

 **AFFORDABLE HOUSING
DELIVERY STATEMENT**

Cardiff Council

Affordable Housing Delivery Statement

This Statement addresses

- Setting a target for the amount of affordable housing to be delivered over the period 2007/8 – 2010/11
- Introduces interim site threshold and quota policies in advance of adoption of the Cardiff Local Development Plan
- Details the various approaches to be used to enable new affordable housing to come forward

Proud to Deliver



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Foreword

Tackling the shortage of affordable housing is a significant challenge in Cardiff. Levels of housing need are extremely high, as evidenced by the Local Housing Market Assessment (2007). The situation has only been exacerbated by the current economic downturn, as demonstrated by the number of households on Cardiff's Common Waiting List for Council and Housing Association properties.

Cardiff Council is nevertheless committed to achieving a housing market that supports the needs and aspirations of its community, and enables choice and accessibility by providing quality, affordable and sustainable homes.

This Affordable Housing Delivery Statement introduces interim planning policy on affordable housing, sets targets for delivery for the period 2007/08 – 2010/11 and details monitoring arrangements.

The policies set out in this Statement reflect the affordable housing policies in Cardiff's deposited Local Development Plan. This Plan was submitted to the Welsh Assembly Government for examination in November 2009. Following significant reservations raised by the Inspectors examining the Plan, on the 25th March 2010 the Council resolved to request that the Inspectors recommend to the Assembly Government that the Plan be withdrawn.

Following this request from the Inspectors, the Assembly Government wrote to the Council on 7th April 2010 informing them that they could now withdraw the Local Development Plan. The Council replied on 12th April 2010 indicating that they had formally withdrawn the Plan.

The Council has now started work on preparing a new Local Development Plan, which will supersede this interim planning policy when it is eventually adopted.

In the meantime, this Affordable Housing Delivery Statement will assist in addressing the considerable housing pressures existing across Cardiff for affordable housing.

A handwritten signature in black ink that reads "J B Woodman". The signature is written in a cursive style with a large initial 'J'.

Councillor Judith Woodman

Communities, Housing and Social Justice

Introduction

The Welsh Assembly Government has set a target to increase the supply of affordable homes in Wales by 6,500 over the period 2007-11. The Assembly Government has identified a key role for locally prepared affordable housing delivery statements in achieving this target.

A key aim of Cardiff's Local Housing Strategy 2007 - 2012 is to increase the supply of quality affordable and sustainable homes across the City. Cardiff Council therefore welcomes the opportunity to present this affordable housing delivery statement (AHDS), which:

- Sets a target for the amount of affordable housing to be delivered over the period 2007/08 – 2010/11
- Introduces interim site threshold and quota policies in advance of adoption of the Cardiff Local Development Plan (LDP)
- Details the various approaches to be used to enable new affordable housing to come forward.

Status of the Affordable Housing Delivery Statement

This AHDS has been prepared in accordance with Assembly Government Guidance and is based on evidence contained within Cardiff's Local Housing Market Assessment (2007). The AHDS will provide a transitional link between Cardiff's current adopted development plan, the strategic aims and objectives set out in the Council's Local Housing Strategy and the affordable housing policies to be contained within the forthcoming LDP. It is a material consideration that should be afforded significant weight when determining planning applications for housing and in dealing with such proposals at appeal.

1. Assessing the Need for Affordable Housing

1.1.1 Evidence of housing need

Cardiff Council commissioned Fordham Research to undertake a Local Housing Market Assessment (LHMA), which was completed in 2007. The LHMA aimed to enable a better understanding of the local housing market, the key drivers of local housing demand and supply and the level of housing need within Cardiff.

The LHMA applied a housing needs assessment model to Cardiff, which examined the levels of current and newly arising need and the estimated future supply to meet this need. The findings indicate an annual requirement of 2,173 additional affordable units per year for the next five years.

High levels of housing need are also evidenced by the number of applicants registering for housing on the Cardiff Common Waiting List.

1.1.2 Definition of affordability

Technical Advice Note 2 ([W] 2006) (TAN 2) considers the concept of affordability as '...the ability of households or potential households to purchase or rent property that satisfies the needs of the household without subsidy. This could be based on an assessment of the ratio of household income or earnings to the price of property to buy or rent available in the open market in the required local housing market area'.

