

The Welborne Plan

Statement on Issues and Questions

Issue 10: Homes and Affordable Housing (WEL17 – WEL22)

September 2014

CD-17

- 10.1 *What is the justification for the requirement for 15% of market homes to be designed to meet higher accessibility standards and is the reference to economic viability in the third paragraph of policy WEL17 appropriate and justified?***
- 10.1.1 The Private Sector Housing Condition Survey 2009 (EV60) estimated that 18.3% of current dwellings in the Borough have at least one resident with a long term illness or disability. The study also estimated that of those who had a disability 64.3% had mobility related impairment, by which they stated they walk unsteadily, walk using a frame or need to use a wheelchair. By extension, therefore, 11.7% (64.3% of 18.3%) of the current housing stock would benefit from being to a Lifetime Homes Standard (LHS).
- 10.1.2 This information of need is backed up in the recent Partnership for Urban South Hampshire (PUSH) Strategic Housing Market Assessment (SHMA) (LD14) which states that 16.5% of the population currently have long term health problems or disabilities (LTHPD), and that 24.8% of households contain someone with LTHPD. The SHMA also includes data on the proportion of each age band that has LTHPD, concluding unsurprisingly that more elderly groups have a higher proportion of people with LTHPD, with 81.4% of over 85's recorded as having a LTHPD. Given that the latest population projections from ONS show a continual rise in the number, and proportion, of elderly people this will undoubtedly result in a rise in the percentage of people who would benefit from living in a property built to LHS.
- 10.1.3 As stated in the SHMA "it is estimated that the number of people with a LTHPD will increase by 34% in the period from 2011 to 2031". Whilst it is fair to assume that some of the living requirements to meet this increase will be met in specialist care facilities it will be equally important to provide a dedicated proportion of all houses that can be utilised by those with mobility issues.
- 10.1.4 There is a clear need for a proportion of properties to be built to meet the needs of the mobility impaired now, and this need is set to increase over time. The Lifetime Homes standard is a nationally recognised standard that would help new homes become adaptable and accessible for all. The figure of 15% of properties to be built to Lifetime Homes Standards within Policy WEL17 is justified on the basis of current need alongside clear demographic evidence of an ageing population.
- 10.1.5 The National Planning Policy Framework (NPPF) is clear that Local Plans must give careful consideration to viability and costs, to ensure that sites are deliverable. Therefore any additional costs applied through the Policies in the Welborne Plan must ensure that overall viability is not adversely influenced. Given that higher accessibility standards are only likely to be achieved through larger floor areas or bespoke designs, slight additional costs over "standard" housing can be expected. To ensure that this cost does not become a burden to the overall development a viability clause is considered appropriate.

10.2 Is the Council's approach to the provision of private market rental housing sufficiently flexible?

- 10.2.1 The Council considers that the development of Welborne provides a good opportunity to deliver a higher proportion of homes for market rent than has traditionally been achieved within the Borough. The availability of sufficient private market rental homes is important to provide choice in the housing market and to address an existing deficiency in this tenure within Fareham. In addition, the availability of good quality market rental homes is important for attracting additional skilled workers that will be required to support South Hampshire's aspirations to strengthen the sub-regional economy and achieve growth.
- 10.2.2 In setting out the approach to achieving a proportion of market rental homes at Welborne, the Council considered, and consulted on, specific target requirements that would need to be secured through planning conditions or Section 106 Agreements (See Policy WEL23 within the Draft Welborne Plan, EV33). However, a number of consultation responses considered that the approach was overly prescriptive and inflexible. Therefore, in preparing the current version of Policy WEL17, a more flexible approach was taken to encouraging the delivery of private market rental homes and seeking to take up any delivery opportunities. One example would be the Council's involvement in the Joint Venture Housing Company (JVHC). In addition, the final paragraph of Policy WEL17 encourages the principal landowners to work proactively with institutional landlords or other investors with the aim of delivering homes specifically for long-term market rent.
- 10.2.3 It is considered that the approach, set out above, is flexible and is not overly prescriptive. The terminology used to describe the Council's expectations of the principal landowners is '*should*' rather than '*shall*'. The 'note regarding terminology within this Plan' (see page viii of LP3) states that '*should*' indicates a recommendation or something that is being particularly encouraged; it is not a policy requirement. Neither is there a requirement for the principal landowners' work with institutional landlords or other investors to necessarily result in the delivery of homes for private market rent. Policy WEL17 states that such work will have '*the aim of delivering homes specifically for long-term market rent*'. This accepts that, even after effort has been expended; it may not ultimately be feasible or viable to deliver homes specifically for private market rent at Welborne.
- 10.2.4 The Council would also point to the final sentence of Policy WEL17, which sets out the flexible approach that it will take to the securing of affordable housing from any homes delivered specifically for long-term market rent. Where there is robust viability evidence to demonstrate that the market rental homes cannot reasonably provide the target proportion of affordable housing, the Council will work with the principal landowners to ensure that as much of the market rental homes can be delivered, bearing in mind the Council's priority to deliver affordable housing. This approach reflects the

