Cardiff RLDP Examination

Reconvened Hearing Session 1 Dec 2026

Housing Numbers Update

Redrow Homes South Wales

04 November 2026

LICHFIELDS

31112/79/CK/GW
41786188v1

Contents

1.0 Background **1**

Test 1: Does the plan fit? 1

Test 2: Is the plan appropriate 1

2.0 Does the Housing Need Figure Need to be Changed in the light of the 2022-based local authority household projections **2**

Edge Analytics – Cardiff Demographic Evidence Addendum (Sept 2026) 2

3.0 Inconsistency between the Council's proposed housing requirement figure and RLDP Policy Objectives **5**

1.0 Background

1.1 This submission is made on behalf of our client Barratt David Wilson Redrow Homes (BDWR) - formerly Redrow Homes. It should be read in conjunction with our previous representations to the deposit draft Cardiff RLDP and Hearing Statement 1 on Housing Numbers.

1.2 Lichfields has not sought to repeat our previous submissions instead this paper primarily considers the implications of the Cardiff Demographic Evidence Addendum prepared by Edge Analytics on the Council's proposed housing requirement figure.

1.3 Lichfields representations to the Cardiff RLDP question whether the proposed housing requirement figure and its evidence base are consistent with the following tests of soundness:

Test 1: Does the plan fit?

- Does it have regard to the national policy (PPW) and the WSP (NDF)

Test 2: Is the plan appropriate

- Is it supported by robust, proportionate and credible evidence?
- Does it seek to meet assessed needs and contribute to the achievement of sustainable development?
- Are the vision and strategy positive and sufficiently aspirational?
- Is it logical, reasonable and balanced?
- Is it coherent and consistent?

2.0 Does the Housing Need Figure Need to be Changed in the light of the 2022-based local authority household projections

Edge Analytics – Cardiff Demographic Evidence Addendum (Sept 2026)

Membership Rate Adjustments

2.1 In our previous representations Lichfields requested that Council consider the implications of adjusted Household Membership Rates on their assessment of housing need. Our case being that the Council's housing requirement figure fails to factor in 'policy on' adjustments consistent with the RLDPs stated objectives. This request was picked up by the Inspectors in Action Point HS1.5 arising from Hearing Session 1.

2.2 The specific justification for a review of household membership rates is the general acceptance that rates of new household formation in younger age groups have been supressed by difficulties in accessing the housing market. The Edge Analytics Addendum summarises the key reasons and implications in paragraphs 2.17 to 2.23 of their addendum. Lichfields generally agree with this analysis.

2.3 In Lichfields view if the RLDP is to properly meet assessed needs in a sufficiently aspirational way then it should plan to enable improved access to the housing market for younger individuals and families. Lichfields is aware that Monmouthshire County Council asked to Edge Analytics to include this policy aspiration as part of the modelling that formed the evidence base for their RLDP that has recently been Examined. As such the housing requirement figure in that draft plan was adjusted to reflect 'policy on' aspirations.

2.4 Edge Analytics Addendum Table 9 highlights that depending upon the scenario the average annual dwelling growth (2021-2036) would be between 150-170 dwellings higher if the adjusted household membership rates are applied. This equates to an uplift of 2,250 to 2,550 homes over the RLDP period against the trend-based membership rates.

Demographic Scenarios

2.5 In Table 6 Edge Analytics present updated Cardiff scenario population growth outcomes based on revised information from Welsh Government and latest population Mid-Year Estimates (MYE). In Table 8 these are converted into household growth scenarios and in Table 9 average annual dwelling growth scenarios.

2.6 The central theme that Edge Analytics raise is that the latest rates of net internation in-migration have reduced significantly from the levels seen 2021-2024. They also note in paragraph 3.2 that the population of Cardiff reduced between 2024-2025 based on MYE data and this trend was reflected across Wales.

