



Our Ref: P1763/SS

Date: 8.5.2024

Programme Officer

BY EMAIL: programmeofficer@erewash.gov.uk

Grosvenor House
75-76 Francis Road
Edgbaston
Birmingham B16 8SP

T 0121 455 9455
F 0121 455 6595

Dear Ms Schofield,

RE: Matter 3 Hearing Statement - Addendum

Harris Lamb Planning Consultancy has been instructed by Wulff Assess Management to prepare this addendum to their Matter 3 Hearing Statement. The points made in our original hearing statement remain relevant. This addendum adds to the original submission and focuses on the recently published housing trajectory (EBC11) and will update the Inspector on the outcome of the appeal in relation to my client’s site - Ref. Site 371 in the 2022 SHLAA (EBH4a) – Lands at Ilkeston Road / Sowbrook Lane – and what this means for consider this site as a potential allocation through the local plan process.

EBC11 Erewash Housing Trajectory (2022-2039)

We have two comments on the housing trajectory -

1. When all the predicted sources of supply are accounted for, the delivery of housing falls short of the minimum housing requirement by 218 dwellings. This shortfall being before any allowance is built into account for the fact that some sources of supply might not come forward as planned. More sites need to be identified to deliver the housing requirement and we still consider non-Green Belt sites should be exhausted before Green Belt sites are considered.
2. Windfall sites by their very nature are sites currently unknown. The trajectory has been published in 2024 and so it stands to reason that windfalls will not occur until

BIRMINGHAM
0121 455 9455

NOTTINGHAM
0115 947 6236

STOKE-ON-TRENT
01782 272555

WORCESTER
01905 22666



after this date. Anything already delivered or already know will count a completion or will be listed separately. It is normal practice to allow a couple of years for windfall sites to become know, make their way through the planning system and construction to start/complete on site. This would mean windfall sites in a document produced in April 2024 should not appear in the trajectory until 2026/27. This would reduce the supply by 300 dwellings, leaving a shortfall of 518 dwellings against the minimum housing requirement.

Site 371 in the 2022 SHLAA (EBH4a) – Lands at Ilkeston Road / Sowbrook Lane

The appeal on this site as referenced in our Matter 3 Statement was dismissed. However, there are a number of reasons why this should not weigh against a housing allocation on this site in the core strategy review:

1. A key consideration for the appeal inspector was that the debate around this site should be held in the local plan forum, rather than through a planning appeal. The Inspector considered the application to be premature in this context.
2. Through the appeal the Council confirmed the site was strategic in scale. The Core Strategy would, therefore, be the appropriate place to allocate the site.
3. In a local plan context, the consideration is whether non-Green Belt sites have been exhausted before Green Belt sites have been released. This is a distinct process and to demonstrate that the release of Green Belt land meets the exceptional circumstances test, it needs to be demonstrated that all other sources of supply, including my client's site, have been exhausted.
4. In a local plan context, a new housing requirement is set, and sufficient sites need to be identified to meet this requirement (which should also include a buffer in our view to provide appropriate flexibility to meet the minimum requirement). The Council is currently unable to demonstrate this as evidenced by their own housing trajectory and more sites are needed.
5. In a local plan context, green field sites are needed to meet the housing requirement. There is nothing unique or special about my client's site in this regard when

compared to the other green field sites proposed to be allocated and the Council has produced no evidence to suggest this is the case.

6. In a local plan context, Stanton South remains a housing allocation and delivery is predicted to start in 2029/30. Stanton South is around the corner from my client's site and will deliver a school and local centre. Residents of my clients Site would have access to these services and would have the same/better access to other local services and facilities as the residents of Stanton South. If Stanton South is considered to have appropriate access to services and facilities, then the same must be true for my client's site.
7. In a local plan context, the Council's assessment of the site through the local plan route only raises access to services and facilities as an issue. The Council are content that the landscape, heritage harm, etc are not a constraint when considering the allocation of the site in the local plan. This being consistent with the Council's consideration of the appeal proposal, where they concluded that the landscape harm was limit to the immediate locality and not contrary to their landscape assessment, and with their conclusion that the heritage harm would be outweighed by the public benefit of the scheme.
8. One of the limitations in this location is the quality of the bus service. We note that it is proposed that this Bus Service will be upgraded as part of the Stanton South scheme. An additional 200 dwellings in this location will help provide greater certainty over the long-term sustainability of this improved bus route. It will also reduce the financial pressure on Stanton South to deliver this upgrade. Stanton South is a more challenging site financially due to is past use and my client already has a solution to upgrade the bus service agreed with the bus company. This solution could be delivered through a residential allocation on my client's site.
9. In a local plan context, it can be seen that the proposed allocations are struggling financially and will only be able to provide limited affordable housing. My client's site can provide a policy compliant level of affordable housing.
10. A local plan inspector has previously concluded that this site should be reserved for housing, demonstrating that through the local plan process it has been concluded

that this is a suitable location for housing, although the additional land was not needed at that time.

Overall, we still consider that in a local plan context a residential allocation of this site is necessary if the emerging plan is going to meet the local plan tests set out in Paragraph 35 of the National Planning Policy Framework.

We hope that you take our comments into consideration, and we look forward to appearing in the hearing sessions at the beginning of next year.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S Silcocks', with a long horizontal stroke extending to the right.

Sam Silcocks BSc (Hons) MA MRTPI

Director

sam.silcocks@harrislamb.com

DIRECT DIAL: 0121 213 6003

Mobile: 07827 343543