

# Erewash Core Strategy Review Examination

## Response to Matters, Issues & Questions (MIQs)

### Main Matter 7: Housing Land Supply

#### 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.**

#### Relevant policies: 1.1

#### Questions

#### Total supply

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

To date, a total of 267 net additional dwellings have been completed in the plan period. These were recorded from the 2022-23 monitoring year. As presented by the Council's Main Matter 5 statement, the potential to extend the Core Strategy Review plan period to ensure a minimum of 15-year coverage could alternatively run between the years 2022 and 2039 and this shown by the revised Housing Trajectory (EBH3b & EBC11). For the purposes of converting whole plan years into equivalent monitoring years, it is necessary to commence the plan's coverage from the 2022-23 year. The 267 net dwellings recorded from 2022-23 reduces the Borough's overall revised housing requirement of 6,562 units down to 6,295 units should a revised and extended plan period be considered appropriate. Work to monitor residential land availability for 2023-24 is currently being undertaken by the Council.

- 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**

Sites from this source are assumed deliverable, with very few recorded instances where after a lawful commencement of development, house building has stalled for any significant period of time. Therefore, such sites are treated accordingly with lead-in times, timings and annual rates of delivery based on local market conditions and historic trends. Sites with planning consent, regardless of construction status, are expected to come forward without delay. A sizeable proportion of new housing delivered in Erewash over recent decades has come from small/minor sites. Such sites do not face the

same pressures as major development, without the need to deliver higher level infrastructure. Whilst different pressures on smaller sites exist, the Council has observed timely lead-in times and build-out rates for sites gaining consent, commencing development and then being completed. This data can be found within EBH9a, with the findings largely reflecting assumptions made for sites in this category which feature within the Council's 2022 SHLAA (EBH4 and EBH4a-d).

**b. Sites with planning permission and not started (split by outline and full permissions)**

In keeping with the answer to Question 2.a, sites with planning permission are also assumed to be deliverable regardless of whether commenced or not, and as such, are expected to come forward without delay. However, a difference here is the divide between full permission and outline. Sites with full permission will follow the principle set out in a. and have been placed within the most immediate part of the five-year period established by the Council's SHLAA. Consistent with the answer a. regarding local data on housing delivery conditions and activity contained in EBH9a, the assumptions made in respect of delivery are broadly in line with the evidence here – particularly that contained at Page 4.

Outline Permissions transitioning to Full Permissions:

In respect of outline permissions granted for residential development which contribute to the Borough's housing supply, once again attention should be drawn to the same table as referred to in the previous paragraph. This shows an average lead-in time of two years, reflecting the fact that in the majority of cases the granting of a further reserved matters consent will be required to enable physical construction of housing stock to begin. Alterations made to the Housing Trajectory have impacted on where stock with outline consent sits within anticipated delivery projections. The Council have not altered any aspect of delivery from developable and deliverable supply other than to address where housing development has already delivered at the beginning of the period covered by the revised trajectory on 'live' sites. As a consequence, those sites that benefit from outline consent will have in effect moved forwards within the trajectory. This sees a handful (3 sites yielding 3 units) of outline consents now fall within the 2023-24 year. A larger level of supply from outline permissions is scheduled to occur within the 2024-25 monitoring year (Year 1 for 5YLS purposes) with 45 units expected to be built across 10 sites, although this total is skewed somewhat by the anticipated delivery of 28 units at the former Gas Street Industrial Estate (a further 25 units at the same site form part of 2025-26's housing supply). However, a now approved reserved matters permission on this site (ERE/0423/0009) for 53 units gives greater certainty over prospects for the site's delivery.

Similarly, the delivery prospects have improved at another major housing development, the former Oakley's Mill site in Long Eaton, which also forms a significant element of supply arising from outline consent (ERE/0120/0049). The original positioning of anticipated supply of 46 units across 2027-28 (25 units) and 2028-29 (21 units) was pragmatic given the site's stalled status

since the original Mill was demolished back in 2015. However, with conditions of the outline consent now being discharged by the Council, the prospects for earlier delivery are heightened. Once again whilst the council is not making wholesale updates to its 2022 SHLAA to reflect new permissions granted since the publication of evidence on housing supply, activity around sites such as Gas Street and Oakley's Mill help to strengthen prospects for sooner than anticipated housing stock which gives greater certainty to delivery within the 5YLS.

