

## Chapter 5, Policy C4 – Affordable Housing

Name	CH5PC4Q3: Response	CH5PC4Q4: Representors Suggested Changes	MBC Response	MBC Suggested Modifications or Proposed Changes
Anthony Paphiti	The assessment of affordable housing need seems to be linked to the use of a demographic projection linking to dwelling growth of 6,125 over the 2011-36 period and applying a percentage figure to the calculation.	Each village should be consulted, through its Parish Council, for an assessment of future housing development. Expansion of the villages would therefore be consonant with the wishes of all concerned in the affected community - this approach epitomises localism, rather than having quotas imposed from outside on what appears to be a random basis.	Each village in the Borough has been consulted and this is outlined in the Consultation Statement. Further consideration has been given to the housing requirement, taking into consideration the Housing and Economic Development Needs Assessment, published in January 2017, and Towards a Housing Requirement for Melton Borough (Jan 2017) and its addendum (June 2017).	None.
Carl Powell	Supported. Essentially it tries to address a national problem - wages haven't kept up with house prices.	none	Support noted	None.
Terence Joyce	The inclusion of a target (on sites of 11 dwellings or more) for Rural Settlements would appear to be contradictory to the restrictions in Policy SS3 (limiting development to no more than 3 dwellings (UNLESS there is a possibility of a particular development in these smallest settlements exceeding 1000m <sup>2</sup> ?)	Remove the table, as the policy will be applied to any relevant proposal.	The provision of affordable housing will not be required unless the site has 11 dwellings or more/floorspace exceeds 1000m <sup>2</sup> . On allocated sites of this size, the affordable housing threshold will be met. Affordable housing could also be developed on a rural exception site. Due to changes proposed elsewhere, the specific reference to rural settlements will be removed.	None in response to this representation.
Colin Love	<p>The Policy C4 text says that the MBC will only ENDEAVOUR to achieve the 37% subject to 'market conditions, economic viability and other infrastructure requirements'.</p> <p>The developers are well rehearsed in creative accounting to demonstrate 'not economically viable' in their favour to make profit.</p> <p>There is no evidence within this Draft Plan for the provision of 'not for profit' Local Authority (MBC) provided housing for rent to meet the local demand.</p>		The use of 'endeavour' was included to provide flexibility, to reflect that site viability may prevent this being viable in some circumstances. Affordable Housing includes social housing which can be provided by us as a Local Authority. This wording will be removed as part of changes to respond to other representations and new evidence.	None in response to this representation.

<p>Colin Wilkinson (on behalf of Asfordby Parish Council)</p>	<p>The Council's emerging Local Plan sets a target of 37% affordable housing on new development across the Borough.</p> <p>The results of the Council's own viability analysis demonstrate that only the highest value areas in the Borough can support this level of affordable housing provision. In areas like Asfordby, the assessment confirms that only a maximum of 30% affordable housing is achievable as set out in Asfordby Parish Neighbourhood Plan Policy A18.</p>	<p>Policy C4 be modified to identify a differential affordable housing target that reflects the diversity of development viability across Melton.</p>	<p>A revised Local Plan and Community Infrastructure Levy (CIL) Viability Study (May 2017) has been prepared and a focused change to Policy C4 and its reasoned justification is proposed to respond this representation, including differential affordable housing percentages.</p>	<p>A focused change to the affordable housing policy and its associated reasoned justification is proposed.</p>
<p>Colin Wilkinson (on behalf of Belvoir Estate)</p>	<p>The Council's emerging Local Plan sets a target of 37% affordable housing on new development across the Borough.</p> <p>The results of the Council's own viability analysis demonstrate that only the highest value areas in the Borough can support this level of affordable housing provision.</p> <p>Supplementary planning documents add further detail to the policies in the Local Plan- they must not set out policy. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.</p>	<p>Policy C4 be modified to identify a differential affordable housing target that reflects the diversity of development viability across Melton.</p> <p>Paragraph 5.8.14 be modified to make clear that an affordable housing and housing mix supplementary planning document will only be used to add further detail to the policies in the Local Plan to help applicants make successful applications and will not be used to add unnecessarily to the financial burdens on development.</p>	<p>A revised Local Plan and Community Infrastructure Levy (CIL) Viability Study (May 2017) has been prepared and a focused change to Policy C4 and its reasoned justification is proposed to respond this representation, including differential affordable housing percentages. The SPD will be used to set out the detail of the housing mix and affordable housing policies and delivery, and will be where any off site contributions approach will be set out. The SPD will not add any unnecessary financial burdens and any housing development will need to be viable.</p>	<p>A focused change on the affordable housing policy and its associated reasoned justification is proposed.</p>
<p>Colin Wilkinson (on behalf of Earl of Rutland and Dr Fleming's Hospital Trust)</p>	<p>The Council's emerging Local Plan sets a target of 37% affordable housing on new development across the Borough.</p> <p>The results of the Council's own viability analysis demonstrate that only the highest value areas in the Borough can support this level of affordable housing provision.</p>	<p>Policy C4 be modified to identify a differential affordable housing target that reflects the diversity of development viability across Melton.</p>	<p>We are proposing to address the findings of the Local Plan and Community Infrastructure Levy (CIL) Viability Study (2016) via different percentage requirements of affordable housing for the differential value areas across the Borough.</p>	<p>A focused change on the affordable housing policy and its associated reasoned justification is proposed.</p>

