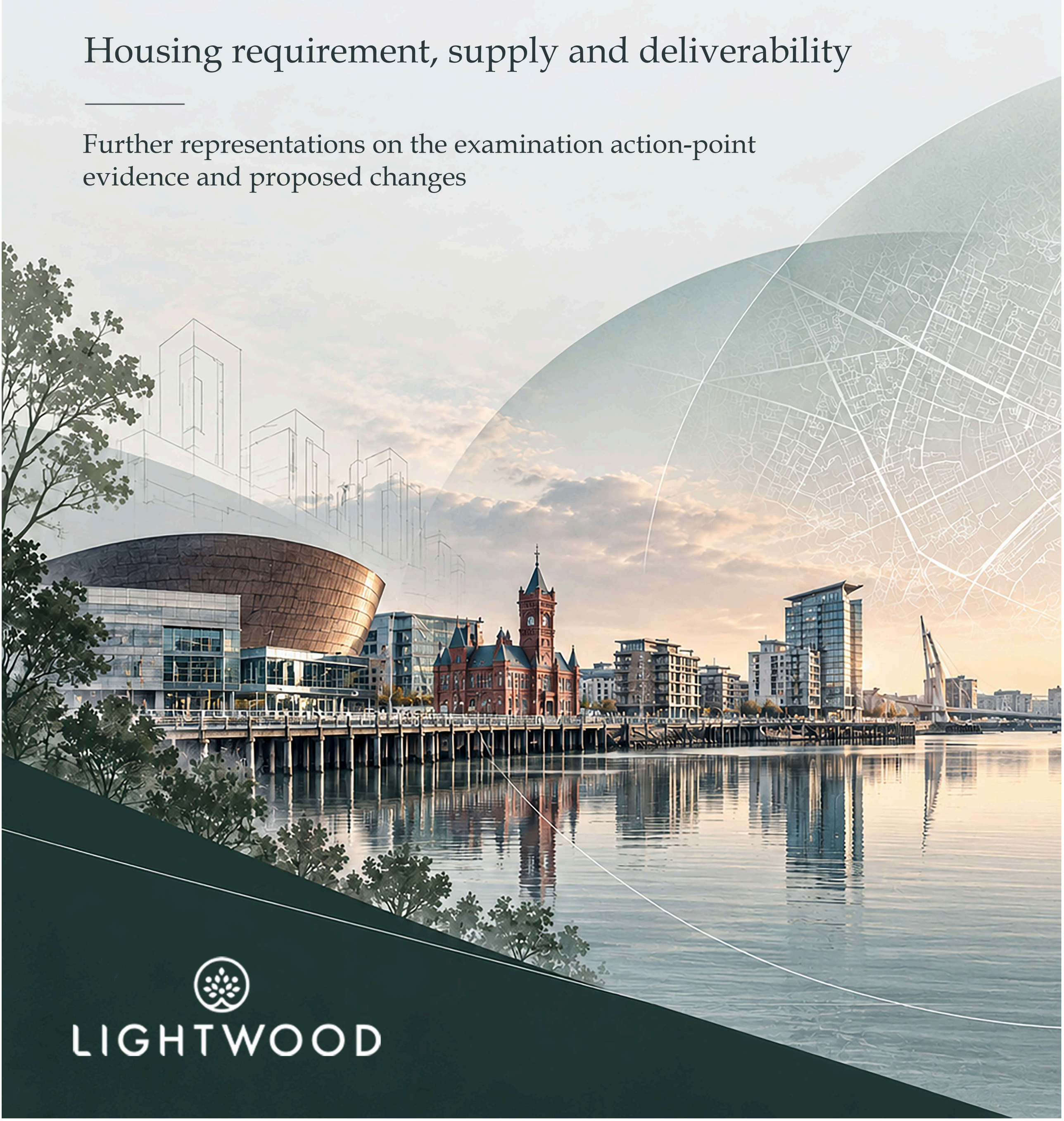
Principal representation and five supporting annexes
October 2026

CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN 2021-2036

Housing requirement, supply and deliverability

Further representations on the examination action-point evidence and proposed changes



LIGHTWOOD

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Principal representation and five supporting annexes

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CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036

Housing requirement, supply and deliverability

Further representations on the examination action-point evidence and proposed changes

Lightwood Strategic | October 2026 | Principal representation and five supporting annexes

Executive summary

These representations respond to the further evidence and proposed changes published following the Cardiff RLDP examination hearing sessions. They bring together five individual submissions addressing the Council's housing requirement, its revised housing supply, two major regeneration locations and recreational disturbance mitigation. The submissions raise connected questions about whether the housing strategy is appropriate, consistent and capable of delivery.

The central concern is that Cardiff may be planning for too little housing growth while assuming too much certainty about delivery from its preferred sources of supply.

The five supporting annexes address distinct but connected aspects of that case and should be read alongside this principal representation:

- Annex A — Housing Requirement: the unchanged 1,600 dpa requirement against the new demographic scenarios and the city's strategic role (AP1.5).
- Annex B — Housing Supply: the landbank reconciliation, the uplift from 3,929 to 6,081 large-site windfalls, viability and the 2036 trajectory (AP2.1, AP2.2, AP2.3e and AP2.4).
- Annex C — Porth Teigr and Alexandra Head: the reduced allocation boundary, the 2,310 dwelling total capacity and the asserted 1,310 completions by 2036 (AP2.3b, PM4).
- Annex D — Gas Ferry Road: remediation, temporary accommodation, scheme assumptions and the 500 dwelling delivery programme (AP2.3d).
- Annex E — SAMM and SANG: whether mitigation can be achieved in practice and reconciled with development viability and urban capacity (AP2.5, AP2.5a and AP2.4).

Three conclusions emerge from this evidence.

First, the justification for the housing requirement has materially changed. The retained figure of 1,600 dwellings per annum, originally substantially above the official Principal projection, is now below the 2022-based Principal outcome of 1,758 and its adjusted equivalent of 1,923. The Council is not obliged to adopt either projection. It must, however, demonstrate why 1,600 remains the appropriate planning response, rather than allowing the limitations of its preferred spatial strategy (referred to during the hearing sessions as supply-led to determine the requirement.

Second, the revised housing supply rests upon assumptions which require further justification. In particular, potential urban capacity previously used to support a discounted large site windfall forecast is now counted in full. The Council must demonstrate how that capacity translates into realistic completions by 2036, rather than treating the identification of development opportunities as sufficient evidence of their delivery.

Third, material risks remain unresolved. At Porth Teigr and Gas Ferry Road, the evidence warrants testing the possibility of nil completions during the Plan period. This is a credible adverse sensitivity, not a prediction. Separately, where necessary SANG cannot be secured, the consequence may be an inability to obtain permission rather than a marginal reduction in delivery. Such risks cannot necessarily be captured by a conventional numerical allowance.

Taken together, the evidence presents a materially less reassuring picture of Cardiff's housing need, the adequacy of its chosen requirement and the reliability of its housing supply than the headline figures in revised Figure 11 suggest. The requirement remains too low, while the supply assumed to meet it may be overstated or delivered later than anticipated. The quantified sensitivities do not, in themselves, establish a definitive housing shortfall. They do, however, expose weaknesses in the apparent surplus which, compounded by delivery risks that cannot yet be quantified, call into question the resilience of the housing strategy.

The Inspectors should therefore require a single, reconciled assessment which justifies the selected requirement, establishes a credible annual delivery trajectory, addresses the viability and implementation of the principal housing sources, and demonstrates that necessary mitigation can be secured. The Council has commissioned further technical evidence and provided explanatory responses to individual examination action points. What it has not done is bring those strands together into a coherent assessment of the cross-cutting issues and their cumulative implications for the housing strategy. The adequacy and resilience of that strategy must be judged as a whole, not through a series of disconnected responses to individual questions.

1 Housing requirement and supply must be tested together

1.1 The Council's 1,600 dwelling-per-annum requirement was originally presented as a positive response substantially above the then official Principal projection of around 898 dwellings per annum. The 2022-based Principal scenario now indicates 1,758 dpa, increasing to 1,923 dpa when the demographic addendum applies improved household formation. The meaning of retaining 1,600 has therefore changed. The decision now requires a convincing account of why the lower migration variants and other planning considerations justify remaining below the new Principal comparison (Annex A).

1.2 The Council is not obliged to adopt any particular projection. Equally, the fact that 1,600 falls within a modelled range does not explain why that outcome is the most appropriate planning choice for the capital and South East Wales National Growth Area. The assessment should distinguish housing need, policy requirement, provision including flexibility and the number of dwellings likely to be completed.

Table 1. Requirement scenarios and 10% provision allowance

Scenario	Dwellings / year	15-year requirement	With 10% provision
A. Council requirement	1,600	24,000	26,400
B. Council + illustrative formation sensitivity[1]	1,765	26,475	29,123
C. WG 2022-based Principal	1,758	26,370	29,007
D. Principal + adjusted formation	1,923	28,845	31,730

[1] Scenario B adds 165 dpa (the modelled difference between the Principal and adjusted Principal scenarios) to 1,600 purely to test sensitivity. Edge Analytics did not model this as a revised requirement. The other scenario rates are taken from the Council's AP1.5 Table 9; all 10% values are arithmetic planning comparisons, not adopted requirements. Rounded to whole dwellings.

1.3 The illustrative formation sensitivity is revealing. Applying the 165-dwelling annual increase identified by Edge Analytics under the adjusted Principal scenario to the Council's retained 1,600 dpa requirement produces 1,765 dwellings per annum, almost identical to the new unadjusted Welsh Government Principal projection of 1,758. This is not a separately modelled requirement, and the adjustment cannot necessarily be transferred directly between scenarios with different demographic assumptions. Nevertheless, it illustrates the potential significance of improved household formation when reconsidering a requirement originally selected under different circumstances. It reinforces the case for testing the retained 1,600-dwelling scenario using a consistent set of contemporary assumptions.

1.4 Table 2 illustrates the sensitivity of the reported supply margin to assumptions on both sides of the housing strategy. At the Council's preferred requirement of 1,600 dpa, substantial nominal headroom remains even in the most adverse illustrated case. At 1,923 dpa, that combined case falls 685 dwellings below the 10% provision benchmark, although it remains 2,200 dwellings above the underlying requirement. These are not forecasts of actual delivery. Further uncertainty associated with urban development capacity, viability and the availability of necessary SANG cannot be represented responsibly by a single numerical deduction on the present evidence. The results therefore underline the need to establish the reliability and timing of the underlying supply, rather than demonstrating a definitive housing shortfall.

Table 2. Headroom above 10% provision across combined sensitivities

Illustrative supply position	Total supply	A: 1,600	B: 1,765[1]	C: 1,758	D: 1,923
Council revised Figure 11	35,007	+8,607	+5,884	+6,000	+3,277
Restore 3,929 large windfalls	32,855	+6,455	+3,732	+3,848	+1,125
Nil delivery at Porth Teigr and Gas Ferry[2]	33,197	+6,797	+4,074	+4,190	+1,467
Both preceding adjustments combined[2]	31,045	+4,645	+1,922	+2,038	−685

[2] Nil plan-period delivery is a deliberately adverse sensitivity rather than a prediction. The calculation removes the 1,310 Porth Teigr and 500 Gas Ferry Road dwellings counted by 2036, but not the further 1,000 Porth Teigr dwellings already assumed beyond the Plan period. Porth Teigr and Gas Ferry Road are separately identified within the allocation components of Figure 11 rather than within the 6,081 large-site windfall allowance. The results measure headroom against provision including 10% flexibility; a shortfall against that benchmark does not automatically constitute a shortfall against the underlying housing requirement. All figures remain subject to the Council demonstrating that the reported supply can be achieved.

1.5 Table 2 illustrates the dependence of the claimed margin on both sides of the strategy. At 1,600 dpa it remains substantial even in the most adverse illustrated row. At 1,923 dpa, that combined scenario would fall 685 homes below the 10% provision benchmark. This is not an exhaustive downside analysis. In particular, further urban-capacity delivery uncertainty and the availability of necessary SANG are not susceptible to a defensible numerical deduction on present evidence. The existence of unquantified risks does not mean that those risks are immaterial or can safely be assumed away.

2 Housing supply: headroom has become assumed completions

2.1 The Urban Capacity Study identified potential capacity for 6,081 dwellings across 26 urban locations to substantiate the Council's previously discounted large-site windfall allowance of 3,929 dwellings. Paragraph 7.15 of AP2.2 explains the derivation of the discounted allowance, while paragraph 3.27 relies upon that discount in explaining why no further non-implementation allowance was necessary. AP2.3e subsequently substitutes the full identified capacity of 6,081 dwellings for the earlier forecast. That is a material change in methodology. Capacity originally identified to provide headroom against non-delivery has become counted supply, without a

corresponding demonstration that the full capacity is realistically capable of completion by 2036. This does not prove that the revised allowance is wrong, but it requires a separate and convincing justification (Annex B)

2.2 The increase in reported supply by 4,236 dwellings between the March and October 2026 figures also requires reconciliation. During the additional monitoring period, completions increased by 1,274 while the anticipated remaining landbank increased by 1,099. There is nothing inherently inconsistent about a rising landbank where new permissions and capacity revisions exceed completions. The question is which changes represent genuinely additional housing opportunities and which reflect transfers, revised yields or movements between accounting categories. The Council's earlier published site-level monitoring schedules demonstrate that much of the information needed to undertake this reconciliation is already recorded. The Inspectors should require a transparent opening-to-closing ledger and an explanation of any consequential changes to the residual windfall allowance

2.3 The 35,007 figure is an aggregate. The Inspectors need a common-base annual delivery trajectory reflecting viability, release dependencies, appropriate risk adjustments and the distinct treatment of committed, allocated and windfall supply. The original windfall allowance is a reasoned benchmark for testing, not an automatic maximum.

3 Major regeneration: a credible risk of nil completions by 2036

3.1 Porth Teigr and Gas Ferry Road should not be dismissed as regeneration opportunities. However, the evidence establishes more than a generic possibility of delay. These are schemes with critical steps between today's position and the first completed homes, for which the Council has not shown an adequately resourced, costed and reconciled delivery route. Nil completions before 2036 is therefore a legitimate downside case that the Inspectors should test, without claiming it is the most probable outcome.

