REPRISE PROPERTY LTD
CARDIFF
[redacted]

19 October 2026

Planning Policy team
Cardiff Council
By email: LDP@cardiff.gov.uk

Replacement Local Development Plan: Additional Information and Proposed Changes consultation

Dear Planning Policy team,

Thank you for the opportunity to comment on the proposed changes. I'm writing on behalf of Reprise Property, a Cardiff property business. We own and manage around 40 homes across the city and the surrounding area, and most of the development we do is converting and refurbishing existing buildings into homes, alongside small to mid-sized new schemes. We support the aims of the plan: Cardiff needs more homes, including more affordable homes, and we want the LDP to succeed.

If I'm honest, my main concern is that too many of the proposed changes have been written from a policy perspective rather than an economic one. Much of the wording is subjective, and the requirements feel pitched at the larger, £5m-plus schemes that have the margin to absorb them. For conversions and small to mid-sized schemes each one adds cost, and developers respond rationally by designing around the rules, so homes that could be built aren't. The Council's own viability evidence supports this, and I've set out the detail in the pages that follow, with the key figures drawn out so they aren't lost in the text. In particular:

- seven of the ten brownfield sites tested are unviable even with no affordable housing, and none of the sites tested was a conversion;
- the five dwelling threshold in H3 is costing homes, with schemes designed at four flats rather than five;
- the 24 month office marketing test in EC6 will leave buildings empty, and marketing evidence should be judged by building type or street, not premises by premises.

I'd genuinely welcome the chance to talk these through with the team, ideally before the hearings resume on 1 December. Could you also let me know which developers were consulted on the proposed changes, and whether anyone at the smaller and conversion end of the market was asked for a devil's advocate view? If not, I'd be very happy to take part, and glad to help bring together a small group of local SME developers if that would be useful?

Thank you very much for taking the time to consider this.

Kind regards,

Matt Wright
Director, Reprise Property Ltd

Our response in detail

The key numbers first, then how the proposed changes meet the market, what the Council's own evidence shows, and our comments on each change.

1 The numbers that matter

7 of 10
BROWNFIELD TEST SITES UNVIABLE EVEN AT 0% AFFORDABLE

3 of 10
BROWNFIELD TEST SITES VIABLE AT THE PROPOSED 20%

0
CONVERSION OR CHANGE OF USE SCHEMES TESTED

0
SME OR CONVERSION DEVELOPERS CONSULTED

10 v 0
SCHEMES OF EXACTLY FOUR HOMES AGAINST FIVE, CARDIFF, JULY 2025 TO JULY 2026

-£24,505
AFFORDABLE TWO-BED FLAT: RSL PRICE LESS BUILD COST ALONE

2
INDUSTRY RESPONSES TO THE AUGUST 2026 REISSUE

24 months
PROPOSED OFFICE MARKETING PERIOD, DOUBLE THE CURRENT 12

Viability and consultation figures are from the Council's own update, Cardiff LDP Viability Testing, Avison Young, 28 September 2026 (Action Point HS2.4), pages 8, 14 and 35. The four against five figure is from our own monitoring of the Cardiff planning register. Sources are listed at the end.

2 Policy versus the market

A planning policy only delivers what the market can build under it. Reading the proposed changes as a whole, they describe what the Council would like each development to provide, without testing what that does to the decision to build in the first place. When a requirement removes the margin from part of a scheme, developers don't absorb the loss. They change the scheme so the requirement doesn't apply, move to a site or an area where it doesn't apply, or don't proceed.

Too much of the wording also leaves the real requirement to be negotiated application by application: “where this can reasonably be achieved”, “impractical and/or inappropriate”, “robust evidence”, “appropriate developer contributions”, “normally” and “measures may include”. That adds time, cost and risk before anyone knows whether a scheme works, and the people least able to carry that are the small developers who deliver conversions.

The five dwelling threshold is costing homes

Many of Cardiff's larger Victorian and Edwardian houses would comfortably convert to five flats. Under a five unit threshold the fifth flat brings an affordable housing obligation, a Section 106 agreement and the time that goes with it, so the rational decision is to design four. We have done exactly that ourselves, and we don't think we're unusual.

10 v 0

Of the 46 conversion and flat schemes we picked up on the Cardiff planning register that were decided or registered between July 2025 and July 2026, **ten created exactly four homes and none created five self-contained homes**. The only five unit scheme was serviced apartments, which sits outside H3.