#### **c. Sites identified in land availability assessments**

Sites identified within land availability assessments are almost exclusively covered by the portfolio of sites referred to in response to **a.** and **b.** above. However, there are a small number of sites assessed as having potential to accommodate new housing which do not have planning permission, and as such, are deemed developable (and positioned outside of the deliverable five-year supply period) because of the absence of planning consent. These sites vary in their character and size, meaning bespoke management of assumptions regarding when such sites are likely to come forward for development and the speed in which construction will occur is necessary and has been applied in their positioning within the delivery schedule.

#### **d. Sites identified in the brownfield register**

Sites identified by the Brownfield Land Register (BLR) are almost exclusively all within the Council's 2022 SHLAA. As such, BLR sites do not make any explicit contribution as a standalone source of housing land supply. Sites in the BLR will already be accounted for within the most up-to-date SHLAA, so assumptions about their delivery are presented elsewhere in answers to **Q2 a-c.**

#### **e. Adopted Core Strategy allocations without planning permission**

This relates solely to the Stanton Regeneration Site, which is allocated by Policy 20 of the Adopted Core Strategy (March 2014). As explained in response to other Matters (but particular **Matters 6 (Q5)** and **8 (Q5)**), the current site allocation has been divided into a north and south section either side of Lows Lane as a consequence of land disposal. The CSR therefore plans on this basis. Further information about Stanton South can be found in **Strategic Policy 1.2 – South Stanton**. Reflecting details of the existing land ownership matters referred to in **Q5 of Matter 6**, the site's availability status cannot currently be considered deliverable. However, with the installation of highway infrastructure associated with the now under-construction Stanton North strategic employment site taking place, it is reasonable to assume delivery of 100 new homes per year, originating from two volume housebuilders working in different parts of the site, each constructing approx. 50 units per year, commencing just beyond the first 5-year plan period from 2029-30 onwards throughout the remainder of the proposed plan period.

#### **f. Windfall sites**

The Council has altered its approach to how supply arising from windfall sites contributes to a proposed revised plan period. Information contained within EBH9a sets out data which provides important context to the contribution of windfall development historically within the Borough. As can clearly be seen from this, but particularly the table on Page 6, a sizeable element of housing development built in Erewash has come through from windfall sources. For reasons explained below, this is likely to continue across the remainder of the plan period.

In terms of specifying further detail around matters of delivery, the fact that the origins of windfall sites are unknown to the Council mean it cannot readily offer assumptions on more detailed aspects of housing supply. The Council's work to identify the scale of windfall allowance (see Q9) is only able to consider sites cumulatively by aggregating data on individual sites together for the purposes of generating an overall number of homes likely to come forward from this source.

Longer term, the Council makes realistic assumptions about the scale of windfall allowance contributing to its overall plan-wide housing requirement. This reflects the presence of strategically-sized housing developments around the Borough which are likely to affect the dynamic and functioning of the localised housing market and the homes which would come forwards from allocations. Whilst windfall sites in Erewash are typically those which yield small/minor schemes, carefully reflecting the urban morphology of the Borough's two towns, it is still expected that opportunities for urban intensification will continue to occur given the Development Plan's framework of policies offering strong support for small-scale housing development in parallel to making provision for strategic-scale housing schemes. As such, there are strong prospects for windfall development to play an important supplementary role to delivery arising from strategic allocations both in the short-term, and then continuing throughout the proposed revised plan period.

#### **g. Housing site allocations in the Core Strategy Review**

Five such allocations are contained within the CSR. Details relating to assumptions made regarding delivery, but mainly the scale of homes likely to be completed, are presented by Table 3 of the Council's 5YLS Position Paper (EBH3) with the delivery rates also contained within the housing trajectory set out at EBH3a. However, the revised Housing Trajectory (EBH3b & EBC11) revises assumptions around the now altered housing capacities of two of the CSR's site allocations based on circumstances arising from their respective site promoters.

