

Erewash Core Strategy Review Examination in Public

Matter 3, Questions 1 - 13

Statement on behalf of Inovo Consulting Ltd

INTRODUCTORY STATEMENT

- i. Hearing Statements are submitted by Christopher Waumsley DipTP MRTPI of Inovo Consulting on behalf of the promoter of land **South West of Kirk Hallam (Lambert Limited)** for which a draft allocation is made under **Strategic Policy 1.5** of the Erewash Core Strategy Review Submission Version.
- ii. Lambert Ltd control and are promoters of land South West of Kirk Hallam which is proposed as a strategic residential led mixed use allocation in the draft plan. The intention is to provide a sustainable urban extension to the South West of Kirk Hallam incorporating a new local centre, strategic green and blue infrastructure including extension to the Pioneer Meadows Local Nature Reserve, and a new relief/link road between Sowbrook Lane South of Kirk Hallam to the A6096 Ladywood Road West of Kirk Hallam.
- iii. Inovo and Lambert Ltd have been positively engaged with the Policy Team, and more latterly, Development Management Team at Erewash since 2020 and throughout the evolution of the Core Strategy Review (CSR).
- iv. For context a summary of activity and engagement undertaken to date in respect of the proposed allocation site is set out below:
 - a) An initial development concept for a sustainable urban extension at Kirk Hallam was prepared in July 2020, worked up in conjunction with the planning authority and proposing a broad vision and overall objectives for development. This concept plan informed the preparation of technical survey and assessment work and was subject to public and stakeholder engagement alongside the November March 201 CSR consultation.
 - b) Responses to that consultation exercise and engagement with key officers, stakeholders and consultees in the period since has resulted in the evolution of the plan
 - c) Alongside this work the promoter's consultant team have carried out a wide range of assessments and studies to allow the identification of the technical considerations pertinent to the site's development. This technical information will inform the preparation of a hybrid outline/detailed planning application for the site's development with the relief/link road and first phase of development in detail and subsequent phases in outline.
- v. Inovo are appearing at the Examination in support of EBC's commitment to an urban extension South West of Kirk Hallam to meet the needs of the plan area within the plan period to 2037.
- vi. In response to the Inspectors Matters, Issues and Questions issued on 5th October 2023, Inovo wish to make a number of points to supplement the representations made by Inovo at the Regulation 18 and 19 stage consultations.

MATTER 3 – THE SPATIAL STRATEGY

(Policies ST1 and ST2)

Issue – Whether the Core Strategy Review is justified, effective and consistent with national policy in relation to the Spatial Strategy.

Q1: Does the Core Strategy have a vision, strategic objectives and provide a clear and cohesive framework for the future growth and development of Erewash?

- 1.1 Inovo consider that the provisions of the CSR in relation to the spatial strategy and location of new development are justified and consistent with national policy. The Core Strategy Review carries forward the vision and strategic objectives of the adopted 2014 Core Strategy (CS) and quite rightly updates the relevant strategies of the CS to achieve that vision and its strategic objectives. Importantly the Draft Options for Growth consultation of January 2020 recognised that the Borough has struggled to achieve the level of housing growth planned for in the CS and the CSR was needed to address this. Reviewing Local Plans to ensure delivery is very much at the heart of both the NPPF and the current national priorities for planned growth and investment.
- 1.2 Specifically in respect of the translation of the Vision and Objectives of the CS into the revised spatial framework of the CSR the need for a Green Belt review is obvious given the stranglehold it has on growth in sustainable locations.

Q2. Will the spatial strategy contribute to achieving sustainable development, including a sustainable pattern of development as set out in paragraph 11a of the national planning policy framework and if so, how ?

- 1.3 It The NPPF informs us in paragraph 9 that “ *Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.*” In Erewash the fundamental constraint to achieving sustainable development is the Green Belt tightly drawn around existing settlements. This local circumstance has effectively prevented the achievement of a sustainable pattern of development that meets the needs of the area and the alignment of growth and infrastructure.

Q3: What were the options for accommodating growth and how were they considered? Have all reasonable alternatives been considered ?

