

## APPENDIX B: SECTION 5 – PROVIDING A BALANCED SUPPLY OF HOUSING (PART)

### ISSUE: AFFORDABLE HOUSING AND DWELLING MIX

#### Policy 27 - Affordable Housing and Dwelling Mix

Housing developments on sites of 0.3 hectares or more and all developments capable of acceptably delivering 10 or more dwellings will be permitted, if they provide an appropriate mix of Affordable Housing types to meet the range of affordable housing needs. The number of Affordable Housing units or an equivalent site area should be provided as set out below:

<b>Number of units</b>	<b>Percentage of Affordable Housing required (minimum)</b>	<b>Number of Affordable Housing units to be delivered (rounded to the nearest whole number) (minimum)</b>
10	20%	2
11	24%	3
12	28%	3
13	32%	4
14	36%	5
15 or more	40% or more	6 or more

The precise amount of such housing to be provided on each site will be negotiated taking into account the viability of the development, any particular costs associated with the development and whether there are other planning objectives for the site. Developers may not artificially subdivide sites in order to circumvent the requirements of this policy.

The occupation of affordable housing will be limited to people in housing need and shall be available in perpetuity. Affordable Housing shall be provided on the development site, externally indiscernible from and well integrated with the general market housing, unless exceptional circumstances are demonstrated, which would necessitate provision of Affordable Housing on another site or payment of a commensurate financial contribution to enable housing need to be addressed within the city.

Developments, particularly on sites over the threshold for Affordable Housing, should include a balanced mix of dwelling sizes\*, types and tenures to meet projected future household needs within Cambridge. The mix shall have regard to the differing needs for different unit sizes of affordable and market housing and to the Affordable Housing Supplementary Planning Document.

Whilst employment related housing within Cambridge is encouraged, where sites delivering employment related housing could deliver above the threshold of 10 units or 0.3 hectares, Affordable Housing will be required.

\*Measured by the number of bedrooms to be provided in each dwelling.

### Supporting Text:

#### Affordable Housing

With a strong economy, Cambridge is at the centre of an area of significant housing growth planned for the coming years. With high housing costs but only limited land available for housing, the city also has a strong housing need. The council recognises that meeting housing need is a key priority.

Most sites in Cambridge with the capacity to deliver 10 or more residential units can deliver at least 20% Affordable Housing whilst remaining viable, whilst most schemes containing 15 or more residential units remain viable with 40% Affordable Housing.<sup>1</sup> A sliding scale is used to move between 20% and 40% Affordable Housing in increments, as shown in the table within the policy. In instances where higher levels of Affordable Housing than 40% are proposed, this is supported. Where a developer considers that meeting the Affordable Housing target percentage will be unviable, robust evidence of this must be provided in the form of an independent viability appraisal. Negotiations between the Council and the developer will need to take place to ensure clarity about the particular circumstances which have given rise to the development's non-viability, either on an open book valuation or involving an independently commissioned valuation using the Homes and Communities Agency's Development Appraisal Tool.<sup>2</sup>

The "sliding scale" approach has been adopted to overcome concerns about the number of planning applications for residential development the Council receives just below the current adopted threshold of 15 units. It also has the potential to overcome the concern that the straight introduction of a higher Affordable Housing provision requirement at a new threshold would place too heavy a financial burden on affected sites on the basis of a sudden step up in requirements. A more graduated approach towards Affordable Housing requirements, starting at lower site size thresholds and percentages, is more appropriate.

#### Table X: Affordable Housing Definition

Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable Housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative Affordable Housing provision.

<sup>1</sup> Dixon Searle (2013) Cambridge City Council Local Plan Review – Viability, Community Infrastructure Levy Viability Assessment (To be finalised)

<sup>2</sup> Homes and Communities Agency's Development Appraisal Tool is available at <http://www.homesandcommunities.co.uk/ourwork/development-appraisal-tool>

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of Affordable Housing, such as “low cost market” housing, may not be considered as Affordable Housing for planning purposes.