Colin Wilkinson (on behalf of Earl of Rutland and Dr Fleming's Hospital Trust)	<p>Paragraph 5.8.14</p> <p>Supplementary planning documents add further detail to the policies in the Local Plan- they must not set out policy. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.</p>	<p>Paragraph 5.8.14</p> <p>Paragraph 5.8.14 be modified to make clear that an affordable housing and housing mix supplementary planning document will only be used to add further detail to the policies in the Local Plan to help applicants make successful applications and will not be used to add unnecessarily to the financial burdens on development.</p>	<p>The SPD will be used to set out the detail of the housing mix and affordable housing policies and delivery. The SPD will not add any unnecessary financial burdens and any housing development will need to be viable.</p>	<p>A focused change on the affordable housing policy is proposed, which will include reference to the detail and interpretation role that the SPD will perform.</p>
Dilys Shepherd	<p>We need a higher % than 37% in order to fill our needs, to use the land space more wisely and lower the costs for young buyers and for those on lower incomes.</p>		<p>Evidence in the Housing &amp; Economic Development Needs Assessment (published since the draft plan was consulted upon) and in the revised local plan viability study (May 2017) indicate the amount of affordable housing needed and the percentage of affordable housing that is viable in different parts of the Borough. These findings (can only viably achieve less than 37% in all but the south of the Borough)are reflected in a proposed change to Policy C4: Affordable Housing and its reasoned justification.</p>	<p>A focused change on the affordable housing policy is proposed, which will include reference to the detail and interpretation role that the SPD will perform.</p>
Guy Longley, Pegasus Group on behalf of Davidsons Development	<p>The policy indicates that the Council will have regard to market conditions, economic conditions and other infrastructure requirements in seeking to achieve this target, the blanket application of this target, particularly to the proposed sustainable neighbourhoods, is inappropriate and is not supported by the available evidence. Again it is noted that the policy is inconsistent with the target included in the Appendix 5 Monitoring Framework, which indicates a 20% target in Melton Mowbray. Part of the plan wide evidence is work undertaken by Cushman and Wakefield on the Local Plan and Community Infrastructure Levy (CIL) Viability Study, 2016. This indicates that there is no headroom for CIL even at a reduced rate of 20% affordable housing provision in Melton Mowbray and the proposed Sustainable Neighbourhoods.</p>	<p>Policy C4 should be amended to advise that the level of affordable housing to be secured on the Melton Mowbray South and North Sustainable Neighbourhoods will be the subject of separate site specific viability assessments.</p>	<p>A revised Local Plan and Community Infrastructure Levy (CIL) Viability Study (May 2017) has been prepared and a focused change to Policy C4 and its reasoned justification is proposed to respond this representation, including differential affordable housing percentages.</p>	<p>A focused change on the affordable housing policy C4 and its associated reasoned justification is proposed.</p>
Howard Blakebrough	<p>We agree with the policy</p>		<p>Support noted</p>	<p>None.</p>