3.2 At Porth Teigr, PM4 removes Associated British Ports land and the BBC studios facility while leaving the overall 2,310-dwelling allocation capacity unchanged. The September scheme evidence supports a notional 1,310 on Welsh Government-controlled land but does not show if the further 1,000 homes beyond 2036 would sit within the reduced boundary. Separately, delivery of 1,310 by 2036 depends on land governance, permissions, procurement and investment commitments not demonstrated in the AP2.1 programme. Savills' base case shows only £11.88m of balancing headroom (just 4.07% of costs), with no separate land allowance and no independently assessed commercial target return. Public ownership is helpful, but does not establish funding approval or implementation (Annex C). The 1,310-dwelling contribution is a longstanding forecast. CD17 anticipated first completions in 2029 and completion of the plan-period contribution by 2035; the current AP2.1 programme moves that delivery window to 2030–2036. That change is not itself evidence of non-delivery, but makes it important to establish whether the original assumptions have been substantively refreshed in light of the revised allocation boundary and present implementation arrangements.

3.3 At Gas Ferry Road, the Council's current AP2.1 forecast of 500 completions between 2029 and 2034 repeats the annual programme already recorded in CD16 (2025). The earlier schedule continued to refer to remediation anticipated in 2022 and construction in 2023, indicating that its supporting implementation commentary had not been brought into line with the forecast. The March 2026 HRA Business Plan subsequently presented a materially later programme and left 100 dwellings without a specified delivery year. These differences, together with historic

contamination, the potential relocation of more than 200 temporary accommodation units and substantial enabling works, require a reconciled and contemporary implementation programme. The 2022 masterplan's 50% affordable housing assumption also differs from the 20% used in the Council's trajectories since at least 2025. None of these matters establishes that the site will fail, but they prevent the current delivery assumptions being accepted without further explanation (Annex D).

3.4 The sensitivity exercise therefore tests nil delivery from both locations. This is an adverse case for the purposes of examining strategy resilience, not an assertion that either allocation should be removed or that later regeneration has no planning value. The Council can rebut it with proportionate evidence of approval, funding, land release, key milestones and annual completions.

4 Recreational mitigation: a cost allowance is not a delivery strategy

4.1 The strongest cross-document inconsistency is ecological. AP2.2 anticipates SAMM and SANG-related costs in respect of the 26 identified urban-capacity sites, without establishing that additional SANG is required for every site or demonstrating how any such requirement would be fulfilled. AP2.5 proposes a SAMM strategy but leaves additional SANG needs to case-by-case decisions without a schedule of achievable provision. AP2.3e nevertheless counts the entire capacity pool. If additional SANG is required but unavailable, a financial allowance will not make planning permission possible (Annex E).

4.2 The legal issue concerns whether the competent authority has sufficient evidence to conclude that necessary mitigation can be achieved in practice, consistent with No Adastral New Town Ltd v Suffolk Coastal District Council [2015] EWCA Civ 88. Not every site necessarily needs SANG, and not every detail must be fixed at plan adoption. The Council must nevertheless show which principal development sources can rely on SAMM alone, what additional measures would be required elsewhere, and how those measures can realistically be secured.

4.3 These matters have a direct bearing on housing numbers as well as habitats assessment. The risk is not readily expressible as a standard discount against site capacity. Where necessary SANG is unavailable, the development may be unable to secure permission at all; elsewhere, assembling off-site provision could delay first completions beyond 2036. Conversely, a satisfactory SAMM-only or other mitigation route may resolve the risk. The absence of a credible numerical estimate is therefore not evidence of an absence of risk. The Council must identify and evidence achievable routes for the principal sites rather than leave the issue outside the quantitative assessment.

5 What the Inspectors should require

5.1 The Council should be asked to provide an integrated response, rather than a sequence of disconnected answers to the annexes. The necessary exercise has five connected components:

- Requirement: explain the selection of 1,600 dpa against the Principal, adjusted and migration-variant scenarios and demonstrate that reasonable strategic alternatives have been considered.
- Accounting: use the Council's existing site-level monitoring records to publish a reconciled account of movements between April 2025 and April 2026, distinguishing new supply, completions, capacity revisions and transfers between allocations, commitments and identified windfall opportunities.

- Trajectory and viability: reconcile the revised Figure 11 with a single annual, net, risk-adjusted completion forecast to 2036, identifying material changes from earlier site programmes and the implementation, viability and funding evidence supporting the larger regeneration and windfall opportunities
- Mitigation: establish which major sources of supply can rely on SAMM alone, which may require SANG or equivalent measures, and whether any necessary provision is demonstrably achievable and reflected in viability and delivery.
- Consequences: recalculate the plan-period position against the justified requirement and 10% provision benchmark, and explain whether modifications, alternative allocations or contingencies are needed.

5.2 The existing evidence does not require the Inspectors to find that all urban regeneration will fail, nor does it establish a definitive shortage in supply. The matrix deliberately isolates only quantifiable sensitivities. Other risks may have threshold or binary effects—notably whether SANG, if required, is available in practice—and cannot be converted responsibly into a universal dwelling discount. Their unquantified character reinforces the need for site-specific evidence; it does not justify ignoring them.

5.3 The fundamental issue is whether Cardiff has chosen an appropriately positive housing requirement and can demonstrate that the homes on which its strategy depends are realistically capable of delivery during the Plan period, including the mitigation without which certain permissions may not be granted. Those propositions must be assessed together before the housing strategy can be found sound.

References: AP1.5, AP2.1, AP2.2, AP2.2a, AP2.3b, AP2.3d, AP2.3e, AP2.4, AP2.5, AP2.5a, CD24, and the five annexes that follow. The matters raised are directed to the additional information and proposed changes presently subject to consultation.

CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN

Annex A

Housing Requirement

Examination submission • October 2026

Lightwood Strategic

CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN

Annex A: Housing Requirement

Further written representations

October 2026 • Lightwood Strategic • Examination action-point response

CENTRAL ISSUE Whether 1,600 dwellings per annum remains an adequately justified and sufficiently positive choice for Cardiff, given the latest official demographic evidence and the city's national and regional responsibilities.

A1 Introduction

A1.1 The fundamental question is whether Cardiff Council has adequately justified its decision to retain a housing requirement of 1,600 dwellings per annum, having regard to the implications of the Welsh Government's 2022-based household projections for the scale and ambition of the Replacement Local Development Plan (RLDP).

A1.2 This is not simply a question of choosing between demographic projections. It concerns the level of growth that should be planned for in Wales's capital city, its principal economic centre and the primary settlement within the South East Wales National Growth Area identified in Future Wales.

A1.3 When the Council originally selected 1,600 dwellings per annum, that figure represented a substantial uplift on the then-current Welsh Government Principal projection. The Council justified its choice in part because relying on the lower projection would risk failing to meet Cardiff's housing needs and economic ambitions. [WG response, October 2023, Annex 2].

A1.4 The significance of that choice has since changed. As already recognised during the examination, the 2022-based Principal projection indicates dwelling growth equivalent to 1,758 homes per annum. The September 2026 demographic addendum increases that figure to 1,923 when adjusted rates of household formation are applied. [AP1.5, Table 9].

A1.5 The Council nevertheless retains the same requirement of 1,600 dwellings per annum. The issue is not that the 2022-based projections are new to the examination. It is whether the Council has adequately addressed what their implications mean for the housing growth it now proposes.

A1.6 The Council has provided reasons for its choice, notably the exceptional recent migration figures, its selected economic growth target and concerns about the sustainability and deliverability of a higher requirement. Those matters deserve proper consideration. But explaining why higher scenarios warrant caution is not, without more, the same as demonstrating why 1,600 represents the most appropriate planning response.

A1.7 The present representations are directed to the Council's response to the Inspectors' request for further demographic evidence, rather than simply reopening the original debate about the submitted requirement. The September 2026 addendum provides an important further test of the assumptions underpinning the Council's retained choice. The question is whether the Council has adequately explained why that choice remains appropriate in the light of the additional information

A1.8 The September 2026 Demographic Evidence Addendum is useful further evidence. In our view, it does not resolve that question. Our concern is therefore principally with the Council's planning judgement and its justification, not with the technical competence of Edge Analytics.

A2 Cardiff's strategic role and the ambition of the Plan

A2.1 Policies 1 and 33 of Future Wales identify Cardiff, Newport and the Valleys as a National Growth Area. Cardiff is the region's primary settlement, with a particularly important role in housing, employment, higher education, services, public transport and investment. The scale of growth planned for Cardiff consequently has effects beyond its administrative boundary.

A2.2 That role does not require growth at any cost. National policy also requires sustainable placemaking, regeneration, efficient use of land and infrastructure, and regard to environmental constraints. Nor is all of South East Wales's growth expected to be accommodated in Cardiff. Nevertheless, an insufficient housing response within the capital could add to affordability pressures, displace households to neighbouring authorities and increase commuting distances.

A2.3 The Welsh Government's response to the Preferred Strategy in October 2023 was supportive of the proposed growth in principle, but asked for better evidence of the relationship between Cardiff's growth and the wider region. It recognised Cardiff as the primary settlement and specifically required further clarity about regional interdependence and the implications for growth levels. [WG response, October 2023, Annexes 1–2]

A2.4 The Council's Housing Numbers statement argues that its requirement remains consistent with this strategic role and that a higher figure could jeopardise its brownfield-first strategy, infrastructure and delivery. [CD08, response to question 3(i)] These are relevant considerations, but they do not themselves establish that the chosen level of growth is sufficient.

A2.5 A plan can provide a substantial number of homes and still fall short of the appropriate response to the city's needs. The issue is not whether 1,600 is substantial in absolute terms. It is whether the Council has demonstrated that it strikes the right balance between Cardiff's demographic and economic prospects, its regional responsibilities and a sustainable spatial strategy.

A3 How the meaning of 1,600 dwellings per annum has changed

A3.1 The Welsh Government's October 2023 response recorded that the 2018-based Principal projection would have generated around 898 dwellings per annum over the Plan period. The Council's 1,600 figure therefore represented an uplift of approximately 78%. The Council considered the earlier projection to be affected by negative demographic trends and insufficient for its housing and economic ambitions. The Welsh Government did not object to that approach at the Preferred Strategy stage. [WG response, October 2023, Annex 2]

A3.2 The original requirement was not merely a neutral technical output. It was a positive planning choice to accommodate growth substantially above the demographic baseline then available.

A3.3 The 2022-based Principal projection produces a materially different comparison. On Edge Analytics' assessment, the Council's requirement is approximately 9% below the unadjusted Principal dwelling-growth outcome of 1,758 per annum and approximately 17% below the adjusted outcome of 1,923. [AP1.5, Table 9]

A3.4 It does not follow that the Council must adopt either figure. The Principal projection is a central demographic scenario, not a statutory housing requirement. But the Council is now making a different kind of planning judgement: rather than explaining why it should plan above the official projection, it is explaining why it should plan below it.

A3.5 The Council has retained the numerical ambition of its original strategy. It has not yet convincingly shown that the same number remains an appropriately ambitious planning choice in the different evidential circumstances now before the examination.

A3.6 This is particularly important because the Council's original economic argument was not that the official projection had to be accepted as determinative. It was that planning for Cardiff required a more positive response than the then-current projection indicated. The Council must now explain how that principle has been reconciled with its preference for a lower-than-Principal requirement.

A4 The policy test: projections, judgement and deliverability

A4.1 Planning Policy Wales, Edition 12, identifies the latest Welsh Government household projections, the Local Housing Market Assessment and the Well-being Plan as fundamental parts of the evidence for determining housing requirements. It recognises that assumptions concerning migration and household formation may require scrutiny and that authorities may undertake alternative modelling supported by robust evidence. [PPW, §§4.2.6–4.2.7]

A4.2 The policy neither requires automatic adoption of the Principal projection nor permits it to be discounted without a sufficiently reasoned explanation. The task is to draw a planning judgement from the full evidence, including affordable housing needs, the relationship between homes and jobs, the strategy's objectives and deliverability.

A4.3 We accept that a purely demographic target, divorced from the ability to deliver homes in sustainable locations, would not provide a sound strategy. Equally, the Council must avoid allowing the capacity of its chosen spatial approach to predetermine the housing requirement without properly examining reasonable alternatives.

A4.4 A distinction must therefore be maintained between the requirement judged appropriate, the provision made to meet it, and the homes realistically expected to be delivered over the Plan period. The adequacy of the Council's explanation should be tested across all three.

A5 The demographic evidence and the Council's justification

A5.1 The September 2026 addendum responds principally to Action Point HS1.5, which requested modelling of improved household formation among younger adults. It also incorporates the latest available population estimates into new trend scenarios and considers revised international migration evidence. We welcome that additional work. [AP1.5, §§1.6–1.16, 4.1–4.6]

A5.2 However, paragraph 5.10 continues to regard 1,600 dwellings per annum as reasonable because it lies within the middle of the modelled range and because higher scenarios warrant caution. We do not consider that reasoning sufficient without a fuller comparison of the assumptions and planning consequences.

A. Being within a range does not justify the selection

A5.3 The principal outcomes of the addendum are shown below. The figures are modelled annual dwelling growth for 2021–2036, not housing requirements prescribed by Welsh Government.

Table 1 — Demographic scenario comparison (dwellings per annum)

Scenario	Unadjusted (dpa)	Adjusted (dpa)
WG Principal	1,758	1,923
Updated five-year trend	1,663	1,830
WG Low Population (revised)	1,495	1,655
WG 10-year migration	1,314	1,469
WG 15-year migration	1,311	1,465
Updated fifteen-year trend	1,130	1,281

Source: Edge Analytics, AP1.5, Table 9. “Adjusted” refers to the household membership-rate sensitivity for ages 19–39.

A5.4 The Council relies particularly on the Welsh Government 10- and 15-year migration variants, which produce adjusted figures of 1,469 and 1,465 dwellings per annum. If those assumptions are accepted, the 1,600 requirement already accommodates the modelled improvement in household formation. It would be wrong to argue otherwise. [AP1.5, Table 9; CD08, question 3(i)].

A5.5 That makes the selection of migration assumptions the decisive question. The higher scenarios should not be preferred merely because they produce more homes; equally, the lower variants should not be preferred simply because they align more readily with the Council's existing strategy.

A5.6 These scenarios are not independent forecasts with equal probabilities. They are conditional outcomes based on different historical periods and demographic assumptions. The fact that 1,600 falls somewhere between the highest and lowest outcomes does not establish that it is the most appropriate planning choice.

A5.7 The Council needs to explain why the lower migration variants provide a more credible basis for Cardiff's Plan than the Principal projection, the updated five-year trend or an alternative central judgement, and how that choice reflects the city's policy objectives rather than just the relative ease of accommodating the resulting growth.

