



# Planning Inspectorate

## Examination of the Erewash Core Strategy Review 5 November 2024

### 1. Introduction

- 1.1 Thank you for your response to my post hearings letter and the additional information you submitted at my request on Thursday 26 September 2024. The request for the additional information was to enable me to properly assess the workplan proposals you outlined in your letter of Tuesday 10 September 2024.
- 1.2 Having reviewed the information submitted I note and welcome the Council's acceptance of the need to address the soundness matters which I have identified. This, amongst other things, includes the need to;
- Fully assess the strength of the function of different parts of the Green Belt in Erewash and assess the level of contribution individual sites make to the Green Belt. This is to comply with the requirements of the National Planning Policy Framework (NPPF) to fully evidence and justify alterations to Green Belt boundaries. I also note the Council's intention to no longer pursue adding additional land to the Green Belt in the absence of an assessment to justify this boundary alteration.
  - Identify additional land for housing in order to demonstrate a deliverable 5-year supply upon adoption of the Plan.
  - Test the use of small/ medium sites outside of existing settlement boundaries as a reasonable alternative to the chosen strategy in the Sustainability Appraisal. This is in the context of paragraph 69 of the NPPF which states that small and medium sized sites can make an important contribution to meeting the housing requirements of an area.
- 1.3 There are however a number of points I wish to raise in response to the information the Council has provided regarding the process of addressing the soundness matters. The points concern the amount of work that is required to resolve what are fundamental soundness issues and the timescales involved in undertaking that work to enable the plan to be found sound.

### 2. Stakeholder Engagement

- 2.1 Whilst I note the planned engagement with neighbouring authorities, there is little before me on what matters are to be discussed and the timings. As such it is unclear how the engagement will consider any potential cross boundary impacts including the impacts of additional development on services and facilities, highways, neighbouring Green Belt boundaries etc.
- 2.2 Critically, there is also no stakeholder engagement on any of the emerging work or the proposed new site allocations. The Council has indicated that this

will be achieved through consultation on any main modifications. However, consultation on main modifications relate to the recommendations I may make to achieve soundness. Obtaining the views of interested parties on the outcomes of the additional work and the suggested site allocations is critical to understanding whether they rectify the identified soundness issues. Furthermore, any new site allocations may generate representations from participants not previously involved in the examination process. In the interests of fairness there would be a need to receive representations from those parties. Given the nature of the work, additional hearing sessions are also going to be required so that I can hear from those who want to exercise their right to be heard and to enable me to test the evidence. Neither of these key stages and their associated tasks are included in the work plan.

### **3. Additional Housing Land**

- 3.1 The Gantt chart provided by the Council is intended to set out the process and timescales for completing the necessary work and identifying additional land for housing. However, as drafted it is difficult to follow and fails to provide the necessary clarity or certainty that the required tasks can be completed within 6 months. I have serious concerns about the extent to which the full scope of tasks has been identified, the sequencing of the tasks and the timescales attached to them. Whilst it is possible for some tasks to be undertaken in parallel, other tasks by necessity are consecutive. This is not reflected in the workplan, which should be updated to accurately reflect the stages that will be required in addressing my soundness concerns.

### **4. Conclusions**

- 4.1 In my post Hearings letter I referred to the Minister of State's letter of 30 July 2024 to the Chief Executive of the Planning Inspectorate. The letter sets out the Government's expectations about how Inspectors should apply pragmatism in conducting Local Plan examinations. It identifies that any pauses to undertake additional work should usually take no more than 6 months overall, with any extensions to the 6 month pause allowed at the Inspectors' discretion to deliver adopted plans under the current system. In agreeing extensions, the Inspector should be confident that the local authority can complete any outstanding work in the agreed timeframe.
- 4.2 In order to take the examination forward, I therefore require a detailed project plan in a clear format which identifies all the necessary tasks and includes accurate timescales associated with the key workstreams that include:
- Undertaking a systematic evaluation of the Erewash Green Belt.
  - Assessing the impact of all existing and potential new site allocations on the Green Belt within the Borough.
  - Identifying sufficient, additional housing sites to achieve a 5 year housing land supply at the point of adoption and meeting the housing requirement of the whole plan period.
  - Identifying the infrastructure implications of additional site allocations.

- Undertaking additional sustainability appraisal work, including appraising all potential new housing sites.
- Producing an updated housing trajectory with sufficient evidence to enable proper testing of all the different elements that are expected to make up the housing land supply.
- Additional previously identified work including work related to the settlement hierarchy and growth strategy, additional transport evidence to support an existing housing allocation and additional evidence to support Strategic Policy 5.
- How and when there will be engagement with different stakeholders, interested parties and Members.

4.3 The project plan should include timescales and identifiable monthly milestones for each workstream. The Council will then need to provide me with monthly updates on progress, measured against those milestones, to demonstrate that the necessary additional work is on course and can be completed efficiently and effectively. If the Council fails to adhere to the timescales, or in the event that any further, significant delays occur, I will need to reassess my position. Likewise, in the event that the work produced over the coming months fails to address the identified soundness issues, then it is unlikely that any further pauses to the examination will be appropriate.

4.4 To move the examination forward, I would therefore be grateful if the Council can provide me with the information requested as soon as possible and no later than 22 November 2024.

4.5 A copy of this letter should be added to the examination webpage as soon as practicable, although I am not inviting any comment from other parties at this stage. For transparency, the Gantt Chart produced by the Council that has been referred to in this letter should also be published alongside this letter.

4.6 If you have any queries about this letter, please contact me via the Programme Officer.

*K Ford*

INSPECTOR

Cc Councillor Dawson Leader of the Council