

AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT (20190 DRAFT FOR CONSULTATION

Norwich Housing Society welcomes the opportunity to be able to comment on the Affordable Housing consultation document.

The Society is a registered social landlord and company with charitable status. It provides good quality affordable housing for older people of limited means, and has a range of properties, almost all of which are located within the City of Norwich. It currently has 320 units of accommodation in 10 small developments housing approximately 340 older persons. The Society has a waiting list for accommodation and therefore has a policy of seeking out and providing additional good quality accommodation, at the same time as ensuring the quality of its existing housing stock, by the implementation of a programme of continuous maintenance and upgrading.

The most recent new development undertaken by the Society at Leander Court off Bluebell Road was in connection with a section 106 affordable housing requirement within a larger market led housing development. The Society therefore has an active interest in this type of arrangement and has first hand experience of its implementation. The Society would therefore wish to make the following observations on the Consultation Draft.

1) The Executive Summary

The Society fully supports the City Council's aim of a proactive approach towards the delivery of affordable housing to meet local needs. It also agrees with the bulleted key aspects list and particularly the need for a local definition of affordable housing to meet the identified needs in Norwich.

2) Legislative and Policy Context

The Society notes the NPPF requirement in paragraph 61 for "The size and tenure of homes required for different groups in the community (including but not limited to, those who require affordable housing) should be assessed and reflected in planning policies"

3) Delivering Affordable Housing

The Society supports the objective contained in paragraph 2.1 to 'Provide the amount and type of housing that meets the needs of all sectors of the community'.

All of the Society's housing is rented without any Right-to Buy obligation and therefore it understands the need for accommodation for older persons, particularly given the overall ageing of the population, especially for those of limited means. It therefore agrees with the requirement for a percentage of properties in new developments to be retained for affordable housing, and for a requirement that some of these should be available for rent in perpetuity.

The Society believes however that the draft could make specific reference to the need for affordable housing for older persons given the requirement of Paragraph 61 of the NPPF, given the increasing problem of finding sufficient accommodation for this sector of the population.

Affordable Housing Design

The Society is concerned about the all-encompassing last sentence of paragraph 2.22 requiring universal compliance of all types of development with design and amenity standards. Whilst the Society always aims to build and maintain its housing

stock to the highest appropriate specifications and standards, those applying to normal housing developments are not necessarily appropriate for developments for older persons. An example of this is the need for car parking, which in the Society's experience is approximately half of that required for normal developments. There are also design and amenity considerations specifically relating to older person housing, that may not be appropriate for regular affordable housing.

The Society would therefore request that affordable accommodation for older persons is specifically referred to in the document and that there may be reasons for dealing with the design of such units as 'special cases' given the particular circumstances of the developments and their occupants.

In this context, the Society is particularly concerned about the blanket design requirements for affordable housing contained in paragraphs 2.24 and 2.25 of the consultation draft. Even distribution of development and car parking provision as prescribed would be impractical for the Society's Housing developments, and almost certainly impossible to comply with.

4) Summary

The Norwich Housing Society supports the overall aims and intentions of the Consultation document and hopes that it will assist its own aims and objectives of continuing to provide good quality affordable housing for older persons of limited means in the Norwich area.

The Society is concerned however that no reference is made in the document to the specific need for this type of affordable housing and that no allowance is made for potential variations in design and amenity standards that are applicable to older person housing.

The Society therefore considers that given the ageing population, the existence of need for affordable housing for older persons should be specifically referenced in the Document. It also believes that reference should be made to the different standards and amenity considerations that may be applicable to this type of housing, and the fact that it needs to be considered as a special case in terms of its design and provision.