### **Employment Related Housing**

The existing pressures on the housing market in Cambridge can lead to employers facing difficulties with the recruitment and retention of staff. Due to Cambridge’s high house prices and levels of housing need, it is important to allow the possibility of employers providing housing specifically for their employees, as part of schemes for employment development.

It is anticipated that this policy will facilitate small numbers of employment related dwellings coming forward. Affordable Housing policies will apply to schemes including 10 or more dwellings. Below that number, the provision of dwellings will need to be justified and managed by reference to the employer carrying out detailed survey work to ascertain the level of demonstrable need for such housing. This can be established by identifying the level of recruitment and retention problems experienced. Survey work would need to establish:

- The level of staff turnover for a five year period;
- Any likelihood of the need for future expansion of the business in question;
- Housing circumstances of employees; and
- Incomes of employees.

Occupation of employment related housing will be secured through a Section 106 obligation.

### **Mix of Dwelling Types, Sizes and Tenures**

In order to provide affordable homes to those who need them, the Council will require a high proportion of Affordable Housing to be provided on site. It is also vital

to provide an appropriate mix of housing types and sizes to meet the needs of different households within the wider community. This allows residents to remain in the locality as their housing needs change, and helps build balanced and mixed communities.

In addressing development proposals coming forward, the Council needs to have an up-to-date understanding of the local housing market, and how it interacts with other housing markets, and the level of local need for housing. Our Strategic Housing Market Assessment for the Cambridge housing market area draws on a number of data sources and has been developed with a range of partners. This will inform the development of a new Affordable Housing Supplementary Planning Document, which will address both tenure and dwelling mix. Applicants need to demonstrate that the proposed mix of units will deliver a balanced mix of dwelling sizes, types and tenures to meet projected future household need within Cambridge in line with the approach towards tenure and dwelling mix set out in the Affordable Housing Supplementary Planning Document.

### **How the Policy Came About:**

#### **What is Affordable Housing?**

1. Affordable Housing is housing provided for people whose income levels mean they cannot access suitable market properties to rent or buy locally to meet their housing needs. It includes: Social Rented; Affordable Rent; and a range of intermediate housing tenures (including Shared Ownership, Equity Share, and Intermediate Rent).
2. Government guidance states that Affordable Housing should:
  - Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices; and
  - Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative Affordable Housing provision.
3. In terms of the different forms of Affordable Housing, social rented housing is owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through the national rent regime. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency as a condition of grant. Target social rents are set using a formula, which considers property prices and average manual earnings, both weighted for the geographical location of the housing stock. The Government has announced that a new social rent policy, which will include arrangements for setting and reviewing rent levels up to 2025 will be included in the next spending review. The national definition of Affordable Housing was revised in June 2011 and a new tenure type was added - Affordable Rent - which is a form of rented rather than intermediate housing.

Affordable Rents are not subject to the same prescriptive rent control as Social Rented Housing. Affordable Rents can be set by the Registered Provider at up to 80% of local market rents. Under current guidance, with very few exceptions, all new Government grant for rented Affordable Housing allocated by the Homes and Communities Agency from April 2011 to March 2015 will require new housing to be let at Affordable Rents rather than Social Rents. It is also noted that Homes and Communities Agency grant will not be available for new Affordable Housing delivered under S106 planning agreements.

4. Intermediate Affordable Housing is housing at prices and rents set above those of social rent, but below market price or rents (not including Affordable Rent) and, which meet the criteria set out for Affordable Housing. These can include shared equity products (e.g. HomeBuy), other low cost homes for sale and intermediate rent.