B. Improved household formation

A5.8 The addendum identifies evidence consistent with constrained household formation. Cardiff's average household size remained at 2.35 between 2011 and 2021; concealed families increased from 1,057 in 2001 to 1,757 in 2021; and overcrowding is above the Wales average, particularly for younger adults. Those findings sit alongside worsening affordability and the shift from owner occupation towards private renting. [AP1.5, §§2.17–2.24]

A5.9 The adjusted membership rates increase the number of smaller households within the 19–39 age groups. This adds approximately 150–170 dwellings per annum across the tested scenarios, including 165 under the Principal projection. [AP1.5, §§2.25–2.30, Table 9].

A5.10 These are meaningful results, but the adjustment is a sensitivity exercise, not a direct measure of the dwellings needed to eliminate existing concealment or overcrowding. It uses selected historical and projected membership-rate maxima and confines the adjustment to younger adults. It has not been demonstrated to capture the full extent of housing-market suppression.

A5.11 We acknowledge the Council's response that 1,600 would exceed the adjusted outcomes of the lower migration variants. Nevertheless, that does not answer whether those variants, alongside the evidence of constrained household formation, constitute the right basis for planning. The role of the evidence is not merely to establish what households might form under one set of

assumptions; it is to inform the Council's judgement about how the Plan should respond to identified housing pressures.

C. International migration: relevant uncertainty, but a qualified criticism of the Principal projection

A5.12 Edge Analytics is right to identify unusually high international migration after the pandemic. The revised estimates indicate that Cardiff's net international migration fell from around 9,895 in 2022/23 to approximately 1,000 in 2024/25. The 2025 population estimate is also approximately 6,650 below the population projected under the Welsh Government Principal scenario. Those differences are material and lend weight to the need for caution. [AP1.5, §§3.5–3.10].

A5.13 However, the Principal projection should not be characterised as simply carrying forward the exceptional annual migration peaks unchanged. Welsh Government uses a cohort-component method, with assumptions informed by recent experience and adjustments to the 2022/23 and 2023/24 international migration estimates. Its published 2022-based release expressly states that net international migration is projected to be lower by mid-2032 than in mid-2022 in every Welsh local authority. The Principal projection therefore already embodies a degree of moderation of recent migration levels; it is not a straight-line extrapolation of the peak. [Welsh Government, Local authority population projections: 2022-based, Components of population change; Quality and methodology].

A5.14 This qualification does not mean the Principal projection is necessarily the best guide to the future. In particular, the substantial decline in 2024/25 reported in July 2026 was not incorporated into the original official projection, and Welsh Government itself emphasises that projections are not forecasts of future policy or economic conditions. That is a legitimate basis for further testing, but not for treating the official Principal scenario as though it assumes the peak continues indefinitely.

A5.15 It is equally important to recognise the limits of longer historical periods. Welsh Government explains that its 10- and 15-year migration variants can even out an atypical five-year period but can also dampen the effect of more systemic changes. They are therefore useful sensitivities, not automatically preferable forecasts. [Welsh Government, Local authority population projections: 2022-based, Variant projections]

A5.16 The updated five-year trend, incorporating the latest 2025 population estimate, continues to produce dwelling growth of 1,663–1,830 per annum, notwithstanding the significant recent reduction in migration. Edge Analytics advises caution because high-migration years remain influential. That is reasonable. But the Council must still explain why its preferred lower-migration assumptions are better suited to Cardiff's circumstances and the Plan's objectives. [AP1.5, §§4.9–4.17]

A5.17 The same need for transparency applies to the inclusion of historical unattributable population change within the trend scenarios, which has the effect of lowering historical net international migration. We do not suggest that its inclusion is necessarily wrong. The Council should, however, disclose its material effect on the results through a proportionate sensitivity comparison. [AP1.5, §§1.8–1.10 and Appendix A.10]

A5.18 Showing that the Principal projection may overstate migration does not, by itself, demonstrate that the Council's preferred alternative is right. The question for the examination is the strength of the comparative justification.

D. The retained 1,600-dwelling scenario is not tested on the same basis

A5.19 The addendum retains the assumptions of the 2021 dwelling-led scenario, while the alternative scenarios incorporate updated population and household assumptions. There is also a difference in the vacancy factor: the retained preferred scenario uses 3.7%, based on the 2011 Census, whereas the updated alternatives use 5.5%, based on the 2021 Census. [AP1.5, §§4.2–4.5 and footnote 19]

A5.20 The difference is disclosed and does not invalidate the work. It does mean, however, that the retained preferred scenario is not a direct like-for-like rerun using the latest assumptions. A fresh dwelling-led sensitivity at 1,600, based on a consistent updated model, would show more transparently the population, migration and labour-force outcomes implied by the Council's choice.

A6 Housing and economic growth

A6.1 The Council's original case for 1,600 homes per annum relied partly on a need to support economic growth above that associated with the earlier Principal projection. The Plan now proposes approximately 32,300 additional jobs. The Council argues that its selected housing requirement supports that level of growth without constraining labour supply. [CD08, question 3(i)]

A6.2 This is relevant evidence, but its independence requires care. The Welsh Government's 2023 response records that the 32,300-job figure was informed by the Council's preferred dwelling-led scenario, although it was also close to the midpoint of the independent economic forecasts. The relationship is therefore not wholly circular, but nor is the alignment of the selected housing and employment numbers a wholly independent test of the housing requirement. [WG response, October 2023, Annex 2]

A6.3 The September 2026 addendum illustrates that higher-growth scenarios could support a materially larger labour force. Its updated five-year trend scenario models approximately 2,804 additional jobs annually, compared with 2,151 under the retained dwelling-led 1,600 scenario. These are modelled capacities, not independent forecasts that such jobs will necessarily materialise. [AP1.5, Table 7]

A6.4 The Council should explain whether its chosen housing and employment figures adequately reflect Cardiff's economic potential and National Growth Area role, and what level of inward commuting or other labour-market adjustment is assumed. Demonstrating that two selected targets are internally consistent is necessary, but does not necessarily show that both are sufficiently ambitious.

A7 Spatial strategy, urban capacity and the deliverability objection

A7.1 The Council argues that increasing the requirement would undermine its brownfield-first strategy, increase infrastructure burdens and risk non-delivery. Those are proper planning concerns. A higher requirement cannot be justified simply by identifying demographic growth without considering how it would be delivered. [CD08, questions 3(i)–(ii)]

A7.2 However, the Council must demonstrate the consequences of reasonable alternatives, not merely assert that a higher requirement would be incompatible with the preferred spatial approach. A dwelling-led strategy can be appropriate, but it risks circularity if its assumed

capacity helps determine the requirement and that requirement is then defended principally by reference to the same preferred capacity.

A7.3 The September 2026 Urban Capacity Study identifies capacity equivalent to 6,081 dwellings on 26 large urban sites. This exceeds the earlier large-site windfall allowance of 3,929 by 2,152 homes. The figures concern potential capacity, not a guarantee of availability, viability or completions by 2036. Nevertheless, the additional identified capacity is relevant when testing the Council's contention that a higher housing requirement would necessarily be incompatible with its preferred spatial strategy. It does not, without further delivery evidence, demonstrate that the additional capacity could be completed by 2036. [AP2.2; AP2.3e, row 14]

A7.4 The revised Figure 11 reports net housing supply of 35,007 dwellings against a 24,000-dwelling housing requirement and formal provision of 26,400. However, this is an aggregate supply calculation, not a finding that all 35,007 homes will be completed by 2036. It includes completions, a discounted consented landbank, allowances and allocations; the timing and reliability of the components matter. [AP2.3e, rows 1–23]

A7.5 This distinction must be preserved. We do not invite the Inspectors to treat the nominal 11,007-dwelling surplus above the requirement as immediately deliverable headroom. The Council should instead reconcile revised Figure 11 with its housing trajectory, explaining what can realistically be delivered by 2036, the treatment of large windfalls, site-specific risks and the difference between capacity and expected completions.

A7.6 That exercise matters to the requirement debate. It would be premature either to conclude that a higher requirement is readily deliverable because a large gross supply is reported, or to conclude that it would necessarily compromise delivery without testing the revised evidence and reasonable alternatives.

A7.7 These matters are examined more fully in separate housing-supply and viability representations. They are referred to here only to demonstrate why the Council's deliverability objection cannot simply be assumed to be decisive.

A8 Provision, flexibility and affordability

A8.1 **T**he distinction between requirement and provision is especially revealing. The Council's housing requirement is 24,000 dwellings. A separate 10% flexibility allowance of 2,400 takes formal planned provision to 26,400 dwellings. [AP2.3e, rows 1–3].

Table 2 — Housing requirement, provision and projected growth, 2021–2036

Measure	Dwellings, 2021–2036
Council housing requirement	24,000
Formal provision, including 10% flexibility	26,400
WG Principal projection, unadjusted	26,370
WG Principal projection, adjusted	28,845
WG Principal scenario with illustrative 10% flexibility	29,007

Sources: AP2.3e, rows 1–3; AP1.5, Table 9. The final row is an arithmetic illustration, not a proposed adopted requirement.

A8.2 The Council's formal provision is almost identical to the unadjusted Principal scenario's dwelling growth. If the Principal scenario were judged to represent the appropriate requirement, almost the whole of the Council's nominal allowance for flexibility would instead be needed to meet that requirement. A further allowance for delivery uncertainty would then be necessary.

A8.3 This is not an assertion that Cardiff has run out of potential housing land; the larger aggregate supply in revised Figure 11 points in a different direction, although it must be reconciled with delivery to 2036. It demonstrates why the choice of requirement has real consequences for the adequacy of planned provision and the resilience of the strategy.

A8.4 The Council also points out that increasing the requirement would not guarantee more affordable homes. That is correct: delivery depends on viability, tenure and the pace of development. But an absence of certainty is not a reason to disregard the opportunity which additional suitably located housing could create to address affordability pressures and unmet need.

A8.5 Given the addendum's evidence of concealed households, overcrowding and delayed household formation, the Council should demonstrate how its preferred requirement has been evaluated against the Local Housing Market Assessment and the potential affordable housing outcomes of reasonable higher-growth alternatives. The aim should not merely be to perpetuate historical household patterns which may themselves have been constrained by housing availability.

A9 Further assessment required

A9.1 The addendum adds useful evidence, but the Council has not, in our view, provided a sufficiently integrated explanation of why 1,600 dwellings per annum should remain the preferred requirement. We therefore invite the Inspectors to require the following matters to be addressed before the soundness of that requirement is determined.

- Scenario selection. Identify the comparative criteria used to prefer the 10- and 15-year migration variants to the Principal projection and updated five-year trend, addressing Cardiff-specific demographic and strategic considerations.
- The moderation already in the Principal projection. Explain why the Welsh Government's treatment of migration, including projected moderation by 2032, is insufficient, while separately accounting for the later 2024/25 migration decline.
- Household formation. Explain what weight has been given to the adjusted membership rates, whether the sensitivity adequately reflects the identified housing-market pressures, and why no change in the chosen requirement follows.
- Consistent modelling. Provide a contemporary dwelling-led sensitivity at 1,600 using current population, household and vacancy assumptions, and quantify any material effect of including historical unattributable population change.
- Housing and employment. Demonstrate that the relationship between the housing requirement, labour-force assumptions, commuting and the selected jobs target amounts to an independent and appropriately positive assessment of Cardiff's economic role.
- Provision and alternatives. Reconcile AP2.3e with the current housing trajectory and Urban Capacity Study, distinguishing identified physical capacity from realistic plan-period completions. The Council should then explain what reasonable higher housing requirements would mean for its spatial strategy, infrastructure provision, development viability and the distribution of growth within Cardiff and the wider region, rather than assuming that a higher requirement would necessarily undermine the preferred strategy.

A9.2 These are proportionate requests because they address the choice the Council is actually asking the Inspectors to endorse. They do not depend upon proving that the Principal projection, or any other single model, is a perfect forecast.

A10 Conclusion

A10.1 The 2022-based projections are not new to the examination. The issue is the adequacy of the Council's response to their implications for Cardiff's growth strategy. The Council originally justified 1,600 dwellings per annum as a deliberately positive departure above the earlier Principal projection, partly to safeguard housing and economic growth. Against the current Principal projection, the same requirement is below projected demographic growth. That change requires more than reaffirmation of the original figure.

A10.2 The September 2026 addendum provides reasons to treat higher scenarios cautiously, particularly given the latest international migration evidence. We accept those reasons are material. But the Welsh Government's Principal projection already incorporates moderation in migration rather than the indefinite continuation of the exceptional peak, and the lower 10- and 15-year variants are themselves conditional scenarios with limitations. The choice between them requires an evidenced planning judgement.

A10.3 Likewise, the Council's preference for a deliverable brownfield-first strategy is legitimate. It does not remove the need to test whether a higher requirement could be accommodated sustainably, particularly where revised capacity and supply evidence calls for closer reconciliation with the trajectory.

A10.4 The Council has explained why 1,600 dwellings per annum is defensible. It has not yet convincingly demonstrated why that figure is the most appropriate and sufficiently positive response to Cardiff's demographic circumstances, housing pressures, economic ambitions, inward commuting balance, and responsibilities as the capital city.

A10.5 We therefore invite the Inspectors to conclude that the justification for the submitted housing requirement remains insufficient and that further comparative assessment is required. If that work supports a higher requirement, consequential changes to housing provision, flexibility and the spatial strategy should follow, tested against realistic delivery and infrastructure evidence.

A10.6 The objective should be a Plan which does more than retain a number originally selected in a different demographic context. It should make a sound, reasoned and sustainable planning choice for Cardiff's future to 2036, while providing a suitable platform for subsequent strategic planning across the wider region

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CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN

Annex B

Housing Supply

Examination submission • October 2026

Lightwood Strategic

CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN

Annex B: Housing Supply

Further written representations

October 2026 • Lightwood Strategic • Examination action-point response

CENTRAL ISSUE Whether the revised housing supply is transparent, non-duplicative, viable and realistically deliverable by 2036, particularly following the uplift in the large-site windfall allowance

Executive summary – what needs to be explained

Cardiff has substantial scope to deliver more homes on previously developed land. We support making the most of that opportunity. The question for this examination is a practical one: can the Council show, clearly and consistently, where its housing numbers come from, that homes are not counted twice, and that the schemes it relies on can realistically be built by 2036?

The most significant change in the revised housing supply is the increase in the large-site windfall allowance from 3,929 to 6,081 dwellings. The Urban Capacity Study identified 6,081 dwellings of potential capacity to support an existing forecast which had already been discounted for non-delivery. The revised Figure 11 instead counts the whole identified reservoir. This is a material change from a forecast of expected completions to the adoption of identified capacity, without a corresponding demonstration that all the identified dwellings can realistically be delivered by 2036.

