

7 March 2012

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F.O.A Mrs Vijaya Ram
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Dear Sirs.

REPRESENTATIONS: FURTHER PROPOSED CHANGES TO CORE STRATEGY DPD AND DEVELOPMENT MANAGEMENT POLICIES DPD

I am writing in respect of the above documents to provide comments in relation to two matters:

- 1. Greenbelt policy; and
- 2. Affordable housing policy.

I have set out my comments in more detail below.

Greenbelt policy (Core Strategy CS1 & CS7 and Development Management Policies DPD paragraphs 16.2.1; 16.2.3; & 16.3.2 and policy DM15):

We consider that it would be prudent for the Council to include reference within both the Core Strategy DPD and Development Management Policies DPD to the position that the Government's draft National Planning Policy Framework (2011) takes with regard to inappropriate development within the Greenbelt. This states that the replacement of any building (not just dwellings), is appropriate development, provided that the new building is not materially larger than the one it replaces. This is not as strict an interpretation as PPG 2: Greenbelts (1995) and therefore the Council should allow themselves flexibility to incorporate the Government's emerging policy position with regard to development in the Greenbelt; otherwise there is a risk that their policy position will be in conflict with National policy guidance.

Affordable housing policy (Core Strategy DPD paragraphs 9.6.6; 9.6.7; & 9.6.12; and policy CS4 and Development Management Policies DPD paragraphs 11.1.1; & 11.1.3; and Policy DM10):

Whilst it is recognised at paragraph 9.6.8 of the Core Strategy DPD and in policy DM10 and paragraph 11.1.3 of the Development Management Policies DPD that the level of affordable housing provision for developments should be "subject to viability", which is in line with PPS 3: Housing (2011), this is not fully



reflected through out the supporting text of both the Core Strategy DPD and Development Management Policies DPD. It is considered that it is important that these references are added for consistency.

We look forward to confirmation that our representations have been taken into account. If you do have any queries in the meantime, please don't hesitate to contact me.

Yours sincerely,

Michael Derbyshire

Director