



Erewash Core Strategy Review Examination  
Addendum to Hearing Statement re Matters 1, 5 and 7

Representations on behalf of  
Green 4 Developments Limited

May 2024

## **1.0 Housing Trajectory new document EBC11**

1.1 These representations have been prepared by Green 4 Planning on behalf of Green 4 Developments Ltd (Green 4) and are solely concerned with the new document **EBC11** Erewash Housing Trajectory 2022-2039.

1.2 In Green 4 Developments hearing statements in reference to Matters 1 5 and 7, reference is made to the need for the Plan to cover a 15 year period and therefore a review of the housing trajectory to project growth to 2039 was required to fully conform with the NPPF.

1.3 Document EBC11 does provide a 15 year housing trajectory however in doing so changes are also made to the figures within this, with very little explanation and no evidence as to the basis for this.

1.4 We highlight the following concerns;

### **(A-C) SHLAA**

1.5 We note the numbers delivered from SHLAA sites decreased in 2022-2023 from the predicted 293 to actual completions of 162. Demonstrating the difficulty in forecasting and the need for built in flexibility and alternative sites to meet the need.

1.6 We also note that Erewash expect to deliver circa 528 dwellings in 2023 to 2025 time period on SHLAA sites. In order to hit that target we presume that these must be all have started on site and we would welcome the evidence for this.

### **(D -E) Windfall**

1.7 In the Green 4 hearing statements we highlight the lack of evidence for the assumptions around windfall numbers, and especially how and where these might be accommodated in a District with a significant Green Belt and very tightly drawn settlement boundaries.

1.8 Within the revised trajectory, the windfall allowance has increased substantially, with little or no additional justification.

1.9 The previous trajectory identified 1062 dwellings in the Plan Period - whereas the revised trajectory indicates 1,600 will be delivered, a 50% increase.

- 1.10 Although there has been a reasonable provision of housing on windfall sites in Erewash in the past, there needs to be evidence that this will continue in the future, and that the Council has undertaken appropriate work to show that this will be the case.
- 1.11 The continued high levels of windfall delivery seems extremely improbable to achieve in a Local Authority area which is predominantly Green Belt, and where the settlement boundaries are tightly drawn.
- 1.12 On the same topic, the trajectory shows 100 dwellings being delivered this year on windfall sites. For this to be achieved, these sites would need to be subject to permissions gained in the last year. We presume the Council has the evidence to show that these windfall numbers can be achieved.
- 1.13 A review of the Joint Methodology Report for Erewash (Core Document EBH9a) sets out the context of the Council's particular housing performance. It is clear that the historic provision of windfall sites across the District has included a large number of units on larger sites of 50 or more dwellings. Green 4 considers that, if the Council is serious about its new Core Strategy Review being a strategic planning approach to the District, it should not be relying on large windfall sites for its housing delivery. This makes understanding and challenge of the approach very difficult, as no-one actually knows where these houses might be located or the scale of the delivery.
- 1.14 Overall, without any evidence, Green 4 is concerned that the increase in the windfall allowance for Erewash, with its significant Green Belt areas, will not be achieved. This approach, requires some large scale sites to come forward as windfall sites, and if this is what the Council is intending, then the Council should have been able to identify these sites as part of the strategic provision for the area.

#### **(F) Surplus Land**

- 1.15 We note the expected provision from surplus land has increased from 200 to 297 and that 130 new dwellings are expected to be delivered in the 2025-2026 timeframe. However within the notes it is acknowledges that none of these sites are subject to a live application. Without any evidence to the contrary, this seems optimistic.

**(G) South Stanton**

- 1.16 Despite no agreement from the landowners and no site promotion or representation to the Local Plan process, Erewash continue to use the figure of 1000 dwellings on this site to meet their housing need over the Local Plan period. It is not appropriate to continue to include this site as a strategic allocation.

**Summary**

- 1.17 Given the new trajectory and the amendments to the figures within this, we would expect some evidence or explanation as to both the basis of these figures and proposed changes to them.