A separate accounting question arises from the increase in the reported supply of 4,236 dwellings between March and October 2026. During the additional monitoring period, completions increased by 1,274 and the remaining anticipated landbank by 1,099. Such movements may be legitimate, but the Council should distinguish genuinely additional supply from capacity revisions and transfers between existing accounting categories. The Council's published monitoring spreadsheets provide an established basis for undertaking that exercise. They should also be used to explain how permissions on previously identified windfall sites affect the residual allowance.

There is also a delivery problem. The latest viability testing finds that many brownfield schemes are financially challenging. Several of the larger windfall figures depend on ambitious densities, operational sites and complex redevelopment. A site might be suitable for housing without the proposed number of homes being commercially viable or achievable by 2036. Those are different questions, and they need different evidence.

We ask the Inspectors for two linked reconciliations: a site-by-site account of how the landbank changed between monitoring dates, and a clear account of how each change affects any remaining windfall allowance. The result must feed one annual, risk-adjusted forecast to 2036 that takes account of the viability evidence. The Council may justify a higher allowance than 3,929, but it should not count all 6,081 merely because it has identified potential capacity. This correction alone would not establish a housing shortfall against the currently proposed requirement, but that is still being debated.

B1 The difference between potential supply and homes delivered

B1.1 A capacity figure tells us how many homes might be accommodated. A housing trajectory tells us when homes are expected to be completed. Both matter. But one cannot stand in for the other, especially where a Plan depends on redevelopment sites that have not yet secured permission or a delivery partner.

B1.2 Cardiff's requirement is 24,000 homes between 2021 and 2036. Adding 10% flexibility gives a provision figure of 26,400. The revised Figure 11 presents net supply of 35,007 homes—11,007 above the requirement. That looks reassuring, but it is a total of different kinds of supply. The Inspectors still need to know what will actually be completed by 2036.

B1.3 The Council recognised this distinction in its earlier Housing Background Technical Papers. Those papers showed a separate, trajectory-adjusted surplus of 2,640 homes in February 2025 and 2,367 in the March 2026 comparison. The October Figure 11 no longer gives that final comparison. The Council's historic monitoring schedules, including CD16 and CD17, contain detailed site-level forecasts, and AP2.1 v1.4 provides a more recent programme. The outstanding requirement is a transparent reconciliation demonstrating how the current annual forecasts, allowances, completions and other supply components together produce the revised Figure 11 position, without overlap and with realistic assumptions about delivery by 2036.

B2 Why has the landbank grown when more homes have been completed?

B2.1 Between the March and October 2026 supply calculations, recorded completions increased from 5,477 to 6,751, an additional 1,274 dwellings. Over the same period the anticipated remaining landbank increased from 15,187 to 16,286, an increase of 1,099 dwellings. Completions and remaining landbank therefore increased by 2,373 dwellings in combination. A rising landbank is not inherently problematic where new permissions or capacity revisions exceed completions. What is required is an explanation of the underlying movements, distinguishing genuinely additional housing supply from changes in status, revised yields and transfers between categories.

B2.2 The published components show part of the calculation. Homes under construction increased by 268, and unimplemented permissions expected to complete by 2036 increased by 1,039. The 20% non-delivery deduction against those unimplemented permissions also increased, by 208. Those numbers add up, but they do not identify the sites behind the changes or explain which movements are new supply rather than changes in classification.

B2.3 It is important to be accurate about the non-delivery allowance. It has not disappeared: it is now 3,421 dwellings and applies to the unimplemented consented category. We are not suggesting that an identical 20% deduction must be applied mechanically to windfalls. We are saying that the Council must explain why different parts of the supply are treated differently for delivery risk.

B2.4 There are clear examples of category changes. Church Farm's 205 dwellings had already moved out of the strategic allocation subtotal by March 2026; CD24 reflects its consented status. It should not be treated as a fresh October increase. CD24 also deletes the 150-home St Mellons allocation, and the revised figures reduce Cardiff Business Park (West) by 30 homes. The October table already reflects those reductions; they must not be deducted again.

B2.5 The historic monitoring schedules provide a clear illustration. CD17 (2024), Allocations Forecast row 4, records Church Farm as allocation SH1.1 with capacity for 205 dwellings. CD16 (2025), LDP Trajectory rows 56–58, records the same development within the consented site register as

LV134K, LV134Ki and LV134L, comprising 144, 43 and 18 dwellings respectively. The total remains 205. This demonstrates a movement from allocation capacity into committed supply rather than the creation of 205 additional dwellings. The same accounting discipline should be demonstrated across the 2025–2026 reconciliation.

B2.6 The critical distinction is between two possible methods. Under a historic trend-based windfall allowance, the Council forecasts a continuing flow of housing completions on sites not specifically allocated. The landbank is a snapshot of permissions already in place. The usual safeguard is to exclude the early years, review the forecast period and trends, and prevent material overlap. A new permission therefore does not automatically require a one-for-one reduction in a genuinely future, trend-based completions allowance. But where a permission has already been anticipated within the forecast, the Council must explain why retaining that forecast does not count the expected delivery twice.

B2.7 A different rule applies if the Council is now using the 26 named urban-capacity sites as a fixed pool to support the 6,081 homes. A site does not create new supply merely by gaining consent: it moves from potential windfall to commitment. For illustration, if 500 homes within a 6,081-home identified reservoir become commitments, the remaining identified windfall reservoir would be 5,581, unless the Council demonstrates 500 genuinely additional opportunities or another justified revision. This is an illustrative accounting principle, not a finding that 500 homes have in fact been double-counted.

B2.8 The relevant question is therefore not simply whether permission numbers have risen, but how many of those permissions were already implicit in an identified or trend-derived expectation of non-allocated delivery. The Council should show permissions originating on former allocations separately from non-allocated sites, and record whether each permission is outside the forecast, replaces part of it, or is evidence for a genuinely increased future rate. This is the necessary bridge between rising commitments and any residual windfall allowance.

B2.9 The immediate remedy is an opening-to-closing ledger: which sites were in the landbank in April 2025; which completed, started, gained or lost permission; which increased or reduced yield; which were previously allocations or identifiable windfall opportunities; and what adjustment, if any, followed to the residual windfall forecast? The Council's existing monitoring records should make it possible to reconstruct these changes, but the published aggregate comparisons do not themselves provide the necessary reconciliation

B3 The different base dates matter

B3.1 The Urban Capacity Study adopts a 1 April 2025 landbank baseline, but it also reports a further check against the Council's 1 April 2026 housing monitoring schedule (AP2.2 §3.29). The October Figure 11 uses April 2026. This is an important safeguard, not something the Council omitted. Nevertheless, the two dates and any permissions resolved or granted in the intervening period must be carried through consistently into the final supply calculation.

B3.2 The study has plainly tried to avoid double counting. It checked sites against allocations and commitments and repeated its check against the 2026 monitoring schedule. It records that the additional check identified two permissions entering the landbank and no other overlap, and explains the exclusion of other sites, including Medallion House. These controls are relevant evidence in the Council's favour. The remaining question is whether the aggregate allowance in revised Figure 11 respects the same distinction between identified future opportunities and sites already committed.

B3.3 Nevertheless, the appraisal for Custom House Street (S55, 400 homes) illustrates the remaining question. The study included it as an urban-capacity opportunity because it was outside its April 2025 landbank, despite a 2025 application and a June 2026 resolution to approve. The study recognises that, once permission is issued, the site should move into the landbank rather than remain additional to it. That makes a dated cross-check essential, not optional. As the resolution occurred after the 1 April 2026 monitoring base, it should not automatically be treated as evidence that the site has been counted twice in Figure 11.

B3.4 For each of the 26 sites, the Council should show its permission status at both dates, any allocation, whether it appears in AP2.1, and how much of its capacity is ultimately counted in AP2.3e. That would establish whether the safeguards have worked in the final October figures.

B4 The windfall reservoir is not the same thing as a delivery forecast

B4.1 Cardiff's historic-rate windfall forecast and its newly identified urban-capacity reservoir are not interchangeable. The original method used historic completions to estimate a future rate, applying a 25% discount and excluding the first two years of large-site windfalls to limit overlap with commitments. AP2.2 subsequently identified capacity for 6,081 homes on 26 sites to substantiate the existing 3,929-home large-site allowance. That provided a margin of 2,152 dwellings between identified capacity and expected completions. Revised Figure 11 instead counts the full 6,081 homes. The Council must explain why the entire identified capacity has become expected supply by 2036.

B4.2 That change is particularly significant in light of AP2.2's own methodology. Paragraph 7.15 explains the discounted historic-rate forecast, while paragraph 3.27 relies on that discount in explaining why no further non-implementation allowance was necessary. That reasoning supported the use of identified capacity as a reservoir underpinning a discounted forecast. It does not, without further analysis, justify substituting the full capacity of the reservoir for the discounted forecast itself. If the Council now relies on all 6,081 dwellings, it should explain the revised treatment of non-delivery risk, the timing of completions and the relationship between the identified sites and the remaining landbank.

B4.3 Three different propositions are possible. The 6,081 could be a newly justified flow of future, as-yet-uncommitted windfall completions; it could be the forecast delivery from the 26 named sites; or it could combine a named site programme with a residual trend-based allowance. They are not equivalent. In the second and third cases, sites moving into commitments must move out of the site-derived windfall component. In the first case, the Council must show how the historic rates, discount, elapsed years and existing landbank justify the increased future allowance without material overlap.

B4.4 The study itself shows why caution is needed. Only 1,142 homes are on High-confidence sites; 4,331 are Medium and 608 Low. The timing is also concentrated late in the period: 1,685 homes in years 3–5, 3,788 in years 6–10 and 608 beyond year 10 but before 2036. Those last 608 are still inside the Plan period, but the timetable leaves limited room for slippage. The latest delivery band requires particular scrutiny because 608 dwellings are identified for delivery more than ten years after the study's April 2025 baseline but before the Plan ends in 2036, leaving limited scope for delay.

B4.5 The largest two opportunities illustrate the issue. NCP Adam Street is credited with 1,110 homes and Utilita Arena with 1,000: together 2,110, or about 35% of the total reservoir. There is meaningful evidence in favour of both sites, including land assembly and work on the

replacement arena. That does not yet establish when complete schemes will start, whether their full yields are viable, or how many homes will be finished by 2036.

B4.6 Sensitivity tests derived from the capacities and confidence assessments in AP2.2 are telling. Excluding Low-confidence sites leaves 5,473 homes. Reducing all estimated yields by 25% leaves 4,561. Excluding the two largest sites leaves 3,971. These are separate tests, not deductions to stack together. They help demonstrate why a pool of 6,081 may support an allowance of 3,929, without proving that every unit in the pool should be counted.

B5 Viability is part of the delivery question

B5.1 A site can be physically capable of accommodating housing while redevelopment remains financially unattractive. This is particularly relevant where existing commercial uses generate value, leases must be released, buildings demolished or costly tall-building construction is required. A capacity assessment should not assume that these matters disappear once a residential density is applied.

B5.2 Avison Young's September 2026 update provides an important reality check. It reports that development viability has worsened since 2024 as build and infrastructure costs have risen faster than residential values. It does not say that all brownfield sites are unviable; several higher-value locations perform positively. The concern is whether the sites responsible for much of the windfall uplift resemble those more favourable examples.

B5.3 Under one of the Council's tested affordable housing tenure scenarios, seven of ten brownfield typologies have negative headroom for further infrastructure contributions even at 0% affordable housing. At 20%, the tested 46-home Splott typology shows −£504/m^2, the 175-home Cathays typology −£931/m^2, the 315-home Callaghan Square typology −£1,103/m^2 and the 500-home Gas Works typology −£412/m^2. These are measures of additional infrastructure headroom under the stated appraisal assumptions—not losses per home or a site-specific verdict on every proposed scheme.

B5.4 The fit between the two studies is the concern. About 68% of AP2.2's capacity comes from density bands rather than defined schemes. Some assumed yields imply very tall buildings. AP2.4 uses broad development typologies, including a category for apartments of six or more storeys, but does not transparently establish the viability of every large, complex tower or operational car-park redevelopment that drives the 6,081 total.

B5.5 A detailed planning-application appraisal for every possible windfall site at plan examination is not necessary. But where a handful of complex sites account for a large share of the allowance, a proportionate check is essential. It should cover existing-use value and leases, abnormal works, realistic building form and mix, policy obligations, developer return and an achievable build-out programme.

B5.6 The Council should not assume that relaxing affordable housing obligations solves the issue. A less onerous policy may help a scheme, but does not automatically overcome demolition, piling, servicing, construction or site-assembly costs. Where a reduced obligation is needed to make a scheme work, the implications for the Plan's affordable housing expectations must also be explained.

B6 The annual trajectory needs to tell the same story

B6.1 Cardiff has published site-level annual housing forecasts over successive monitoring periods, including CD16 and CD17, and AP2.1 v1.4 provides a more recent schedule. The issue is not the absence of annual forecasts for identified large sites. It is whether the Council has reconciled the latest site programmes with every component of Figure 11, including completed dwellings, remaining commitments, allocations, large and small windfalls, changes of use and stock adjustments. The Inspectors need one integrated annual account, using a consistent monitoring base, which distinguishes identified capacity from expected completions and explains the treatment of development risk.

B6.2 The Council should provide a category-by-category reconciliation between the AP2.1 annual forecast and AP2.3e Figure 11, identifying which components are included in each schedule and where separate allowances are applied. In particular, the reconciliation should distinguish remaining consented dwellings from allocations, identify any under-construction subsets already incorporated in the landbank, and demonstrate how the windfall and stock-adjustment assumptions have been incorporated into a single net plan-period forecast.

B6.3 Porth Teigr makes the timing distinction particularly clear. The stated full capacity is 2,310 homes, but 1,310 are programmed by 2036. The remaining 1,000 are beyond that date. Figure 11 correctly uses the 1,310 figure. The question for plan-period delivery is whether that programme remains realistic in light of the proposed boundary change, implementation dependencies and viability. Separately, the Council has still not justified that the revised policy area can actually host 2,310 homes.

B6.4 Figure 11 also counts 528 small-site windfalls and 934 change-of-use windfalls, alongside net stock adjustments of −538. Each must appear once in the final annual calculation, with the relevant forecast period and assumptions made clear. The 20% allowance for unimplemented permissions must likewise be reflected consistently in the timing of expected completions.

B7 What we ask the Inspectors to require

B7.1 First, the Council should use its existing site-level monitoring records to publish an auditable opening-to-closing reconciliation between April 2025 and April 2026. This should identify completions, starts, new and expired permissions, revisions in capacity, changes in development status and transfers between allocations, commitments and identified urban-capacity opportunities. It should distinguish genuinely additional expected homes from movements between accounting categories and identify any consequential effect on the remaining windfall allowance.