Information around housing delivery of the site allocations in the CSR has benefitted from close dialogue with promoters of each of the sites throughout the course of the CSR's development. This has allowed the Council to better understand the factors which may impact on the rate of development at each allocation. All site promoters of the four Green Belt allocations are acutely aware of the urgency of and need to commence housebuilding in a timely, yet

prompt manner, with acknowledgement made within submitted representations since allocations were included within the Plan stating how the draft allocations could play a significant role in boosting the delivery of new homes, overseeing a step change in the types of site available for housebuilding and helping the Council to identify a 5YLS of deliverable land. The discussions and communication referred to in response to Questions in Matter 6 have therefore influenced the setting of realistic building rates and lead-in times presented within EBH3 and EBH3a.

**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?**

The basis for a 6% non-implementation rate to be applied to deliverable and developable sites from the 2022 SHLAA is set out at Page 7 of EBH9a. The Council's residential monitoring work has enabled the production of data allowing assessment of the number of housing consents which have lapsed, with data split between small/minor (1-9 homes) and large/major (10+ units) developments. With the information on lapsed permissions spanning a period of six years, this draws data from a sufficiently long period to enable an understanding of trends to be formed in which a non-implementation rate was able to be generated from. To confirm, the 6% rate continues to be applied as part of the Council's revised Housing Trajectory.

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

All information presented by the Council across much of its evidence base, but primarily that set out by the 2022 Erewash SHLAA (EBH4), the 5YLS Position Paper (EBH3) and the housing trajectory (EBH3a – now superseded by EBH3b & EBC11) that has been prepared to show expected housing delivery the Borough, identifies a small gap between the overall number of homes the Council is planning to deliver and the total identified supply of housing. As shown within the updated Housing Trajectory, the difference between the plan's housing requirement and identified supply is **218 homes**. However, information provided in response to Q1 of MM5 suggests that Erewash's most recently calculated LHN of **376 homes** per annum would, if applied across the revised plan period of 2022-39, result in a plan-wide need for 6,392 homes - a shortfall of just **48 units** against the identified supply. Another key consideration relates to information provided at Q1 of MM5 which explains that despite the potential for the housing elements of the plan being extended to cover a 17-year period, the evidence advising on the availability of housing land supply in the Borough remains identical and drawn from the same source (the 2022 SHLAA). As a consequence, the Council has not been able to formally identify any additional land through an updated SHLAA exercise to address the identified shortfall, which would allow a number of new consents granted for residential development to be incorporated into the overall land supply. The absence of new housing permissions from April 2022 onwards when the 2022 SHLAA bases its information on housing sites from results in an artificially low figure shown in lines (b) and (c) of the revised

Housing Trajectory. Data available from a reviewed and updated SHLAA would help to reduce, and possibly even remove altogether the reported shortfall, and likely see sufficient land available to meet the housing requirement across the entire proposed plan period out to 2039.

- 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?**

See the Council's response to Q5 of Matter 5 which confirms the existence of at least 10% of the housing requirement being able to be met on sites no larger than one hectare. In total, the Council can demonstrate 11.5% performance in response to the expectation set out by NPPF Paragraph 69. As explained in response to Q5 of MM5, the 11.5% figure will likely be elevated significantly given much of the windfall provision accounted for by the revised Housing Trajectory will occur on sites smaller than one hectare in size as per historic trends observed in the Borough.

### ***5 Year Housing Land Supply***

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

The Council's housing land evidence supporting the submitted CSR (contained within EBH3) identifies a 5-year housing land period spanning the years 2022-23 to 2026-27. However, with the CSR reaching the hearing sessions stage of Examination in 2024, this leads to conflict between the base date of the housing evidence and the Plan's potential adoption date.