Council's view, supported by evidence in the South Hampshire SHMA, that the provision of market rental homes has a role to play in helping to meet housing needs (see paragraphs 5.58 – 5.66 of LD14).

10.3 *Core Strategy policy CS18 requires 40% affordable housing on sites of 15 or more dwellings. What is the justification for reducing the percentage at Welborne to 30% bearing in mind the significant need for this type of housing in the area?*

10.3.1 Note on proposed modifications to Policy WEL18 and supporting text

As part of adopting a flexible approach in the Plan, the Council included reference to the deferral of affordable housing contributions in Policy WEL18. This was outlined further in the Council's draft Welborne Planning Obligations and Affordable Housing Supplementary Planning Document (SPD), which was published for public consultation between 25 June and 6 August 2014. Following consideration of the responses received during that consultation, the Council submitted a summary of responses and an initial response to the Examination (CD-05), which indicated that the Council would change Policy WEL18 and supporting text to remove references to deferral of affordable housing and to clarify the policy and supporting text. The Council is therefore minded to propose modifications to Policy WEL18 of the Welborne Plan in line with the text set out in Appendix 10A to this document.

10.3.2 Council's response to Question 10.3

The target for affordable housing set within Policy CS18 of the Core Strategy was based on affordable housing viability evidence that supported a 40% rate for developments of 15 or more dwellings. This viability evidence related to the types of developments that were likely to come forward for housing across the Borough, in accordance with the spatial strategy set out within the Core Strategy. Therefore, the sites included within the viability evidence, and able to support a 40% rate of provision, were generally small sites on previously developed land within the existing settlement boundaries. Such housing developments generally have lower site-specific infrastructure costs than larger greenfield sites, such as Welborne, and are therefore more likely to be able to provide higher levels of affordable housing.

10.3.3 The same viability evidence concluded that the Strategic Development Area (as Welborne was then) would be likely to be able to support only an estimated range of between 30% and 40% affordable housing. This was taken forward within Policy CS13 of the Core Strategy.

10.3.4 Since the adoption of the Core Strategy, considerable work has been undertaken on planning for the infrastructure requirements of Welborne (Infrastructure Delivery Plan Review 2013 Stage 1 Report (EV27) and Infrastructure Delivery Plan 2014: Stage 2 Update Report (EV29)). This evidence has confirmed the very significant level of infrastructure that will be required to support the development and to ensure that the new

community will be genuinely sustainable. This overall level of necessary infrastructure investment has an impact on the viability of the development. This point has been confirmed by the comprehensive site viability evidence undertaken by the Council to support LP3 (EV30). This viability evidence demonstrates that funding the necessary infrastructure, at the time it is required to support the new community, may not be viable with affordable housing set at 40%. Indeed, delivery of the infrastructure will be, at least partially, dependent on external funding and borrowing, as part of an overall Infrastructure Funding Strategy (EV28).