#### **Making Affordable Housing Provision**

5. Paragraph 47 of the National Planning Policy Framework asserts that local planning authorities should ensure that their local plan meets the full, objectively assessed needs for market and Affordable Housing in the housing market area, as far as is consistent with the policies set out in this Framework. In Cambridge, though, there is a tension between the requirement set out in the National Planning Policy Framework and the ability to fully meet affordable housing need.
6. Paragraph 50 of the National Planning Policy Framework states that local planning authorities should deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. They should do this by planning for a mix of housing, identifying the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and where the local authority has identified that Affordable Housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.
7. The availability of Affordable Housing in Cambridge to meet housing need is a key issue. It is also vital in supporting economic growth, and promoting and improving the health and well-being of Cambridge residents. The Council's Housing Strategy 2012 - 15 identifies the need to maximise the delivery of new Affordable Housing in a range of sizes, types and tenures to meet a range of housing needs, as part of delivering balanced, mixed and inclusive communities.
8. The Strategic Housing Market Assessment sets out the annual need for 2,140 new Affordable Homes per year over the five years between 2009/10 and 2013/14 to deal with existing and newly arising housing need and then 592 per annum thereafter up to 2027/28. The Strategic Housing Market Assessment is

in the process of being updated, and these figures may be subject to change. The Affordable Housing need in Cambridge is therefore much greater than the level of housing that can ever be fully met. Affordable Housing in Cambridge is provided by the Council and a number of Private Registered Providers (Housing Associations). Over the last 15 to 20 years, new Affordable Housing has been provided mainly by Housing Associations (Private Registered Providers), but the Council has now agreed a programme to deliver its own Affordable Housing. Government grant has been secured for the Council to build 146 new Affordable Homes in a mix of Affordable Housing tenures over the next three years, and the Council has the potential to provide approximately 500 more new Affordable Homes in following years, subject to capital funding being made available. This includes the replacement of old, unpopular and difficult to manage housing stock with more modern accommodation, as well as providing additional new homes.

9. In view of the high level of housing need in Cambridge, Policy 5/5 of the 2006 Cambridge Local Plan is concerned with the provision of Affordable Housing, establishing thresholds and targets for provision and accepting that the actual provision will be for negotiation taking into account viability, any particular costs associated with the development and whether there are other planning objectives which need to be given priority. The policy states that the Council will seek as Affordable Housing 40% or more of the dwellings or an equivalent site area as part of new residential developments which are either on sites of over 0.5 hectares or can deliver 15 or more dwellings. Annual monitoring of Policy 5/5 of the 2006 Cambridge Local Plan and the delivery of Affordable Housing over the past seven years has shown that qualifying development sites have been delivering 40% Affordable Housing consistently since the 2006 Cambridge Local Plan was adopted. Whilst this approach has contributed to providing more Affordable Housing in Cambridge, and has been tested at appeal, most notably in relation to urban extensions at Clay Farm and Glebe Farm on Cambridge's southern fringe, the evidence suggests that there is still a need to provide more than this approach has achieved to date. In April 2012, there were 8,210 applicants on the Council's Housing Register. This showed an increase of around 1,500 applicants since March 2011. All applications on the register have been reviewed and these numbers are expected to have changed. Furthermore, the ratio of average house prices to average earnings has remained fairly stable over the three years to 2012, standing at 9.2 in 2012. Despite the wider economic climate, Cambridge has not seen a reduction in house prices or private rent levels. With a relatively young mobile workforce and a growing student population, demand for the private rented sector remains high.
10. The National Planning Policy Framework states that where there is an identified Affordable Housing need, councils should set policies for meeting this on-site unless off-site provision or a financial contribution can be justified. Within the options on Affordable Housing in the Issues and Options Report (2012), there were three options which set out the potential to require the delivery of 30%, 40% or 50% or more Affordable Housing within new residential developments. Given the interim findings on viability, it was agreed at Development Plan

Scrutiny Sub Committee in February 2013 that Option 90 would be pursued, which requires 40% or more Affordable Housing.

