



TUTBURY PARISH COUNCIL

ESBC Local Plan - Position Statement



High Tower - Tutbury Castle

DEVELOPMENT ALLOWANCES

ISSUE 15B

East Staffordshire Local Plan Inquiry

Tutbury Parish Council

Position Statement – Development Allowances

SP4 Distribution of housing growth

Not Sound – effective

1.0 This issue is prefaced by the earlier discussions of housing need, requirement and land supply. A very detailed and complex analysis was put forward by agents essentially requesting on behalf of clients, more housing land with ESBC officers defending the sufficiency of their allocations in the local plan (LP). The exercise was perhaps necessary but disappointing, becoming bogged down in procedure rather than focussing on the outcome i.e. meeting the housing needs of the borough.

1.1 The elephant in the room was the national planning policy framework, an inherently flawed policy with its inbuilt conflict between a five year land supply requirement verses the necessity of sustainable development.

1.2 The parish council proposed a relatively straight forward option to overcome this difficulty by suggesting a reduced headline figure for the number of houses. At a stroke it would remove the land supply problem and the incredulity of the housing trajectory chart, bringing the whole exercise back to the real world.

1.3 But what about the housing need? The stated figure of 11,648 is based on supposition and an uncertain future prediction, but worst of all, it is one that can never realistically be delivered in the early years of the LP with labour, materials and available finance in short supply. It was stated in the early part of the discussion that the LP would be periodically reviewed and amendments made to meet the circumstances prevailing at the time. This seems eminently sensible and this ability to change tack would introduce the flexibility needed to satisfy fluctuations in demand; the essence of sustainability through the application of the precautionary principle.

1.4 Agents went on to suggest that a wide range sites (to produce even more than the headline figure) was necessary to achieve the five year land supply. It was suggested the plan might even be unsound if the land supply position was not met. ESBC officers asserted that there was a sufficient allocation, but developers were not delivering houses, a 'Catch 22' situation seemed to exist.

1.5 ESBC's view has some merit – academic research (Oxford Brooks) has analysed the land management technique of some builders. Their assertion is that there are more than enough plots nationally to meet delivery needs and it is the management of their land banks which is the problem.

1.6 It has been stated that house builders are not simply development companies, profits are also made by trading in land or by holding onto it to get the benefit of rising prices. Land portfolios are released to ensure that house sale prices meet or exceed their predetermined targets. As land values rise faster than the rate of growth in the economy, it is held for trading and investment without necessarily developing it. This can result in its slow or only limited release.

1.7 Richard Rogers suggests that England has 66,000 hectares of brown field land, more than any other industrial nation, but there is a reluctance by builders to build on this type of land attributing it to higher costs of development. This situation needs to be tackled to avoid 'hollowed out' towns and cities. Builders need to be innovative in this area and not just covet green field land.

1.8 Turning to development allowances, no doubt agents will continue to assert that a wider portfolio of sites is needed and that villages and their green field perimeters are the best place to build. If this accepted then brown field sites will be neglected, valuable agricultural land lost in an unnecessary attempt to meet an unrealistic housing target leaving villages struggling to cope with inadequate infrastructure.

1.9 The theory that SME's will come to the rescue with an increased number of outlets and delivery targets will somehow be met, is wishful thinking. It is not likely to happen in an uncertain macro-economic climate where risk taking by financial institutions is very limited and where predicted economic growth is set to fall due to low expectations in the Eurozone. It is difficult to argue that East Staffordshire will buck this trend.

1.10 The questions that developers and their agents have yet to answer are:-

- How many plots does each builder represented at the hearing hold?
- What is the number of plots each released in the past 5 years?
- How many of plots are added to their land bank each year?
- What is the ratio of green field/brown field plots held and/or developed per annum?
- How many plots are on land where an option to buy exists?

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