- 10.3.5 Given the evidence on infrastructure costs and the resulting impact on site viability, the Council took the view that it would be unrealistic and unreasonable to require a level of affordable housing delivery above 30% overall. Therefore, the commitment to seek to achieve 30% affordable housing overall reflects the very high priority that the Council places on meeting affordable housing needs, whilst meeting the challenging requirements of providing the necessary infrastructure in a timely and appropriate manner. Moreover, the 30% target requirement, as set out above, is in line with the available viability evidence underpinning the Core Strategy. This commitment is reflected in Policy WEL18, and is clarified further by the proposed modifications set out in Appendix 10A to this statement. The second paragraph of the proposed modifications to Policy WEL18, as set out in Appendix 10A, clarifies that 30% affordable housing will be expected at each phase, unless a robust viability-based case is accepted by the Council.
- 10.3.6 It should also be noted that paragraph 6.24 of LP3 provides encouragement for opportunities, for example, through the Council's involvement in the Joint Venture Housing Company, to fund additional levels of affordable housing at Welborne, above and beyond the 30% target requirement. The Council is not able to ensure such opportunities will come forward, but the Council will work proactively towards this end, throughout the build-out of Welborne.
- 10.4 *Is the reference in paragraph 2 of policy WEL18, to the precise number and mix of affordable homes being agreed by the Council at the time a phase comes forward, a justified approach? Does it demonstrate that the plan is positively prepared and effective?***
- 10.4.1 Representations received on the draft Welborne Planning Obligations and Affordable Housing SPD, and further discussions with the principal landowners and other interested parties, highlighted a number of areas of concern regarding Policy WEL18. In its initial response to the representations (CD-06), the Council indicated that it is minded to suggest modifications to address concerns over the references to the deferral of contributions policy, mechanisms for achieving flexibility in delivery, and the delivery of housing with reference to the most recent evidence of housing need. Those changes, together with a number of consequential changes to improve clarity, are set out in Appendix 10A to this Statement.

- 10.4.2 A key concern for the Council in preparing Policy WEL18 has been to strike the appropriate balance between providing certainty on the overall level of affordable homes that will be delivered, to meet housing needs, and the need to ensure that LP3 is deliverable and can operate in a flexible way. Policy WEL18 will need to provide for the delivery of affordable homes at Welborne over a 20-year period. During this time significant changes can be expected in the macro-economic context, in Government policy on affordable housing and in the viability of development at Welborne. These changes will each impact on the level of provision that each phase of the development can reasonably be expected to deliver.
- 10.4.3 In order to meet the challenge of a policy that will need to operate effectively over the long term, the Council has focused on setting a clear expectation that the overall level of affordable housing, to be provided at Welborne, should achieve the 30% target. However, flexibility will need to be applied throughout the plan period in order to allow for changes in site viability and in the wider national policy and economic context. In preparing Policy WEL18, the Council considered how the required flexibility could be applied. This included considering alternatives to the need for the Council to agree numbers on a phase-by-phase basis. One alternative considered was to set a range for affordable housing delivery within each phase. This was rejected however, as being overly prescriptive and because there was no available evidence to support setting a detailed framework of affordable housing delivery ranges throughout the 20-year plan period.
- 10.4.4 The proposed modifications to Policy WEL18, referred to above and attached as Appendix 10A, include changes to the policy text to improve the clarity of the Council's expectations in terms of the delivery of affordable housing at each phase. This modification proposes a clear statement that each phase shall be expected to meet the target of 30% affordable housing provision, unless a robust and transparent viability appraisal, proving this not to be possible, is accepted by the Council. In addition, the Council considers that there is sufficient justification to require that a minimum of 10% affordable housing is delivered as part of any phase of the development, and that is also further clarified through the proposed modification.
- 10.4.5 In relation to the mix of affordable homes to be provided, the Council has carefully considered the evidence within the South Hampshire SHMA (LD14, see Tables 52 and 53). However, as paragraph 6.20 of LP3 explains, the long build-out period for Welborne means that the SHMA evidence on an appropriate mix for affordable housing provides, at best, a starting point for the early phases. The mix of affordable homes required during the middle and later stages of Welborne's development cannot yet be known. Such requirements will inevitably change over time, due to normal demographic change, changes in the economy and in Government policy. It is not considered appropriate therefore to seek to prescribe the mix of affordable housing within LP3.