**Threshold for Affordable Housing**

11. In view of the high level of housing need in Cambridge, Policy 5/5 of the 2006 Cambridge Local Plan on the provision of Affordable Housing, also established the threshold for provision. The policy states that the council will seek as Affordable Housing 40% or more of the dwellings or an equivalent site area as part of new residential developments, which are either on sites of over 0.5 hectares or can deliver 15 or more dwellings. Since the policy was implemented, a number of schemes have come forward in Cambridge, which have delivered Affordable Housing on sites accommodating 15 or more dwellings. However, a number of sites have also come forward with between 10 and 14 dwellings. The table below sets out the number of schemes of 15 or more units and between 10 and 14 units, which have been approved within five monitoring years since the adoption of the 2006 Cambridge Local Plan. The monitoring year 2006/07 was not used as a number of schemes permitted using the 1996 Local Plan parameters were monitored in this year. Reserved matters applications were also excluded from the table, as the commitment to deliver Affordable Housing had been made at outline stage in all applications.
  
12. Whilst the number of applications approved for over 15 units appears low when considered in purely numeric terms, it should be noted that some of the approved schemes were outline applications for the development of hundreds of homes in the urban extensions to Cambridge. However, it should also be noted that a number of schemes came forward for between 10 and 14 units, which did not deliver any Affordable Housing due to the current threshold of 15 units. Furthermore, a number of the sites identified in the Strategic Housing Land Availability Assessment and anticipated on windfall sites (using sites delivered between 1999 and 2011 as a guide) would deliver schemes of between 10 and 14 units.

**Table 1: Commitments from 2007 to 2012 (source: Cambridgeshire County Council)**

<b>Monitoring Year</b>	<b>No. of schemes over 15 units approved</b>	<b>% of schemes over 15 units with 40% Affordable Housing or more</b>	<b>No. of schemes of between 10 and 14 units</b>
2011/12	2	100%	5
2010/11	4	100%	3
2009/10	2	100%	5
2008/09	4	100%	5
2007/08	3	66.6%	2

13. In the Issues and Options Report (2012), there were two options given on thresholds for Affordable Housing. The approach agreed at Development Plan Scrutiny Sub Committee in February 2013 was to pursue option 93, which lowers the qualifying threshold for Affordable Housing to include sites providing 10 or more dwelling units or sites of 0.3 hectares or more. A lower threshold will potentially increase the overall supply of Affordable Housing, and for this reason, the lowering of the threshold was generally supported by respondents to the Issues and Options consultation (2012).
14. As with any threshold, however, there is always the risk that developers look to artificially lower the number of units to be delivered on a particular site in order to avoid crossing the Affordable Housing threshold and that the difference of one extra dwelling could trigger the requirement for 40% Affordable Housing with an associated significant impact on viability. This could be avoided to an extent by stating within the policy that the artificial subdivision or amalgamation of sites with the intention of subverting this policy will not be permitted. Furthermore, if the threshold is lowered too significantly, there is the risk that Registered Social Landlords find sites with very small numbers of Affordable Housing difficult to manage. In lowering the threshold, the balance needs to be struck between meeting housing need, maintaining effective management of Affordable Housing and continuing to deliver well-designed developments of appropriate density for their context.
15. Viability testing considered the impact of lowering the threshold of 40% Affordable Housing requirements to cover developments of between 10 units or at least 0.3 hectares in size. It was established by this work that 40% Affordable Housing on these smaller developments/sites would have too great an impact on viability when viewed alongside other requirements, but a lower percentage of 20% would be viable at 10 dwelling units. It is considered appropriate to operate this lowered threshold on a sliding scale commencing at 20% for developments of between 10 units or at least 0.3 hectares in size progressing up to 40% at 15 units or at least 0.5 hectares in size. The sliding scale is set out within the policy itself and moves from 20% for 10 dwelling units through to 40% for 15 units in 4% increments.

#### **Clustering of Affordable Housing**

16. The council's Affordable Housing Supplementary Planning Document sets out clustering as:

*“Clustering, which is the development of the Affordable Housing in multiple groups normally of between 6 and 25 dwellings depending upon the size and design of the development and the nature of the Affordable Housing. In flatted schemes no more than 12 affordable dwellings should normally have access from a common stairwell or lift. Clustering is the usual approach that is followed in Cambridge. The Affordable Housing should be provided in prominent parts of a site to aid integration.”*

17. Within the Issues and Options report (2012) a question was posed regarding the clustering of Affordable Housing and whether to continue the current approach to clustering. The layout of a development should integrate Affordable Housing with the open market housing in ways that minimise social exclusion and improve community cohesion, but also continue to allow effective management by the relevant Registered Provider. The plan itself does not refer to clustering as this is an internal housing management issue to be covered if necessary in the Affordable Housing Supplementary Planning Document. The plan rather focuses on ensuring that the external appearance of Affordable Housing is the same as general market housing.

