HBF Home Builders Federation
Cymru | Wales

Consultation Response

About HBF

The Home Builders Federation represents home builders in England and Wales. HBF's members build the majority of new homes built in England and Wales each year. Its membership includes national developers and hundreds of SME builders.

Representor ID no. – 1255

Hearing session 1

Action Point HS1.5 Edge report

HBF notes that at Para.2.4 - the 2022-based population projections estimate a higher level of population growth over the 25-year projection period compared to the population projections that underpinned the 2018 projections. However, this has not resulted in a conclusion that the level of dwellings proposed should be increased.

The evidence is suggesting an increase yet the dwelling requirement figure stays the same.

The HBF notes that the Edge evidence emphasises the need to treat the latest data with caution particularly with regard to migration (noting the text highlighted. IN HBF's view this was clearly a reason why a higher housing requirement figure was not proposed:

5.6 Within the May 2026 Edge Analytics study, it was recommended that **caution should be exercised in relation to the 2022-based WG** Principal, High Population and Low Population scenarios, due to their dependence upon the unprecedented levels of international migration captured between 2021/22 and 2023/24.

5.7 **This recommendation has been reinforced by the revised MYE and the significant drop in net international migration in 2024/25, as well as the differences between the MYE and the population projected by WG in its Principal projection between 2022 and 2025**. WG has also announced plans to review its population projections in light of these differences.

However, this same caution is not recommended in Edges report relating to the Newport RLDP which is current being consulted on:

NEWPORT CITY COUNCIL Demographic Evidence Update July 2026 (V2)

E14 For RLDP purposes, greater weight should be placed on the WG 2022-based Principal projection, Trend-10yr and Trend-15yr scenarios, and mid-range Dwelling-led scenarios. These offer a more stable basis for selecting a realistic and flexible growth strategy that avoids reliance on short-term migration anomalies while remaining responsive to longer-term structural growth pressures.

The HBF notes that in the Newport scenario the housing figure was increased following a review of the latest 2022 figure, accordingly HBF would question the different approach taken.

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Hearing session 2

Urban Capacity Study

HBF notes that at Para7.10 Two sites carry a third of the capacity identified.:

- *Para 7.11 'The existing arena is expected to become surplus to requirements on the opening of its replacement.' As the Council own the site it seems strange to say 'expected'?*
- *7.12 NCP Adam Street car park. 7.13 notes ownership is fragmented. HBF would suggest there is a known shortage of car parking in Cardiff, so why develop the site?*

In HBF views the two site above which account for a third of that capacity have no guarantee of coming forward.

In terms of the final figure of 6,081 HBF suggest the following:

- *The low confidence rating number removed – 608 units.*
- *In terms of the 6-10 years period will the larger sites be able to deliver all the units during the plan period? Accordingly suggest the two 1000 unit sites be reduced.*

Action Point HS2.4 – Cardiff LDP Viability Testing, Avison Young, September 2026

HBF notes that the SAMM/SANG cost have increased from £333.94/ dwelling to £555.75 (Urban Capacity Study Report and Appendices, Expedite, September 2026)

No details of what additional cost have been allowed for in the viability study, SuDS Building Regs Part L&F, SuDS, Fire Sprinklers, EV charging. Note that some but not all of these are included in the table at para.5.2.1

Action Point HS2.5 – Cardiff and the Vale of Glamorgan Severn Estuary Recreation Mitigation Strategy 2026, Footprint Ecology, September 2026 Appendix 3 Costs

HBF questions why some costs are shown as 50 years and others 80 years, the impact will remain for the life of the proposed development. Although para 4.11-4.13 of the report cover this issue HBF are not convinced that these should not be considered as an ongoing cost over the life of the development.

If 80 years were applied to the four cost areas identified as only 50 yrs it would increase total costs by £1,442,250 or £113 per dwelling.

Also, will the inability to pool S106 contributions (para. 4.9) affect the level of contributions asked for particularly on larger schemes. As regardless of the pooling constraints the cost of the mitigation remains the same.

SOCG02-Statement-of-Common-Ground-between-the-Council-and-Associated-British-Ports-ABP

Although it is not HBF's role to comment on individual sites due to the size of this site and the numbers it contributes to the plan it would make the following comments:
Given the opportunity that Cardiff have had to work with ABP it appears strange that they have not been able to agree a masterplan for the site which takes account of ABP's concern about the relationship between the proposed new development and the operational docks. In HBF's view this level of continued uncertainty leads to doubts over how many units this site will deliver within the plan period.

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Schedule of Proposed Changes to the Replacement LDP Deposit Plan October 2026

PPC41 Policy HF3

HBF questions what is the definition of 'major development'?

HBF notes that 10 units ius used in national policy but the council use 25 units in Policy WL1 Welsh Language of the Plan.