Findings & Comments from St Fagans Community Council.
Date 05/11/2026

St Fagans Community Council welcomes the new information provided by Cardiff Council. We believe that it clearly demonstrates the need for a new approach to delivering the level of new housing required by Cardiff.

1. **Population Forecasts**

It is our view that consideration of the Replacement LDP must include a fair and critical review of the existing LDP - what has worked well, what has succeeded and a realistic assessment of what has not worked well/and what has been unsuccessful. We also need to understand why. Without this, lessons will not be learnt, yet we see little indication that this has been done. What is clear from all the evidence is that simply making greenfield sites available will not deliver housing at the level required.

The latest information, particularly as detailed in the reports from Edge Analytics, Avison Young and Expedite, explain why the existing LDP has not delivered as expected. The Plasdwr development is some 10 years behind schedule, having been originally planned for completion by 2026. The information provides lessons to be learnt on population and household growth and what this means for the RLDP.

The existing LDP was formulated around population projections that have proven to be inaccurate, specifically they were much too high. It is crucial for the RLDP that the same does not happen again. Yet there is evidence to suggest that this is happening once more.

The ONS provides objective data. Their revised MYEs, which include downward revisions for earlier years, confirm the validity of Edge Analytics original warning to exercise caution on the highest population estimates. Far from increasing, Cardiff's population is declining, albeit only slightly, in line with the picture for Wales as a whole. The trend is that this will continue.

The revised MYE for 2025 (delivered in July 2026) is over 6,600 less than the WG estimate (and well below the projections used to justify the current LDP). The credibility of the revised MYE is sufficient for WG to revise their estimates so must be taken seriously and not dismissed. Indeed, the Chief Statistician in Wales is now planning to revisit the future population projections, and may revise these figures and change the methodology. Where does this leave the RLDP if it adopts a highly optimistic population projection as the basis for its strategy?

All the available evidence indicates that population growth or decline was, and continues to be, strongly influenced by international migration. When international migration is high there is population growth: low international migration obviously has the opposite impact. Net international migration reached a peak in 2022/23 of 9,895. By 2024/25 it had fallen to 1,000. We have seen nothing to suggest that it will return to previous peak levels. On the contrary, all the evidence is that it will continue to remain low, reflecting changes in UK Government policy.

There are, of course, many reasons why delivery on LDP Strategic Sites has been much slower than expected but it would be foolish to deny that lack of population growth was not a contributor.

We would propose that a "Low International Migration" scenario is a more appropriate basis for the RLDP, given the significant drop in international migration that we are now witnessing, underpinned by changes in UK Government policy that have increased the salary thresholds required for incoming migrants and have reduced the dependents that can accompany migrants such as students.

## 2. International Migration and the Nature of Housing Demand

We do not question Cardiff's urgent need for housing. The issue is where, what type and how confident we are that it can be delivered.

A recent House of Commons Library report using 2025 ONS data outlined the nature of international migration:

- 60% are students or seasonal short- term workers (who will require short-term rentals, probably taking over the short-term rentals of returning students or seasonal workers who are leaving),
- 34% are low skilled or not working (who will require low cost or social rentals),
- only 6% earn £42,000 or more (who may seek to buy a property).

This clearly shows that only a few, if any, of the migrants still coming will be looking to purchase properties. It is important that this is reflected in the housing demand estimates, yet there is little evidence that this is the case.

## 3. Affordability

New housing must be delivered where it is wanted and be affordable. Affordability has become a major problem in Cardiff. The Edge Analytics Report (Action Point HS1.5) reveals how house price growth in Cardiff is outstripping growth in earnings, leading to worsening affordability rates. Figure 6 shows that the gap between the Earnings Index and the House Price Index has been growing steadily since 2001. During the same period owner occupation has declined from 69% to under 60%. This suggests that affordability is a significant issue in Cardiff. Residents faced with affordability concerns are more likely to favour dwellings with existing public transport over sites which require reliance on the car (such as those strategic sites in North West Cardiff where public transport is limited). They may also favour neighbouring cheaper authorities such as Caerphilly, Barry or Newport. Indeed this is likely to be already happening as Cardiff is experiencing net internal migration of -471.

Affordability is often spoken of purely in terms of the non-market percentage of homes to be provided as part of a development; but it is much wider. New market homes are only of value to meeting a city's housing demand if they are within the purchasing ability of the home buying public. As the Edge Analytics Report states, Cardiff is experiencing worsening housing affordability. We were surprised to read the Avison Report claims Cardiff's housing market is showing resilience even though 'affordability remains a challenge'. According to the ONS, property sales in Cardiff for the 12 months to March 2026 were 4,181, less than in any of the previous 6 years. It is comparable to 1995, 4,239, and considerably less than many intervening years.