2.7 Edge Analytics conclude in paragraph 5.10 that the RLDP housing requirement figure of 1,600 dwellings per annum is still considered a reasonable growth target for Cardiff and sits within the middle of the range of outcomes. They express caution over the scenarios that

generate higher dwelling growth outcomes due to their reliance on unprecedented growth linked to internation migration.

2.8 Lichfields note that all of the scenarios listed are essentially trend-based projections either generated by Welsh Government or by Edge Analytics. The only 'policy on' adjustment is the inclusion in the addendum of the household membership rate adjustments.

2.9 Whilst it might be that UK level policies have recently resulted in reduced levels of international net in-migration the question for the Council is whether it wishes to achieve RLDP policy outcomes that encourage household growth in Cardiff above longer term past trends or simply to repeat them?

2.10 Lichfields understand that the majority of net international net in-migrants are people of working age. It could be argued that this in-migration is of importance within the context of a region with an aging population and economic growth ambitions.

2.11 Lichfields notes that the Council's preferred strategy also has implications for labour market growth. Based on the dwelling led 1,600 scenario Table 7 identifies Labour Force Change of 2021-2036 of 26,801 (1,786 per annum) and annual average modelled employment growth 2021-2036 of 2,151 per annum. Both rates are below average job growth over the previous ten-year period (2014-2024) of 2,450 jobs per annum.

2.12 The Edge Analytics trend-15yr MYE scenario would result in Labour Force change of 22,333 2021-2036 (1,489 per annum) or annual average modelled employment growth of 1,946. Again significantly below average job growth of 2,450 in the previous 10 years.

2.13 It is accepted that it is not a linear relationship between population growth and employment growth but if Cardiff is to be the economic driver of the region with the CCR which is seeking enhanced job growth it would be anticipated that the preferred growth strategy would support labour force growth at least in line with past trends.

Backlog of affordable housing needs

2.14 Further to our deposit plan reps and subsequent hearing session statement Lichfields continue to argue that an adjustment is required beyond the newly arising needs dwelling estimates set out by Edge Analytics.

2.15 It is noted that the Council's 2025 LHMA is based upon the 2018 household projections. If the Council updated the LHMA to include the 2022 based household projections the range of assessments of affordable and market housing need would be significantly higher.

2.16 The LHMA sets out a range of additional housing needs estimates in section 4. For the first five years of the LHMA period the range of net annual affordable housing need is from 854 affordable dwellings using the 2018 WG Lower Variant Household projection to 1,334 affordable dwellings using the Councils USER household projections. These equate to between 53% to 83% of the Council's preferred annual housing requirement of 1,600 dwellings per annum.

2.17 If the housing requirement is to remain at 1,600 dwellings per annum levels of affordable housing delivery will be well below the assessment of need identified in even the lowest of the LHMA scenarios.

2.18 The scenarios tested in the LHMA identify existing unmet affordable housing need as being 1,680. This equates to 112 affordable dwellings per annum before any account is made of newly arising affordable housing need.

3.0 Inconsistency between the Council's proposed housing requirement figure and RLDP Policy Objectives

3.1 It is clear from the objectives in the deposit RLDP that the Council is seeking to deliver improved outcomes for the City in terms of both housing delivery and economic growth.

Objective 1: To provide a variety of quality low carbon homes to address the housing crisis and future housing needs.

Objective 2: To provide space for more jobs and maximise Cardiff's role as the capital city of Wales and the economic driver of South East Wales to improve the prosperity of the region.

3.2 In Lichfields view the Council should be taking the trend-based projections as a starting point and then adjusting them to secure delivery of the plan's objectives. These adjustments should include:

- An uplift to reflect backlog of affordable housing needs as well as newly arising affordable need;
- adjusted household membership rates to allow more young adults to access the housing market;
- secure an increased labour force broadly consistent with economic objectives of the RLDP, CCR and Future Wales.

3.3 Whilst Lichfields acknowledge that Welsh Government has signalled further updates to household projections the 2026 projection suite remain the latest published data sets and the starting point for consideration of the RLDP dwelling requirement figure.