Ian Kitchener	Affordable MUST mean a lower price than currently available housing in the area, if not why bother.		Comments noted.	None.
K Lynne Camplejohn	The provision of 40% affordable housing in the service centres and rural hubs may make it more difficult to develop such sites with the type of housing that is required in that area.	Reduce the percentage of affordable housing required from 40% across-the-board to 30% in service centres and 10 to 20% in hubs and settlements.	A revised Local Plan and Community Infrastructure Levy (CIL) Viability Study (May 2017) has been prepared and a focused change to Policy C4 and its reasoned justification is proposed to respond this representation, including differential affordable housing percentages. The references will be to value areas, and not the hierarchy of settlements.	A focused change on the affordable housing policy C4 and its associated reasoned justification is proposed.
LCC (Highways, Education, Early Years, Waste, Property Assets, LLFA, Libraries & Culture, LRERC)	Policy C4 – Affordable Housing Provision  The policy proposes a target rate for Affordable Housing of 37%. This target needs to be regarded as a maximum with actual delivery on a site by site being set at a level that does not compromise the viability and deliverability of the development. Further, it should have regard to the overall level of infrastructure being brought forward as a result of the housing scheme and a balance achieved between the two.		A revised Local Plan and Community Infrastructure Levy (CIL) Viability Study (May 2017) has been prepared and a focused change to Policy C4 and its reasoned justification is proposed, including differential affordable housing percentages. The modelling carried out in the viability study from which the affordable housing targets are drawn, includes assumptions/estimates for specific infrastructure costs and assumptions about abnormals, etc.	A focused change on the affordable housing policy C4 and its associated reasoned justification is proposed.
Leigh Higgins	37% could be seen as too high.  We also need to understand land values and the balance of starter homes which can aid the viability of schemes.  Encourage "building now" positively where possible by in return for a lower amount of affordables. This "bonus" would mean housing had to be built by a set timeframe otherwise a s106 agreement would require a payment to ensure the developer was not bending the rules.	Housing built/completions between 2017-2022 (five years) had a reduction in affordable amount of 37% to a range of 25-30%. This is to positively encourage development today and get some much needed affordable housing online sooner in the life of the Plan.  Consider starter housing as a very good element, but more than currently planned in this Plan.	A revised Local Plan and Community Infrastructure Levy (CIL) Viability Study (May 2017) has been prepared and a focused change to Policy C4 and its reasoned justification is proposed, including differential affordable housing percentages, lower than 37% in all but the south of the Borough. The viability work models for a lower proportion of starter homes than previously as the Government has stepped back from its commitment to seek 20% on all new sites and it wasn't justified by local needs evidence.	A focused change on the affordable housing policy C4 and its associated reasoned justification is proposed. It addresses part of this representation.

Lilian Coulson	<p>I am extremely concerned as to whether the target of 37% affordable housing on sites of more than 11 or more dwellings is viable and therefore legally compliant. The policy would not be sound if it was intended to be used in a way that the majority of sites have to undertake a viability assessment to prove that the full affordable requirement cannot be met.</p> <p>I would ask the Inspector to coordinate with the HBF and other larger planning consultants / housebuilders / landowners to ensure that the target included in the policy takes account of the CIL rate to be adopted by the Council to ensure that sites allocated are not inhibited to come forward by any viability concerns that the affordable target is undeliverable and the uncertainty this would cause.</p>	See response to Q3 above	A revised Local Plan and Community Infrastructure Levy (CIL) Viability Study (May 2017) has been prepared and a focused change to Policy C4 and its reasoned justification is proposed, including differential affordable housing percentages according to where the new development proposed would be located. All are now lower than 37%, in all but the south of the Borough.	A focused change on the affordable housing policy C4 and its associated reasoned justification is proposed in response to this representation.
Lince Wiggins (on behalf of G S Developments (Leicester) Ltd	Paragraph 2.2.4 of the draft Plan details the challenging position that the Borough finds itself in. The requirement for 37% affordable housing on all sites is considered a reasonable requirement (subject to individual viability assessments) which would assist in the effective delivery of affordable housing in the Borough.		Support noted	None.
Maurice Fairhurst	<p>The target of 37% on all relevant sites is too prescriptive and implies that anything less will be refused.</p> <p>In practice, some sites may be able to deliver 37% and some will only be able to deliver a smaller percentage or none at all depending on the value of market sales and the need for other essential infrastructure.</p> <p>It is impossible to say how much affordable housing should be provided on any of the allocated sites until all other infrastructure requirements have been considered by both the developer and the Council.</p>	This is partly explained at paragraph 5.8 16 but a clearer and more explanatory wording should be part of the policy.	A revised Local Plan and Community Infrastructure Levy (CIL) Viability Study (May 2017) has been prepared and a focused change to Policy C4 and its reasoned justification is proposed, including differential affordable housing percentages according to where the new development proposed would be located. All are now lower than 37%, in all but the south of the Borough. The modelling that established the viable level of affordable housing took account of infrastructure costs and abnormals.	A focused change on the affordable housing policy C4 and its associated reasoned justification is proposed in response to this representation.
Melanie Steadman		See comments to previous section.		None.

