What is the "But For" Test, and who determines if it has been met?

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VEPC will review each application - other than those for which the housing development is an affordable housing development - to determine whether the infrastructure improvements proposed to serve the Housing Development Site and the proposed housing development *would not have occurred* as proposed in the application or *would have occurred in a significantly different and less desirable manner* than as proposed in the application ***but for*** the proposed utilization of the incremental tax revenues.

A non-exhaustive list of factors VEPC may consider around the question of what is a "significantly different and less desirable manner" may include, but is not limited to:

- a housing development occurring significantly ***later*** than it could occur with CHIP financing,
- a housing development that would include ***fewer units*** without CHIP financing,
- a housing development that is ***significantly less affordable*** than could occur with CHIP financing.



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