Why the fifth flat doesn't pay for itself

A TWO-BED FLAT IN A CONVERSION	£
Average Cardiff flat price, July 2026 (UK House Price Index)	160,574
Build cost: 61 m² (nationally described space standard, two-bed three-person flat) at a lean conversion rate of about £2,000/m², before land, fees and finance	122,000
Fixed capital payment from a housing association for a two-bed social rent flat, 2026/27 (viability study, para 5.5.3)	97,495
Affordable unit sale price less build cost alone	**-24,505**
Revenue given up against an open market sale	**-63,079**

On a five flat conversion the affordable unit is transferred for less than it costs to build, before the land has been paid for, and the other four flats have to carry that loss, which on a small scheme is most or all of the profit. As drafted, the policy makes the fifth home a cost rather than an opportunity, which works against the very thing it is trying to achieve.

What the wider evidence says

Mandatory affordable housing quotas on market housing (inclusionary zoning) have been studied extensively, particularly in the United States. The evidence is mixed, but the pattern is consistent. In California, one study found housing supply around 7% lower and prices around 20% higher where they applied over the 1990s (Means and Stringham), while another found a smaller price effect of 2 to 3% and a shift away from smaller-scale housing (Bento and others). Researchers generally find that quotas work best when paired with offsets such as density bonuses, fee relief or faster decisions. Berlin's rent cap, a related form of price control, saw rental listings fall by up to 60%, with some of that supply lost for good (ifo Institute; Hahn and others, 2024). The lesson is not that Cardiff shouldn't seek affordable housing, but that requirements need to be set with the economics of the schemes that deliver them in mind, and offset where they bite.

3 What the Council's own viability evidence shows

BROWNFIELD TEST SITE	HOMES	0%	20%
Plasnewydd	5	-810	-928
Splott	46	-346	-504
Gabalfa	65	-376	-527
Llandaff	90	**845**	**451**
Rhiwbina	140	**1,085**	**632**
Whitchurch	140	**725**	**301**
Cathays	175	-655	-931
Grangetown	200	-118	-367
Butetown	315	-817	-1,103
Grangetown	500	-122	-412

Surplus or deficit per m² after a competitive land value and developer return, at 0% and 20% affordable, 80% social rent and 20% low cost home ownership (scenario A, page 35). A negative figure means the scheme isn't viable.

Seven of the ten brownfield sites are unviable with no affordable housing at all. At 20%, only Llandaff, Rhiwbina and Whitchurch work, all in the city's highest value areas. On greenfield land, two of the six sites are viable at the proposed 30%.

The study keeps 20% "to capture the brownfield sites where viability remains positive" (para 1.1.6) and as "a strong base for negotiations upon the less viable schemes" (para 8.2.2).

In practice, most brownfield schemes will go through a site by site viability negotiation, which for a small developer is exactly the cost, delay and uncertainty that stops a scheme going ahead. Three further points stand out:

- **No conversion was tested.** The smallest sites are two greenfield houses and five new-build flats on a yard, yet para 7.17 now applies H3 explicitly to conversions and changes of use.
- **The cost assumptions favour larger developers.** Finance is modelled at 7% for the "average" developer, while national housebuilders borrow more cheaply than SME developers (para 5.12.2). The study also finds the cumulative effect of affordable housing, biodiversity, infrastructure and wider obligations has already increased costs and reduced land values (para 5.6.4).
- **The industry consultation missed our part of the market.** The questionnaire went to 23 organisations: seven national housebuilders, nine housing associations, five larger developers, the Council's development team and a contractor (section 4). None of the housebuilders responded, eight organisations responded across both rounds, and only two to the August 2026 reissue. No SME or conversion developers were asked.

4 Comments on the proposed changes

PPC7 · POLICY EC6 OFFICES IN THE CENTRAL AND BAY BUSINESS AREAS

This is the change we disagree with most strongly. Doubling the expected marketing period to at least 24 months encourages owners to leave city centre buildings empty for two years so they can qualify for a residential use that is worth more. Empty buildings don't benefit anyone: not the city centre, not neighbouring businesses and not the Council's business rates.

The bigger problem is that the test is applied premises by premises. It makes no sense for a single building to have to prove it isn't viable as offices when several before it in the same street have already done so, and comparable buildings nearby are still sitting vacant. The evidence should be assessed by building type or by street. If offices of that type, in that street or immediate area, have been marketed and remain empty, that should be accepted as showing there is no reasonable prospect of office use, without every owner having to start their own clock.

