

Erewash Core Strategy Review Examination in Public

Matter 10, Questions 1 - 4

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 10 – DELIVERY AND MONITORING

Issue – Whether the approach to delivery and monitoring is justified effective and consistent with national policy.

Q1: 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? All any amendments required following the publication of the viability assessment (Sept 2023)?

- 1.1 In respect of the allocation South West of Kirk Hallam viability has been a primary consideration throughout the evolution of its allocation for development in the CSR. Lambert and Inovo have thoroughly assessed the physical and social infrastructure needs of the development and the technical constraints and costs associated with its development. This we trust will be evident from our submissions in relation to matter 6.
- 1.2 We are confident on the basis of our detailed assessments of viability of the realistic delivery of the allocation including the Relief Road.
- 1.3 The CSR and the Viability Assessment (Doc EBC04) clearly need updating to reflect the revised development capacity of the allocation South West of Kirk Hallam but we remain satisfied that despite this change the allocation is viable and deliverable.

Q2. Is the approach that the core strategy review takes to viability and the application of policy requirements sufficiently flexible?

- 1.4 We consider that the approach of the CSR to viability and the application of policy requirements is sufficiently flexible.

Q3: How will the Core Strategy Review be monitored? Will this be effective and how would any issues arising from monitoring be addressed?

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

Q4 Does the Core Strategy Review have sufficient flexibility to respond to changing circumstances. Which policies/measures will ensure that?

- 1.6 In our view the CSR does have flexibility to respond to changing circumstances. It is noted that each of the proposed strategic housing allocations in the CSR are caveated in respect of the affordable housing requirement identified in terms of viability. This we consider to be sufficient flexibility to manage future viability and deliverability of the housing allocations.

- 1.7 In terms of flexibility should there be any unanticipated difficulties with delivery of housing numbers some flexibility in the form of "white land" is provided at Kirk Hallam. The inspector may wish to consider whether further white land should be provided as part of the Green Belt review.

Q.5 Would at least 10% of the housing requirement be accommodated on sites no larger than one hectare as set out in paragraph 69 of the national planning policy framework ? Does this include sites that have already been completed ?

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

Q.6 In overall terms is the approach to the housing requirement justified ?

- 1.9 Yes, provided the requirement is clearly understood to be a minimum and that the supply of additional land is not unduly constrained by the Green Belt should it be found necessary to meet the minimum requirement on additional sites.