10.4.6 Whilst a mix of affordable homes to be delivered is not prescribed, Policy WEL18 does set out a clear expectation that a range of affordable housing types will be delivered within each phase. For the initial phases, as indicated by paragraph 6.20 of LP3, the Council will give weight to the evidence within the current SHMA on the appropriate mix of affordable homes. In addition, the Council will consider the local evidence of the needs and requirements of those on the Council's housing register at the time the planning applications for each phase comes forward.

10.5 *Is the tenure split, of 70% being affordable or social rent and 30% being intermediate provision, justified?*

10.5.1 Policy WEL18 sets out the requirement for an initial affordable housing tenure split of 70% social and affordable rent and 30% intermediate tenures. This is based on the latest available housing needs evidence, set out in the South Hampshire SHMA (LD14, see Table 46 and Appendix Y).

10.5.2 The policy text and paragraph 6.18 of LP3 are clear that the 70:30 tenure split will be applied initially, but that the split will be kept under review over the lifetime of LP3, to ensure that the split being required remains appropriate and continues to meet the needs of those who will benefit from the affordable housing provided.

10.5.3 In preparing this aspect of Policy WEL18, the Council considered two alternatives. The first was to avoid setting any prescribed tenure split and therefore seek to agree the split on a phase-by-phase basis throughout the Plan period. This was rejected as it did not take the available evidence into account and would provide no certainty whatsoever about the split that would be delivered. The second alternative considered was to prescribe the SHMA recommended split for the duration of the Plan. This was rejected on the basis that it would be overly prescriptive and would lack the flexibility to take account of likely changes in the need for different affordable housing tenures during the 20-year build-out period.

10.6 *Is the inclusion of policy WEL22 on gypsies and travellers consistent with national policy? Does it have any substantive impact on the effectiveness of LP3?*

10.6.1 The current Local Plan policy covering sites for gypsies, travellers and travelling showpeople is Policy CS19 of the adopted Core Strategy. However, following a Section 78 Appeal in early 2013, the Council decided that an additional policy covering traveller sites should be included within LP2 to address what the appeal inspector considered to be the ambiguity in Policy CS19. The Council subsequently decided to replace Policy CS19 completely, by deleting it and including a new policy in LP2 (See Policy DSP47). In view of the likely deletion of Policy CS19 and the limits to the coverage of LP2, which does not extend to Welborne, the Council decided to include a policy covering traveller sites within the Welborne Plan in order

to avoid a policy vacuum.

- 10.6.2 As Policy WEL22 does not seek to allocate any sites for gypsies, travellers or travelling showpeople, its purpose is to provide a basis for determining any planning applications for such sites that nevertheless come forward within Welborne. Paragraph 10 of the national policy (Planning Policy for Traveller Sites), states that, where there is no identified need, criteria-based policies should be included within the Local Plan to provide a basis for determining planning applications. Therefore, and in view of the likely deletion of Policy CS19, the Council considers that the inclusion of Policy WEL22 is required to be consistent with national policy.
- 10.6.3 The criteria within Policy WEL22 have been developed alongside the equivalent policy within LP2 (DSP47) and are intended to provide a consistent approach to the determination of planning applications for traveller sites across the Borough. The criteria have been drafted to be consistent with the guidance provided by Policy B (Planning for Traveller Sites) and Policy H (Determining Planning Applications for Traveller Sites) of the national planning policy.
- 10.6.4 The level of impact that Policy WEL22 will have on the effectiveness of LP3 is not known at this stage. As outlined above, no planning applications for traveller sites are currently anticipated at Welborne. However, as paragraphs 6.53 to 6.54 describe, there is currently an un-met need for 'transit sites' and sites for travelling showpeople and work is still being carried out to identify appropriate sites within the 'Eastern Grouping' of local authorities¹. During public consultation on the Draft Welborne Plan (EV33), one or two consultees suggested that Welborne would provide a good location for a transit site for travellers. Whilst the Council does not necessarily agree with this view, it is considered important to include a policy within LP3 that would allow any planning applications for such sites, or indeed for permanent traveller sites, to be determined.