Paras 7.125 and 7.126 also pull against each other, asking for 24 months' marketing and then saying the absence of a letting proves nothing in itself, so it isn't clear what evidence would ever be enough. Owner-occupied buildings, which won't have a marketing history, aren't addressed.

WE'D SUGGEST

Marketing evidence judged by building type or street, accepting evidence from comparable vacant premises nearby. No marketing test where a scheme keeps or provides office space. Where a premises-specific period is still needed, six months, which keeps buildings churning rather than empty. An objective definition of the evidence under criterion (iii), a clear approach for owner-occupied buildings, and consistent definitions of the City Centre, CEZ and Central and Bay Business Area boundaries.

PPC3 · POLICY H3 AFFORDABLE HOUSING

Threshold. The five dwelling threshold falls on the most common size of conversion in Cardiff and, as above, costs a home on almost every scheme designed around it. A threshold of ten aligns with the definition of major development in Wales and with the point at which a scheme has the scale to carry an on-site unit.

A fixed contribution for small schemes. A published commuted sum per unit would be quicker, simpler and more transparent than an on-site unit and a site by site negotiation. Developers would know the cost when they buy the site, which is when it matters.

Co-living (para 7.17). Co-living schemes are let and managed as a single building, so units aren't sold individually and an on-site affordable unit doesn't fit the model. They are aimed at young professionals without children, so contributions such as school places don't relate to what is built. Without clarity, schemes are likely to become HMOs instead.

Evidence of need (para 7.19). If need is assessed area by area, developers will naturally move towards areas where affordable housing isn't required. The approach should be published in advance.

On-site provision (paras 7.20 to 7.22). "Impractical and/or inappropriate" needs specific criteria rather than individual officers' discretion, and the multi-functional building expectation should be proportionate. Five one-bed flats won't justify a new GP surgery.

WE'D SUGGEST

A ten dwelling threshold, a fixed per unit contribution for small schemes, clear treatment of co-living, and objective published criteria for on-site provision.

PPC6 · POLICIES EC5A AND EC5B EMPLOYMENT LAND

Criterion (i). "Prejudice the delivery of Cardiff's employment land strategy" is too generic and needs measurable criteria.

New workspace and community facilities (EC5B). This should only apply above a clear size threshold, in the region of 20 to 25 homes or an equivalent floor area. On a scheme of five flats it isn't needed and will make it unviable. If flexible workspace or co-working space would satisfy para 7.115, please say so.

Compensation for "economic harm". It isn't clear how this would be calculated or where the money would go, given most employment sites in Cardiff are privately owned. We'd ask for it to be removed or clearly defined.

Marketing evidence. As with EC6, "robust evidence" should be defined and judged by building type or street rather than site by site. If neighbouring premises of the same type have been marketed and remain vacant, the next one shouldn't have to sit empty to prove the same point.

Mixed-use priority (para 7.114). Mixed use of this kind is generally only practical on large sites. The policy should say how smaller conversions will be treated.

PPC4 · POLICY SP15 WELSH LANGUAGE

We support the aim. Developers are experts in design, engineering and finance rather than the Welsh language, and different consultants will give different answers. Rather than "measures may include", could the Council publish a list of required measures, proportionate to scale, and apply them as planning conditions?

PPC5 · POLICY C4 SCHOOLS

Contributions should reflect what is actually built. A site that could take four two-bed flats or five one-bed flats shows the problem: the five one-bed flats are likely to generate fewer pupils, yet they trigger the obligations, so the policy pushes towards four flats and one fewer home. We'd suggest consulting on schools only above ten family homes, with contributions based on bedroom mix.

PPC9 · POLICY R9 FLATS ABOVE SHOPS

We support the principle. Criterion (iii) should say what is required on parking, amenity space and refuse, so developers can assess sites before buying them.

PPC11 · POLICY BG4 BIODIVERSITY

For small schemes, conversions and HMOs, net benefit for biodiversity should be secured by a standard condition setting out what the Council wants, rather than a Green Infrastructure Statement, which only adds delay.

PPC13 · POLICY H5 (IV)

“Size”, “design” and “security” need defining. Does security mean a door and lock specification, CCTV or something else?