Cardiff's LHMA includes the following measure of Combined Affordability:

'A household containing one person in employment is not eligible for a mortgage if the gross household income multiplied by 3.5 is less than the cost of the mortgage requirement. A household containing more than one person in employment is not eligible for a mortgage if the gross household income multiplied by 2.9 is less than the cost of the mortgage requirement.

AND

A household is unable to afford private sector housing if renting privately would take up more than 25% of its gross household income'.

The Council has also assessed available data on local income levels and has developed a table of affordable values for assisted home ownership. This will be appended to the Authority's Affordable Housing Guidance Note which is being prepared and will be published later this year. Affordability of schemes will be set against a maximum of 40% of household net income to be used to meet housing costs (to include any service charges, rent and/ or ground rent and mortgage payments).

1.1.3. Definition of affordable housing

TAN 2 defines affordable housing as 'housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers'. Schemes which provide for staircasing to full ownership must have in place secure arrangements to ensure the recycling of capital receipts to provide replacement affordable housing.

In line with TAN 2, the Council recognises that there are two broad types of affordable housing:

- i) Social rented housing - provided on the basis of need by local authorities and RSLs, where rent levels have regard to the Assembly Government's guideline and benchmark rents. It is the Council's expectation that this type of accommodation will be rented dwellings provided by an RSL.
- ii) Intermediate housing - where prices or rents are above those of social rent but below market house prices or rents. This includes assisted home ownership models such as shared equity and intermediate rented schemes.

Housing provided at a discount by the developer to the first occupier, or low cost market housing, is unlikely to constitute a suitable form of affordable housing.

Affordable housing provision may also include affordable special needs housing, based within the community, for particular groups such as the disabled and chronically sick, subject to agreement on need.

2. Meeting the Need for Affordable Housing

2.1 Target number of affordable housing units

The target number of affordable housing units for the period of the AHDS is based on the latest agreed Joint Housing Land Availability Study (2009/10 – 2013/14) for Cardiff, as detailed below. The affordable housing target incorporates both general and special needs provision, which will be based on identified need.

Table 1 – Target Number of Affordable Housing Units 2009/10 – 2013/14

	Years	2009-10	2010-11	2011-12	2012-13	2013-14	Average per annum
Forecast Completions	With consent	354	153	91	155	294	352
	Subject to s106	-	38	87	274	314	

2.2 Local site threshold and quota policies

Where there is evidence of need, the Council will seek a target of 40% affordable housing in all new residential proposals that:

- a) contain 10 or more new dwellings; or**
- b) exceed 0.3 hectares in gross site area; or**
- c) exceed the thresholds in (a) or (b) above for adjacent sites**

and

the exact affordable housing contribution to be provided will depend on the circumstances of each proposal, particularly scheme viability.

The aim of this interim policy is to assist the Council to meet evidenced housing need by seeking an appropriate affordable housing contribution from new residential developments in the city and to provide a range and mix of sustainable affordable housing.

This policy will apply to all proposed housing developments covered by the policy thresholds, including proposals on previously undeveloped land, redevelopment schemes, schemes providing specialised accommodation (except those in which residents require a significant element of care), conversions, changes of use, and mixed-use developments containing housing. It will not apply to housing specifically designed to cater for students.

Where there is evidence of need for affordable special needs housing it may, subject to council agreement, be provided as all, or part of, the affordable housing requirement.

The target of 40% affordable housing derives from the Cardiff LHMA (2007). An assessment of the practicality of achieving this target was undertaken in October 2009 by the District Valuer Service, the result of which confirms the 40% target as achievable in a spectrum of realistic housing market conditions.

In seeking a target of 40% affordable housing, each proposal's actual contribution will depend on that scheme's capacity for provision, as evidenced by appropriate costings and valuations. This approach will ensure that the affordable housing contribution in itself will not make the scheme unviable.

The Council will work with developers to agree a contribution in an open and transparent manner. In cases where agreement cannot be reached, an independent assessment will be commissioned by the Council, the cost of which to be met by the developer.

This policy will normally be implemented by the use of a planning obligation.

2.3 Approach to seeking developer contributions

In its guidance on preparing AHDSs, the Assembly Government recognises that they will not fulfil the role of conventional Supplementary Planning Guidance (SPG) unless existing development plan policies are up to date. Cardiff Council's approach to seeking developer contributions towards affordable housing provision was established through the publication of SPG in March 2007.

