

Our Ref: UB/Local Plan
Date: 11th October 2013

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Dear Sean

In response to the examination of the plan for Stafford Borough Development Plan document Schedule of Matters and Issues for Examination, further consideration has been given to the two points raised under 8.2 Affordable Housing.

In regard to whether their approach to providing affordable housing is sound based with particular term to:-

- i. **The need of 210 new affordable homes/year from SHMA. How will this amount of affordable be delivered, including the size, type and tenure of affordable housing and the means of meeting the objectively assessed need for affordable housing.**

The need for 210 new affordable homes will be met through the provision of 30%/40% affordable housing contribution from private developers on sites around Stafford Borough. Our experience is that there are currently a high number of private developer sites that are being brought forward within the Borough where there has been a positive affordable housing delivery and negotiation offering the policy compliant 30% contribution for Registered Providers to bid for.

In addition, there are development sites within the Borough that will provide 100% affordable homes through land purchases, development opportunity on Association's whole land and the active work with Parish Councils which identify the housing need in terms of type, size and type via rural exception sites. Purely affordable housing sites, especially rural exceptions sites, are assisted as landowners are offering land at low prices (well below market) which enables affordable housing to be built out cost effectively, with the provision of associated grant.

- ii. **Policy C2 sets a target for affordable housing of either 30/40% with a site size threshold of 0.1/0.4ha (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?**

From an independent review, the Council's economic viability assessment was undertaken as a comprehensive exercise and the appropriate overview level of viability

of housing development, including affordable housing in Stafford Borough. This assessment has guided and informed the development of affordable housing policy targets, which are considered appropriately within the local circumstances and not in isolation but in the context of other development costs and obligations and, therefore, the over all framing of the proposed Stafford Borough Plan policies.

Stafford Borough has had fairly flat house prices overall over the last two years or more and the overall viability review approach and assumptions, combined with the more positive market signs that are now being noted, is considered to provide on-going support to the proposed policy position on affordable housing targets.

In addition, the positive recent affordable housing delivery and negotiation experienced of the developers by Registered Providers reinforces confidence in the way this aspect of the strategy, the council's policies and operational approach have been framed.

Yours sincerely,

Ursula Bennion
Director of Business Development
