

# Submission to Inspector from Keele Parish Council

## KPC comments

### **Matter 7 - Housing Policies**

#### **Policies HOU1, HOU2, HOU3, HOU4, HOU5, HOU6**

#### **Issue 7 - Does the Plan set out positively prepared policies to meet affordable housing needs and the housing needs of other groups, which are justified, effective and consistent with national policy?**

*7.1 a) In Policy HOU1 are the (brownfield/greenfield) affordable housing requirements justified, and will the policy be effective in helping to maximise affordable housing and not undermining deliverability? The affordable housing requirements are based on the findings of the Local Plan Viability Assessment (ED004). Are the assumptions used within this soundly based? Why do the thresholds in policy HOU1 differ from those recommended in ED004? Should the policy include a threshold for older person homes and at what level should this be set?*

The Affordable Housing strategy needs further work. It is far from clear how the allocations in HOU1

- 30% on Greenfield Sites
- 15% on Brownfield Sites in the 'Low Value Zone'.
- 25% on Brownfield Sites in the 'High Value Zone'.

could yield the 278 affordable homes needed per annum, as identified in the HNA 2024 when 400 houses per annum are being built. This portion of the plan is thus not effective nor credible.