When seeking affordable housing contributions, the Council will adopt the following principles:

- (i) affordable housing should normally be provided on-site, in order to secure mixed, balanced communities and promote social integration;
- (ii) affordable housing delivered through the planning system should not rely on the provision of public subsidy;
- (iii) if public subsidy is not available, negotiations will take this into account;
- (iv) developers should meet the standards set out in the latest Development Quality Requirements (Welsh Assembly Government, July 2005 as amended from time to time), Welsh Housing Quality Standards and Code for Sustainable Homes (Level 3+ minimum) when designing a social rented and/or tenure neutral scheme;
- (v) alternatives to on-site provision will only be accepted in exceptional circumstances; and
- (vi) the tests set out in the SPG will be applied before the Council agrees to any form of off-site provision and, where appropriate, the SPG's formula will be used for calculating financial contributions in lieu of on-site provision.

The Council encourages developers to discuss affordable housing provision at an early stage and, where possible, agree the affordable housing contribution prior to submission of a planning application.

To support the development of mixed and inclusive communities, the Council will expect that the affordable housing should be located throughout the site and not concentrated in one part of the development.

Further details on the delivery of social rented, intermediate rented and assisted home ownership accommodation can be found in the SPG and, when published, in the Affordable Housing Guidance Note.

2.4 Rural exception site policy

Due to Cardiff's largely urban nature the Council does not have a rural exception policy in place and would be unlikely include one in any future development plans.

2.5 100% affordable housing site policy

There are currently no sites identified in the current adopted development plan for 100% affordable housing.

However, Cardiff Council will continue to work closely in partnership with local RSLs, land owners and developers to deliver affordable housing on windfall sites that become available for development.

2.6 Local policy on disposal of local authority owned land

The affordable housing thresholds and target detailed at 2.2 above will apply to local authority owned land as well as private sites.

2.7 Information on likely availability of other public sector sites

Cardiff Council will continue to work in partnership with the Assembly Government and Welsh Health Estates and other public bodies to secure an affordable housing on sites which are in existing public sector ownership and which may be available for future development. The affordable housing thresholds and target detailed at 2.2 above will apply to all public sector owned land as well as private sites.

2.8 Local statement on priority to be given to affordable housing in s106 negotiations

The delivery of affordable housing is a high strategic priority for Cardiff Council. Where other planning obligations are offered or sought by the Council, affordable housing requirements will normally still apply in full. Nevertheless, other S106 obligations will be negotiated by other internal departments and/or Development Control and prioritisation of any contributions will be decided by Planning Committee.

3. Securing Affordable Housing

3.1 Use of s106 agreements to secure affordable housing in perpetuity

When securing affordable housing through the planning system, the Council will attach appropriate conditions / obligations to any permission to ensure the agreed affordable housing is delivered. In most cases, a S106 Agreement will be required (to secure the affordable housing for as long as the need arises), and planning permission will be dependent on the signing of any such legal agreement. If a site is suitable for affordable housing and a need exists, permission will normally be refused if such arrangements are not in place.

A typical S106 Agreement is likely to cover, where applicable:-

- (i) the amount and type of affordable housing to be provided;
- (ii) the location of the affordable housing;
- (iii) occupancy criteria and nomination rights for the affordable housing;
- (iv) arrangements to ensure the provision is affordable for as long as the need arises;
- (v) transfer of land or dwellings from the developer to a RSL;
- (vi) the timescale, or phasing, for providing the affordable housing, in relation to the construction of the remainder of the development;
- (vii) contingency arrangements, if the affordable housing is not provided by a certain date;
- (viii) the level of any financial contribution, its timing, and any related arrangements.

In order to improve the process of drafting and finalising S106 agreements, the Council has prepared standardised clauses relating to the provision of affordable housing. The use of these clauses will deliver a more consistent and efficient approach towards the preparation of S106 agreements.

3.2 Other mechanisms used to secure affordable housing

As well as securing affordable housing through the planning system, a number of other mechanisms are also used in Cardiff to increase provision.

Maximising Investment of SHG

The Council works in partnership with RSLs to manage and monitor delivery of new social rented homes utilising SHG. To help address high levels of unmet housing need, the Council has introduced a process which enables schemes to be identified that could attract national slippage within the programme and submit these to the Assembly Government for consideration. Adopting a pro-active approach to managing the programme has secured additional investment in Cardiff, helping to increase the supply of new social rented properties.