¹ The 'Eastern Grouping' comprises the local authority areas of East Hampshire, Fareham, Gosport, Havant and Winchester.

APPENDIX 10A:

Proposed modifications to Policy WEL18 and supporting text.

Affordable Housing

6.16 Housing Needs

Meeting the needs of those in the Fareham area who cannot access the housing market is one of the key priorities of the Council and is an important objective for Welborne. Delivering new affordable housing is vital in achieving sustainable development and Welborne provides a rare opportunity for the Borough to deliver a significant number of affordable homes and to make a real contribution towards addressing the current backlog of housing need.

6.17 Policy CS13 of the Core Strategy sets out the aim to achieve between 30% and 40% of all homes at Welborne as affordable homes and this was the starting point for the Welborne Plan. Subsequently, up-to-date evidence on housing needs has been undertaken, initially by the Council² and subsequently by PUSH through the South Hampshire Strategic Market Assessment (SHMA) and a target of 30% affordable housing has been confirmed. The SHMA identified likely housing need within the Borough to 2036, ~~taking into account the role that lettings in the private rental sector play in meeting needs.~~ This evidence recommended an annual target for the whole Borough of 146 additional affordable homes, which amounts to 3,358 by 2036. Given that Welborne represents a majority of Fareham's planned housing delivery within this period, it is expected that a significant proportion of this target for affordable homes will be met at Welborne.

6.18 Tenure, Housing Mix, Adaptability and Integration

The SHMA also considered the proportions of new affordable homes that should be provided to meet varying levels of need and it recommended a tenure split of 70% affordable and social rented homes and 30% in 'intermediate' forms of tenure, such as shared ownership homes. Whilst this split will be appropriate in the early phases of development, it will need to be kept under review to ensure that tenures being provided meet the needs at the time each phase is built out and that phases of development remain viable.

6.19 Housing Mix, Adaptability and Integration

A wide range of affordable housing types and sizes will be required at Welborne to meet identified housing need. Within each residential phase, the mix will need to provide homes suitable for families and for smaller households as well as homes suitable for vulnerable households, including those with reduced mobility. Over the course of the Welborne development, a range of specialist needs housing should be provided as part of the affordable housing mix. This will include specialised accommodation for older people and wheelchair accessible homes. These requirements are covered in more detail in the following section below and in Policies WEL19 and WEL20.

² [Fareham Borough Housing Needs Assessment \(DTZ, August 2012\)](#)

- 6.20 The SHMA considered an appropriate mix of affordable homes for Fareham, based on the latest available data on housing needs. However, the long build-out period of Welborne means that this evidence provides only a starting point and the precise affordable housing mix required cannot be known at this stage. Housing needs change over time and are also influenced by Government policies, such as welfare reforms. Therefore, the agreed mix of affordable homes provided within each residential phase will need to reflect the identified needs and viability at the ~~that~~ time the phase comes forward ~~and will be agreed with the Council.~~
- 6.21 In line with the requirement set out in the previous section for a proportion of market homes to be adaptable and to provide for those with reduced mobility, the providers of affordable housing at Welborne will also be expected to respond to this need. Therefore, subject to need and viability, approximately 15% of all affordable homes within each residential phase should be designed and built to meet higher accessibility standards equivalent to the Lifetime Homes standards.
- 6.22 To ensure the creation of a mixed, integrated and socially inclusive community, the affordable housing should be developed to the same design and construction standards as the market housing. Affordable dwellings should be integrated with the market housing, taking account of the nature of the stock, the mix of tenures and the prevailing character of the different parts of Welborne, as set out in Chapter 4. The level of integration will always be expected to fit within a range consistent with the upper and lower limits referred to below and set out in Policy WEL18. For management purposes, it may be considered appropriate to cluster the affordable housing in small groups.
- 6.23 *Delivering Affordable Housing*
National planning policy requires that new development is deliverable and this means that the overall financial burden on new development, including obligations to deliver affordable housing, should not threaten its economic viability.³ Extensive viability testing has been undertaken on the proposals within this ~~p~~Plan. The outcome of this evidence is that there is potential to deliver a significant proportion of affordable homes, but that an overall target of 30% is likely to be the highest that the development as a whole could reasonably be expected to achieve.
- 6.24 In coming to this conclusion, the viability evidence has taken into account separate studies⁴ which have sought to identify and secure additional and external funding for infrastructure and affordable housing at Welborne. One ~~significant outcome of this work is the Council's decision to participate in establishing~~ of the potential delivery mechanisms which may assist viability is a ~~Joint v~~Joint ~~Venture~~Venture ~~Housing~~Housing ~~e~~Company (JVHC) that ~~will~~ may allow the Council

