

Green Party Group Response to the Draft Affordable Housing Supplementary Planning Document (2019) Consultation

We welcome the fact that a draft revised Affordable Housing SPD has finally been brought forward, with the aim of delivering badly-needed affordable housing in Norwich. Greens have long called for this document to be updated, (see, for example, Councillor Andrew Boswell's question to council in September 2016, and others, [1]) whilst the out-of-date policy has allowed millions of pounds worth of affordable housing planning obligations to be avoided by developers.

We consider that a viability assessment should only be used when it is necessary for the council's policies to be achieved. Viability assessments should be initiated by the council in order to enable development of a particular type or in a particular place, not routinely produced by developers hoping to enlarge their profits.

We note that Table 1 in the draft document shows a dramatic fall in the provision of affordable housing in the city between 2012 and 2014, which coincides with the introduction of the use of viability assessments by developers to contribute less towards affordable housing than they had done previously.

We welcome the provision of new good quality, affordable housing by the council or a registered provider on council land, such as at Goldsmith Street (1.7). However, we are not confident that private sector development at Anglia Square will boost the supply of affordable housing in the city, as the number of affordable dwellings included in this development is lower than required by local planning policy, and the dwellings may not be built for some years.

We note that the revised NPPF requires local authorities to 'deliver a sufficient number and range of homes to meet the needs of present and future generations' (1.12). It is clear that the range of homes required to meet the needs of future generations will need to acknowledge the impact of a changing climate. Affordable dwellings should, therefore, be built in as efficient a manner as possible, taking into account ways in which homes will need to be adapted to cope with extreme weather events.

The Green group would like to see more detail in this document explaining how dwellings can be kept available for rent. We would also like to see further explanation detailing how intermediate housing will be made available over the long-term and not lost to the local supply of affordable housing.

We are pleased that an affordable housing contribution will be required on purpose-built student housing and we look forward to seeing a student housing strategy for the city, as was called for by Green councillors in 2017.

If a viability assessment is taken into account at an early planning stage, the affordable housing contribution should not be renegotiated following a developer's purchase of this land at an inflated price. The required affordable housing contribution should be made known to potential buyers and taken into account at the point of sale. As far as the council is concerned, this requirement should be non-negotiable when planning consent is given.

References

Councillor Boswell's question to council, September 2016

County councillor Andrew Boswell, Nelson division, asked the cabinet member for cabinet member for environment and sustainable development:

“Norwich City Council has a commitment to “a healthy city with good housing” and “access to affordable decent homes” in its corporate plan. It risks failing in this commitment because current development control is inadequate to ensure developers provide affordable housing in accordance with their legal obligations.

The economic viability of development has become an important consideration as part of the planning system nationally, both in terms of plan-making and when determining planning applications. There are well-documented cases where developers are overestimating costs and underestimating development value in their viability assessments in order to claim they cannot provide affordable housing - pulling the wool over the eyes of planners, councillors and communities.

Some authorities and cities are already developing supplementary planning guidance (SPG) on viability assessments and there is a growing body of expertise. A Norwich SPG could, for instance, provide a framework for rigorous evaluation of development proposals, checking of secondary data such as indices or other information sources generated by third parties, using best practice from Royal Institute of Chartered Surveyors, Royal Town Planning Institute and other authorities.

Will the cabinet member for environment and sustainable development ask officers to take a paper to the Sustainable Development Panel on developing a Supplementary Planning Guidance on Viability Assessments?”

<https://norwich.greenparty.org.uk/news/2016/09/26/greens-call-for-more-robust-rules-on-affordable-housing/>

Green Motion September 2017

<https://norwich.greenparty.org.uk/news/2018/01/12/greens-call-for-more-transparency-on-housing-development-profits/> –

Green Call for Student Housing Strategy, December 2017

<https://norwich.greenparty.org.uk/news/2017/12/22/norwich-needs-a-plan-for-student-housing/>