Affordable Housing Guidance Note

The Council is preparing a draft Affordable Housing Guidance Note which will provide a statement of the criteria to be applied when negotiating affordable housing requirements on potential development sites. It will be aimed at

developers planning to undertake residential and/or mixed use development in the City and will expand on the SPG and updated guidance provided in this document.

Enabling and Section 106 Officers

The Council employs a full time Affordable Housing Enabling Officer and a Section 106 Officer to help ensure that affordable housing opportunities arising through the planning system are maximised. The Enabling Officer also has a key role in securing affordable housing through other mechanisms including windfall opportunities and schemes that utilise existing private sector stock.

Existing Properties

Cardiff Council recognises that new build homes are not the only solution to increasing the supply of affordable housing. It will continue to use a variety of approaches that make best use of existing properties as part of an integrated approach to affordable housing provision. This includes supporting RSLs in the acquisition of existing properties, for example through the Council's existing Purchase to Let Scheme.

Land for Affordable Housing

The Council works closely with partner RSLs to support the purchase of sites for affordable housing development outside of the S106 process.

Mortgage Rescue

The Council works with three local RSLs to administer the Assembly Government's Mortgage Rescue Scheme for households in financial difficulties.

Strategic Capital Investment Fund

Through its Strategic Capital Investment Fund (SCIF), the Assembly Government has made available monies to enable the purchase of new and partially completed properties. The Council has worked with partner RSLs to submit a number of schemes for 2009/10 and will continue to work to maximise additional funding through this route.

Under Phase One of the SCIF Programme, Cardiff secured 27 social rented family houses, in addition to part funding a further 17 houses secured through a S106 agreement and also included within Cardiff's Social Housing Grant Programme. A further two schemes have been submitted under Phase Two of the SCIF Programme, to fund a total of 33 intermediate rented family units.

3.3 Empty homes

Cardiff's Empty Property Strategy (2006) aims to bring long-term empty properties back into use, in line with annually set targets. Ongoing works to minimise the impact of empty properties on the local housing market include:

- Awareness raising of the help available to return properties to use
- Maintenance of the Empty Property Register

- Enforcement action, including statutory notices, compulsory purchases and enforced sales.

The Council encourages initiatives to return vacant accommodation above commercial premises back into residential use, for example in conjunction with regeneration programmes for district and local shopping centres.

The Council also works to maximise the re-use of empty properties for affordable housing, for example through:

- Advice regarding RSL purchase of empty properties directly from owners
- Advice regarding letting of empty properties to social sectors
- Operating lettings schemes to secure short term re-use of empty properties within the social sector.

4. Monitoring the Delivery of Affordable Housing

4.1 Monitoring statement

Effective arrangements have been established for monitoring the delivery of affordable housing in Cardiff. As key delivery agents, RSLs report completions to the Council on a quarterly basis. The statistics provided cover the variety of mechanisms used to increase supply so every additional RSL unit is included. The delivery of assisted home ownership units through the Council's scheme is also monitored on a quarterly basis.

A Housing Monitoring Report is published annually providing statistics and analysis relating to all housing completions.

Following a consultation period, the Assembly Government has now introduced new monitoring arrangements to capture the delivery of affordable housing across Wales. As part of the first exercise carried out at the beginning of 2009/10, Cardiff Council were asked to provide completion statistics for both 2007/08 and 2008/09, as well as projections for 2009/10 and 2010/11. This exercise is to be completed on an annual basis.

Future affordable housing provision is reviewed and reported through the annual Joint Housing Land Availability Study. Although delivery through S106 Agreements has slowed during the current economic downturn, alternative opportunities are being identified and progressed by RSLs.

4.2 Performance framework

Progress towards achieving Cardiff's affordable housing target is monitored against corporate and national Performance Indicators. Through this system, new affordable housing is also recorded as a percentage of all new housing completions.

4.3 Risk assessment and remedial measures

Any difficulties in achieving the targets set out in this document will be identified through the monitoring arrangements described above. A review of relevant policies may be required if targets are not being achieved and the introduction of additional measures may need to be considered.

