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Date: 12 March 2010

Dear Mike.

Bromsgrove District Council: Draft Affordable Housing SPD.

Thank you for coming to the Government Office on Thursday 4 March 2010 to discuss the draft Affordable Housing SPD and explaining the background to the document and its purpose.

The Government Office does not generally comment on SPDs unless there are particular circumstances which merit its consideration. In the case of the draft Affordable Housing SPD there is concern that it goes beyond the purpose of an SPD which is to add detail to policies contained in Development Plan Documents, such as the Core Strategy. Paragraph 6.1 of PPS 12 makes a clear statement on this point.

We consider that the policies in the draft document go further than providing additional detail to supplement the existing development plan policies which in your Council's case are contained in the RSS and the "saved policies" of the Bromsgrove Local Plan. It is also stated in the draft SPD that the policies are to supplement Policy CF7 in the Core Strategy. However, the Core Strategy is still in the course of preparation and that particular policy on affordable housing together with the Core Strategy as a whole has yet to be tested through an Examination.

The policies you have put forward in the draft SPD should be included in a DPD, consequently they should be incorporated into the emerging Core Strategy, supported by the evidence which you have already gathered, rather than continuing with the preparation of the SPD.

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We acknowledge that the provision of affordable housing is a priority for Bromsgrove District Council. However, until your Core Strategy is in place, provision will have to be on the basis of existing policy, including PPS 3 Housing and the emerging RSS which provides for affordable hosing targets to be established in development plans, as well as the "saved" Local Plan policies.

With regard to the suggestion, which I understand some respondents have made, that you should prepare an Affordable Housing DPD, it would be more appropriate for you to progress the Core Strategy as quickly as you can, incorporating the affordable housing policies rather than embarking on the preparation of another DPD.

If you wish to discuss this matter further please contact me. You may also wish to consider seeking your own legal advice on the matter.

Yours sincerely

Mike Price

**Acting Head of Local Planning**