

# **Erewash Core Strategy Review Examination Response to Matters, Issues & Questions (MIQs)**

## **Main Matter 10: Delivery and Monitoring**

### **Issue:**

**Whether the approach to delivery and monitoring is justified, effective and consistent with national policy.**

### **Questions:**

- 1. How has viability been taken into account in preparing the Core Strategy Review and setting policy requirements? What are the conclusions in terms of the realistic delivery of the proposals within the Core Strategy Review? Are any amendments required following the publication of the Viability Assessment (September 2023)?**

The Council have worked very closely with the various site promoters of strategic site allocations from an early stage of the Core Strategy Review (CSR) to understand the realistic expectations of what facilities and general infrastructure can be delivered on a site-by-site basis. Close dialogue has been ongoing throughout the course of the CSR to ensure it is clear for all parties what can and cannot be delivered in respect of individual sites. These discussions have included regular meetings between the Council and agents representing housebuilders.

As referenced, a Viability Assessment (VA) was also produced. This tested the viability of each of the proposed allocations. The VA was undertaken by Dr Andrew Golland, a specialist in the field of development appraisal and development economics.

The outcome of the VA showed that the development of each proposed allocation was viable. Details of each individual site's viability results can be found in the VA document (EBC04).

Since the submission of the original statement, the Council has produced a revised housing trajectory. One of the main amendments concerning the size of Strategic Housing Allocations in the CSR is the reduction in capacity at the SW Kirk Hallam site (Policy 1.5) from 1,300 to approximately 1,000 homes. In order to seek assurances that a reduced site capacity could continue to finance the essential infrastructure required to support the successful delivery of SW Kirk Hallam the Council recommissioned Dr. Andrew Golland to update the VA based on the new capacity. The updated VA (EBC04a) confirms that the site continues to be viable at the reduced capacity of 1,000 homes.

In light of the VA's findings, along with the updated VA, no amendments are required to any aspect of the submitted CSR.

**2. Is the approach that the Core Strategy Review takes to viability and the application of policy requirements sufficiently flexible?**

Yes, the approach the CSR takes to viability and the application of policy requirements is sufficiently flexible.

Flexibility is explicitly addressed within the site specific policies (Strategic Policies 1.2 to 1.6) through the affordable housing requirements within these policies. Affordable housing requirements are subject to each individual site's viability. The VA update demonstrates that the Strategic Policies display sufficient flexibility with an example of this the reduction in size of the SW Kirk Hallam allocation. The fact that this allocation was reduced by 25% in housing numbers yet still remains viable after testing demonstrates this. Similar flexibility is built in across all Strategic Policies.

**3. How will the Core Strategy Review be monitored? Will this be effective and how would any issues arising from monitoring be addressed?**

The Core Strategy Review will be monitored through the annual production of the Authorities Monitoring Report (AMR). This offers a timely and regular opportunity to keep each of the Plan's policies under review, appraising each ones effectiveness. Monitoring of site allocations in particular will be done through the Development Management process as sites progress from pre-application, through construction phases and to completion. Annual monitoring on the progression of these strategic sites will be undertaken via the Council's annual residential land monitoring work, where the Council will be able to monitor all aspects of the development including lead-in times and build out rates. In conjunction, s106s which obligate the provision of infrastructure alongside the development of allocations will be subject to active and continuous monitoring through the Council's comprehensive s106 monitoring database.

**4. Does the Core Strategy Review have sufficient flexibility to respond to changing circumstances? Which policies/measures will ensure that?**

Whilst the Council recognises the need for Plans to demonstrate flexibility in line with NPPF requirements, it must be borne in mind that Erewash comprises approx. 70% of land designated as Green Belt. Accordingly, opportunities for the Plan as a whole, and individual policies relating to the delivery of strategic growth in particular to show flexibility are extremely limited. Higher levels of growth, whether this is connected to housing or

employment needs, would inevitably necessitate further incursions into the Green Belt. With partner councils within the remaining Core HMA and the adjoining Derby HMA confirming they are not able to accept additional levels of growth (see the Council's Matter 2 statement), the Plan's growth strategy cannot advocate for unfettered flexibility.

As per the Council's answer to MM7 Q13, the Council has been in constant dialogue with four of the five promoters of site allocations throughout the Core Strategy Review which has allowed meaningful collaboration with site promoters to ensure that the policies developed are realistic. This collaboration has led to the Council receiving a planning application for land North of Spondon (ERE/0923/0024) proposing 263 homes. Positive and proactive discussions continue with the developer over the most suitable site capacity, but the Council are of the view that approx. 250 new homes is a more appropriate capacity to achieve the site-based criterion set out in Strategic Policies 1.1 and 1.4. Such a scheme would represent an increase of 50 homes over and above Strategic Policy 1.4.

Notwithstanding the above, the Council would wish to point to Strategic Policy 3 – Town, Local and Village Centres as an example of where the Council has demonstrated flexibility in the removal of Primary Shopping Areas within the Borough's two town centres. This is a response to ever changing retail and trade conditions affecting shopping areas across the country, and promotes the two highest order centres as being locations where a mix and diverse range of town centre uses can exist, contributing to them being vital and viable places.