4.4 Summary statement

The appended Summary Statement gives a breakdown of affordable housing completions for 2007/08 and 2008/09, plus projections for 2009/10 and 2010/11, set against the Council's affordable housing delivery targets. The table will be updated annually, providing a summary record of progress towards Cardiff's affordable housing commitment.

Appendix 1 – Summary Statement

ACTION	2007/08 Completed	2008/09 Completed	2009/2010 Completed	2010/11 Projected	4 Year TOTAL
(1) SHG (Subject to WAG Allocation)					
General Needs (Inc. Homebuy)	97	127	253	145	622
Vulnerable Households and Extra Care	6	100	121	10	237
Mortgage Rescue	7	11	21	25	64
Rural Exception Sites	n/a	n/a	n/a	n/a	n/a
Empty Homes	n/a	n/a	n/a	n/a	n/a
Strategic Capital Investment Fund (SCIF)	n/a	2	25	35	62
(2) Non SHG Funded					
Section 106 - New Build Units (committed)	46	108	10	41	205
Section 106 - New Build Units (Windfall)	0	23	0	Established in year	23
Rural Exception Policy Inc. CLTs	n/a	n/a	n/a	n/a	n/a
Empty Homes Initiatives	n/a	n/a	n/a	n/a	n/a
Other Measures	20	37	33	28	118
Totals	176	408	463	284	1,331
(1) Target Delivery Figure as Identified in Table 1	352	352	352	352	1408
Variance	-176	56	111	-68	-77
(2) Annual Housing Need Requirement as Identified in the LHMA	2,173	2,173	2,173	2,173	8,692
Variance	-1,997	-1,765	-1,710	-1,889	-7,361
Affordable Housing Delivered by Cardiff as a % of all Wales Total <small>(source – www.statswales.gov.uk)</small>	15.1%	18%	16.1%	8.3%	

**Affordable Housing Delivery Statement 2007/08 – 2010/11
Schedule of Consultee Responses**

Comment No:	Para/ Topic	Consultee Name & Address	Comment	Response	Proposed Modification
1	Status	Environment Agency St Mellons Business Park Fortran Road St Mellons Cardiff CF3 0EY	Recognise that the AHDS will be a material planning consideration but there is no mention in regard to environmental considerations and wish to highlight that this is another material planning consideration that could affect the viability of a site and the affordable housing achieved.	The AHDS is an interim planning policy for affordable housing only and does not alter or change the weight given to environmental considerations.	No change
2	General	Countryside Council for Wales, Unit 7 Castleton Court, Fortran Road, St Mellons, Cardiff CF3 0LT	Would wish to provide a screening opinion once specific sites are identified so that we can provide a view on the potential impact of the scheme on protected sites and species.	The AHDS is an interim planning policy for affordable housing only and will not identify specific and/or prospective sites for development	No change
3	1.1.1	Wales & West Housing Association Head Office 3 Alexandra Gate Ffordd Pengam Tremorfa Cardiff CF24 2UD	As the evidence base for the threshold and target is based on Local Housing Market Assessment (2007) seeking confirmation that secondary data is being obtained to support the policy as housing markets have changed over recent years	The Local Housing Market Assessment (2007) was commissioned to serve a period of 5 years and any update would use the original survey data collected. Therefore, only current/updated secondary data would be used to update the survey information, to take account of changes to key variables affecting the overall assessment. This secondary data is being obtained via Hometrack and existing information sources within the Council and the affordable housing sector to provide an upto date analysis.	No change
4	1.2		Reference to the Balanced Housing Market assessment being confusing unless read in conjunction with the overall projected shortfall in the supply of affordable housing and does not appear to add any weight to the document. Suggest this is expanded for clarification or deleted	Comment noted. This will be removed in the final version.	Remove
5	2.4		Request a rural exception policy be reconsidered as it will enable housing demands to be met for all communities and expand housing choice to those with connections to those areas	Cardiff is probably the most urban of all the 22 counties in Wales, but this matter will be considered as part of the new LDP.	No Change
6	2.8		Acknowledge that affordable housing is a priority for the Council at this time and planning committee will	Comment noted	No change