3.4 Lichfields consider that the housing requirement figure should be seeking to deliver household growth above long term past trends if it is to be in accord with the RLDP economic and housing objectives as well as wider Future Wales and CCR aspirations.

3.5 In Lichfields view a housing requirement figure of 1,850 per annum would better reflect the RLDP objectives. It allows for a modest level of population and household growth above longer-term trends as well as an uplift to accommodate adjusted headship rates and address backlog of affordable housing needs.

3.6 The range of scenarios set out in Figure 11 of the Edge Analytics addendum only include for the adjusted headship rates. If the other 'policy on' elements described above are added in to reflect addressing the housing crisis and to drive the economic growth of the region then the Council's preferred dwelling requirement is unlikely to sit within the middle of the range of outcomes.

Cardiff RLDP Examination Hearing Session 2

Redrow Homes South Wales

05 November 2026

LICHFIELDS

31112/79/CK/GW
41793724v1

Contents

1.0 Revised Figure 11 – Summary Housing Table 1

Completions and Landbank 2

Allowances 2

Strategic Sites Policy H1A & H1B 2

Housing-led Regeneration Areas (Policy H2) 2

Conclusion 3

1.0 Background

1.1 These representations have been submitted on behalf of Barratt David Wilson Redrow Homes (BDWR) – formerly Redrow Homes (Representor 77) in response to the consultation documents:

- Cardiff Replacement Housing Trajectory April 2026
- Revised Figure 11 Summary Housing Supply Table

1.2 They should be read in conjunction with our Hearing Statement submitted to Session 2 – Housing Strategy.

2.0 Revised Figure 11 – Summary Housing Table

Completions and Landbank

2.1 It would be helpful if the Council could set out completions by year 2021 to 2026. The updated Housing Trajectory table records 1,176 completions 2025-2026. If these are added to the previous stated completions to 2025 the total completions 2021-2026 would be 6,613? Row 4 of the Council's updated table records 6,751 completions 2021-2026.

2.2 Row 5 of revised Figure 11 records 2,604 homes currently under construction as of 1st April 2026. Column K in the updated Housing Trajectory records 2,511 dwellings as being under construction?

2.3 Row 6 of revised Figure 11 records 17,103 homes as having planning consent and not implemented (as at 1st April 2026) and anticipated to complete during the plan period. This does not match the figure from the updated Housing Trajectory spreadsheet. Dwellings not started but anticipated to be completed 2027 to 2036 are listed in columns L to U. These total 15,682.

2.4 Based on the above Lichfields calculate the Completions and anticipated 'Landbank' subtotal to be 21,670 homes rather than 23,037.

Allowances

2.5 Lichfields acknowledge that the Council has undertaken an extensive urban capacity study to assess potential sources of windfall supply. This does not mean that the Council should assume that all of these sources of supply will come forward within the plan period.

2.6 In Lichfields view the urban capacity study provides verification that the Council previous assumptions that large windfall sites can come forward at the rate proposed of 437 dwellings per annum.

2.7 Lichfields believe that the large windfall figure should be 3,493 across the balance of the RLDP period 2026-2036.

2.8 The allowances sub total in row 17 of revised figure 11 should in Lichfields view be 4,955.

Strategic Sites Policy H1A & H1B

2.9 The sites listed under rows 18 and 19 totalling 1,560 (1,470 + 90) are all set out in the updated Housing Trajectory table and contribute to the total housing supply set out in row 6. This double counting should be removed from updated Figure 11.

Housing-led Regeneration Areas (Policy H2)

2.10 It is noted that the Council has made minimal changes to the sites listed and discussed at the previous Examination Hearing.

Conclusion

2.11 Based on the above Lichfields notes that there remain significant discrepancies between the Council's Revised Figure 11 Summary Housing Table and the detailed updated Housing Trajectory required by Action Point HS2.1 and HS2.7

2.12 As a result, Lichfields consider that the Council has significantly overestimated its housing supply by at least 5,000 homes. This makes no allowance for the discussion around the Housing-led Regeneration Areas.