³ [National Planning Policy Framework](#) paragraph 173 (DCLG, March 2012)

⁴ [These comprise the Welborne Infrastructure Funding Study \(GVA, March 2013\) as well as further commercially confidential work undertaken for the Council on options to support housing investment.](#)

and its partners to play a more central and active role in the delivery of affordable housing across the Borough potentially including Welborne. The nature of the role this JVHC will play at Welborne will be determined in dialogue with the principal landowners ~~prior to the determination of the initial planning applications at Welborne.~~ If the opportunity arises to use the JVHC, or any other external funding, to help deliver a higher level of affordable housing than would be expected to result from the 30% overall target, this will be positively and actively pursued by the Council.

- 6.25 Notwithstanding the potential role of the JVHC, delivering the target level of 30% affordable homes each year will be a significant challenge given the overall infrastructure burden on the development and the length of time it will take to build the new community. Therefore, it is necessary for the Welborne Plan to consider how a flexible approach to the delivery of affordable homes could be required.
- 6.26 Flexibility may be required, for example, where the proportion of affordable homes considered to be deliverable within the early phases of the development fell below the 30% policy target, or proposed a different tenure split to the 70:30 envisaged in Policy WEL18. In line with the overall approach to development viability (see Chapter 10), the Council would expect such proposals to be fully justified by a robust and independently verified viability assessment. Where the Council accepted a reduced percentage levels of affordable housing numbers delivery, there would also be a clear expectation that the affordable housing deficit would be 'clawed back' rectified, preferably later within that same phase of development or, failing that, within a subsequent residential phase.
- 6.27 ~~Before accepting reduced levels of affordable housing delivery, the Council will initially consider whether some or all of the short-fall in affordable housing could be delivered by the JVHC. Where this option proved not to be viable, feasible or desirable, the Council will apply its deferral of contributions policy as set out in WEL41 and expanded upon in the Welborne Planning Obligations SPD.⁵ In essence, this policy expects that, if market sales values increase significantly following an agreed reduction in affordable housing delivery, the increased development revenues would subsidise additional affordable housing provision within that phase of development.~~
- 6.28 If it proves not to be viable or practical for the principal landowners to increase the ~~level~~ percentage of affordable housing provision within the same phase, then the Council will seek to ensure that the affordable housing deficit is rectified the 'claw-back' within the subsequent phase of residential development. ~~Again, the~~ The Council will initially consider the potential for the JVHC to deliver some or all of the short-fall, but failing that, will expect increased development revenues within ~~that~~ the next phase to subsidise the additional affordable housing. ~~In the latter case, expectations of additional provision for affordable housing would be subject to the overall priorities at~~

⁵ The Welborne Planning Obligations SPD will be prepared during 2014 and will be adopted at the same time as the Welborne Plan in early 2015.

