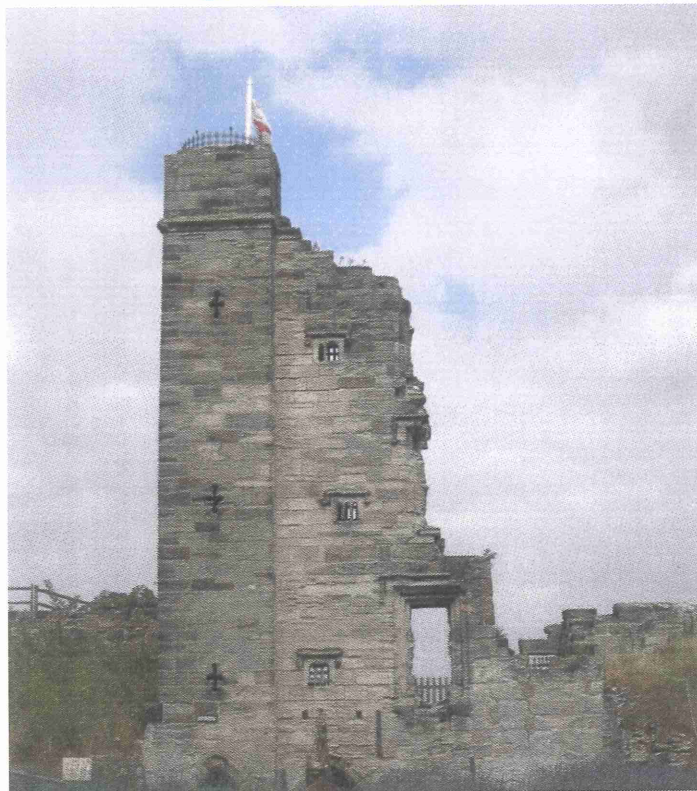


TUTBURY PARISH COUNCIL

ESBC Local Plan Position Statement



High Tower – Tutbury Castle



HOUSING NEED AND REQUIREMENT
ISSUE 6

East Staffordshire local plan inquiry

Tutbury Parish Council

Position Statement – Housing Need and Requirement

(SP3 Provision of homes and jobs LP292)

Not Sound – positively prepared, justified, effective or consistent with national policy

1.0 Tutbury Parish Council lodged a number of objections to the proposed East Staffordshire Local Plan; including opposition to ESBC's desire to allow for an average of 613 new houses in each year of the 19 years 2012 - 2031, a total of 11,648 dwellings. Concern over a sharp increase in the annual target for house building in excess of even former Growth Point plan numbers and one which differs so much from historic patterns of development led to our objection.

1.1 In the four years or so leading up to the local plan inquiry house building proposals have varied, the most thorough independent analysis of housing need is contained in the GVA Grimley 'Housing Requirements and SHMA' Final Report of July 2012 which concluded that there was a need for 470 new houses each year, a figure that shows growth over the local plan average performance of 433 each year (1996 – 2011). The parish council wrongly believed that ESBC, having received government grants, would be bound to the Growth Point figure, it expected a response which would include a sound reason for increasing the rate to 613, but did not get one.

1.2 As far as the parish council can tell from the October 2013 Strategic Housing Market Assessment (updated in April 2014), the increase is justified after consultation with four 'stakeholder' organisations, each of which has a reason to set a higher target for new house building. Population and household formation projections (which may or may not become fact or new house sales) are set into scenarios 1a, 1b, 2a, 2b. The 1a and 1b scenarios are dismissed because they claim not to include for increased labour demand in the borough to fill potential job opportunities, despite the earlier GVA report that allows for such growth.

1.3 This increase in build rate is therefore linked to a possible economic growth that may or may not happen and its effectiveness cannot be measured because only the future can tell if the rise to 613 plus houses per year was justified by economic growth that in turn triggered a major increase in demand for new houses in East Staffordshire. The hoped for surge in commercial activity is not represented by the curve of the trajectory of house building which would statistically be expected to cumulatively follow a bell shape rising

toward the end of the 19 years, not front loaded as shown in the trajectory chart. But approvals set against that expectation remain.

