



Forward Planning Section  
Stafford Borough Council  
Civic Centre  
Riverside  
Stafford  
ST16 3AQ

SENT BY E-MAIL AND POST

25<sup>th</sup> January 2016

Dear Sir / Madam

## **STAFFORD LOCAL PLAN PART 2 CONSULTATION**

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following responses and in due course appear at future Examination Hearing Sessions to discuss these matters in greater detail.

In this current consultation the Council sets out the approach to development across the settlement hierarchy and establishes settlement boundaries for Stafford, Stone and Key Service Villages. No specific site allocations are proposed in the Local Plan Part 2 as there are 10,812 existing commitments against a housing requirement of at least 10,000 dwellings however a headroom of only 8% on the overall housing land supply throughout the plan period may not be sufficient especially since between 10 – 20% of planning consents are never implemented. Moreover it is the opinion of the HBF that the proposed settlement boundaries are drawn too tightly meaning that the Local Plan Part 2 lacks flexibility which will inhibit the ability of alternative sustainable developments from coming forward if any unforeseen problems occur with existing consents and / or strategic site allocations in the Local Plan Part 1.

In allocating sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst some SUEs

may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. So for any given time period, all else been equal, overall sales and build out rates are faster from 20 sites of 50 units than 10 sites of 100 units or 1 site of 1,000 units. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.

For the Stafford Local Plan Part 2 to be found sound under the four tests of soundness as defined by paragraph 182 of the NPPF, the Plan should be positively prepared, justified, effective and consistent with national policy. It is suggested that the Council gives further consideration to the proposed settlement boundaries and site allocations in order to produce a sound Plan.

It is hoped that these representations are of assistance to the Council in informing the next stages of the Stafford Local Plan Part 2. In the meantime if any further information or assistance is required please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



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