### **Tenure Mix**

18. In accordance with the National Planning Policy Framework, the council encourages a mix of tenures to be provided as part of new development. With high levels of need for rented housing identified through the housing register, the council currently resolves to achieve that 75% of the Affordable Housing on qualifying sites should be Social Rented Housing and 25% Intermediate Housing. This is set out in the council's Affordable Housing Supplementary Planning Document (January 2008), which provides additional detail supporting policies in the 2006 Cambridge Local Plan.
19. Research undertaken by the University of Cambridge's Department of Land Economy on behalf of the Council in March 2011 has shown that at 80% of local market rent, Affordable Rents would not be "affordable" to the majority of households who cannot afford lower quartile market housing. The council has therefore negotiated with the Homes and Communities Agency to limit Affordable Rents to approximately 65% of local market rent and at or below Local Housing Allowance rates for its own new-build homes. The council's Tenancy Strategy states that the council would like to see other providers negotiating towards a similar position - to ensure some parity of Affordable Rent levels across the city, and to ensure that rents remain as affordable as possible. Coupled with fundamental reforms to the welfare system, it is too early to fully assess the impact of the introduction of new Affordable Rents on the ability of tenants on low incomes to access different sizes, types and tenures of housing. However, early analysis – both locally and nationally – shows that Affordable Rent properties are tending to be let to people with high priority on Cambridge's and other authorities' needs registers, which suggests that they are probably being let to people who are in receipt of Housing Benefit. Work on the Strategic Housing Market Assessment and the council's Housing Strategy has identified that there is a growing group of people unlikely to be able to have sufficient priority to access Social or Affordable Rented homes, but who are also unable to afford to purchase on the open market. Intermediate housing can help to provide for people in this group.
20. Given the local need to provide housing across different tenures, the council's Issues and Options report (2012) addressed this issue by setting out options 97 and 98 on tenure mix. Option 98 was supported at Development Plan Scrutiny

Sub Committee in February 2013. The policy will allow for greater flexibility, by stating the need to consider tenure mix, making reference to the Strategic Housing Market Assessment and the council's Affordable Housing Supplementary Planning Document. Both the Strategic Housing Market Assessment and the council's Affordable Housing Supplementary Planning Document are capable of being updated more regularly than the local plan to reflect changing circumstances, including the ongoing impact of Affordable Rents and fundamental reforms to the welfare system, including Universal Credit.

### **Housing Mix**

21. In accordance with the National Planning Policy Framework (paragraph 50), it is important that new residential development provides a good mix of size and type of dwellings to meet a range of needs. Development of a mix of different dwelling sizes, types and tenures will assist in the creation and maintenance of mixed, inclusive and sustainable communities. Such policies at a local level should be sufficiently flexible to take account of changing market conditions over time.
22. Currently, Policy 5/10 Dwelling Mix within the 2006 Local Plan states that on sites of 0.5 ha or more or 15 dwellings or more, residential developments will be expected to provide a mix of dwelling sizes based on the number of bedrooms. The policy does not set any proportions for mix. However, Annex 2 to the Affordable Housing Supplementary Planning Document includes key findings from the Strategic Housing Market Assessment, which sets out a guide for new Affordable Housing provision. It goes on to note that the guidance "...will also be a material consideration in the determination of planning applications for the market housing element..." (Cambridge City Council, 2008, p5).
23. The guidance in Annex 2 of the Affordable Housing Supplementary Planning Document sets out the following mix: 50% 1 and 2 bedroom dwellings, but with no more than 10% 1 bed dwellings, 50% 3 bedroom or larger dwellings, but with no less than 20% 3 bed dwellings. Annex 2 of the Affordable Housing Supplementary Planning Document is caveated by reference to the site size, location and previous decisions.
24. The council's recently produced Housing Strategy 2012-15 recognises that there is a tension between the higher levels of absolute need for one and two bedroom homes amongst applicants on the housing register, the relatively high level of existing supply of smaller homes, and the need to create a balanced and mixed communities and provide larger homes to enable families to grow without having to move on again. Sizes of homes and occupancy rates affect the infrastructure required, including levels of need for school places and health service provision. Welfare reforms restricting housing benefit to those under-occupying their homes may also affect the size of homes needing to be built in the future, although the council will still want to balance this with a need for mixed and balanced communities.

