

## AVGP Submission to Consultation on the Preferred spatial strategy for housing and economic growth and draft policies

### Proposed Housing Types, Mix and Choice Policy

We agree that the council should secure a mix of new housing which reflects the most up-to-date evidence of local housing needs.

However, the policy should be enhanced by strengthening the wording, using the word 'require' i.e. 'The Borough Council will **require** developers to agree a mix of new housing on development sites which reflect the most up-to-date evidence on local housing needs'.

We also see a problem with including the word “viability” in criterion c), because this gives the developer the opportunity to argue that it is not viable, for example, to build homes suitable for elderly and disabled people simply because these homes may not be as profitable as large houses. The words, “and the viability of the development” should be deleted.

Most importantly, the policy should contain a requirement relating to housing densities (dwellings and/or bedspaces per hectare) and site coverage ratios which would use land responsibly, sustain vibrant communities, ensure green space provision, the viability of shops, public transport and amenities and increase walking and cycling and reduce car dependency.

A suitable minimum housing density requirement will also result in a smaller quantity of the greenfield sites being used during this Local Plan period, as described in our submission relating to the Proposed Housing Growth Sites Policy.

The appropriate target density figures need to be informed, in part, by the accessibility of the site, volume of development and the proposed provision and mix of amenities (such as shops, green spaces and schools).

We request that this policy should require a minimum density of 65 dwellings/hectare, the minimum needed to sustain a '20minute neighbourhood' \* (Royal Town Planning Institute Scotland)

If it is not considered possible to include this requirement in this policy, the requirement for minimum housing density should be included in a Supplementary Planning Document.

Such an SPD should also require a minimum percentage of a development site to be kept as green, biodiverse, protected public space.

\*an established principle of urban design and planning, which aims to make sure that people's everyday needs are within easy, safe walking distance of their homes: schools, shops, parks, good public transport, etc.