PPC14 · POLICY CP2 BUILDINGS IN THE COUNTRYSIDE

A building that is structurally sound and convertible without substantial reconstruction is rarely the one sitting derelict, so CP2(a) is likely to leave derelict buildings as they are. CP2(c), by allowing a habitable cottage only to be refurbished rather than replaced, limits the value that can be created and the lending available. We'd also encourage a more open approach to contemporary design on extensions, as in countries such as New Zealand.

PPC16 · POLICY H7 CO-LIVING

Please could the relationship between co-living and small and large HMOs, and how H3 and Section 106 apply to co-living, be set out clearly?

PPC17 · POLICY W3 FLOOD RISK

Flood affected sites are already lower down developers' lists. A more enabling approach, working with developers on solutions including culvert works where they are the right answer, as long as flood provision is properly designed in, would help bring them forward.

PPC18 · POLICY HE1 HISTORIC ENVIRONMENT

Timber is right for listed buildings. In conservation areas, though, many streets already have a mix of uPVC windows, roofs and colour schemes, and timber windows and doors are expensive, often made abroad and need regular maintenance. On streets such as Ninian Road many now look tired. We'd ask for the same design, proportions and colour to be required by condition, with modern materials such as uPVC or aluminium allowed. We'd also like the policy to support solar panels and air source heat pumps clearly, including in conservation areas.

PPC36 · POLICY C2 PUBS, PARA 7.219

366 pubs demolished or converted in England and Wales in 2025, about one a day.

They are often in prominent, well connected locations with floor plates that suit homes. Over a ten year plan period, a 12 month marketing and community use test risks leaving them empty and deteriorating, which doesn't serve the community either.

PPC46 · POLICY RE1 RENEWABLE ENERGY

The policy should distinguish between new build on brownfield or greenfield land and the conversion of existing buildings. For conversions, solar panels and air source heat pumps are realistically the only options, and they should face very little restriction.

PPC58 · POLICY H3 PARA 7.16

The need for affordable housing is a material consideration, but a policy that requires it doesn't by itself get it built. As Section 106 is currently assessed, if a developer finds a site with a good margin the viability process takes that margin away, which encourages developers to avoid those sites altogether. The policy needs to be aligned with what motivates developers to bring sites forward.

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5 What we'd ask the Council to consider

- Replace subjective wording with published, objective criteria wherever an applicant needs to know a requirement before buying a site.
- Judge marketing evidence in EC5A and EC6 by building type or street, not premises by premises, and drop the 24 month period in favour of six months where a premises test is still needed.
- Raise the H3 threshold to ten dwellings, with a fixed, published per unit contribution for small schemes.
- Test conversions and small schemes specifically in the viability evidence, using SME finance costs, and consult SME and conversion developers as part of that.
- Apply EC5B workspace, community facility and compensation requirements only above a clear size threshold.
- Use standard planning conditions rather than statements and plans for small schemes and conversions.

- Allow modern materials in conservation areas where design and colour are matched, and support solar and heat pumps explicitly.
- Take a more enabling approach to the re-use of closed pubs and derelict rural buildings.

6 Sources

- Cardiff Council, Cardiff Replacement LDP Examination: Schedule of Proposed Changes (CD24), October 2026.
- Avison Young for Cardiff Council, Cardiff LDP Viability Testing, 28 September 2026 (Action Point HS2.4): paras 1.1.6, 5.4.1, 5.5.3, 5.6.4, 5.12.2, 8.2.2; section 4; results table, page 35.
- HM Land Registry, UK House Price Index, Cardiff, July 2026: average flat or maisonette price £160,574.
- Nationally described space standard: two-bed, three-person, one-storey dwelling, 61 m².
- Reprise Property monitoring of the Cardiff planning register: conversion and flat schemes decided or registered July 2025 to July 2026 (46 schemes).
- T. Means and E. Stringham, “Unintended or intended consequences? The effect of below-market housing mandates on housing markets in California”, 2012.
- A. Bento, S. Lowe, G. Knaap and A. Chakraborty, “Housing market effects of inclusionary zoning”, Cityscape, 2009.
- ifo Institute study of the Berlin rent cap; C. Hahn, K. Kholodilin, S. Waltl and M. Fongoni, “Forward to the Past: Short-Term Effects of the Rent Freeze in Berlin”, Management Science, 2024.
- Analysis of government data on pubs demolished or converted in England and Wales during 2025 (366).