**Affordable Housing Delivery Statement 2007/08 – 2010/11
Schedule of Consultee Responses**

Comment No:	Para/ Topic	Consultee Name & Address	Comment	Response	Proposed Modification
			determine prioritisation of any contributions		
7	Site viability		Question whether options are being presented to planning committee on the impacts of s106 contributions following site viability assessments where proposed s106 contributions are factored into the calculation at that time and will determine the level of affordable housing that can be supported on the scheme?	To date the number of external full site economic viability assessments that have been formally undertaken is minimal. However, it is the intention on future or re-negotiated schemes to present planning committee with options highlighting the different impact of s106 contributions	No change
8	Site viability		Suggest a common approach to site viability between the Council and neighbouring local authorities	Comment noted. Information is shared and discussed within the SEWSPG & SEWRHF arena. However, it may not be possible to adopt a common external validation approach due to the difference in timings with regard to LDP's, SPG's and individual budgets	No change
9	Unit size & specification		Affordable housing is of a different size and specification to that of the open market housing and as such will have a design implication if the affordable housing contribution is amended at planning committee stage	Comment noted	No change
10	2.2 (AHDS – Interim AH Policy)	The Home Builders Federation (HBF) Haywood House North Dumfries Place Cardiff CF10 3GA	Concerned that the AHDS policy mirrors the policies of the recently abandoned LDP, which the Inspector criticised in terms of the affordable housing viability assessment.	The comments of the Inspector at the LDP Exploratory meeting (Feb 2010) in relation to the viability assessment are acknowledged. The council is required by the WAG to prepare an Affordable Housing Delivery Statement (AHDS) to maximise both the current opportunities to deliver affordable housing and future opportunities as housing market conditions improve. It is WAG's intention that AHDS's will form interim planning policy which should be afforded significant weight when determining planning applications. The Council has made it clear that the 40% is a target which allows the exact affordable housing contribution to be provided will depend on the circumstances of each proposal, particularly	No change

**Affordable Housing Delivery Statement 2007/08 – 2010/11
Schedule of Consultee Responses**

Comment No:	Para/ Topic	Consultee Name & Address	Comment	Response	Proposed Modification
				scheme economic viability at the time planning applications are submitted. Therefore each scheme proposal or potential development will be assessed on a case by case basis at the relevant time.	
11	SHG Availability		Concerned about the assumption in the DVS study that social housing grant (SHG) would be available given impending spending cuts and restrictions on public finances	<p>The decision to include SHG was made on the basis that increasing the supply of affordable housing is a national, regional and local priority, and given past performance there was no reason to believe that Cardiff will not continue to have access to SHG for investment.</p> <p>There is currently no official information forthcoming from the WAG in respect of future SHG levels so the comments made can only be considered as speculation at this stage.</p>	No change
12	Individual site viability assessment		Comment that the Council is not in a position to require developers to submit evidence to prove it ('a scheme') is not viable	<p>The Council has made it clear that the 40% is a target which will be applied flexibly depending on the circumstances of each proposal.</p> <p>It must also be noted that the Council's current practice (as outlined in the Affordable Housing – SPG (March 2007) is for costings and valuations to be verified in the case of viability disagreement.</p>	No change
13	2.2 (AHDS – Interim AH Policy)	Barton Willmore Greyfriars House Greyfriars Road Cardiff CF10 3AL	Concerned that the AHDS policy mirrors the policies of the recently abandoned LDP, which the Inspector criticised in terms of the affordable housing viability assessment.	See comment 10 (above)	No change
14	SHG availability		Concerned about the assumption in the DVS study that social housing grant (SHG) would be available given impending spending cuts and restrictions on public finances	See comment 11 (above)	No change
15	2.2 (AHDS – Interim AH Policy)	HARMERS LIMITED 39 Lambourne Crescent Cardiff Business Park Llanishen	Concerned that the AHDS policy mirrors the policies of the recently abandoned LDP, which the Inspector criticised in terms of the affordable housing viability assessment.	See comment 10 (above)	No change

