Cardiff Council

Replacement Local Development Plan

Examination

Additional Hearing Session 3a – 09.30 – 13.00, 3 December 2026

County Hall

Affordable Housing

Issues - Whether the Plan's affordable housing target is justified having regard to the identified level of need, and whether the proposed thresholds and percentage targets are supported by robust evidence.

1. Opening and introductions

2. Affordable Housing Target & Viability

2.1 Is the target of 5,500 to 6,000 units sufficient to meet the need for affordable housing? The impression given at the first affordable housing Hearing is that the target was derived from the available landbank and allocations by applying the 20% and 30% requirements, rather than starting with the need identified in the Local Housing Market Assessment (LHMA). Is this an appropriate way to set a target?

2.2 Does the updated viability study account for the need for affordable housing and other LDP requirements?

2.3 Does the updated evidence support affordable housing requirements of 20% on brownfield sites and 30% on greenfield sites, or should the viability challenges highlighted in the Avison Young report lead to an acknowledgement in Policy H3 that requirements may be relaxed if developers demonstrate 20% or 30% are unachievable on viability grounds?

2.4 Seven of the ten brownfield sites tested have negative viability even at 0% affordable housing. The Avison Young report states greenfield sites continue to outperform brownfield sites from a viability perspective. Does the brownfield-first strategy undermine the Plan's objective of providing homes to address the housing crisis and the aim of Policy SP1 to effectively meet Cardiff's evidenced social needs?

2.5 The Council's efforts to deliver affordable housing are noted but are they enough? Should more brownfield and/or greenfield sites be allocated? Where is the evidence to support the Council's argument at the first Hearing that raising targets would create an over-supply, leading to empty properties?

2.6 To what extent are affordable housing requirements a determining factor in the viability and deliverability of allocated sites, and would reducing those requirements realistically improve their prospects of delivery? What does this imply for the balance between Plan-wide requirements and site-specific flexibility?

2.7 Has the Council quantified the effect of delays or reduced affordable housing contributions, particularly from larger allocations? What evidence shows that the Plan's overall affordable housing target would remain achievable?

3. Action Points