B7.2 Second, the Council should explain the justification for counting all 6,081 identified urban-capacity dwellings rather than the previously discounted allowance of 3,929. That explanation must address the change in methodology, including the Council's earlier reliance on a 25% discount, and demonstrate the realistic timing and reliability of the revised contribution. If it is a trend-based allowance, it should explain the revised annual rate, forecast years, early-year exclusions and safeguards against overlap. If the methodology is mixed, the two elements should be shown separately. This should be followed by realistic site yields, timings and proportionate viability checks for the larger opportunities.

B7.3 Third, the Council should publish a single annual, net housing trajectory which reconciles all supply categories without duplication, incorporates realistic delivery assumptions and shows

cumulative completions to 2036 against both the 24,000-dwelling requirement and the 26,400-dwelling provision benchmark. If the full 6,081-dwelling allowance cannot be substantiated, the previous 3,929-dwelling allowance provides a reasoned benchmark for reconsideration, rather than an automatic ceiling on the contribution which may ultimately be justified.

B7.4 Finally, the Council should explain what any revisions mean for the Plan: the timing of homes, the contribution to affordable housing, key infrastructure, monitoring arrangements and whether any additional allocations or modifications are required. The request is for clarity and proportionate evidence, not for the dismissal of promising urban sites.

B8 Conclusion

B8.1 There is no shortage of potential redevelopment land in Cardiff. That is not the issue. The issue is whether the Council has moved too quickly from identifying opportunities to counting them as homes that will be built by 2036.

B8.2 The questions are connected. Did completed homes reduce the stock of outstanding permissions? Did new permissions replace anticipated windfalls rather than add fresh delivery? Has the Council changed from a discounted historic forecast to a site-based reservoir without adjusting for transfers to commitments? And can the largest schemes actually be funded and built by 2036?

B8.3 A rising landbank and a rising windfall allowance can both be justified, but not simply by adding each new source of evidence to the last. The Council needs to identify what each number represents, how the estimates interact, and why the combined 35,007-dwelling supply is deliverable without material duplication. Until then, its 11,007-dwelling margin should not be taken as conclusive proof of housing delivery by 2036.

Annex B — Schedule A: Supply movements and audit of the October 2026 supply uplift

Table A1 - Published housing supply figures.

February 2025: Housing Background Technical Paper; March 2026: CD07 comparison; October 2026: AP2.3e. Figures are dwellings. Blank cells indicate the earlier source did not give an equivalent figure.

Component	Feb 2025	Mar 2026	Oct 2026
Dwelling requirement	24,000	24,000	24,000
Provision incl. 10% flexibility	26,400	26,400	26,400
Cumulative completions to monitoring date	3,997	5,477	6,751
Under construction	2,641	2,336	2,604
Consented, not implemented, anticipated by 2036	15,088	16,064	17,103
Non-delivery allowance (20% of unimplemented consents)	-3,018	-3,213	-3,421
Anticipated remaining landbank	**14,711**	**15,187**	**16,286**
Completions plus landbank	18,708	20,664	23,037
Net stock adjustments	-592	-576	-538
Large-site windfalls	**3,898**	**3,929**	**6,081**
Small-site windfalls	653	581	528
Change-of-use windfalls	1,096	1,027	934
Windfall allowances subtotal (published)	5,646	5,537	7,543
Strategic allocations	1,675	1,470	1,470
Non-strategic allocations	240	240	90
Housing-led regeneration allocations	3,751	3,435	3,405
All allocations	5,666	5,145	4,965
Net housing supply (published)	**29,429**	**30,771**	**35,007**
Surplus against 24,000 (published)	5,429	6,771	11,007
Trajectory-adjusted surplus (earlier documents)	**2,640**	**2,367**	**—**

Checks: March published components sum to 30,770, one below the stated 30,771; the February windfall subtotal shows a one-dwelling difference against individual components. These immaterial presentation differences are not treated as material additional supply. CD16 and CD17 provide historic site-level monitoring and forecast information. They do not, on their own, reconcile the April 2025–April 2026 movements represented by the March and October 2026 published totals.

Table A2 – Arithmetic change between March and October 2026

Component	March 2026	October 2026	Change
Completions	5,477	6,751	+1,274
Under construction	2,336	2,604	+268
Unimplemented consented	16,064	17,103	+1,039
Non-delivery allowance	-3,213	-3,421	−208
Anticipated landbank	15,187	16,286	+1,099
Completions + landbank	20,664	23,037	+2,373
Stock adjustments	-576	-538	+38
Large windfalls	3,929	6,081	+2,152
Other windfalls	1,608	1,462	−146
All allocations	5,145	4,965	−180
Published net supply	30,771	35,007	+4,236

The combined increase of 2,373 dwellings in completions and anticipated landbank is an accounting movement, not a measure of additional permissions granted during the year. It must be reconciled to starts, completions, new permissions, changes in expected capacity and classification movements.

The changes in the displayed category subtotals add to 4,237 owing to the one-dwelling discrepancy in the March published headline total. The data do not independently explain which permissions are new additions and which are category transfers. No new-permissions figure should be inferred from these aggregate changes alone.

Table A3 – Classification and dated crosswalk checks

Evidence item	Observed position	Required check
Church Farm, 205	Out of the strategic allocation subtotal by March 2026; CD24 PPC59 reflects commitment status.	Track February 2025 → March 2026 transfer; do not attribute to March → October uplift.
St Mellons, 150	Deleted by PPC1 and removed from October non-strategic supply.	Ensure no duplicate deduction and reflect in annual programme.
Cardiff Business Park H2.3, 30	Capacity falls from 200 to 170 in October.	Check site-level yield and H2 programme.
Urban Capacity Study base	AP2.2 checks against 1 April 2025 commitments.	Provide crosswalk to Figure 11 at 1 April 2026.
Asset House	Urban Study removes consented capacity from windfalls.	Carry forward exclusion and show commitment ledger.
S26 Penarth Road	168 consented dwellings counted in bank; 55 residual potential in urban study.	Verify the 55 is additional and does not reappear elsewhere.
S55 Custom House Street	400 identified homes; application/resolution post-2025 study base.	State 2026 monitoring and consent position; avoid prospective duplicate.
Porth Teigr H2.5	1,310 expected to 2036; 2,310 total capacity.	Test actual programme and revised allocation boundary.

Annex B - Schedule B: Urban-capacity reservoir

Table B1 - Identified urban-capacity sites, capacity, confidence and indicative delivery period

Table B1 reproduces the 26 counted sites, capacities, basis, confidence and broad delivery band in AP2.2 Table 8. “Band” means capacity derived from density assumptions; this is not an application-stage yield or viability appraisal.

Ref	Site	Units	Basis	Confidence	Delivery Period
S2	Admirals Landing, Schooner Way	60	Band	Low	Beyond 10, by 2036
S3	Cardiff Bute Terrace Hotel	165	Indicative	Medium	6–10
S6	Eastgate House, Newport Road	120	Scheme	Medium	6–10
S9	Former HMRC Tax Office, Ty Glas Road	100	Indicative	Medium	6–10
S13	Howard Gardens, Adamsdown	128	Band	Medium	6–10
S19	NCP Adam Street Car Park	1,110	Band	Medium	6–10
S20	NCP Knox Road Car Park	441	Band	Medium	6–10
S22	Orchard Media, Curran Road	346	Band	Medium	6–10
S23	Plot 6, Pierhead Street	184	Band	Medium	6–10
S24	Principality House, The Friary	237	Scheme	Medium	3–5
S26	St Mary’s House and 51–59 Penarth Road	55	Indicative	Medium	3–5
S27	The Wharf, Schooner Way (Blocks G/H)	132	Scheme	High	3–5
S30	University Halls, Birchwood Road	100	Indicative	Low	Beyond 10, by 2036
S31	Utilita Arena Cardiff	1,000	Band	Medium	6–10
S36	Clydesmuir Industrial Estate	93	Band	High	3–5
S37	Bute Street Car Park	132	Band	Medium	6–10
S39	James Street (former Merthyr House)	47	Scheme	High	3–5
S40	Cardiff Central Station Car Park (Plot 4)	221	Band	Medium	3–5
S45	Cardiff Theatrical Services, Ellen Street	288	Band	Low	Beyond 10, by 2036
S47	5–7 Queen Street	30	Indicative	Low	Beyond 10, by 2036
S49	64 Charles Street	130	Band	Low	Beyond 10, by 2036
S50	24 Cathedral Road	53	Scheme	High	3–5
S53	118 Maindy Road	30	Scheme	Medium	3–5
S55	Land at Custom House Street	400	Scheme	High	3–5
S56	Land north of John Street, Butetown	417	Scheme	High	3–5
S62	Former Star Centre, Splott Road	62	Indicative	Medium	6–10

TOTAL: 26 sites; 6,081 dwellings. Confidence: High 1,142; Medium 4,331; Low 608. Delivery bands: years 3–5 1,685; years 6–10 3,788; beyond ten years but within the period to 2036 608.

Of the identified capacity, 2,110 dwellings are attributed to S19 NCP Adam Street Car Park and S31 Utilita Arena. Together these account for approximately 35% of the reservoir. The combined figure is not a risk deduction; it illustrates the significance of establishing realistic site-specific yields and programmes for a small number of large opportunities

Table B2 – Urban capacity sensitivities and comparison with 3,929 allowance

Scenario	Units	Headroom above 3,929	Nominal Fig.11 supply if substituted
Full reservoir	6,081	+2,152	35,007
Exclude low confidence	5,473	+1,544	34,399
Reduce all yields 25%	4,561	+632	33,487
Exclude two largest sites	3,971	+42	32,897
Exclude interest and reduce yields 25%	4,243	+314	33,169
Earlier allowance	3,929	+0	32,855

The sensitivity outcomes are illustrative calculations derived from AP2.2 and are not represented as the Council's own delivery forecasts. They are alternative scenarios, not cumulative deductions or probability-weighted estimates. The final column shows the arithmetic effect of substituting each scenario into the revised Figure 11 total, not a verified annual delivery forecast..

Annex B — Schedule C: Viability evidence

Table C1. Extract from Avison Young AP2.4, scenario A

(80% social rent/20% LCHO within the affordable element). Values are the modelled residual capacity for additional infrastructure contributions, £/m^2 of development, not losses per dwelling or formal appraisals of the named AP2.2 opportunities.

Illustrative appraisal typology	Units	0% AH £/m^2	20% AH £/m^2
Splott – 46 dwellings / Star Centre typology	46	-346	-504
Cathays – 175 / Custom House Street typology	175	-655	-931
Butetown – 315 / Callaghan Square typology	315	-817	-1,103
Grangetown – 500 / former Gas Works typology	500	-122	-412
Llandaff – 90	90	+845	+451
Rhiwbina – 140	140	+1,085	+632
Whitchurch and Tongwynlais – 140	140	+725	+301

These typologies are not direct site-specific viability appraisals of the identified urban-capacity opportunities. In particular, the 175-dwelling Custom House Street typology should not be treated as a viability appraisal of the separate 400-dwelling S55 opportunity..

Table C2 – Specific viability matters requiring a tested response

Issue	Evidence to request
Physical yield	Height, net/gross efficiency, housing mix, site coverage and servicing assumptions supporting density-derived units.
Existing-use value	Investment value, leases, rights to possession and demolition / diversion / relocation costs.
Commercial assumptions	Site-specific cost and income benchmarks, development finance, developer return and realistic delivery vehicle.
Planning obligations	20% brownfield AH and infrastructure requirements; effects of any assumed policy flexibility.
Timing	Land-release event, application and consent timetable, construction duration, annual completion distribution to 2036.
Alternatives	Reduced density, changed tenure, delayed start and lower sales value / higher build cost scenarios.
Public-sector or alternative delivery	Where conventional viability is insufficient, identify whether the site relies upon public land contributions, grant, affordable housing funding, retained investment or another delivery model, and the status of any relevant commitment.

Annex B — Schedule D: Monitoring reconciliation

The Council's published monitoring schedules already identify individual sites by reference, development status, capacity, tenure and annual completion programme. The following schedule therefore identifies the additional reconciliation required, rather than proposing an entirely new monitoring system. A common site identifier should allow the April 2025 and April 2026 landbank records, AP2.1 trajectory, AP2.2 urban-capacity register, allocations and AP2.3e summary to be compared consistently, with identifiable changes in capacity, status and expected delivery

Field	Minimum content	Purpose
A	Unique site ID / boundaries	Prevents duplicate parcel counting and supports map check.
B	2025 opening capacity and category	Shows source of expected supply before the extra monitoring year.
C	2025/26 starts, completions, losses	Reconciles completion drawdown without assumptions.
D	New permissions; effective dates and counts	Distinguishes new opportunities, allocations and replacement consents.
E	Capacity changes, expiries, removals	Identifies true increases/losses versus reclassification.
F	2026 category and remaining unbuilt capacity	Matches 1 April 2026 landbank and AP2.3e.
G	AP2.1 annual completion profile	Provides 2036 delivery evidence; no separate additions for under-construction subset.
H	AP2.2 potential, confidence, programme	Differentiates wider capacity from the net windfall contribution.
I	Overlap treatment and remaining allowance	Explains how consents and historical windfall assumptions interact.
J	Viability and release assumptions	Shows economic basis for high-impact or high-risk schemes.
K	Net counted 2036 dwellings	Derives annual net housing total without double counting.
L	Change from previous annual delivery forecast, with explanation	Demonstrates whether forecasts have been refreshed in response to actual progress, including changes in viability, funding, land release and enabling works.

CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN

Annex C

Porth Teigr and Alexandra Head

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CENTRAL ISSUE Whether the reduced allocation supports 2,310 dwellings and whether 1,310 homes can be delivered by 2036 on a credible financial and implementation programme.

Executive summary

This location offers an important opportunity to make effective use of previously developed land. We do not suggest that the Welsh Government site is inherently incapable of accommodating 1,310 dwellings. The questions are whether the Council has justified the capacity attributed to the amended allocation as a whole, and whether the 1,310 dwellings assumed by 2036 are supported by a credible programme for bringing the development forward.

The distinction matters. Modification PM4 removes land owned by Associated British Ports (ABP) and land occupied by the BBC studios from the Porth Teigr and Alexandra Head allocation. The Council nevertheless retains the original estimated overall capacity of 2,310 dwellings, including 1,000 assumed beyond the end of the Plan period. Its September 2026 evidence demonstrates a notional capacity for 1,310 dwellings on 9.8 hectares of Welsh Government-controlled land. It does not demonstrate how the additional 1,000 dwellings can be accommodated on the residual land now proposed to remain within a modified allocation boundary.