In order to resolve this, the Council has produced a revised Housing Trajectory (EBH3b & EBC11).

With the above in mind, a more realistic 5-year period upon adoption would cover the 2024-25 to 2028-29 period, assuming the CSR is found sound within the 2024-25 year. Further to commentary provided by the Council regarding the timing of when housing affordability data is released by ONS (see Q1 MM5), an actual 5YLS requirement can be difficult to fully identify, particularly during the course of a live Examination. However, the information provided by MM5 Q1 which reports an annual LHN of 386 homes is able to simply be rolled forward to cover an updated 5-year period without a change to the LHN number.

The current five-year requirement is 2,316 homes (386 x 6 years, incorporating a 20% buffer). Despite the rebasing of which year the five-year

supply is due to commence in, the way the figure has been calculated remains accurate and is presented in Table 2 of EBH3.

**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?**

The Council's revised Housing Trajectory (EBC11 & EBH3b) indicates **2,352 dwellings** are expected to be delivered in the first five years following the anticipated adoption of the CSR. The five-year period commences in 2024-25 (Year 1) and runs through to 2028-29 (Year 5). The identified supply (2,344 homes) is just in excess of the five-year requirement at adoption which totals 2,316 units. This results in a 5.06-year land supply. However, as explained above in response to Q4, this figure would have been higher had the council been able to produce a more up-to-date SHLAA which would likely identify additional deliverable housing land. Much if not all, would have resulted from adding newly-consented residential development to the existing stock of deliverable housing sites.

**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?**

Only 4 of the 150 sites (2.7%) identified as contributing new housing to the Council's current 5YLS do not benefit from planning permission. It is accepted that sites without consent are required to demonstrate how they meet the classification of being deliverable in line with national planning policy guidance. The Council, in partnership with other Nottingham Core HMA councils in work presented by EBH7 and EBH8, have over the course of several SHLAA updates worked to greatly reduce the quantity of sites without planning permission within successive reported 5YLS's in order to align with definitions around deliverability (and developability). This has culminated in just four sites remaining within the deliverable (0-5 years) tranche of housing supply. These are the strategic housing sites allocated within the Plan. The clear evidence on why the Council expects these allocations to commence within a five-year timescale can be found in responses made in **Matter 6**, and specifically **Questions 6 L-N, 7 K-M, 8 J-L & 9 J-L**.

**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?**

The windfall allowance made for as part of the expected 5YLS totals 500 housing units and sees a flat provision of **100 units per annum** across the five-year period between 2024-25 and 2028-29.

As discussed in response to **Q2f**, information contained within EBH9a from Page 6 onwards provides helpful contextual data presenting data on recent trends of windfall housing delivery. It should be noted that the previous

Housing Trajectory incorporated 462 units in total into the 5YLS (at 231 units per annum for Years 4 and 5 of the 5YLS period). Through the preparation of a revised Housing Trajectory to address concerns over an insufficient plan period, the Council has considered the approach taken to planning for windfall development and altered its assumptions to follow a more pragmatic approach.

The Council's approach to setting a consistent windfall allowance which remains stable beyond the 5YLS period attempts to demonstrate the consistent role and contribution this source of housing supply has made over a prolonged period of time. In the housing trajectory submitted alongside the submission CSR, the Council limited windfall allowance to Years 4 and 5 of its 5YLS. Whilst this was a valid approach for the reasons set out in the previous statement for MM7, the Council are of the view that limiting windfall contribution to only the final two years of a 5YLS calculation does not reflect the continual supply of windfall housing each year. The justification for limiting windfall allowance to Years 4 & 5 was to avoid the potential for double counting of planning permissions. The new approach mitigates this by reducing the annual provision, whilst reflecting the continuing role planning permissions make to overall deliverable housing supply.

The setting of a 100 dpa windfall provision arises from technical work carried out by the Council through differentiating the sources of the net completions figure reported in the revised Housing Trajectory. Analysis of the 2022-23 completions recorded by the Council through its monitoring work, which saw 267 units, was able to determine that 105 of these units originated from a non-SHLAA source with completions arising from sites that were not part of the 2022 SHLAA. The 105 figure was rounded down to 100 by the Council, providing a consistent input across all remaining years covered by the revised Trajectory.