- 1.4 It is anticipated that this question will be addressed by the Planning Authority. However it is self evident that the CS was over reliant on development within existing urban areas. Consequently a review of Green Belt boundaries is the only realistic option to meet the development needs of the

area. The CSR Draft Options For Growth Jan 2020 identifies correctly a sequential assessment of growth options A) – H) and their ability to deliver the housing requirement.

Q4 what is the basis for the conclusions on each of the growth options and are these justified ?

- 1.5 It is anticipated that this question will be addressed by the Planning Authority. However The analysis in the CSR Draft Options For Growth and the consequent conclusions leading to the Revised Options for Growth of March 2021 would seem logical and sound.

Q.5 how was the settlement hierarchy in Strategic Policy 1 derived ? Is the methodology used to determine the hierarchy appropriate and sufficiently robust ?

- 1.6 It is anticipated that this question will be addressed by the Planning Authority. However the settlement hierarchy would seem to be a logical development of the CS hierarchy (Policy 2 Spatial Strategy) taking account of the need to review green belt boundaries.

Q.6 How has the level of development anticipated in different settlement categories in strategic policy one being arrived at ? Does the settlement hierarchy appropriately reflect the role and function of these settlements ?

- 1.7 We consider that this question will be addressed primarily by the Planning Authority in respect of the sustainability appraisals of both the spatial strategy options (SA 1 & 2 and the site-specific SA 3.)
- 1.8 We note the SA 3 assessment of the Land SW of Kirk Hallam allocation (Table 9 of the SA) scored this site 3rd highest of all the potential housing allocations considered at that time and 2nd of those now proposed for allocation. We consider this assessment has been undertaken in a robust and objective manner.

Q.7 Are Has the potential for development in the urban area, the use of previously developed land and increased densities been optimised ?

- 1.9 It is self-evident from the failure of the CS to deliver housing needs to date that the potential for development in the urban area, use of previously developed land and increased densities has been optimised.

Q8 on a strategic, Boroughwide level, does the scale of housing growth required and the limited opportunities within existing built up areas provide the exceptional circumstances to justify altering the Green Belt ?

- 1.10 Quite simply yes.

Q.9 what factors were taken into account regarding the suitability of each of the rural villages/settlements to accommodate growth? What is the basis for the conclusions in each case and are these justified?

- 1.11 It is anticipated that this question will be addressed by the Planning Authority. However, it is clear that one of the drivers for the spatial strategy is the location of new growth at locations which benefit from existing infrastructure and services or at a level where these can be provided within close proximity to facilitate short (non car) journeys to reduce the overall need to travel, thereby positively impacting vehicle emissions and air quality.

Q.10 How were different sites considered for inclusion as allocations ? What process did the council follow in deciding which sites to allocate ?

- 1.12 It is anticipated that this question will be addressed by the Planning Authority.

Q.11 How did the council consider the viability and deliverability of sites in deciding where to allocate development ?

- 1.13 It is anticipated this question will be answered by the local planning authority. However in relation to the allocated site southwest of Kirk Hallam the promoters have worked closely with the council in assessing and sharing viability information throughout the course of the CSR. More recently the promoters of this site have also been working closely with the PLC housebuilder partner to confirm viability and deliverability assumptions.

Q.12 How did the council consider the infrastructure requirements of the proposed development in the strategy and how did this inform the site selection process

- 1.14 It is anticipated this question will be answered by the local planning authority. However in relation to the allocation South West of Kirk Hallam the promoters have thoroughly reviewed and identified the necessary infrastructure required to facilitate and support the development of the site. A considerable amount of detailed design and assessment has been carried out in consultation with statutory undertakers and others to develop an infrastructure strategy and viability assessment. This has enabled the promoters and their development partners to establish the capacity of the allocated site and the deliverability of 990 dwellings within the allocation with associated infrastructure including the relief/link road.

Q.13 in overall terms is the spatial strategy appropriate and justified particularly in terms of the range and mix of locations identified for growth ? Is it effective and consistent with national policy ?

- 1.15 It is anticipated this question will be answered by the local planning authority. However as referred to in the response to Q.2 the spatial strategy is a sustainable response to the development needs of the area given the particular circumstances. Strategic Policy 1 of the CSR distributes

development to a range and mix of locations which taken together with the adopted CS provides a mix of locations for growth, effective in delivering the housing requirement and consistent with national policy.