Separately, the Council's AP2.1 trajectory assumes that the first dwellings will be completed in 2030 and that all 1,310 will be completed by 2036. The supporting viability appraisal assumes a ten-year development programme but does not establish the planning, procurement, funding and construction milestones which would enable the Council's annual forecasts to be achieved.

The central concern is therefore not the principle of allocating the land. It is the distinction between a plausible development opportunity and a sufficiently evidenced allocation capacity and housing delivery forecast. The Council should resolve both issues before the Plan is found sound.

We do not comment on agent of change matters that could affect the operation of the Associated British Ports (ABP) land.

C1 The amended allocation still assumes 2,310 dwellings

C1.1 The Deposit Plan identified Porth Teigr and Alexandra Head for an estimated 2,310 dwellings, of which 1,310 were assumed to come forward by 2036. In the Statement of Common Ground with ABP (SOCG02), the Council agreed to exclude ABP-owned land from the allocation. This is now reflected in proposed modification PM4 in CD24. The change is material to the land available for development, not merely a cartographic correction. The BBC studios land is also proposed for removal from the allocation.

C1.2 At paragraph 1.8 of SOCG02 the Council expressly acknowledges that the reduced site area may affect the overall capacity. It nevertheless concludes that this will not affect the housing strategy because only 1,310 dwellings are expected within the Plan period. That reasoning may explain why the plan-period housing contribution has been retained. It does not establish that the original total capacity of 2,310 dwellings remains justified.

C1.3 The September 2026 CarneySweeney report (AP2.3b) concentrates on the 9.8-hectare Porth Teigr site. Its 22-plot schedule accommodates 1,310 dwellings. The land at Alexandra Head beyond the southern end of Channel Dry Dock is expressly excluded from the detailed assessment. Paragraph 3.3.2 does no more than anticipate that further residential development at Alexandra Head would follow the Porth Teigr phases after 2036.

C1.4 No corresponding plot-based capacity study, illustrative layout or other quantified assessment is presented demonstrating that the additional 1,000 dwellings fit within the remaining PM4 allocation boundary. The Council has not identified where those dwellings would go, the land available to accommodate them, or the development assumptions necessary to achieve that further capacity. These matters are particularly relevant given the removal of port-owned land and the continuing interface with operational port uses.

C1.5 The point is not that the additional 1,000 dwellings are proved incapable of being accommodated, nor that they must be delivered before 2036. It is that the Council continues to attribute a specific overall capacity of 2,310 dwellings to an amended allocation without evidence substantiating that figure. The Council should either demonstrate, proportionately, that the amended allocation can accommodate the total or revise the estimated capacity to the level reasonably supported by the evidence.

C2 Deliverability of the first 1,310 dwellings by 2036

C2.1 The first 1,310 dwellings raise a different question. The CarneySweeney schedule provides a credible starting point for considering physical capacity: its proposed apartment floorspace per dwelling on the converted plots is broadly consistent with that on plots previously intended for residential use. The representation does not dispute the capacity solely because the drawing has not yet been updated.

C2.2 However, AP2.1 assumes a substantial programme of completed homes between 2030 and 2036. A programme of that intensity depends upon more than a theoretical capacity schedule. It requires an achievable route through planning, design, procurement, site preparation, infrastructure and construction, together with a market or funding mechanism capable of absorbing the completed accommodation.

C2.3 The September report adopts a north-to-south sequence broadly inherited from the former 2008 outline permission, which it confirms has lapsed. Phase 1 comprises plots A–D and 460 dwellings; Phase 2 comprises plots F–K and a further 453 dwellings. Some 498 dwellings have been introduced onto plots previously shown for commercial uses, including 368 dwellings on plots A–C in the earliest phase. The physical possibility of parallel construction does not remove the need for a dated, plot-by-plot programme showing how that first phase will progress to occupation.

C2.4 Savills assumes orderly delivery over ten years with a construction period of 24 months for each parcel. This is not necessarily inconsistent with first completions in 2030 and the last in 2036: preparatory activities and overlapping phases could account for the difference. But the appraisal

does not identify the start date, construction overlap, rate of investment disposal or other assumptions required to reconcile the two programmes.

C2.5 The September report also describes the transfer of the Welsh Government land to its Land Department within Place Division as imminent. It identifies a renewed public-sector focus on housing, but provides no dated planning application programme, procurement strategy, development partnership, funding approval or expected date of commencement. Commissioning evidence for the RLDP is evidence of active promotion; it is not, by itself, evidence of a resourced application and implementation programme.

C2.6 The Council should therefore obtain a delivery statement from Welsh Government confirming the current governance and ownership arrangements, whether a residential planning application is being funded and prepared, its proposed submission date, the necessary enabling works, the intended development/procurement model, and the anticipated start, first occupation and annual completion programme. If that programme does not support AP2.1, the trajectory should be adjusted.

C3 The viability appraisal demonstrates limited financial headroom

C3.1 Savills' September 2026 appraisal is particularly important because it is the only identified site-specific assessment of the scheme now assumed. It estimates a net development value of approximately £304.09 million, total development costs before finance of £282.43 million and finance costs of £9.78 million. The balance is £11.88 million, equivalent to 4.07% of total development costs.

C3.2 The Council's anticipated contribution of 1,310 dwellings is longstanding. CD17's 2024 Allocations Forecast, row 22, identifies 2,310 dwellings of total capacity, 1,310 within the Plan period and 1,000 beyond 2036. That programme anticipated 250 completions in 2029, a further 250 in 2030 and the full plan-period contribution by 2035. The current AP2.1 programme instead anticipates first completions in 2030 and the final contribution in 2036. The change is not intrinsically unreasonable, but it requires the Council to demonstrate that the assumptions underpinning the longstanding delivery forecast remain realistic in the light of the amended development proposition.

C3.3 That £11.88 million must be interpreted correctly. It is a balancing return after the modeled expenditure, not a residual land value established after allowing for an independently assessed existing land value and an appropriate target developer return. Savills expressly makes no separate allowance for the land's value, relying upon Welsh Government ownership and the possibility of a public-sector partnership model. Savills also acknowledges that the resulting margin is below standard commercial levels.

C3.4 In a conventional appraisal requiring an appropriate developer return and positive benchmark land value, the proposition could produce a negative residual land value. That is not established by the submitted assessment, and a negative development residual would not mean that the underlying land had no value. The point is that the appraisal does not demonstrate what return, if any, would remain for the landowner or development partner after recognising the commercial and public-sector requirements of bringing the development forward.

C3.5 The appraisal assumes a substantial build-to-rent component. Savills derives approximately £26 per square foot from its analysis of the current unit mix but adopts £28 per square foot, anticipating the possible introduction of studios and other optimisation. It then capitalises rental income using a 5.5% investment yield. These may be achievable assumptions, but the overall

outcome is especially sensitive to rental values, investment yields, construction expenditure and timing.

C3.6 Savills' own sensitivity exercise ranges from a best-case return of £38.4 million to a worst-case loss of £16.4 million. The latter is a useful demonstration that the limited base-case headroom could disappear without exceptional changes in assumptions. The appraisal also includes site-wide infrastructure and landscaping costs of approximately £12.13 million and a 4% construction contingency. Given the site's extensive made ground, shallow groundwater and port-related history, the adequacy and timing of abnormal costs are relevant to the robustness of that outcome.

C3.7 The assessment includes 263 affordable dwellings, approximately 20% of the residential total. It would therefore be wrong to suggest that affordable housing has been ignored or found unviable. The issue is whether that provision and the other policy requirements remain realistic when a reasonable development return, the value of the land and full abnormal/infrastructure costs are considered. Any reliance on additional grant or unusually low investment returns should be made transparent, including its implications for the affordable housing offer.

C4 Public-sector commitment, funding and cash flow

C4.1 Public ownership provides genuine advantages. Welsh Government may pursue housing, affordable housing, regeneration and environmental objectives which a private owner would not deliver on a strictly commercial basis. Nevertheless, the ability to accept a reduced financial return should not be equated with an approved and funded decision to do so.

C4.2 A project requiring expenditure approaching £292 million may need substantial working capital or long-term investment funding, even if its lifetime appraisal shows a small positive balance. The public information does not identify the maximum cumulative funding exposure, how much equity or grant is required, who is to provide that capital, or when sale or investment receipts would become available.

C4.3 It cannot be assumed that cash flow will remain negative until the end of construction: completed blocks could generate receipts through forward funding, investment disposals or affordable housing transfers, and overlapping phases might permit recycling of capital. Equally, a model in which rental blocks are retained would create very different long-term capital requirements. The distinction must be explained rather than hidden within an aggregate ten-year appraisal.

C4.4 In particular, the Council should establish whether Welsh Government is willing and authorised in principle to accept a sub-commercial return, or a financial shortfall, in order to deliver the asserted planning benefits. If a public subsidy, discounted land contribution, retained investment asset or special partnership structure is required, the associated business-case and funding milestones should be identified at an appropriate level of detail. There is no need to publish commercially sensitive negotiations; a clear statement of delivery mechanism and public commitment would be sufficient

C4.5 This issue is directly relevant to the trajectory. If no development partner, capital commitment or approved delivery vehicle is yet in place, the Council should explain what justifies a programme starting to generate completed dwellings from 2030. A landowner's policy intention to regenerate a site is not the same as evidence that its proposed programme can be financed and implemented.

C5 Limited further clarifications

C5.1 The proposed accommodation schedule and assumed building heights provide a reasonable basis for considering the first 1,310 dwellings at allocation stage. Nevertheless, the May 2024 illustrative plan predates the conversion of six commercial plots to residential use. An updated plan should in due course confirm the plot layouts, residential amenity, servicing and common infrastructure. This is a qualification, not a principal reason for disputing the 1,310-dwelling capacity.

C5.2 The 2026 schedule includes 1,106 parking spaces, of which 325 are in the multi-storey car park at Plot O. Savills excludes Plot O from the residential-led viability appraisal with other commercial-only parcels, because those parcels are currently difficult to deliver. The Council should clarify whether any Plot O parking is necessary for the residential development or its essential servicing, and if so how its costs and delivery are secured. This is a discrete appraisal clarification, not an assertion that the scheme has omitted parking.

C5.3 The site's ecology, flood-risk, heritage and port-interface considerations are important to detailed development. Relevant strategic evidence exists, including the Council's flood-consequences work. These matters are not relied upon as independent objections to the principle of allocation. They reinforce the need for realistic abnormal-cost assumptions and a credible programme for obtaining permission and constructing the housing.

C6 Matters requiring resolution before the Plan is finalised

C6.1 The Council is invited to provide the following proportionate clarification, drawing directly on information from Welsh Government as the landowner and promoter:

- Allocation capacity: a plan and quantified assessment demonstrating how the amended PM4 allocation accommodates 2,310 dwellings, clearly distinguishing the 1,310 dwellings on Porth Teigr from the additional 1,000 attributed to land beyond it; or a corresponding adjustment to the estimated Policy H2 capacity.
- An updated annual completion forecast, reconciled with the previously published 2024 programme and supported by a plot/phase implementation schedule, planning submission and permission milestones, enabling infrastructure, procurement, construction periods and expected occupations.
- Landowner commitment: confirmation of the current status of land transfer/governance, the resources committed to a residential planning application, anticipated submission and commencement dates, and any proposed development partner or procurement programme.
- Financial deliverability: an explanation of the appropriate land value and required development return, updated sensitivities for rental yields, costs and timing, and confirmation of the assumptions underpinning the modeled affordable housing and infrastructure obligations.
- Funding and cash flow: the intended investment/disposal model, estimated peak funding requirement, proposed sources of public and private finance, the stage of relevant approvals and the allocation of downside risk.
- Parking and shared infrastructure: confirmation whether Plot O or other excluded commercial parcels include elements required for occupation of the residential plots, and how any such dependencies have been reflected in viability and phasing.

C6.2 If the Council cannot demonstrate that 1,310 dwellings are capable of completion by 2036 on the present evidence, an appropriately evidenced reduction or rephasing of the plan-period contribution should be made. That need not prevent the land being allocated for regeneration in principle. Separately, retention of the 2,310-dwelling overall capacity should depend upon an

evidence-based assessment of the amended allocation boundary, regardless of the timing of the additional dwellings.

C7 Conclusion

C7.1 The case for regenerating Porth Teigr is strong in principle. Welsh Government ownership, an accessible urban location and the opportunity to reuse former dockland are important advantages. The 2026 plot schedule also provides a credible initial explanation for how 1,310 apartments might be physically accommodated.

C7.2 But the Council has not yet shown that those homes can be delivered on the timetable assumed in AP2.1, or that a low-return project of this scale has an adequately advanced and funded implementation route. The possibility of public intervention is material, but its financial and programme implications cannot simply be presumed.

C7.3 There is an additional and separate deficiency in the justification for the allocation itself. The reduced PM4 boundary is being carried forward with the original estimated capacity of 2,310 dwellings, despite the absence of evidence demonstrating that the further 1,000 dwellings can be accommodated on land remaining within that boundary.

C7.4 The Inspectors are therefore invited to require the Council to substantiate the overall allocation capacity and to reconcile the 1,310-dwelling plan-period contribution with a realistic, financially credible delivery programme. In the absence of that information, the current capacity and trajectory assumptions should not be accepted as adequately justified.

C7.5 The progressive movement of the original completion programme, without corresponding evidence of the key implementation milestones, reinforces the need for a contemporary delivery statement from Welsh Government as landowner

CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN

Annex D

Gas Ferry Road

Examination submission • October 2026

Lightwood Strategic

CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN

Annex D: Gas Ferry Road

Further written representations

October 2026 • Lightwood Strategic • Examination action-point response

CENTRAL ISSUE Whether the Council has adequately evidenced remediation and site preparation undertaken to date, identified the outstanding works and their financial implications, and demonstrated a credible programme for completing 500 dwellings by 2034 on a scheme reflecting current planning requirements.

D1 Purpose of this note

D1.1 The Inspectors requested further information on remediation works and site preparation undertaken to date at the former Gasworks site, Ferry Road, together with masterplanning evidence demonstrating the extent to which the site can accommodate 500 dwellings and whether the proposals take account of the latest planning requirements.

D1.2 In response, the Council has submitted AP2.3d-i and AP2.3d-ii, including the December 2022 Arup Gasworks Masterplan, a 2016 Advisian Land Condition Summary Statement and earlier technical and planning material.

