



**Affordable Housing
Supplementary Planning
Guidance August 2010**

500 Word Response

13th September 2010

1. The SPG has not been subject to public consultation. This is inappropriate.
2. Paragraph 1: Need – the SPG refers to increased need, despite that there has been no revision of the strict affordable housing (“AH”) allocations policy to enable households described access to the said AH.
3. Paragraph 4: Proportion – a staggered AH proportion over 5 years is proposed, but this does not accord with proposed Policy H3 wording which includes a single AH target and does not refer to / include triggers to increase this. The proposed H3 target and the increasing targets are not indicated to be introduced only subsequent to a robust review of economic viability and AH need.
4. Paragraph 5 – Economic Viability Model (“EM”) – the States have not presented any evidence of an economic assessment of the viability of land and the impact of the proposed targets on housing delivery. The EM does not provide such an assessment, and has not been consulted upon.

The SPG suggests that every application will need to be accompanied by an EM assessment regardless of the proportion of AH proposed. This does not conform with Policy H3.

The States seeks to restrict appraisals to the format set out within the EM at Appendix 2: this has not been consulted upon, applies assumptions that are unexplained (and all of which should be independently examined), assumes a low level of developer profit, does not reflect other planning gain contributions, and does not reflect that land owners will seek a proportion of any uplift in land value realised as a result of obtaining planning permission. An objective definition of viability is not provided.

5. Paragraph 6 – On-Site Provision – the SPG says of schemes at or above the ‘threshold level’ that:

‘the Minister will require that a minimum of 12.5% of the units are provided on site as affordable housing...’

This does not conform with revised or original Policy H3 wording which now includes a target for 12.5% AH; the target is not expressed as a minimum.

The proposed thresholds have not been subject to economic assessment by the States.

6. Paragraph 8 – Commuted Payments (“CP”) – the SPG suggests that CPs will need to enable the purchase of ‘at least as much affordable housing as that which would have been provided on site’. How is this appropriate? Surely it is more equitable for the level of provision to be of broadly equivalent value to the on site provision?

The SPG appears to suggest that withholding of any information when submitting a viability assessment (even commercially sensitive information) will result in imprisonment.

7. Paragraphs 9 and 10 – Type and Mix – the Ministers preferences in respect of AH mix /t type are not supported by a robust assessment of housing need.
8. Paragraph 11 – Securing AH – the wording is too vague regarding the triggers for market housing occupation; can 50% market housing be occupied, 80% or 99%? This needs re-wording appropriately.