<p>Melton North Action Group MNAG</p>	<p>Policy C4 - Affordable Housing Provision</p> <p>The council still aspires to its figure of 37% affordable homes "within housing developments on all sites of 11 or more units.....". This requirement is unsound as it has been acknowledged by the council that for the two Melton Sustainable Neighbourhoods to contribute effectively towards the Melton Distributor Road and to contribute to other road infrastructure, new schools etc., the council will have to accept that affordable housing requirement for each site will need to be dramatically reduced from 37%. The Local Plan is therefore ineffective and unsound whilst it continues to demand that 37% of new housing should be affordable.</p>		<p>A revised Local Plan and Community Infrastructure Levy (CIL) Viability Study (May 2017) has been prepared and a focused change to Policy C4 and its reasoned justification is proposed, including differential affordable housing percentages according to where the new development proposed would be located. The level of affordable housing that is now proposed for the SUEs will be 15%.</p>	<p>A focused change on the affordable housing policy C4 and its associated reasoned justification is proposed in response to this representation.</p>
<p>Melton North Land Consortium - GVA Consultants</p>	<p>Support the flexibility demonstrated by policy C4 - namely being subject to economic viability market conditions and other infrastructure requirements. In line with the Government's intention to introduce a greater range of affordable housing products, it is recommended that flexibility as to the type of accommodation which could be provided through development is maintained. Agreeing the precise form of affordable housing where this is to be provided on-site should be agreed with the Council during the course of a planning application being determined.</p>		<p>Comments noted</p>	<p>None</p>

Michelle Colclough	This is not in compliance with the Duty to Co-operative, especially with the village community. 37% is a large proportion of affordable homes, especially as these households may be more reliant on public transport, cycling or walking to get to places of work. They would be the furthest away from likely places of employment. A large percentage of affordable, social housing is being proposed. This may have an impact on the value and desirability of properties in the same and surrounding housing estates.		Duty to Co-operate has a specific meaning which is to do with engagement between the Council and other key statutory bodies. The % of affordable housing need was determined through the SHMA (2014) and will be updated to reflect the evidence in HEDNA (2017), which shows no material change (71 dpa to 70 dpa) across the whole Borough. The policy in the Local Plan will not reflect differing housing need levels per village. We have identified villages which are more sustainable communities for housing allocations due to their public transport links and amenities. The % of affordable housing delivered will also be dependent upon the viability of a site. We seek to provide affordable housing to ensure that residents who are on lower incomes are accommodated. Impact on values is not a planning consideration.	A focused change on the affordable housing policy C4 and its associated reasoned justification is proposed in response to this representation.
Mr Gavin Simpson	37% for affordable homes within housing developments on all sites of 11 or more units is not realistic. It should be flexible and range from 20-37% depending on circumstances an situation.	20-37% depending on identified need.	A revised Local Plan and Community Infrastructure Levy (CIL) Viability Study (May 2017) has been prepared and a focused change to Policy C4 and its reasoned justification is proposed, including differential affordable housing percentages according to where the new development proposed would be located.	A focused change on the affordable housing policy C4 and its associated reasoned justification is proposed in response to this representation.
Mrs Sarah Grey	<p>The Council's emerging Local Plan sets a target of 37% affordable housing on new development across the Borough.</p> <p>The results of the Council's own viability analysis demonstrate that only the highest value areas in the Borough can support this level of affordable housing provision.</p>	Policy C4 be modified to identify a differential affordable housing target that reflects the diversity of development viability across Melton.	A revised Local Plan and Community Infrastructure Levy (CIL) Viability Study (May 2017) has been prepared and a focused change to Policy C4 and its reasoned justification is proposed, including differential affordable housing percentages according to where the new development proposed would be located.	A focused change on the affordable housing policy C4 and its associated reasoned justification is proposed in response to this representation.

