

## Comments

### Main Modifications to the Local Plan (18/02/19 to 01/04/19)

Comment by	Rentplus ( - 1128735)
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Consultation Point	Policy HOU 07 - Affordable Housing ( <a href="#">View</a> )
Status	Processed
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**To which proposed Main Modification does your representation relate? Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications e.g. MM1**

MM21, HOU 07

**Do you consider the proposed modification is:  
(please mark the appropriate box)**

**If you consider the proposed Main Modification to be UNSOUND, please identify which test of soundness your representation relates to?**

- Is it effective?
- Is it consistent with national policy?

**Please give us details as to why you think the Local Plan with proposed modifications is NOT legally compliant or sound?**

The addition, also noted under MM21, of the below text referring to the tenure split as identified in the CNSHMA should however be amended for consistency with the NPPF, and to provide clarity of how decision makers will approach development proposals that are consistent with the new tenure types. currently a tenure split of 70:30 rented to affordable housing for sale, such as shared ownership/intermediate products (CNSHMA 2017) The sole reference to 'intermediate' in the NPPF now falls within part d) of the definition of affordable housing, in relation to the rent that may be charged for rent to buy affordable housing. The Planning Practice Guidance, parts of which were updated for consistency with the NPPF in February and March 2019, does not include any reference to 'intermediate' and this suggests that references within planning policy are outdated and potentially misleading. The above proposed changes are more consistent with the NPPF which allows for tenures which comply with one or more of the four main (a to d) definitions in Annex 2, enabling effective decision-making consistent with the NPPF whilst acknowledging and reflecting the evidence of the CNSHMA.

**Please set out what changes you consider necessary to make the proposed main modifications to the Local Plan legally compliant or sound.**

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**Would you like to be notified of future stages of the Local Plan?**    Yes

**How would you like to be notified?**    .    By email to my email address