

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

Proposed Affordable Housing Policy

The policy should include a definition of “affordable housing”.

The statement re the quantum of affordable housing should be considerably strengthened:

- The phrase “**up to 40%**” is meaningless in this context, since even 1% qualifies as “**up to 40%**”. If the policy intends to require a certain amount of affordable housing, that figure should be a **minimum** figure. Therefore, the policy should read: “Proposals for housing development for 10 or more dwellings will be expected to provide 40% of the gross number of dwellings in the form of ‘affordable housing’”;
- The policy should include the following requirement: “Where it appears that a larger site has been subdivided into smaller development parcels in order to circumvent the requirements of this policy, or for any other reason, the threshold and the pro-rata percentage of affordable housing sought will apply to the requirement from the larger area as a whole”.
- The phrase “subject to considerations of viability” is problematic, because this gives the developer the opportunity to argue that a 40% requirement is not viable simply because these homes may not be as profitable as larger houses.
“Viability” should not be interpreted as only **economic** viability. The reason the Local Plan is specifying a minimum number of affordable homes is to make a development **socially** viable i.e. to provide the number of affordable homes which that community requires.
If a developer states that 40% affordable housing is not (economically) viable, robust evidence of this must be provided in the form of an independent viability appraisal, AND the lower number suggested by the developer should be assessed for its **social viability** i.e. does this community need more affordable homes than the number suggested by the developer?
There should, therefore, be a statement such as, “If a developer states that 40% affordable housing is not viable, robust evidence of this must be provided in the form of an independent viability appraisal, and the economic viability of that required amount will be independently

assessed against the social viability of the smaller number of affordable homes suggested by the developer.”