We submit that this suggests a slightly less optimistic picture, something confirmed by other statements in the Avison Young report, for example that the market continues to function 'at broadly sustainable levels with buyers remaining active where pricing and affordability align'. Evidence suggests that pricing and affordability do not align on the allocated sites. According to the ONS, the average house price in Cardiff in August 2026 was £272,000. Obviously many factors combine to reach an average figure, but this is less than the starting price for dwellings on several allocated sites. For example, Barratt advertise Bryn Coedlan at £280,000-£560,000 and Afon Las @ Plasdwr at £359,000-£482,000; David Wilson advertise Bryn Coedlan at £399,000-£730,000. Redrow Lisvane prices range from £530,00-£773,000.

We understand the need for developers to make a profit, and viability will reflect this and the total costs of development. Avison Young state that some greenfield sites 'now experience viability constraints ….. highlighting the impact that changing market conditions have had on development economics'.

The result is allocated site dwelling prices that will appeal to, and be affordable for, only a minority of the population. According to the Homello housing portal, 69% of all sales were in the price range £125,000-£350,00. The ONS state that the average price paid by first time buyers is £265,000. Avison Young refer to a 'growing demand for a broader range of housing products, including apartments, rented accommodation and higher density residential development.' It is clear that this 'growing demand' is not being met on greenfield allocated sites, nor are properties being delivered for first time buyers.

## 4. Windfall Sites

The Expedite study at HS2.2 reminds us:

- Planning Policy Wales states that Planning Authorities are required to prioritise use of suitable and sustainable previously developed land and under-utilised sites within existing boundaries in advance of other land.
- Future Wales references the importance of sites within existing boundaries proximity to existing (and planned) public transport nodes.

Most windfall sites will be brownfield. Much is often made of the uncertainty surrounding windfall sites coming forward. Combined with the claimed added cost of developing brownfield sites, extra time to start-up etc it is easy to be sceptical about the reliability of the contribution windfall sites will make to housing delivery.

The Expedite Report at HS2.2 makes it clear that windfall delivery within Cardiff is both reliable and significant. In the last 10 years 90% of windfall completions were on previously developed sites and accounted for 66% of total completions. In all but one year since the LDP was approved in 2016 windfall sites exceeded completions on allocated sites. This strongly suggests that it is wrong to question the reliability of windfall sites.

There has been a move from industrial redevelopment sites to higher density urban living sites. This is consistent with the trend towards urban living, with people including young professionals, wanting to live in affordable, close knit communities, with all services and social places within walking distance.

One question to be answered is whether the windfall and other brownfield sites will come forward and deliver at the rate and density required. We suggest that there is sufficient evidence to believe the sites will deliver. For example:

- Porth Teigr: Savill's conclude that 'we consider the site demonstrates sufficient viability for re-allocation in the RLDP, notwithstanding profit margins are below standard commercial levels, noting its potential for enhanced contributions to affordable housing, employment and public realm improvement.'
- Eastgate House: rated as medium because the upper floors are still occupied even though a pre-application for conversion of these floors to residential indicates a clear statement of intent.
- Former Tax Office, Llanishen: rated medium even though owned by the Council because there is no adopted allocation, masterplan or live application (and possible contamination issues to be resolved).
- NCP Adam Street Car Park is described as medium although 13 of 16 titles are held by one active developer and a pre-application recorded. The site will move to High if the pre-application is confirmed and the other titles are acquired.
- Plot 6 Pierhead Street: rated as medium even though the land is a vacant site in Council ownership because access roads and roundabout are in 3rd party ownership.
- Utilitia: rated as medium because development cannot start until after replacement facility is in place (planned for 2028) which possibly limits ability to contribute within plan period.

Obviously there are numerous other sites under consideration and interpretations of issues involved in all sites will vary; but we suggest that the examples above demonstrate that a perhaps overly conservative approach is being taken when assessing the potential for sites to come forward. The approach is clearly not an over optimistic one based on hope rather than realism. This makes the figures and assessments credible.

## 5. Conclusion

In conclusion, we recommend that:

- In order to learn from the experience of the current LDP, a lower population projection should be used as the basis for the RLDP. We would propose that a “Low International Migration” scenario is a more appropriate basis, given the significant drop in international migration that we are now witnessing, and the changes in UK Government policy with regard to future international migration.

- Account is taken of the nature of demand arising from those international migrants that do settle in Cardiff. This is likely to be primarily demand for student accommodation and short-term rentals (where new students and seasonal workers will likely replace existing students and seasonal workers), and low cost or social rentals. Very little demand is likely to arise from international migrants for large private houses in green field sites on the edge of Cardiff.

- Greater heed is taken of the affordability problem with regard to much of the proposed housing development in Cardiff

- It is accepted that windfall sites, many of which will be brownfield, will make a reliable and significant contribution to the RLDP.

St Fagans Community Council
November 2026