Nevertheless, it must be borne in mind that with no formal housing allocations other than the Stanton Regeneration site from the adopted Core Strategy, as per the NPPF glossary, almost every planning permission for residential development granted by the Council is likely to be deemed as windfall by definition.

Forward projection of windfall allowance for the remainder of the plan period can be seen within the revised Erewash Housing Trajectory at EBH3b & EBC11. This shows a consistent rate of windfall extending beyond the Borough's 5YLS across the entirety of a suggested revised plan period. As demonstrated by historic data presented by EBH9a, there is a long-term trend of a substantial component of the Borough's new housing stock originating from windfall sources/sites. This responds to the Council's established preference for a spatial growth strategy involving urban concentration with regeneration which strongly encourages development, both in urban areas and within village settlement boundaries inset from the Green Belt, helping ease pressure on the designation inside Erewash. Whilst the Council has identified land in the Green Belt to meet its housing needs as part of the CSR, its housing policies within the Development Plan when taken together



continue to provide a positive framework for largely small-scale, minor housing schemes to occur. As such, and with a spatial growth strategy still favouring new development in non-Green Belt locations, windfall development will endure beyond the 5-year period and extend across the plan period.

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

Yes. The application of a 20% buffer is fully justified. The Council's longer-term housing delivery record, consistently recording less than 85% of its necessary housing requirement across the period of time the Housing Delivery Test (HDT) has been in place to assess performance, sees Erewash required to make provision for a buffer as part of the measures required.

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

Currently, based on the local housing need (LHN) figure calculated using the Standard Method (which has influenced both the 5,800 homes and the revised proposal for 6,562 homes as part of the plan-wide requirement), the annual LHN is 386 homes per annum. For the purposes of calculating a 5YLS, the 386 homes figure also represents the total of the 20% buffer, with this number added to the 1,930 homes accumulated from five years of the assessed LHN figure, totalling a requirement for 2,316 homes.

In terms of each source of supply, the Council has demonstrated the component parts of its 5YLS, both in its latest SHLAA and also the accompanying 5YLS Position Paper (EBH3). Whilst NPPF Para 74 calls for land to be brought forwards from later in the plan period, this appears at odds with the intention of boosting supply. Instead, sources of housing land supply already identified as deliverable form part of the Council's 5YLS – therefore improving prospects of earlier delivery of new housing. This means the disaggregation of supply, pinpointing where exact sites/land are needed to demonstrate the provision of a 20% buffer, is felt to be unnecessary.

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

The information provided in response to **Q11** is of relevance. Due to where Erewash sites are drawn from to ensure a 20% buffer to the Council's 5YLS, then assumptions on sources of supply for this period are consistent with answers provided by **Q2a-g**.

**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?**

As discussed in response to **Q2g** above, the Council has established strong dialogue and embarked upon meaningful collaboration with site promoters of four of the five strategic housing allocations in order to secure early delivery.

This has enabled the Council to develop policies which are realistic in terms of expectations around the delivery of required infrastructure. Evidence of the proactive collaboration between the Council and site promoters has resulted in a planning application already submitted for the North of Spondon site (ERE/0923/0024) proposing 263 homes. Subsequent discussions have seen the Council propose a small reduction to 250 homes in order to meet planning principals set out in policy, but this still represents additional numbers over and above the 200 homes which Strategic Policy 1.4 makes provision for and demonstrates the possibility for some flexibility in the scale of housing to be delivered at strategic housing allocations. The collaborative manner in which the Council has worked with site promoters throughout the Plan's development has enabled the preparation of applications in parallel, as a consequence of establishing a strong spatial growth strategy at the Plan's outset, giving certainty to future applicants.