R H B Ranns	<p>There should be better co-ordination between Policy C4 and C5.</p> <p>As a consequence of taking an arbitrary allocation for all rural settlements (70) and allocating them to Service Centres and Rural Hubs (19) these settlements are receiving housing numbers over and above the local need and the need of local business. The affordable element of a development will probably exceed the local need established by authorised survey. However these properties will not currently be reserved for people with a local connection, as in the case of rural exception sites.</p> <p>Currently rural exception sites are only to be identified once the allocated housing numbers have been met and are not to be taken into account in the overall provision. This means that the local need might not be satisfied even after large developments.</p> <p>Allocation of affordable housing should be clarified in villages outside Melton Mowbray (Plan Not justified)</p>	<p>Policy C4</p> <p>Add</p> <p>For developments outside Melton Mowbray allocation of Affordable Housing will be based in perpetuity on local connection.</p>	<p>The % of affordable housing need was determined through the SHMA (2014) and has been updated to reflect the evidence in HEDNA (2017), which shows no material change (71 dpa to 70 dpa). The Rural Housing Need Surveys can not be used as the evidence base for the Local Plan as they only look at need over the next 5 years and do not take into account the long term needs for the whole plan period, or for the Borough as a whole, which the former studies do. It is not just rural exception sites where a local connection can be applied. Our intention is to address the issue of local connection through an SPD , reference to which will be included in the local plan. We are proposing to have different percentage requirements of affordable housing for the differential value areas across the Borough to address the findings of the Local Plan and Community Infrastructure Levy (CIL) Viability Study (2017). Allocations of affordable housing cannot be made on specific sites as it will depend upon the numbers of dwellings included in planning applications submitted, as to whether or not affordable housing will be required.</p>	None in response to this representation.
Ricahrd Simon, Clerk to BPNP Steering Group	<p>All the small developments permitted off-plan will not provide affordable housing so there will be no affordable housing in the smaller villages, where the maximum development is 5 or 3 houses, unless specifically requested. Given the clear and identified urgent need for affordable housing this should be brought forward on individual development schemes as soon as possible and methods identified that permit this to happen. Deferring the affordable housing where there is a specific requirement (5.8.16) should be avoided wherever possible.</p>		<p>Affordable Housing could be developed on the allocated sites in the villages if the site is 11 or more dwellings/floorspace exceeds 1000m<sup>2</sup>. It will not always be possible to bring the development of affordable housing forward on a scheme due to the initial costs of infrastructure required on a site first. Affordable housing can also be brought forward on 'exception sites' (see Policy C5)</p>	None.



Richard Simon	All the small developments permitted off-plan will not provide affordable housing so there will be no affordable housing in the smaller villages, where the maximum development is 5 or 3 houses, unless specifically requested. Given the clear and identified urgent need for affordable housing this should be brought forward on individual development schemes as soon as possible and methods identified that permit this to happen. Deferring the affordable housing where there is a specific requirement (5.8.16) should be avoided wherever possible.		Affordable Housing could be developed on the allocated sites in the villages if the site is 11 or more dwellings/floorspace exceeds 1000m <sup>2</sup> . It will not always be possible to bring the development of affordable housing forward on a scheme due to the initial costs of infrastructure required on a site first. Affordable housing can also be brought forward on 'exception sites' (see Policy C5)	None.
Robert Fionda	Small rural sites may have difficulty reaching this target due to viability/infrastructure issues.		Affordable housing would not be required unless the site was 11 or more dwellings/floorspace exceeds 1000m <sup>2</sup> .	None.
Robert Galij BA (Hons) BTP MRTPI, Planning Director - Barratt David Wilson Homes North Midlands	Whilst the proposed reduction - in percentage terms - from '40%' to '37%' is welcomed along with references to "market conditions" and "economic viability", concern is expressed over the (evidence) base for the lower figure reflecting the most up to date OAHN, all in the context of the NPPF/NPPG and whether, in fact, the percentage target should be lower in order to ensure delivery ?	The percentage (target) ie "37%" for the provision of Affordable Housing should be based on the most up to date evidence base and tested through the Local Plan process.	A revised Local Plan and Community Infrastructure Levy (CIL) Viability Study (May 2017) has been prepared and a focused change to Policy C4 and its reasoned justification is proposed, including differential affordable housing percentages according to where the new development proposed would be located. All are now lower than 37%, in all but the south of the Borough.	A focused change on the affordable housing policy C4 and its associated reasoned justification is proposed in response to this representation.
Robert Ian Lockey	A blanket 37% fails to reflect the individual needs of communities. For Bottesford, where the average house price is 50% higher than the borough average, there is a greater need than elsewhere for low cost housing (market and affordable) than elsewhere.	Determine low cost housing needs for each community individually.	Development will be dependent upon need and viability of sites. We are proposing to have different percentage requirements of affordable housing for the differential value areas across the Borough to address the findings of the Local Plan and Community Infrastructure Levy (CIL) Viability Study (2017).	A focused change on the affordable housing policy C4 and its associated reasoned justification is proposed, but not in response to this representation.

