# **Consultation Documents Update and Proposed Responses**

Report by Planning Policy Officer

## **Summary:**

This report informs the Committee of the Officers' proposed response to planning policy consultations recently received, and invites any comments or guidance the Committee may have.

#### **Recommendation:**

That the report be noted and the nature of the proposed response be endorsed.

### 1 Introduction

- 1.1 Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2 The Committee's endorsement, comments or guidance are invited.

## 2 Financial Implications

2.1 There are no financial implications.

Background papers: None

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Appendices: APPENDIX 1 – Schedule of Planning Policy Consultations received

Norwich City Council - Affordable Housing SPD

**APPENDIX 1** 

Planning Policy Consultations Received

ORGANISATION:	Norwich City Council
DOCUMENT:	Affordable Housing SPD
LINK	https://www.norwich.gov.uk/SPD
DUE DATE:	14 February 2019
STATUS:	Draft SPD.
PROPOSED LEVEL:	Planning Committee Endorsed
NOTES:	The council is in the process of revising the 2015 Affordable housing supplementary planning document (SPD).  Since the 2015 SPD was adopted the government has published a new National Planning Policy Framework ('NPPF' 2018) and local evidence on housing need has been updated in the 2017 Central Norfolk Strategic Housing Market Assessment. The SPD has therefore been reviewed to ensure that it complies with relevant national planning policy and guidance and adopted local plan policy. Once finalised the revised SPD will replace the previous adopted SPD (2015) and will supplement Joint Core Strategy policy 4 (housing delivery) and Norwich Local Plan policy DM33 (planning obligations).  It is important to note that this SPD is of relevance to the Broads Authority as, for affordable housing, we defer to/have regard to our districts' policies on affordable housing; so if there are schemes in the Broads part of Norwich City that involve affordable housing/meet the threshold to require affordable housing, this SPD will be used in determining the application.
PROPOSED RESPONSE:	<ul> <li>Perhaps the Executive Summary could refer to the relevance of this SPD to the Broads as the main document does in section 1.11.</li> <li>1.5 – could the change to planning obligations and national policy be another factor? That change increased the threshold.</li> <li>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.</li> <li>1.10 – ideally the SPD would be taken into account when a scheme is being prepared.</li> <li>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.</li> <li>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.</li> </ul>

- 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.