25. Within the Issues and Option report (2012) of the Local Plan Review, two options were put forward for consultation on housing mix. Option 100 suggested a general policy on housing mix with more detailed advice provided through the Strategic Housing Market Assessment and the council's new Affordable Housing Supplementary Planning Document, whilst Option 101 suggested setting specific levels within the policy itself.
26. Following agreement at Development Plan Scrutiny Sub Committee in February 2013, pursuing Option 100 will enable flexibility to adapt to any future changes in circumstances in the wider economy and in the local housing market. This is noted in the Sustainability Appraisal of the Issues and Options Report and recognises that updates to the Strategic Housing Market Assessment and the council's Affordable Housing Supplementary Planning Document can reflect and allow for changes in local housing need more frequently and more regularly than through formal plan-making. The sub-regional Strategic Housing Market Assessment is currently being updated and it is proposed that the council's Affordable Housing Supplementary Planning Document is updated to reflect and complement the new local plan. Consideration should also be given to the need to express the housing mix across all tenures and whether to differentiate between houses and flats. The dwelling size would be measured by the number of bedrooms provided.

#### **Employment Related Housing**

27. In terms of previous policy development relating to this issue, Policy 5/6 of the 2006 Cambridge Local Plan set out the requirement for proposals for employment development, which impact on the demand for affordable housing, to provide Affordable Housing on-site; contributions towards off-site housing or by means of key worker housing provision. This policy was deleted after the application to the Secretary of State to save the policies of the 2006 Cambridge Local Plan because it was recognised at the Examination in Public for the Regional Spatial Strategy for the East of England that there was an absence of convincing evidence that specific local circumstances existed to justify the imposition of the requirement. Deleted Policy 5/6 was worded in a negative manner, requiring mitigation of impacts on Affordable Housing provision as a result of new employment development.
28. The council included Option 99 *Employment related housing* in the Issues and Options report (2012). This option set out the development of a specific policy, which encourages the provision of housing for employees in Cambridge. Generally, this option was supported by respondents, particularly the University of Cambridge and the Bursars' Committee. The key difference between the deleted Policy 5/6 of the 2006 Cambridge Local Plan and Option 99 of the Issues and Options report is in the positivity of wording. Whilst Option 99 seeks to encourage housing provision for specific employers within the city, who have a demonstrable need for housing for their employees, the deleted 2006 Local Plan policy required mitigation of impacts on Affordable Housing provision as a result of employment development within the city. Direct action by local employers

may help alleviate the existing pressures of the housing market in Cambridge as it could take a number of people out of the private rented sector and off the Housing Register.

29. In order to allow any provision of employment related housing, the applicant would need to demonstrate that there is a proven need for such housing that cannot be met by the housing market and that, in the absence of this new housing provision, the provision of their business/services would suffer. The planning application for employment related housing would be required to have an allocations policy identifying the range of employees within their institution. This allocations policy would also form part of a S106 agreement.

## **DELIVERY AND MONITORING**

### Policy 27 – Affordable Housing and Dwelling Mix

- Site plans to show clearly which dwelling units will be affordable;
- Evidence: If full requirements of the policy cannot be met, the applicant must submit an independent viability appraisal;
- Monitor percentage of provision of Affordable Housing on sites of 10 or more units or over 0.3 hectares in size in accordance with the sliding scale set out in the policy.