D1.3 These documents provide useful evidence of development potential, historic constraints and initial masterplanning. However, they do not adequately establish the extent of remediation and site preparation actually undertaken, the remaining works necessary for permanent residential development, or the financial and practical deliverability of 500 dwellings within the Plan period.

D2 Remediation and site preparation

D2.1 The 2016 Advisian report identifies substantial contamination associated with the former gasworks, including coal-tar residues, spent oxide, foul lime, polycyclic aromatic hydrocarbons, heavy metals and groundwater contamination. Contaminated made ground extends locally to depths exceeding three metres, with spent oxide and foul lime reaching approximately 4.1 metres below ground level.

D2.2 The report identifies potential remediation measures, including removal of hydrocarbon-impacted soils and deposits of spent oxide and foul lime. Importantly, it expressly acknowledges that the remediation then envisaged would not achieve a standard suitable for the proposed development end use, and that further remediation or mitigation would probably be required.

D2.3 The submitted evidence does not provide an updated, comprehensive account of remediation undertaken since 2016. It does not identify the quantities of contaminated material removed or treated, the geographical extent of completed remediation, residual contamination or further works required for permanent residential development.

D2.4 This omission is significant given the subsequent development of temporary accommodation. More than 200 modular units have been delivered through Yr Hafan and Ffordd-y-Rhaffau. These schemes involved enabling and groundworks, but their completion does not demonstrate that the wider former gasworks has been remediated for comprehensive permanent residential development.

D2.5 Temporary modular accommodation may be delivered through localised remediation, engineered protective measures and relatively limited ground disturbance. Permanent housing, roads, drainage, utilities and landscaped open space may require a different and potentially more extensive remediation strategy.

D2.6 The Inspectors' request specifically concerned works undertaken to date. The response should distinguish completed remediation, residual contamination and outstanding works, supported by updated remediation and verification evidence.

D3 Temporary accommodation and site availability

D3.1 The 2022 Arup masterplan anticipated temporary emergency accommodation from early 2023 for approximately two years. Subsequent events have overtaken that assumption.

D3.2 More than 200 temporary accommodation units have since been delivered. The Council's subsequent housing programme indicates that the modular units are intended to be relocated to other sites to facilitate permanent redevelopment.

D3.3 The November 2024 Cardiff and Vale Housing Partnership programme identified relocation of modular accommodation to other sites within Cardiff over one to five years. At that time, planning permissions for receiving sites had not been secured.

D3.4 Relocation requires alternative locations, planning permissions, funding and a programme maintaining accommodation for households experiencing homelessness. The Council should explain whether relocation remains necessary, which parts of the site are affected, when removal is expected and whether permanent development can proceed in phases beforehand.

D3.5 The presence of temporary accommodation does not necessarily prevent all development. The Arup masterplan envisaged the Joint Equipment Services facility being constructed while the accommodation remained. That does not establish the programme for permanent housing or the extent to which residential phases depend on relocation.

D4 Masterplanning and capacity for 500 dwellings

D4.1 The December 2022 Arup masterplan identifies up to 500 dwellings across approximately 11.74 hectares, alongside 1.2 hectares of open space, community facilities and a Joint Equipment Services facility. It envisages 50% affordable housing. By contrast, the Council's latest examination trajectory (AP2.1 v1.4) assumes 400 private and 100 affordable dwellings, or 20% affordable housing. The 20% assumption was already present in CD16 (2025), which records 400 private dwellings under GR177A and 100 affordable dwellings under GR177B. The discrepancy therefore predates the latest examination trajectory. The masterplan therefore differs materially in tenure terms from the scheme now used for housing supply purposes.

D4.2 The masterplan provides a coherent initial vision and demonstrates that a substantial residential neighbourhood can be contemplated in physical design terms. It is expressly a high-level study intended to inform subsequent technical assessments, design, costings and planning applications.

D4.3 Conceptual capacity is not the same as demonstrable housing capacity. The masterplan does not establish that 500 dwellings can be delivered after technical, environmental, infrastructure and planning requirements have been resolved.

D4.4 The evidence does not show how the capacity has been tested against a fully developed remediation strategy, updated flood risk and drainage requirements, operational gas infrastructure, biodiversity requirements or detailed infrastructure needed for occupation.

D4.5 Nor is it apparent that the 2022 masterplan has been comprehensively tested against subsequent planning policy and regulatory requirements, including current flood risk, sustainable drainage, biodiversity and placemaking expectations. Its 50% affordable housing assumption also requires reconciliation with the 20% assumed in AP2.1. This difference does not necessarily alter physical capacity, but it calls into question whether the masterplan provides a sufficiently current description of the development relied upon in the examination.

D4.6 This does not mean that 500 dwellings cannot be accommodated. It means the Council has not demonstrated that the stated capacity remains robust when tested against current requirements.

D5 Development viability and delivery

D5.1 The financial implications of the site's constraints are material. Remediation of a former gasworks, potentially difficult ground conditions, substantial infrastructure and relocation of accommodation could collectively represent significant abnormal costs.

D5.2 The November 2024 housing partnership programme identified an estimated construction cost of approximately £126.84 million for 500 homes, or around £254,000 per dwelling. The published information does not establish whether this includes all abnormal costs, remediation, relocation, infrastructure, finance, contingency and other development expenditure.

D5.3 The difference in assumed tenure is material to development economics. The 2022 Arup concept envisages 50% affordable housing, while the Council's October 2026 examination housing trajectory (AP2.1 v1.4) identifies 400 private and 100 affordable homes. The Council should explain whether the reduction reflects subsequent viability evidence, a revised delivery model, or a change to the proposed scheme. The change cannot be treated as a minor clarification of the masterplan.

D5.4 The Avison Young RLDP viability work provides relevant context. Its 500-dwelling former Gasworks typology indicates negative residual headroom for additional infrastructure contributions under the tested assumptions, including approximately −£412/m^2 at 20% affordable housing in scenario A. That is a typology-based indication, not a site-specific appraisal establishing a development loss. Nonetheless, it reinforces the need to identify which remediation, abnormal and infrastructure costs are covered, and what funding or delivery mechanism supports the assumed programme.

D5.5 The Council may deliver through public-sector investment, partnerships or combined funding. Conventional private-sector viability is therefore not necessarily decisive. Nevertheless, the Council should demonstrate that necessary investment is realistic and the programme financially supportable.

D6 Housing delivery programme

D6.1 The Council's latest examination housing trajectory (AP2.1 v1.4) is the primary statement of its housing delivery assumptions for the RLDP. It identifies 500 homes at Ferry Road (site references GR177A and GR177B): 400 private dwellings and 100 affordable dwellings. The affordable

housing assumption is therefore 20%, compared with 50% in the December 2022 Arup masterplan.

D6.2 AP2.1 anticipates 75 completions in 2029 (50 private and 25 affordable), 100 in 2030 (75 and 25), 125 in 2031 (100 and 25), 100 in 2032 (75 and 25), 50 in 2033 (private), and 50 in 2034 (private). It therefore assumes that all 500 dwellings are completed by the end of 2034, with no allowance for delivery in 2035 or 2036.

D6.3 This programme was not newly established for the October 2026 examination. CD16 (2025), LDP Trajectory rows 6–7, records the same annual completion profile for GR177A and GR177B: 75 dwellings in 2029, 100 in 2030, 125 in 2031, 100 in 2032, 50 in 2033 and 50 in 2034. CD17 (2024), Allocations Forecast row 10, recorded a different distribution of the same 500 dwellings, with fewer completions in the early years. The current programme therefore represents an earlier acceleration retained in the latest examination evidence, rather than a newly demonstrated 2026 delivery forecast.

D6.4 The supporting commentary in CD16 raises a separate question about the updating of implementation assumptions. It records that the Council had acquired the site and obtained demolition consent, but continues to state that land remediation was anticipated to commence in 2022 and construction in 2023. Those references were evidently historical by the time of the 2025 schedule. The issue is not that the stated dates prove that works were never undertaken. It is that the published commentary does not demonstrate that the later completion forecast was supported by a contemporaneous assessment of completed works, outstanding remediation, development readiness and the timing of first occupation.

D6.5 The Council's March 2026 Housing Revenue Account Business Plan identifies 493 dwellings at Gasworks: 60 in 2031/32, 113 in 2032/33, 120 in 2033/34, 100 in 2034/35 and 100 with timing yet to be determined. The two schedules use different time conventions (calendar and financial years), and may not have identical tenure or delivery coverage. Nevertheless, they relate to substantially the same redevelopment opportunity and show materially different phasing. The HRA programme should inform scrutiny of, rather than replace, the more recent AP2.1 examination trajectory.

D6.6 The disparity is not simply seven dwellings between the headline totals of 493 and 500. AP2.1 assumes the first 75 homes are completed in 2029 and all 500 by 2034, whereas the HRA programme commences in 2031/32 and leaves 100 without a specified completion year. The Council should explain why the completion profile already recorded in CD16 (2025) has been retained in AP2.1 notwithstanding the materially later programme in the March 2026 HRA Business Plan, identifying any differences in scheme coverage, tenure, development vehicle or subsequent implementation assumptions which might account for the discrepancy.

D6.7 That reconciliation is especially important because the housing trajectory does not itself explain the preceding sequence of temporary accommodation relocation, remediation, site preparation, infrastructure works and planning approvals. The Council should identify the milestones supporting first occupation in 2029 and full completion by 2034, distinguishing works that can proceed alongside temporary accommodation from those dependent on its removal.

D7 Conclusions

D7.1 The Council's response provides evidence that Gasworks offers substantial redevelopment potential. The 2022 Arup masterplan demonstrates conceptual capacity for approximately 500 homes, while AP2.1 v1.4 identifies a specific 500-dwelling delivery programme. However, the

submitted material does not adequately connect the site's physical preparation, the updated scheme assumptions and the dates on which homes are forecast to be completed.

D7.2 First, the Council has not provided a sufficiently current account of remediation completed to date, the extent to which temporary accommodation works have addressed contamination, or remaining remediation necessary for permanent development.

D7.3 Second, the 2022 masterplan demonstrates conceptual capacity but has not been shown to accommodate the full implications of current planning and infrastructure requirements. It also envisages 50% affordable housing, compared with the 20% used in AP2.1, without an explained transition between those positions.

D7.4 Third, the Council has not adequately explained why the completion programme established in CD16 (2025) has been retained unchanged in AP2.1, despite the materially later programme recorded in its March 2026 HRA Business Plan. CD16's historic commentary concerning remediation and construction reinforces the need to establish when the assumptions were last substantively reviewed. The necessary reconciliation must address relocation of temporary accommodation, remaining remediation, infrastructure, permissions, funding and the sequence of works required to achieve first occupation in 2029.

D7.5 These matters do not establish that the site is incapable of redevelopment. The question is whether sufficiently robust evidence has been provided to justify the scale and timing of its housing contribution within the RLDP.

D7.6 Before substantial weight is placed on delivery of all 500 dwellings by 2034, the Council should provide: an updated schedule and verification of completed remediation; a plan identifying remaining contamination and site preparation works; an updated masterplan tested against current requirements and the 20% affordable housing mix now assumed; and a costed delivery programme that reconciles AP2.1 with the HRA Business Plan and identifies the basis for first completions in 2029.

D7.7 Absent that evidence, the issue is not whether the site can ultimately accommodate 500 homes but whether the particular contribution and timing in the primary examination trajectory are adequately demonstrated. Any allowance in the Plan should be supported by proportionate evidence of capacity, infrastructure, funding and the likely rate of delivery.

CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN

Annex E

SAMM and SANG

Examination submission • October 2026

Lightwood Strategic

CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN

Annex E: SAMM and SANG

Further written representations | Annex E

October 2026 • Lightwood Strategic • Examination action-point response

CENTRAL ISSUE The Inspectors must be satisfied that necessary recreational mitigation is effective and achievable, and that the housing which depends on it is deliverable. Cardiff's September evidence does not yet establish either proposition, and its urban-capacity and housing-supply submissions are internally inconsistent with the mitigation strategy.

E1 What the Inspectors must be satisfied about

E1.1 These representations turn on a question which precedes the detail of any SANG tariff: has the Council provided sufficient evidence that the recreational mitigation necessary for the housing development relied upon in the RLDP is effective and achievable in practice? On the September 2026 submissions, the answer has not been demonstrated.

E1.2 The appropriate assessment under the Habitats Regulations must support a conclusion, without reasonable scientific doubt, that the Plan will not adversely affect the integrity of the Severn Estuary and Cardiff Beech Woods SAC, alone or in combination with other plans and projects. Where that conclusion depends on mitigation, it must be possible to rely on that mitigation being effective and capable of delivery. The competent authority remains responsible for the appropriate assessment; the Inspectors must examine whether the Plan and its evidence provide a proper basis for the statutory conclusion and a deliverable housing strategy.

E1.3 The Court of Appeal in No Adastral New Town Ltd v Suffolk Coastal District Council [2015] EWCA Civ 88, paragraph 72, identified the critical issue at plan-making stage as whether there was sufficient information to be satisfied that proposed mitigation "could be achieved in practice". It did not require every detail to be settled before adoption. But paragraph 74 distinguishes a later policy safeguard against unmitigable impacts from the prior need to establish that the mitigation upon which the plan relies is achievable. The Court upheld that plan on its evidence; it did not endorse deferring the basic question of achievability.

E1.4 Three linked propositions therefore need to be established: (i) that the proposed mitigation is sufficient to avoid adverse effects on protected-site integrity; (ii) that any further SANG or equivalent mitigation necessary to reach that conclusion is realistically achievable; and (iii) that the Plan's assumed housing capacity and timing remain credible once the land, costs and delivery dependencies of that mitigation are taken into account. A planning-application safeguard may prevent environmental harm by preventing permission. It does not, without more, demonstrate that housing counted by the Plan can be delivered.

E1.5 Christopher Katkowski KC placed precisely this distinction before the South Gloucestershire Inspectors in his 28 August 2026 reply for Swanmoor Stoke. His submissions are advocacy, not a judicial or Inspector finding; the decisive authority remains Adastral. They nevertheless identify the correct enquiry for this examination. Cardiff must demonstrate an achievable mitigation route, not merely promise that an unacceptable proposal will be refused later.

E2 HS2.5 has not been answered

E2.1 The Inspectors' Hearing Session 2 question 2.8 expressly asked how SAMM and SANG would affect the density, timing and financial viability of identified allocations and windfalls. Action Point HS2.5 then required a draft strategy for the delivery of "SAMM and SANG, indicating and evidencing likely solutions and cost"; HS2.4 required the resulting costs and requirements affecting developable area to inform the viability evidence. These were specific requests about practical delivery.

