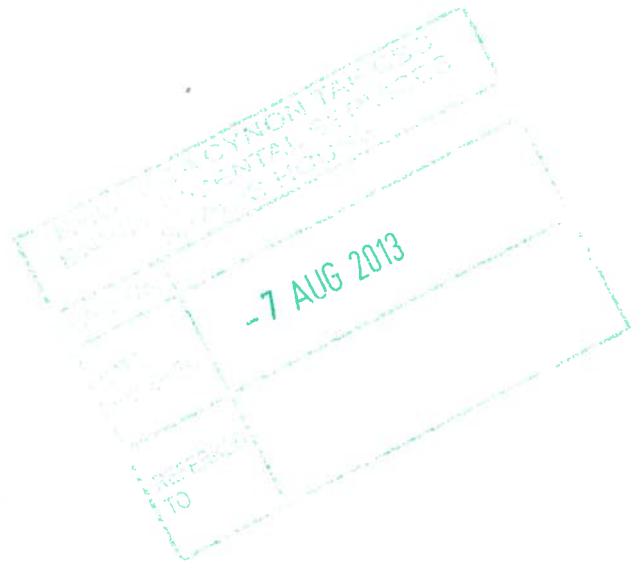




The Spatial Development Team
Regeneration & Planning Division
Rhondda Cynon Taf County Borough Council
Floor 3
Sardis House
Sardis Road
Pontypridd
CF37 1DU



6th August 2013

Dear Sirs,

Consultation on the Draft Community Infrastructure Levy (CIL) Proposed Charging Schedule

I am writing on behalf of Hendre Limited (which includes both Hafod Housing Association Limited and Hafod Care Association Limited) in respect of the Draft Community Infrastructure Levy (CIL), proposed Charging Schedule.

As Registered Social Landlords (RSL's) operating within Rhondda Cynon Taf County Borough Council we welcome the opportunity to present our observations in respect of the CIL and in particular the proposed Charging Schedule.

Given that the primary function of the Hendre group members is to provide Affordable Housing (and also that they are Charitable organisations) we accept that we receive the concession that we will not be directly affected by the proposed charging mechanism contained within the CIL for the types of development we regularly undertake. We can also appreciate the certainty that a Charging Schedule brings to developers in identifying "up-front" non-negotiable contributions that are required (or not required) to be made for a scheme in a prescribed area (or zone) of the Authority.

However, given the reduction in the Social Housing Grant (SHG) capital programme within Wales over recent years, every opportunity should be made to encourage the delivery of Affordable Housing through other mechanisms, including the planning system.

John Wreford csw, rsw Chairman / Cadeirydd
Ian Williams FCIH, MRICS Group Chief Executive & Company Secretary / Y Grwp Prif Wiethredwr ag Ysgrifennydd Cwmni

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Hendre is registered under the Industrial & Provident Societies Act No 29386R and registered with the Welsh Assembly Government No L132
Cofrestrwyd o dan y Ddeddf Cymdeithasau Diwydiannol a Threfniadol Rhif 29386R. Cofrestrwyd gyda y Llywodraeth Cynulliad Cymru Rhif L132



It is felt that by leaving the requirement for Affordable Housing as an element that is open to negotiation, it will be very difficult to predict and programme for the amount of Affordable Housing that will be provided outside the main Social Housing Grant Programme.

The measure of viability of a development site is also very subjective with the delivery of Affordable Housing being the only element dependent upon the case that a developer may choose to make for a given site.

At present, even with the use of the existing Section 106 mechanism which places a requirement of the provision of 20% Affordable Housing on residential development sites, the Authority have struggled to attain this target and therefore have been left with a shortfall of provision against that predicted.

Whilst the CIL residential rate of zero in Zone 1 is welcomed it is felt that the rates within Zone 2 and 3 at £40 and £100 respectively are too high and would thereby reduce or even preclude the delivery of Affordable Housing in the areas of the Authority where the need for Affordable Housing is greatest and a rate more reflective of the mid-point recommended within Schedule 1 of the "Study into the economic viability of charging community infrastructure levy in Caerphilly, Merthyr & Rhondda Cynon Taf County Borough Councils" prepared by District Valuer Services, would be more appropriate.

I would also wish to highlight any recovery mechanisms to be employed by the Authority on larger strategic sites if the parameters on which the original viability were based were to change significantly between any agreement to decrease or forego any Affordable Housing and the completion of the development. For example where expected abnormal costs may not have actually materialised, or the market may have increased over a review period to such an extent that would have enabled the provision of Affordable Housing to have been increased.

Should you wish to discuss any elements of the representation made above in greater detail please do not hesitate to contact me.

Yours faithfully

On Behalf Of Hendre Limited



Matthew Davies

Director of Development Services