



## Erewash Core Strategy Review

### Hearing Statement

On behalf of William Davis Homes

## Matter 6: Housing Allocations

December 2023

## **Question 5 Strategic Policy 1.2 South Stanton**

### **Q5a - What is the background to the site allocation and how was it identified?**

The South Stanton site is a rebrand of the Stanton Iron Works Regeneration site. This was allocated for employment purposes in the 1994 and 2005 Local Plans and for mixed use residential/employment in the 2014 Core Strategy. The site remains undeveloped although it is noted that planning permission has been granted for commercial/employment use and it is understood that units will begin to be available in 2024.

### **Q5b – What is the basis for the scale of development proposed and is this justified?**

Strategic Policy 1.2 allocates the South Stanton site for “*residential development of around 1,000 new homes, a new primary school, and new village centre across 47 hectares of land*”. It is noted that the site was previously allocated for 2000 dwellings, a 10ha business park and 10ha for ‘general industry’. While it is understood that that employment element has been covered by the planning permission referred to in Q5a and Strategic Policy 2.1 (North Stanton) it is unclear from the information available the reason for this reduction in residential capacity.

### **Q5g – 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?**

As noted above the site has been available for residential development for a number of years. The supporting text to Policy 1.2 succinctly sets out the deliverability issues with the site; namely the uncertainty of land stabilisation and remediation costs. The LPA appear to be reliant on delivery of the North Stanton employment area to provide “market confidence” in the site. In addition, the site will need to cover the costs of a new primary school, 10% affordable housing alongside highways improvements. It is noted that the Viability Assessment (EBC04) considers the site to be in a higher value area. However, the site will be seen as an extension to Ilkeston and be surrounded to the north by significant commercial and industrial uses and cannot be considered a higher value area.

The Viability Appraisal has assumed a remediation cost of £500k per hectare based on HCA guidance from 2015; there is no explanation of how the figure has been calculated from the information contained in the HCA guidance or whether it has been indexed. A review of Figure 2 of the Guidance indicates a range of costs from £715k to £1.765 million per hectare. It is also noted that the guidance was withdrawn in 2022.

### **Q5i – What is the expected timescale and rate of development and is this realistic?**

It is noted that the LPA do not consider the site deliverable within the first five years. However, the trajectory shows the site delivering 100 dwellings in 2027/28; this is within the first five years of adoption of the Local Plan (assuming adoption of the Local Plan in 2024). Given that there is no planning application submitted, delivery of homes in 2027/28 seems optimistic given the need to gain outline consent, market the site to house builders, submit reserved matters applications and get them approved, get technical approvals, commence delivery of site wide infrastructure (such as spine roads and SUDs ponds) and commence delivery of specific parcels of residential land.

**Q5j – Overall is the allocation justified, effective and consistent with national policy?**

It is clear that the site has failed to be developed since allocation for residential use in 2014 and its deliverability, as acknowledged by the LPA is uncertain. While redevelopment of brownfield land is to be supported this should not be at the expense of delivering the homes needed in Erewash (see our Matter 5 and 7 written statements regarding the housing requirement and supply). It is considered inappropriate to rely on the site to deliver 1000 homes (around 17% of the proposed housing target) during the plan period and additional deliverable sites should be allocated to reduce the impact of non-delivery.

**Q6 - Strategic Policy 1.3 Acorn Way**

**Q6e – What is the basis for the scale of development proposed and is this justified?**

The Viability Assessment (September 2023) (EBC04) identifies that the site has a net developable area of “around 20ha”; assuming the figure provided in the Strategic Growth Area Assessment (EBH1) is a gross figure this would suggest a gross to net split of around 77%. This is totally unrealistic when accounting for sites of this size and their requirements for open space, landscaping, BNG, supporting facilities, roads etc. For example, Leicestershire assume a gross to net split of 62.5% for sites up to 35ha<sup>1</sup>.

**Q6l - 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?**

The s106 cost shown in the EBC04 of £4,295,000 equates to £7,158 per dwelling; this is significantly lower than is shown elsewhere in Erewash. The costs of school provision appears to be lower than our experience in Derby City given that sites of around 700 (i.e. only a little larger than this site) generally create sufficient capacity to justify an onsite primary school.

**Q6n - What is the expected timescale and rate of development and is this realistic?**

The submitted housing trajectory (EBH3a) identifies a start year for delivery of homes of 2024/25 and a build rate of rising to 100dpa. We understand that no planning application has been submitted and as such delivery of any homes in the next financial year onwards appears highly unlikely given the work need in terms of planning permission (outline/RMs), discharge of conditions, technical approvals before ground works can begin in advance of housing delivery.

