

Erewash Core Strategy Review Examination in Public

Matter 5, Questions 1 - 6

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 5 – THE HOUSING REQUIREMENT/ OVERALL HOUSING PROVISION

Issue – Whether the Core Strategy Review has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the housing requirement and overall housing provision.

Q1: What is the minimum number of new homes needed over the plan period calculated using the standard method ? Has the calculation of Local Housing Need been undertaken appropriately using the standard method and correct inputs reflecting the methodology and advice in the PPG ?

- 1.1 Inovo consider that the **minimum** number of new homes needed over the plan is 5800. Minimum is emphasised for clarity that this is not an upper limit but as required by the national policy the minimum required to meet the areas housing needs over the plan period. It is anticipated that the council will provide evidence as to how the calculation of local housing need has been undertaken and whether this has involved the correct inputs and reflects the methodology and advice in the PPG.

Q2. In response to the Inspectors Initial Questions, the Council concluded that there are no circumstances that justify a higher housing figure. Is this conclusion reasonable and supported by evidence ?

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

Q3: The Core Strategy Review identifies a minimum housing requirement of 5,800 net dwellings over the period 2022-2037 is this justified ? If not what should the housing requirement be?

- 1.3 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 Will the proposed supply of dwellings set out in strategic policy 1 incorporate a sufficient buffer to allow for non delivery as well as providing choice and flexibility in the supply of housing land ?

- 1.4 There is concern that the supply of dwellings set out in Strategic policy 1 is not sufficient to provide the minimum requirement of 5,800 dwellings. The distribution of new homes in SPP 1 (3.) only

adds up to 5750 dwellings. A detailed capacity assessment of the Land South West of Kirk Hallam has identified that this can deliver around 990 dwellings not the 1,300 dwelling anticipated by the CSR. Whether this needs to be addressed by way of a buffer in the housing requirement perhaps increasing that to 6000 new homes or whether this should be Addressed by safeguarding additional land remove from the Green Belt is debateable. In our view removing and Safeguarding additional land from the Greenbelt would provide an appropriate form of flexibility.

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 ?

1.5 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 ?

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