

Walker, Samuel

From: Natalie Beal <Natalie.Beal@broads-authority.gov.uk>
Sent: 08 February 2019 10:43
To: LDF
Subject: RE: Consultation on Norwich's draft Affordable Housing Supplementary Planning Document (SPD)

Dear Sir

Thank you for consulting the Broads Authority.

Please find our comments attached which were endorsed by Planning Committee today.

Thanks

Natalie

- Perhaps the Executive Summary could refer to the relevance of this SPD to the Broads as the main document does in section 1.11.
- 1.5 – could the change to planning obligations and national policy be another factor? That change increased the threshold.
- 1.8 – it is interesting to know the other ways that affordable housing are being delivered, but this could be read by a developer who may conclude that they don't need to do anything as the City Council and RPs are doing a good enough job. Perhaps you may want to end this sentence with a statement that says that despite these additional ways of providing affordable housing, developers are still expected to provide affordable housing in line with policy requirements.
- 1.10 – ideally the SPD would be taken into account when a scheme is being prepared.
- 1.15 – is it worth being clear to say that because of the then Written Ministerial Statement and now as a result of the 2019 NPPF the 5-9 dwelling part of the policy is not in use (if indeed that is the case)? Similar to 2.14.
- 2.2/1.3 – re adopted policy having primacy over the NPPF. Is there an issue with dates however? The JCS is older than the 2018 NPPF.
- 2.4 – refers to affordable housing being provided and maintained in perpetuity. There are parts of page 13 that imply that those types of affordable housing are not in perpetuity. Is this contradictory or is it worth providing some explanation? For example on page 13 it says that purchasers can staircase to *owning* 100% of the property, discounted market sale housing is *purchased* at a discounted price and Rent to Buy refers to a tenant being able to *buy* the property.
- 3.6 refers to paragraph 34, but paragraph 34 of which document?
- 3.24 onwards – could a review lead to contributions going down?
- Section 6 – suggest the examples are put in boxes. It is not clear when the example 3 actually ends – does 6.11 onwards refer to the examples or are they general text?
- Section 6 – is it worth mentioning our likely adopted policy that seeks off-site contributions for schemes of 6-9 dwellings? That is another scenario where off-site contributions may be sought.

From: LDF [mailto:ldf@norwich.gov.uk]
Sent: 18 January 2019 10:30
To: LDF
Subject: Consultation on Norwich's draft Affordable Housing Supplementary Planning Document (SPD)

Dear Sir / Madam,

Norwich City Council is revising its 2015 Affordable Housing Supplementary Planning Document (SPD) to reflect updated local evidence on housing need and the recent revision of the National Planning Policy Framework. The revised SPD will provide guidance on the implementation of Joint core strategy policy 4 (Housing Delivery) and Norwich local plan policy DM33 (Planning Obligations).

Your views are sought on the draft SPD which has been produced for consultation.

Please note that, due to technical problems with sending out consultation emails, the start of the consultation period has been delayed by one day. It now commences today, Friday 18 January, and will end on Thursday 14 February. Apologies for any confusion caused if you recently received a blank email in relation to this consultation.

More information about the document and how to comment can be found on our website: www.norwich.gov.uk/SPD. The consultation document is also attached for ease of reference.

Please let us have your comments by **5pm on 14 February 2019** by email to LDF@norwich.gov.uk.

It is anticipated that the revised SPD will be reported to Norwich City Council's Sustainable Development Panel on 27th February for member comments, and then reported to Cabinet on 13th March for adoption.

Yours sincerely,

Judith Davison
Planning policy team leader
Norwich City Council

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