**Q7 - Strategic Policy 1.4 North of Spondon**

**Q7m - What is the expected timescale and rate of development and is this realistic?**

The submitted housing trajectory (EBH3a) identifies a start year for delivery of homes of 2024/25 and a build rate of rising to 70dpa. We understand that no planning application has been submitted and as such delivery of any homes in the next financial year onwards appears highly unlikely given the

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[https://www.nwleics.gov.uk/files/documents/shelaa\\_joint\\_methodology\\_2019/SHELAA%20Joint%20Methodology%20Paper%20-%202019.pdf](https://www.nwleics.gov.uk/files/documents/shelaa_joint_methodology_2019/SHELAA%20Joint%20Methodology%20Paper%20-%202019.pdf)

work need in terms of planning permission, discharge of conditions, technical approvals before ground works can begin in advance of housing delivery. A build rate of 70dpa is also higher than normal given that this will likely be developed by a single developer where a build rate of 40-50dpa is more normal.

#### **Q8 - Strategic Policy 1.5 South West of Kirk Hallam**

##### **Q8e – What is the basis for the scale of development proposed and is this justified?**

The Viability Assessment (September 2023) (EBC04) identifies that the site has a net developable area of “around 43ha” with a gross area of around 51ha; this would suggest a gross to net split of 86%. This is totally unrealistic when accounting for sites of this size and their requirements for open space, landscaping, BNG, supporting facilities, roads etc. For sites of this size Leicestershire would assume a gross to net split of 50%; this would indicate a capacity of closer to 900 dwellings.

##### **Q8j - 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?**

The cost of the school shown in the Viability Assessment (September 2023) (EBC04) is significantly lower than the £10 million suggested by Derby City Council in relation to a new 1.5fe primary school on a site we are involved with. There is no justification for the cost or information on the funding of the road.

##### **Q8l - What is the expected timescale and rate of development and is this realistic?**

The submitted housing trajectory (EBH3a) identifies a start year for delivery of homes of 2024/25 and a build rate of rising to 120dpa. We understand that no planning application has been submitted and as such delivery of any homes in the next financial year onwards appears highly unlikely given the work need in terms of planning permission, discharge of conditions, technical approvals before ground works can begin in advance of housing delivery. It is unclear if all the land needed to build the road is within the control of the site promoter and does not requires completion of a CPO; if this were to be the case a significant delay would be experienced.

A build rate of 120dpa would likely mean three developers on site at any one time; this appears to be high given the nature of the site and an assumption of two developers would be more realistic.

#### **Q9 - Strategic Policy 1.6 North of Cotmanhay**

##### **Q9e – What is the basis for the scale of development proposed and is this justified?**

The Viability Assessment (September 2023) (EBC04) identifies that the site has a net developable area of around 7ha; assuming the figure provided in the Strategic Growth Area Assessment (EBH1) is a gross figure (as is indicated by other sites) this would suggest a gross to net split of 97%. This is totally unrealistic when accounting for sites of this size and their requirements for open space, landscaping, BNG, supporting facilities, roads etc. For sites of this size Leicestershire would assume a gross to net split of 62.5% indicating a capacity of around 150 dwellings.

##### **Q9g - What are the highways implications of the allocation and how will any impacts be mitigated?**

It is understood that access would be taken from Heanor Road via Woodside Crescent; it is understood that the site promoter controls a property on Heanor Road that would allow for an access to be provided (assumed to be either 332 or 330 Heanor Road). However, other properties lie alongside Woodside Crescent to the east of the junction along the main access to the site and the land ownership narrows at a point where a PRoW (which appears to lie on 3<sup>rd</sup> Party Land) joins Woodside Crescent. It is unclear if the width along the length of Woodside Crescent would be sufficient to allow the access required in their design guidance.

**Q9I - What is the expected timescale and rate of development and is this realistic?**

The submitted housing trajectory (EBH3a) identifies a start year for delivery of homes of 2024/25 and a build rate of rising to 100dpa. We understand that no planning application has been submitted and as such delivery of any homes in the next financial year onwards appears highly unlikely given the work need in terms of planning permission, discharge of conditions, technical approvals before ground works can begin in advance of housing delivery.

A build rate of 100dpa is also significantly higher than normal given that this will likely be developed by a single developer where a build rate of 40-50dpa is more normal.