~~that time for the use of deferred contributions where other infrastructure requirements had also been deferred on viability grounds.~~

- 6.29 In cases where the affordable housing deficit claw-back is deferred to a subsequent phase and, at the start of that phase of development, the principal landowner considers that the provision of the additional affordable housing would not be financially viable, then the Council will expect this to be tested through a formal development valuation commissioned by the Council, at the developer's cost. This valuation would take account of costs and revenues to date as well as the anticipated infrastructure requirements ~~(including any other requirements deferred from previous phases)~~ and the anticipated revenues for the following main phase. Where it is agreed that both the normal target levels of provision and the additional ~~claw-back~~ provision to rectify a shortfall on the previous phase cannot be met, the Council will again consider whether it would be viable, feasible and desirable for the JVHC to deliver some of or the entire shortfall. ~~Failing this, the Council will re-employ its deferral of contributions policy.~~
- 6.30 When applying any flexibility in the phasing and delivery of affordable housing it will be important not to undermine the principle of creating a mixed, integrated and socially inclusive community as set out above. In practice, this means that lower and upper percentages of affordable housing will be set for any given phase of development at Welborne to avoid under provision or over-concentration in any one part of the development. The minimum and maximum levels that will be acceptable within any given phase will be agreed with the Council. However, overall, it is considered that a ~~an absolute~~ lower limit of 10% affordable housing numbers and an upper limit of 40% affordable housing numbers provide a reasonable balance between the need for flexibility and achieving the vision and objectives of the Welborne Plan.

WEL18 – Affordable Housing

Development at Welborne shall provide a total of 30% affordable housing. ~~(approximately 1,800 homes) with an initial tenure split of 70% affordable or social rent and 30% intermediate tenures. The tenure split will be kept under review based on evidence of need.~~

Each residential phase of development shall be expected to meet the target of 30% affordable housing provision unless a robust and transparent viability appraisal proving this not to be possible is accepted by the Council.

In exceptional circumstances where viability considerations require, the absolute minimum affordable housing numbers on any phase will be 10% (subject to viability and the implications for other infrastructure) and the maximum required will not normally exceed 40%.

Where it is agreed that a residential phase will not meet the 30% target of affordable housing, the subsequent phase or phases will be expected to meet that shortfall in addition to the 30% target if possible in viability

terms.

The initial tenure split will be 70% affordable or social rent and 30% intermediate tenures. The tenure split will be kept under review phase by phase based on evidence of need and viability.

A range of affordable housing types, sizes and tenures shall be delivered within each residential phase. The precise number and mix of affordable homes within each phase shall be agreed with the Council, having regard to the nature of the phase to be developed, ~~and the~~ identified need for affordable homes and its viability at the time the phase comes forward.

Approximately 15% of all affordable homes delivered within each phase of the development shall be designed to meet higher accessibility standards equivalent to the Lifetime Homes standards. The precise proportions shall reflect evidence of need demand at the time the phase comes forward and will be subject to the need to ensure that the phase remains economically viable.

Planning permission will be granted for affordable homes that are integrated with the market housing, within the overall limits set out below, and are designed and will be constructed to the same or higher standards. Affordable housing may be clustered in small groups.

~~Each residential phase of development shall be expected to meet the target requirements (set out in the first paragraph of this policy) unless a robust and transparent viability appraisal proving this not to be possible is accepted by the Council. In such cases, the Council will consider alternative delivery mechanisms including the Joint Venture Housing Company (JVHC). Where such alternative delivery mechanisms are not viable, feasible or desirable, flexibility may be applied to the target level requirements within this policy, consistent with the Council's deferral of contributions policy (See WEL41 and the Welborne Planning Obligations SPD). Where a case for deferral is accepted, the absolute minimum level of affordable housing within any residential phase of development will be 10%.~~

~~Where an agreed deferral of affordable housing results in any residential phase of the development not meeting the 'normal' target requirements of this policy, subsequent phases will be expected to provide affordable housing deferred from the previous phase(s). This will be in addition to meeting that phase's own normal 'target' provision, but will be subject to an overall maximum level of 40% of the housing within any one phase being delivered as affordable housing.~~