## THE PLAN FOR STAFFORD BOROUGH - EXAMINATION MATTER 8. COMMUNITIES (Policies C1-C7)

Inspector's Matters, Issues and Questions in bold text.

Key issue: Does the Plan provide an appropriate, effective and soundly based framework for supporting strong, vibrant and healthy communities, including the provision of a mix of dwellings, including affordable housing, special needs accommodation and provision for gypsies and travellers, clear and effective locational criteria for new and replacement dwellings, and provision of open space, sport and recreational facilities, which is fully justified with evidence and consistent with national policy?

## 8.2 AFFORDABLE HOUSING (Policy C2)

a. Is the approach to providing affordable housing soundly based, justified with evidence, effective, deliverable, viable, appropriate for Stafford Borough and consistent with national policy, particularly in terms of:

ii. Policy C2 sets a target for affordable housing of either 30/40%, with a site size threshold of 0.1/0.4.ha (3/12 dwellings). Are these thresholds and targets, along with the approach to seeking developer contributions to facilitate the provision of affordable housing either on-site or off-site, fully justified and supported by an informed robust assessment of economic viability?

Although the document "*Plan for Stafford Borough Whole Plan Viability Report Final Report*" dated August 2013 by SKM Colin Buchanan addresses some of the issues raised about the Council's viability assessments outlined in earlier consultations, there remain concerns about the level of costs used. The report "*Economic Viability of Housing Land in Stafford Borough*" dated July 2011 by Levvel is now somewhat dated especially the BCIS figures dated from Quarter 2 2010. The NPPF requires Councils to use up to date information in evidence. There also remain concerns over the allowances added onto these basic build costs for compliance with policy requirements contained within the plan, for example, Lifetime Homes.

Whilst the later viability appraisal on Strategic Development Locations (SDL) is more up to date, the original Levvel report is the Council's viability appraisal relevant to all non SDL sites in the plan. Therefore the affordable housing provisions set out in Policy C2 are not supported by economic viability assessments.

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