

Walker, Samuel

From: James Mann <James.Mann@north-norfolk.gov.uk>
Sent: 12 February 2019 14:46
To: LDF
Subject: Consultation on Norwich's draft Affordable Housing Supplementary Planning Document (SPD)

North Norfolk District Council comments on the Norwich City Council Draft Affordable Housing SPD consultation

Thank you for providing North Norfolk District Council the opportunity to comment on the Norwich City Council Draft Affordable Housing SPD. North Norfolk District Council is largely supportive of the SPD but wishes to make the following Officer level comments on specific paragraphs of the document.

Paragraph 2.4

The NPPF requirement at paragraph 64 is for 10% of dwellings on major developments to be available for affordable home ownership. Whilst it is acknowledged that Norwich City Council believe this to be incompatible with the identified housing need in the SHMA 2017, there is a potential opportunity to capitalise on the NPPF definition of at least 20% below market value and to align this with local levels of affordability, i.e. align the level of discount to that of local income.

Paragraphs 2.16 – 2.21

North Norfolk support the requirement to seek affordable housing contributions from both C2 and student accommodation. In relation to C2 dwellings specifically, the target of 275 C2 dwellings was not included within the overall housing numbers in the SHMA, there is therefore a requirement to deliver these in addition to overall housing numbers. Careful consideration should be required to ensure that the affordable housing requirements do not impact upon the C2 requirement as set out in the SHMA. Additional clarity on this point may be useful.

Paragraphs 2.27- 2.30

North Norfolk District Council support the approach detailed. However, it is considered that this section could be strengthened to emphasise that all proposals should be fully policy compliant and provide the full affordable housing requirement unless it can be demonstrated through a full viability assessment that this is not possible.

Paragraph 2.29

Although paragraph 3.15 clarifies the position, it may be worth mentioning within paragraph 2.29 that the price paid for land is not a relevant justification for failing to accord with relevant policies in the plan.

Paragraphs 2.31 to 2.32

North Norfolk District Council supports the approach taken to the sub-division of large sites.

Paragraph 2.38

North Norfolk District Council supports the approach to the Vacant Building Credit, but the equation could benefit from further clarity. For example, why is net Additional floorspace divided by proposed floorspace. Add x 100 to the formula for clarity.

These comments are intended to be helpful and offer further consideration. If you have any questions, please don't hesitate to ask.

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North Norfolk District Council

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