**F. What is the background to the specific policy requirements? Are they justified and consistent with national policy? Do they provide clear and effective guidance on constraints and suitable mitigation?**

- 1.47 The Council are best placed to comment on the background to the individual site-specific policy requirements.
- 1.48 Bloor Homes do however broadly support the site specific policies, all of which we consider to be fairly reasonable to the optimal development of the site. On that basis, we consider the requirements are clear and effective, and whilst previous questions alluded to potential other criteria which could be added, it must be remembered that the Plan should be read a whole, inclusive of retained Core Strategy policies which will continue to have effect. We consider that the requirements of development of the allocation are sound, being both justified and consistent with national policy.
- 1.49 The requirements of Strategic Policy 1.4 North of Spondon have informed the submitted full application.

**G. What are the highways implications of the allocation and how will any impacts be mitigated?**

- 1.50 A full Transport Assessment has been submitted with the planning application, inclusive of off-site mitigation measures, and Travel Plan (ADC Infrastructure 08/23). For ease of reference key conclusions are provided below. We would have no objection for such measures to be referenced within the Plan, albeit we note the Transport Assessment is a snapshot in time, and as such requirements now may not be applicable in the future (as other schemes or highways improvement measures may negate such requirements for example), as such the inclusion of these measures are not considered fully necessary for soundness.
- 1.51 Vehicular access to the development is proposed to be taken from a single point on the A6096 Dale Road and would take the form of a priority-controlled T-junction with a ghost-island right-turn lane. The existing 30mph speed limit within Spondon would be extended to accommodate the development frontage, with the change point enhanced by gateway features. The proposed works have been designed in accordance with relevant standards and would operate with suitable capacity to serve the proposed development.
- 1.52 There are good opportunities for pedestrian travel. The centre of Spondon is located within walking distance of the site, along with its associated amenities including schools, medical facilities, cafes, a supermarket, pubs, and restaurants. The proposed development would tie into the existing footway network within Spondon in the east and would provide a connection to Footpath 58/1 in the west to provide pedestrian connectivity to Spondon.
- 1.53 There are good opportunities for cycle travel. East Derby is within cycling distance of the site and there is a network of recommended routes and traffic-free cycle infrastructure within and to the south west of Spondon that provides an attractive route to Derby city centre.
- 1.54 The nearest bus stops are less than 100m from the site boundary and are served by regular services to Ilkeston and Derby, as well as irregular services to Borrowash and Chaddesden. A trial Spondon Shuttle bus service is currently in place and using adjacent stops. Spondon railway station is within cycling distance of the site and is served by irregular trains to local and regional destinations. The proposed development would provide improvements to the existing bus stops close to the site boundary.

- 1.55 The proposed development would generate up to 19 pedestrian trips, nine cycle trips, 23 bus trips, and two train trips in a given peak hour. The existing and proposed infrastructure would be able to accommodate that increase in demand. The development would further enable sustainable transport through the measures described in the accompanying Travel Plan, which would aim to further reduce single occupancy car travel and promote home shopping, home working, and sustainable travel methods.
- 1.56 The proposed development would generate up to 200 two-way vehicle trips in the morning peak hour and up to 181 two-way vehicle trips in the PM peak hour. The impact of that traffic has been examined within a study area informed by a Census traffic distribution and comprises seven off-site junctions. The calculations and assessments contained within this report highlight the existing and future year issues at several study area junctions.
- 1.57 Where necessary, mitigation has been proposed at the A6005 Nottingham Road/Willowcroft Road signal junction, which would take the form of an additional through lane on the A6005 Nottingham Road westbound approach and moving the pedestrian crossing to the centre of the junction to provide a dedicated left turn lane from Willowcroft Road.
- 1.58 Mitigation has also been proposed at the Spondon Roundabout, in the form of partial signalisation of the A52 west-bound off-slip and the A6005 Derby Road arms of the junction. The proposed scheme would more than mitigate the impact of the proposed development at this junction.
- 1.59 With mitigation in place where necessary, the impact of the development traffic on the local highway network would not be considered severe.
- 1.60 The development would provide opportunities for travel by sustainable transport modes; safe and suitable access can be achieved for all users; and the impact of the development would not be severe. The development should therefore not be prevented on highways grounds.

**H. Does the policy identify appropriate and necessary infrastructure requirements? How will these be provided and funded? Is this sufficiently clear?**

- 1.61 The Policy does not provide all the likely required developer contributions, however, such an approach within adopted planning policy is not always optimal, as clearly development requirements are a snapshot in time and constantly fluid. There may be instances where such a

requirement is necessary, but this is usually more when there is a specific need for a significant piece of infrastructure or something unique and site specific, i.e.. provision of a link road, school, etc or development needs arising through new strategic development for example.

