



Colchester Preferred Options Local Plan - Regulation 18 Representation

Policy H2: Affordable Housing

We object to Policy H2 as drafted. The policy is insufficiently clear, overly prescriptive, and risks undermining housing delivery.

1. Lack of Clarity on Tenure Prioritisation

The policy states that social and affordable rented housing should be prioritised “where delivery does not prejudice the overall delivery of affordable homes.” This wording is **unclear and ambiguous**, providing little certainty to applicants or decision-makers as to how tenure choices will be assessed in practice.

The policy should allow **flexibility across the full range of affordable tenures**, including affordable rent, social rent, shared ownership and other intermediate products such as First Homes, having regard to site context, delivery mechanisms and Registered Provider requirements.

We note from the viability evidence base that an assumption of 60% Affordable Rent, 25% First Homes & 15% Intermediate tenure has been applied on all schemes. Is this the preferred tenure mix of Affordable Housing?

2. Tenure Blind Design and Distribution Requirements

While the principle of tenure blind design is supported, the policy requirement that affordable housing should not “dominate an area, road or building” is impractical and risks unintended consequences.

In practice, Registered Providers often prefer a degree of clustering of affordable homes for management, maintenance and long-term stewardship reasons. A rigid approach to pepper-potting can create operational inefficiencies and deter delivery. The policy should therefore be more flexible and responsive to agreed management and delivery arrangements.

3. Viability and Review Mechanisms

The policy’s approach to viability is overly onerous, with a strong presumption in favour of policy compliance and the routine use of review mechanisms. While viability review clauses may be appropriate in some circumstances, they should not be applied as a default.

Excessive reliance on post-permission review mechanisms introduces uncertainty, affects land values and can deter investment, particularly on marginal sites. Viability should be assessed proportionately and pragmatically, with clear recognition of market conditions and cumulative policy burdens.

4. Accessible and Wheelchair Housing Standards

The requirement for 95% of affordable homes to meet M4(2) standards and 5% to meet M4(3) wheelchair user standards is overly rigid. The appropriateness of accessible and wheelchair housing provision should be assessed on a site-by-site basis, informed by location, site constraints, scheme type and evidenced local need.

A blanket requirement risks rendering some schemes unviable or undeliverable, particularly on smaller or constrained sites.