1.4 The much higher build rate proposal is out of line before the local plan can be tested at public inquiry because, due to under delivery (from April 2006) and ESBC's 5 year rule calculation sheet (of August 2014), the 613 per year target must be changed upward to 736 dwellings for 5 years plus the under supply figure which brings the annual total to over 1000 by 2017 and remains close to that level for at least 5 more years to get back to its intended trajectory.

1.5 According to that same calculation the borough has only a 3.89 year supply. Failure to deliver such high numbers was forecast by Tutbury Parish Council and should have been expected by ESBC. Their revised target of more than 1000 new houses in any year is not feasible. To source materials and labour, find customers who can borrow money to fund it and then install the infrastructure needs of such a huge increase in population is impossible.

1.6 In addition to all this there are developments already coming forward, precisely because of ESBC's 5 year supply failure and the new local plan will not act as a reliable control document if the base annual build rate is left at 613 because there is a conflict between the local plan and the 5 year rule calculation. This leaves villages such as Tutbury under constant threat of speculative development

1.7 Tutbury has two such sites and it will be as good as impossible to refuse them if the planning authority cannot show a 5 year supply. Such approval would take no account of the effect on Tutbury or whether there is sufficient infrastructure in place, or planned to support it, only that there is no 5 year supply and that an appeal would be successful if an application was to be refused. The only protection the village has are other policies such as the percentage of new houses allocated to strategic villages that might prevent it, but that may not be sufficient to prevent a successful appeal if the applicant can show that the site is ready to start and is deemed to be sustainable as defined in the NPPF.

1.8 The parish council saw all this happen when the Burton Road site for 224 houses and 14 industrial units was approved. Policies meant to protect the countryside were set aside; the grade of land was 2 and 3a but that meant nothing and did not feature in the officer's report. All that mattered was the 5 year rule; that situation will go on for as long as the target is too high. If ESBC had taken advice contained in the GVA report their target would be 470 new houses each year, a figure that provides the immediate comfort of a 5 year supply and represents a more realistic assessment of need.

1.9 Tutbury is a large village and a rural parish, the parish council has good reason to ask for protection of its historic village environment and countryside around the castle and Iron Age pale. Much of the centre of Tutbury is a Conservation Area and presents reasons for planning controls which go beyond numbers on a document that can be used by developers to speculate

against a 5 year rule that has nothing to do with planning and is little understood by the public at large.

1.10 Development that would destroy views of the castle and the setting of a Norman Priory Church do not meet the parish council's definition of sustainability as used in the National Planning Policy Framework because it compromises the ability of future generations to meet their own needs such as the need to preserve historic places and open countryside.

1.11 Building on Greenfield land damages the countryside, weakens the vitality of towns and destroys their potential for regeneration. Brownfield urban land lies derelict in Burton while approval may be given for yet more housing estates in the countryside because of the high rate proposed.

1.12 Parishes have been encouraged to start Neighbourhood Plans and set about the process in a belief that they can shape the future of their communities. At least one of those plans is in danger of abandonment because of the futility of trying to stop unwanted development; others may follow when they realise that the 5 year rule based on too high an annual target is used by developers to gain further approvals and thereby overrule the good intentions of parish communities.

1.13 The major need, as seen by the parish council is that the number of houses should represent organic growth over the plan period based on a thorough analysis of need set against past performance. In addition to these principles homes should be reasonably close to work opportunities and be supported by effective social infrastructure. Health care is the most important social need as the population grows it brings with it a greater number of retired residents. There is almost daily new evidence that health care will not be able to cope should such growth occur.

1.14 Executive style houses in the countryside won at appeal or because of the fear of appeal costs is not planning. There is much more to the proper orderly development of communities than market forces run riot. To be worthy of the title 'plan' the final document must be sound, sensible, credible and possible. An amended trajectory chart of house building that proposes 1000 plus houses in any one year will be purchased, built and occupied annually in the early part of the plan then 613 each year until 2031 is unsound, incredible and impossible. The number should be reduced.

Tutbury Parish Council (October 2014)