In terms of wider flexibility around housing delivery in the unlikely event allocations do not come forward as anticipated, localised planning conditions must be taken into account. Primarily, this involves the Borough's extent of Green Belt designation and the important continuing role it plays in preventing coalescence between Nottingham and Derby. Approximately 70% of Erewash is Green Belt, limiting greatly the Council's ability to demonstrate sizeable flexibility in the identification of suitable and sustainable sources of land allowing for housing growth. The identification of a strategic growth strategy does indicate where the Council would encourage new housing growth, and strategic housing allocations made in the Plan closely reflects this. The Council continues to proactively encourage new housing locations around the Borough that are compliant to planning policies.

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

Yes. For the reasons given above in response to Q1-14, the Council would be able to demonstrate a 5YLS upon the adoption of the CSR. Whilst the supply is marginal in showing the existence of a 5YLS, there are strong reasons explained in response to Q4 and Q7 which demonstrate why the 5YLS figure presented by Q7 is likely to be artificially constrained to a lower level.

***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?**

Yes. The Viability Assessment (VA) (EBC04) produced to appraise aspects of the CSR confirmed the provisions within four of the five housing allocations, insofar as they relate to the delivery of stated requirements for affordable housing, were up to date. Each of the housing allocations located in Green Belt have been confirmed as being able to deliver the scale of affordable housing indicated and expected by their respective site allocation policies. Due to the site promoter of the South-West Kirk Hallam allocation proposing a

scheme which reduces the number of homes from 1,300 to 1,000, an addendum to EBC04 (EBC10) investigating the viability of delivering forms of supporting infrastructure has been undertaken. This confirmed that the affordable housing provision being sought by the site allocation policy remains viable. One exception to being able to demonstrate housing viability is Strategic Policy 1.2 – South Stanton. More challenging viability conditions as a consequence of the site's characteristics conclude that the requirement to provide 10% of units as affordable might not be achievable. However, attention should be drawn to the wording of that element of the Policy which qualifies the 10% requirement by stating such a figure would only be appropriate subject to viability. It should be noted however, that this site is scheduled to commence delivery outside of the revised five-year period.

**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?**

Focusing on the delivery of affordable housing in a wider context, the Council has secured a healthy number of affordable units between 2017-18 and 2021-22 with a total of 333 new homes delivered on residential developments at an annual rate of 67 per annum. This level of performance has been underpinned by Registered Providers purchasing land unattractive to commercial housebuilders, helping to boost the supply of new homes and contribute towards the demand for affordable properties. This trend is set to continue into the near future with the consented and commenced development site at Bennett Street, Long Eaton set to yield 109 new affordable units. All units referred to so far have been delivered from non-allocated, non-strategic housing sites and have been achieved through the application of policies from the adopted Core Strategy (Policy 8), aided by the provisions of the Council's Developer Contributions SPD.

The CSR's strategic allocations, with their varying levels of affordable provision, contributes to further boosting the Council's performance in delivering affordable housing. Additional to the committed supply, the five housing allocations could deliver as many as 335 affordable homes in total across the sites, with another 160 homes being provided in off-site locations in areas across the Borough where need for affordable housing is high. In total, this would see the delivery of 495 affordable homes. The Council's Local Plan Viability Report (EBC04) provides an assessment of whether the various policy provisions set out within each site allocation policy represent a realistic and viable element of policy, with all stated percentages subject to viability. Demonstrating this will be for site promoters of each allocation to confirm, via discussions with the Council prior to the submitting of future planning applications.

Taken together, affordable housing supply from strategic and non-strategic sources is insufficient to meet the full, evidenced need for this form of housing as concluded by the Nottingham Core (and Ashfield) HMA Housing Needs Study (EBH10). With need not being met, alternative options to increase the

delivery of affordable housing would inevitably involve the identification of further Green Belt land in order to facilitate the provision of similar scales of affordable units to those tested for viability on the CSR's site allocations. For reasons explained in more detail elsewhere within the Council's responses to these main matters (but in particular, Main Matters 3, 4 and 5), the Council feels pursuing such a strategy would be inappropriate given the level of harm arising to the Nottingham-Derby Green Belt within the Borough's boundaries.