1.62 In terms of the currently identified infrastructure requirements of the site, we make the following comments. The creation of a new vehicular junction and pedestrian access on to the A6096 Dale Road, and a pavement along the west side of the A6096 Dale Road to Spondon are all logical and agreed. With regards to the request for associated pair of bus halts, it is noted that there are already existing bus stops in close proximity to the site boundary, so instead of providing additional stops it is considered to be more appropriate to provide improvements to the existing infrastructure. Therefore, it is proposed within the planning application that the existing bus stops on the A6096 Dale Road, adjacent to Pheasants Field Drive are provided with suitable upgrades (Shelter, seating, raised kerbs etc.) to be agreed with the LHA. We would be content for the policy wording to be amended as such. The requirement to minimise disturbance to the Dunshill Shelterbelt local wildlife is noted and again informed the planning application.

1.63 We are content with the approach to affordable housing delivery, with 10% affordable housing on site to allow for affordable routes to home ownership and a further equivalent financial contribution of 20% provision to enable the Council to meet affordable housing needs in a responsive and holistic manner elsewhere. The tenure of the 10% affordable housing provided on the site will be affordable home ownership, the exact tenure of which will be agreed with the Council during the course of the planning application.

1.64 We are content through the development management process all required CIL compliant contributions can be met through a suitable Section 106 agreement. We do not think it necessary for soundness for such contributions to be explicit within the site-specific policy.

#### **I. What implications will the allocation have on Derby City?**

The provision of the allocation will have limited implications on Derby City, as any possible issues relating to service provision etc. can be mitigated through suitable mitigation and developer contributions. It is not considered likely at this stage that any issues will persist that cannot be adequately mitigated through effective cooperation, the process of which is already underway through the submission of the Planning application and an update as to the position of matters

can be provided if necessary, at the hearings.

**J. Are there potential adverse effects not covered above? If so what are they and how would they be addressed and mitigated?**

- 1.65 No unknown adverse effects. An update on statutory consultee responses can be provided at the hearings, to demonstrate the site's deliverability.

**K. What evidence is there to demonstrate that the allocation is viable and deliverable within the plan period? What is the situation with regards land ownership and developer interest?**

- 1.66 Significant work has been undertaken in respect of the site, both in site promotion and now through the submission of a full planning application. Meetings have been held with Erewash's viability consultants and has informed updated viability evidence submitted by Council (EBC04 Erewash Borough Council Local Plan Viability Report - September 2023), which demonstrates the viability of the scheme.
- 1.67 The site is under the control of a major housebuilder (Bloor Homes). A full planning application has been submitted and there is a willingness from all parties associated that the site be delivered as soon as practicable. It is noted that the submitted scheme has been prepared with a view to create a legacy development.
- 1.68 The site is viable and deliverable within the Plan period and can deliver in the early years of the Plan period once approved.

**L. How will the site be brought forward for development? What mechanisms will there be to ensure a comprehensive and co-ordinated approach to development, ensuring that infrastructure requirements are provided?**

- 1.69 The site is under the control of a single housebuilder who will deliver the entire site in a single comprehensive phase. Details of the delivery of infrastructure will be an integral part of any Section 106 negotiation, however given the control of the site, and as demonstrated by a submitted full application, it is reasonable to assume that all infrastructure requirements can be delivered through usual mechanisms. Moreover, given the site is being delivered in full by a major housebuilder, there will be a cohesive design throughout the site, delivering attractive placemaking.



**M. What is the expected timescale and rate of development and is this realistic?**

1.70 The Council's housing trajectory (EBH3a Erewash Housing Trajectory) assumed the delivery of 60 dwellings in 24/25. It is not clear if this can be achieved given the slight delays since the Regulation 19 consultation, and much will depend on the timely conclusion of this examination and the Council's determination of the application. Regardless, a full planning application has been submitted by an established major national housebuilder who can deliver quickly once an application is fully approved. Whilst there may be some slippage in terms of the assumption of EBH3a, this is likely to be incidental as the quantum identified (200) can be delivered in full within the 5-year period following adoption, and due to the increase of likely site capacity is likely to be exceeded, but again is obviously fully dependent on timely application approval. Please view updated trajectory below.

	22-23	23-24	24-25	25-26	26-27	27-28	28-29	29-30	30-31	31-32	32-33	33-34	34-35	35-36	36-37	22-37
Strategic Policy 1.4 – North of Spondon (EBH3a Erewash Housing Trajectory)			60	70	70											200
Strategic Policy 1.4 – North of Spondon (Promotor updated Erewash Housing Trajectory)				60	70	70	63									263

**N. Overall, is the allocation justified, effective and consistent with national planning policy?**

1.71 Yes, the allocation is justified, effective and consistent with national planning policy. Whilst the site is dependent on Green Belt release, exceptional circumstances are clearly present within Erewash. The site makes a limited contribution to the overall purposes of the Green Belt and is largely disconnected from the wider Green Belt due to Spondon Wood. A full planning application has been submitted for the site which is supported by robust evidence and confirms that 263 dwellings can be reasonably and attractively accommodated on the site. Spondon is a demonstrably sustainable location for growth. Census data (2011) demonstrates there is a strong interrelationship between Erewash and Derby City, with Derby City being a predominant destination of Erewash workers who work outside of the Borough, a pattern likely continued in

more recent Census (2021) data which is not yet available. As such the site's removal from the Green Belt and allocation is considered eminently justified and sensible.