<p>Susan E Green</p>	<p>Policy C4 – Affordable Housing proposes 37% affordable homes on sites of more than 6 dwellings subject to viability, infrastructure requirements and market conditions. With reference to the recent Court of Appeal judgement, subsequent changes to the NPPG and the Written Ministerial Statement dated 28 th November 2014 the proposed site thresholds are not consistent with national policy therefore Policy C4 should be modified before the Local Plan is submitted for examination.</p> <p>If the Local Plan is to be compliant with the NPPF development should not be subject to such a scale of obligations and policy burdens that viability is threatened (para 173 &amp; 174).</p> <p>It is noted that the Council has a new Local Plan &amp; Community Infrastructure Levy (CIL) Viability Report dated October 2016 prepared by Cushman &amp; Wakefield. However this report does not provide any definitive conclusions on viability. The report identifies the trade-off between affordable housing provision and CIL and the inverse relationship whereby the higher affordable housing provision then the lower the rate of CIL that is viable. So the Council will have to balance affordable housing provision and securing funding for infrastructure.</p>	<p>These comments relate to the Emerging Options version of the Local Plan. We have already made the amendment from sites of 6 or more dwellings to sites of 11 or more dwellings/floorspace exceeds 1000m<sup>2</sup> to meet the affordable housing threshold. A revised Local Plan and Community Infrastructure Levy (CIL) Viability Study (May 2017) has been prepared and a focused change to Policy C4 and its reasoned justification is proposed, including differential affordable housing percentages according to where the new development proposed would be located. All are now lower than 37%, in all but the south of the Borough.</p>	<p>A focused change on the affordable housing policy C4 and its associated reasoned justification is proposed in response to this representation.</p>
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	<p>The results vary across the four value areas tested with development in the</p> <p>high value rural area viable but in Melton Mowbray urban area development is not viable. The results also varied across the different site typographies tested</p> <p>with medium sized sites viable but small sites and SUEs unviable. If an</p> <p>affordable housing policy of circa 40% is applied only on medium sized sites in</p> <p>high and medium value rural areas is CIL viable.</p>			
Terence Joyce	<p>I question SOUNDNESS: of this policy</p> <p>With regard to rural areas, build should be more evenly spread around villages.</p>	<p>To satisfy SOUNDNESS:</p> <p>Target villages that have a real need.</p> <p>Remember people who go for affordable housing tend to be on limited budget, therefore commuting to work etc. from rural locations can be expensive.</p>	<p>We have identified villages which are more sustainable communities for housing allocations due to their public transport links and amenities.</p>	<p>None.</p>
Richard Crosthwaite (Gladman Developments)	<p>The affordable housing need within the Borough remains unclear in the absence of up-to-date evidence of housing need.</p> <p>Further flexibility is required within the policy to ensure that affordable housing requirements can be considered on a site-by-site basis and are responsive to individual site</p>		<p>The 37% affordable housing need was determined through the SHMA (2014) and has been updated to reflect the evidence in HEDNA (2017) and the revised Local Plan and CIL viability study. Affordable housing requirements can be considered on a site by site basis as all development needs to be viable. 5.8.15 already states this.</p>	<p>A focused change on the affordable housing policy C4 and its associated reasoned justification is proposed in response to this representation.</p>

	<p>circumstances. In addition, the proposed site thresholds are not consistent with national policy and should be reconsidered before the Local Plan is submitted for examination.</p>			
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