E2.2 AP2.5 and AP2.5a provide proposed Strategic Access Management and Monitoring (SAMM) measures and per-dwelling tariffs. Their treatment of Suitable Alternative Natural Greenspace (SANG) is different. Both accept that substantial developments, or development close to a protected site, may require SANG or bespoke measures in addition to SAMM, but leave the decision to project-level assessment.

E2.3 Neither strategy defines what constitutes a sufficiently large proposal or close proximity for that purpose. Neither applies an identified screening method to the strategic housing allocations, urban regeneration areas or other large site sources of supply. Neither provides a schedule of plausible SANG sites, available recreational capacity, delivery arrangements, funding and management. The 12.6km Severn Estuary and 6km Beech Woods zones identify where recreation effects may arise; they are not criteria for determining where SANG becomes necessary.

E2.4 There is no objection in principle to SANG being unnecessary for some, or even many, developments. Nor is there a requirement to acquire every SANG site before plan adoption. The omission is that Cardiff has not explained, at the level of evidence required to support the housing strategy, which principal developments can safely rely on SAMM alone and which may need an additional, achievable solution.

E2.5 That is not a question of administrative detail. For a large urban regeneration site with no land for on-site SANG, the absence of a deliverable off-site alternative may make planning permission unattainable. The risk is not only delay or an increased contribution: it is that assumed housing delivery may not be possible at all. The Inspectors asked for evidence addressing that risk. The September strategies do not provide it.

E3 Cardiff's own submissions expose a direct inconsistency

E3.1 The clearest evidence of the deficiency is now found in the Council's own September housing submissions. The Urban Capacity Study (AP2.2), paragraph 5.7, states that each of its 26 capacity-bearing sites lies within the Severn Estuary's 12.6km zone of influence. It anticipates contributions towards both SAMM and SANG on each site. Those sites have an identified residential capacity of 6,081 dwellings, including 1,110 at Adam Street car park and 1,000 at the Utilita Arena. The anticipation of SANG-related contributions does not establish that every site will require SANG. It does, however, demonstrate that the Urban Capacity Study considered SANG a potential development requirement, without establishing whether the full identified capacity can be delivered if such provision is needed.

E3.2 Yet AP2.2, paragraphs 5.8 and 6.6, proceeds on the basis that recreational mitigation is a financial cost and not a constraint on housing capacity. No site is discounted or has its yield reduced on that account. The study refers to a forthcoming SAMM/SANG study and the two proposed per-dwelling mitigation charges; the resulting Footprint Ecology Severn Estuary strategy (AP2.5) establishes a SAMM charge but no routine SANG contribution, no identified

strategic off-site SANG provision and no mechanism demonstrating how additional SANG would be made available if needed.

E3.3 This is not a difference in presentation. The Urban Capacity Study assumes a SANG-related contribution can be treated as an ordinary development cost, while the ecological strategy leaves open whether SANG will be required at all and provides no basis for assuming off-site capacity will exist. A financial allowance is not an alternative greenspace solution. Where SANG is necessary but unavailable, the obstacle to development cannot be absorbed by a viability appraisal.

E3.4 The Council's revised primary housing supply table (AP2.3e) compounds the problem. AP2.2 was originally commissioned to demonstrate a stock of capacity supporting a large-site windfall allowance of 3,929 dwellings. Its 6,081 identified dwellings were presented as the capacity reservoir, with 2,152 dwellings of headroom. AP2.3e instead imports the whole 6,081 as the large-site windfall component of expected housing supply. The full capacity of these 26 sites is thus counted in the revised supply, although the study has not tested whether any need for SANG would affect their ability to obtain permission. The increase from 3,929 to 6,081 also removes the delivery headroom which the Urban Capacity Study originally identified between expected windfall completions and the wider reservoir of opportunities. The availability of effective and achievable mitigation must therefore be considered against the larger contribution now claimed.

E3.5 The Severn Estuary strategy's Table 1 uses 5,537 Cardiff windfall dwellings, reflecting the earlier allowance, whereas AP2.3e provides 7,543 citywide windfall dwellings, including the revised 6,081 large-site component. These figures are not automatically comparable because one is expressed for the estuary catchment and the other citywide. However, AP2.2 specifically confirms that all 26 sites generating the 6,081 large-site capacity are inside the 12.6km zone. The 2,152-dwelling increase in that component is therefore within the zone, and AP2.5 does not demonstrate that its growth assumptions, funding denominator or conclusion about SANG have been reconciled with it.

E3.6 The inconsistency runs through to the principle of deliverability: AP2.2 anticipates SANG; AP2.5 makes no provision for it beyond a case-by-case possibility; and AP2.3e counts all the identified urban capacity as supply. These three propositions cannot be relied on together without a reasoned explanation of whether SANG is necessary and, if so, where it can actually be provided. That is the explanation now required.

E4 Neither mitigation strategy closes the evidential gap

E4.1 The Cardiff Beech Woods strategy identifies 2,577 additional dwellings within the 6km zone, including 970 on strategic sites. It proposes ranger provision, path works, signage, interpretation and monitoring. Those measures can usefully manage behaviour and access, but their description is not the same as a demonstrated conclusion that the additional recreational effects of the housing strategy will be avoided.

E4.2 The April 2026 HRA recognises that the particular attraction of the protected woodland may reduce the effectiveness of alternative greenspace for some visitors. That is an ecological reason to examine the balance between SAMM and SANG carefully, not a reason to leave that examination unexpressed. The September strategy also proposes directing recreation into woodland immediately adjoining the SAC, without clearly demonstrating the extent to which this would relieve rather than relocate recreational impacts.

E4.3 In the Severn Estuary strategy the absence of local visitor surveys is acknowledged. The 12.6km zone has been applied cautiously by reference to evidence elsewhere, with surveys and subsequent strategy reviews proposed. That is a defensible approach to identifying a provisional area of influence, but monitoring in future cannot establish today that additional SANG, if needed for the Plan's development, will be available. A plan-level judgment must be supported by the evidence available before it is made.

E4.4 The issue is not that Footprint Ecology has proposed no mitigation. It has specified a substantial SAMM package. The unresolved proposition is whether that package is sufficient for the new allocations, large windfall sources and remaining commitments upon which Cardiff's supply depends, or whether some of those developments require further avoidance measures for which no achievable solution has been established.

E5 The comparison with other authorities reinforces the point

E5.1 South Gloucestershire provides the most direct comparison. It addresses recreation impacts upon the same Severn Estuary across the same 12.6km zone of influence, including inland sites well beyond the immediate shoreline. Proposed Policy LPS11 addresses SAMM together with on-site or off-site SANG, and the Council has produced a separate SANG Delivery Strategy (HD/08) rather than leaving the provision question wholly open.

E5.2 As recorded in the South Gloucestershire examination submissions, HD/08 assesses 44 proposed allocations representing 7,096 dwellings within the zone and an indicative 135.31 hectares of SANG, as well as approximately 4,218 dwellings from existing commitments and 1,444 from windfalls. Natural England has endorsed the appropriateness of the Delivery Strategy through an addendum to its Statement of Common Ground; the adequacy of the proposed sites and the degree of certainty nevertheless remain contested. This is not evidence that every dwelling must be provided with a bespoke SANG, but it demonstrates the scale of the spatial and delivery exercise being undertaken elsewhere around the same estuary.

E5.3 Monmouthshire, also advised by Footprint Ecology, identifies a quantified SANG requirement of approximately 15 hectares for its HA2 Caldicot allocation of around 770 dwellings. The allocation's proximity to the estuary is relevant, but the South Gloucestershire exercise shows why that example cannot be dismissed as a special case confined to development closer to the shore line. The zone relevant to recreational effects is 12.6km, and the need for SANG should be considered across that area on an evidenced basis.

E5.4 For the woodland issue, the Chilterns Beechwoods SAC framework developed with Natural England combines SAMM and SANG with identified design, catchment and delivery requirements. St Albans' April 2026 HRA Addendum similarly considers prospective SANG capacity against housing allocations and their delivery programmes. Cardiff is not bound to copy those thresholds. It is, however, required to explain why its markedly less developed response provides the necessary ecological and delivery certainty.

E5.5 The pertinent distinction is thus not between English and Welsh policy. It is between an evidenced plan-level evaluation of whether mitigation is needed and achievable, and a statement that those questions may be answered on future applications. The former can properly support subsequent detailed design; the latter may leave the Plan depending on homes that cannot obtain the approvals needed to proceed.

E6 Existing commitments require a separate, proportionate audit

E6.1 Existing permissions should not be treated as if the September strategy could retrospectively reopen them. Much may already have been authorised and mitigated. The question for the examination is narrower: whether the remaining completions assumed in the housing supply depend upon further approvals or mitigation whose availability is uncertain, and whether the effects of that unoccupied development have been properly treated in the cumulative HRA.

E6.2 The Supreme Court in C G Fry & Son Ltd v Secretary of State [2025] UKSC 35 confirmed, in relation to sites to which the Habitats Regulations apply, that appropriate assessment can arise at reserved-matters or condition-discharge stages where an authorisation permitting the project to proceed is still required. The conclusion in any particular case depends on the operative permission and the decision outstanding; the judgment is not authority for treating every existing permission as reopened or for automatically imposing new SANG obligations.

E6.3 Plasdŵr illustrates the necessary enquiry. The Council has previously identified approximately 30.7 hectares of natural, semi-natural and informal open space and 56.3 hectares of existing woodland. The evidence should identify which remaining residential phases are within each recreational zone, what mitigation was assessed and secured under the original permissions, whether the greenspace has any demonstrable effectiveness as SANG for either protected site, and whether it has spare capacity beyond the needs it already serves. Green infrastructure for residential amenity is not automatically qualifying SANG.

E6.4 The same proportionate questions arise in respect of North East Cardiff, Junction 33 and other material commitments. Existing consents may be largely water under the bridge, but that does not justify disregarding a genuine residual approval risk or treating previously secured greenspace as spare mitigation capacity without evidence. This audit is subsidiary to, but supports, the central concern about new strategic allocations and large urban sites.

E7 The outstanding evidence is necessary to demonstrate housing deliverability

E7.1 The most acute risk lies with central and waterfront regeneration and other constrained urban capacity sites, which may offer little scope for on-site SANG. If off-site SANG is necessary, delivery depends on identifying suitable and accessible land, demonstrating its recreational capacity, obtaining the necessary rights and securing management over the required period. Neither a generic financial allowance nor a policy prohibiting harmful development establishes that such land or capacity is available.

E7.2 It is this risk that may undermine the Plan's assumed supply. The relevant question is not merely how much more a dwelling will cost if SANG is needed, but whether a lawful and effective mitigation route exists in time for the homes expected by 2036. The Avison Young viability study makes an allowance for SAMM but not a site-specific, costed and deliverable SANG solution. Its SAMM tariff assumptions also differ from the final Footprint Ecology figures; this relatively modest numerical issue should be reconciled, but is secondary to the missing spatial and delivery evidence.

E7.3 Where the Council argues that SANG is unnecessary for a particular allocation or large windfall source, it should provide the site-based ecological reasoning. Where it acknowledges that SANG may be needed, the Council should provide proportionate evidence of at least one feasible location or mechanism, available capacity, management and cost, and the implications for the

assumed housing yield and trajectory. An inability to demonstrate any feasible solution is not a detail that can safely be postponed to the application stage.

E8 NRW's advice and the action required from the Inspectors

E8.1 NRW's May 2026 Statement of Common Ground records agreement with the revised April HRA. The Footprint Ecology strategies and the revised urban-capacity and housing-supply material were submitted subsequently. Agreement to the earlier HRA should not be treated, without confirmation, as NRW's endorsement of the later decision to rely upon SAMM with SANG considered only case by case. The Inspectors should obtain NRW's explicit written advice on that decision and the revised growth evidence.

E8.2 Before treating HS2.4 and HS2.5 as discharged, the Inspectors should require: (i) a site-by-site assessment of the strategic allocations, substantial housing-led regeneration sites and large urban-capacity/windfall sources within each zone; (ii) evidenced reasons for concluding that SANG is unnecessary where that conclusion is advanced; (iii) identification, where necessary, of achievable SANG or equivalent provision with its land, capacity, timing, management and cost; (iv) a proportionate audit of material outstanding commitments and secured mitigation; and (v) a reconciliation of AP2.2, AP2.3e, AP2.5 and AP2.5a, with any consequential changes to viability, capacity or the housing trajectory. The results should also be cross-referenced to the Council's revised annual housing trajectory, so that any unresolved mitigation dependency is reflected in the timing and reliability of the supply relied upon.

E8.3 NRW should be asked whether the completed evidence is sufficient to support the requisite no-adverse-effect conclusion for each protected site, alone and in combination, and whether it agrees with the ecological basis for excluding strategic SANG in circumstances where the Council has not yet identified a delivery solution. Its opinion warrants considerable weight; the Inspectors must nevertheless assess the evidence and the separate deliverability implications.

E8.4 If that exercise demonstrates that SAMM alone is sufficient, Cardiff will have resolved the central point. If some developments need SANG, the Council must show that provision is achievable and properly reflected in the Plan's housing assumptions. If it cannot, the relevant development should not continue to be relied upon as deliverable on the present basis.

E8.5 The Inspectors asked whether the required mitigation could be provided and what its consequences were for housing delivery. The Council has answered how much its proposed SAMM package costs, while leaving the potential SANG requirement unresolved. AP2.2 anticipates SANG on each capacity-bearing urban site, AP2.3e now relies on their full 6,081 dwellings, and AP2.5 provides no corresponding SANG solution. On the evidence presently submitted, the Inspectors cannot yet be satisfied that the necessary mitigation is achievable in practice or that the regeneration-led housing supply is deliverable as assumed.

CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN

Annex F

Land at Thornhill Concept Plan

Examination submission • October 2026

Lightwood Strategic



LEGEND

1. Thornhill Station & New Electric Bike Hub
2. Caerphilly Road Express Bus Stop
3. Community Hub/Local Centre/ Neighbourhood Workspace
4. 2fFe Primary School
5. Destination Playspace & Dedicated Youth Allotments
6. Allotments
7. Forest School
8. Country Park
9. Self/Custom Build
10. Thornhill Cemetary Northern Extension

- Residential
- Existing Vegetation
- Proposed Planting
- Existing PRoW's
- Proposed PRoW's
- Strategic Cycle Network
- Bus Routes
- Cycling Hub Locations

LIGHTWOOD

LAND NORTH OF THORNHILL, CARDIFF

CONCEPT MASTERPLAN

JULY 2026