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Caroline Danby
Planning Policy
Stevenage Borough Council
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AG/SM – 13/621
BY EMAIL

Dear Caroline,

**STEVENAGE BOROUGH LOCAL PLAN EXAMINATION – PROPOSED AMENDMENTS TO
POLICY HO7**

I write to you regarding the forthcoming Examination of the Stevenage Borough Local Plan 2011-2031, and in particular draft Policy HO7: Affordable housing targets. As you are aware, we raised some concerns on behalf of our client, RPF Developments, within our representations regarding the wording of the draft policy and its supporting text as set out in the January 2016 Publication Draft of the Local Plan. We note that the Council has proposed a number of modifications to Policy HO7 and its supporting text following submission of the draft Local Plan to the Planning Inspectorate, as set out within the August 2016 schedule of proposed Main Modifications entitled 'Appendix A – Changes proposed by the Council to make the local plan sound' (Document ED114).

Having reviewed the proposed modifications to Policy HO7 and the supporting text, we welcome the fact that the wording of the policy has been amended by Modification HOC9 to clarify that the 25% and 30% targets for affordable housing provision will apply, and that a financial appraisal to justify the proportion of affordable housing proposed will not be required where these minimum requirements are met. We consider that this provides additional certainty for developers and reduces the risk that the policy would place an undue burden on developers and thereby limit the supply of residential development in the Borough. In this regard, we consider that the proposed modifications would make the policy text broadly compliant with the requirements of paragraph 173 of the NPPF. The proposed removal of the phrase "based on agreed values and viability at the time of the application" from the first paragraph of the policy provides additional certainty regarding how a decision maker should react to a development proposal as required by paragraph 154 of the NPPF. We similarly welcome the proposed update to the wording of paragraph 9.53 of the supporting text to the policy to clarify that proposals which meet the minimum affordable housing targets will not be required to be supported by a financial viability appraisal.

We anticipate that we will make further representations on behalf of our client in response to the Inspector's Stage 2 Matters, Issues and Questions, however I trust that the above is helpful in confirming our broad support for the identified amendments proposed to Policy HO7 and its supporting text.

Yours sincerely,

Stuart Mills
SENIOR PLANNER