**Affordable Housing Delivery Statement 2007/08 – 2010/11
Schedule of Consultee Responses**

Comment No:	Para/ Topic	Consultee Name & Address	Comment	Response	Proposed Modification
		Cardiff CF14 5GG			
16	SHG availability		Concerned about the assumption in the DVS study that social housing grant (SHG) would be available given impending spending cuts and restrictions on public finances	See comment 11 (above)	No change
17	10% house price growth figure		Dispute the assumption that the 10% uplift in price is likely to occur.	The DVS advised that this was considered reasonable within the context of the plan and it is accepted by established market commentators that a return to house price growth will occur, the only question is when (not if).	No change
18	AHDS Guidance		Comment that the AHDS does not comply with the WAG AHDS guidance, in particular paragraph 1.24	<p>Paragraph 1.24 states “<i>targets for the amount of affordable housing to be provided should reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and on the likely levels of finance available for affordable housing, including both public subsidy such as Social Housing Grant and the level of developer contribution that could reasonably be secured. A viability calculation is equally relevant in a buoyant or a depressed market</i>”.</p> <p>The AHDS does meet the criteria of the WAG guidance as we have made it clear that the 40% is a target which allows that the exact affordable housing contribution to be provided will depend on the circumstances of each proposal, particularly scheme economic viability. Therefore each scheme proposal or potential development will be assessed on a case by case basis at the relevant time irrespective of the target.</p>	No change
19	2.2 (AHDS – Interim AH Policy)	WYG 21 Park Place Cardiff CF10 3DQ	Contend that the AHDS policy is likely to deter developer investment in housing in Cardiff, and does not sit favourably with the policies of neighbouring LA's.	The AHDS would not deter or stifle future development in Cardiff as we have made it clear that the 40% is a target which will be applied flexibly depending on the circumstances of each proposal.	No change

Affordable Housing Delivery Statement 2007/08 – 2010/11
Schedule of Consultee Responses

Comment No:	Para/ Topic	Consultee Name & Address	Comment	Response	Proposed Modification
				In relation to the policies of neighbouring LA's – all are likely to be seeking to change their affordable housing policies in their future LDP's. In addition, local policies are based on evidence of local housing need.	
20	2.2 (AHDS – Interim AH Policy)		Contend that the AHDS policy does not have a sound justification and does not reflect correct evidence based policy making as it incorporates the majority of the now withdrawn LDP Policy HSC2.	See comment 10 (above)	No change

**Affordable Housing Delivery Statement 2007/08 – 2010/11
Schedule of Councillor Responses**

Comment No:	Para/ Topic	Consultee Name & Address	Comment	Response	Proposed Modification
1	General	Cllr Keith Hyde	I have read the Housing strategy document and I am in broad agreement with it. I wait to see the revised document once the views of others are in.	Comment noted	None
2	2.2	Cllr Dianne Rees	Comment that the 40% target is unrealistic particularly in the current climate.	The Affordable Housing Delivery Statement (AHDS) does make it clear that the 40% is a target which allows the exact affordable housing contribution to be assessed and will depend on the circumstances of each proposal, particularly scheme economic viability at the time planning applications are submitted. Therefore each scheme proposal or potential development will be assessed on a case by case basis at the relevant time.	None
3	2.2	Cllr Jane Rogers	Comment on the threshold of 10 or more dwellings that recent national surveys have identified that the general public may be in favour of affordable housing being delivered on sites or 25 or more dwellings.	Affordable Housing Policy is based on rigorous housing needs assessments, and has been an important part of housing strategy and planning policy since 1991. The threshold of 10 or more units was selected to maximise affordable housing provision in Cardiff given the identified high levels of housing need, whilst excluding the requirement to provide affordable housing on very small sites.	None
	2.3		Comment that there will be a need for an in-depth survey regarding the location of social housing developments to ensure that future occupants are in fact not opposed to this idea. This ideal will in fact work against the majority of elderly social renters who may well wish to live in close proximity to other social renters.	Planning Policy Wales (PPW) – (Ed 2) (June 2010) states that LA's must ensure there is greater choice for people over the type of housing and the location they live in, recognising the needs of all, including those in need of affordable or special needs housing in both urban and rural areas. The policy aim is to create long-term mixed and sustainable communities for all sections of the community. On large sites the residential units will be developed in phases which, means that the affordable housing will be 'clustered' throughout the various phases. This assists with the funding of the units which can be spread over a longer period of time.	None

**Affordable Housing Delivery Statement 2007/08 – 2010/11
Schedule of Councillor Responses**

Comment No:	Para/ Topic	Consultee Name & Address	Comment	Response	Proposed Modification
				In addition, consultation with the local community is undertaken as part of the planning process. Therefore local residents or their representatives will be able to make their views known regarding the location of affordable housing.	
	2.4		Comment that it is important to consider the need to include a rural exception policy in future development plans.	Cardiff is probably the most urban of all the 22 counties in Wales, but this matter will be considered as part of the new LDP.	None

