Persimmon Homes

Cardiff Council RLDP Consultation on Further Information – Statement 1

Date of report: October 2026

PREPARED FOR

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Contents

1. Introduction 2
2. Housing Numbers 3
   Flexibility Allowance 3
   Demographic Addendum 3

Document History

Issue	Date	Issued by	Comment
1.0	23 October 2026	LS	Draft
2.0	5 November 2026	LS	Final

1. Introduction

1.1 The Cardiff Replacement Local Development Plan (RLDP) is currently undergoing Examination by independent Planning Inspectors. Following Hearing Sessions 1-15 the Council was required to undertake additional work on a range of matters arising from discussions at the Hearing Sessions.

1.2 Savills is instructed by Persimmon Homes (East Wales) ('Persimmon') to submit a Statement in response to matters that arose from the Cardiff Replacement Local Development Plan Examination Hearing Sessions, and additional information and proposed changes to the RLDP.

1.3 This statement should be read in conjunction with previous responses prepared by Savills and Persimmon. These include:

- Cardiff Council Local Replacement Local Development Plan - Call for Sites. Land at Bridge Road, Old St Mellons (Savills, August 2021);
- Replacement Local Development Plan – Strategic Options Consultation (Savills, February 2022);
- Replacement Local Development Plan – Preferred Strategy and Stage 1 Candidate Site Assessment Consultation (Savills, October 2023); and
- Cardiff Council Replacement Local Development Plan 2021–2036 Deposit Plan (Savills, April 2025).
- Cardiff RLDP Examination Hearings - Session 1 Statement (Savills, June 2026, ref. HS1.05).

1.4 This statement will comment on the following additional information:

1. Revised Figure 11 Summary Housing Supply Table
2. Cardiff Demographic Evidence Addendum (September 2026)

2. Housing Numbers

Flexibility Allowance

2.1 As previously outlined in representations, Persimmon maintains their view that a 10% flexibility allowance is inadequate and should be a minimum This is outlined in The Development Plans Manual (Edition 3) where it says that a 10% figure for the flexibility allowance should be considered as the "starting point" with any deviation required to be robustly evidenced.

2.2 A higher flexibility allowance is necessary to provide an effective contingency against delays, under-delivery, or non-delivery of allocated sites. Given the inherent uncertainties associated with housing delivery (such as possible planning and legal agreement delays, land ownership constraints, changes in market conditions and viability issues), a flexibility allowance of only 10% may be insufficient to ensure that the Plan's housing requirement is met throughout the plan period.

2.3 Past evidence shows that Cardiff has underdelivered on housing targets in the Adopted LDP. Table 21A of the most recent available Annual Monitoring Report (AMR), which is the 9th AMR, records housing completions over the Adopted LDP plan period thus far and forecasts completions through to the end of the plan period in 2026. Against the requirement of 41,415 homes over the whole of the Adopted LDP plan period, Table 21A shows that 26,245 homes would have been completed, equating to 63.4% of homes that the Adopted LDP planned for.

2.4 This means that Cardiff is forecast to fall 36.6% short of their housing allocations.

2.5 The third test set out in the Development Plans Manual (2020)[1] is that a plan must be deliverable. This includes consideration of whether the plan is sufficiently flexible and whether appropriate contingency provisions are in place. Persimmon argues that the proposed flexibility allowance of 10% undermines the Plan's flexibility and fails to provide an appropriate contingency to account for potential delays, under-delivery, or non-delivery of allocated sites.

2.6 Persimmon recommends that a 25% figure should be used for flexibility.

Demographic Addendum

2.7 This addendum by Edge Analytics was prepared in response to the Cardiff RLDP Examination Action Point HS1.5. It specifically considers whether improving rates of household formation among younger adults would justify higher housing requirements. It also updates demographic evidence using the latest population estimates and migration data.

2.8 The report concludes that the current RLDP target of 1,600 dpa remains a reasonable and appropriate target for Cardiff. The report argues that higher housing requirements are generated mainly by scenarios relying on exceptionally high recent international migration levels and those higher-growth scenarios should be treated with caution because the latest evidence suggests migration levels are already falling.

2.9 Importantly, however, Edge accepts evidence of housing market suppression and contends that improving household formation increases housing need. The 2022-based rates have been adjusted in the young adult (19–39) age groups, increasing the proportion of 1-, 2-, and 3-person households. Applied in the scenario modelling, these adjustments result in higher levels of household growth and higher dwelling growth outcomes.

[1] https://www.gov.wales/sites/default/files/publications/2020-03/development-plans-manual-edition-3-march-2020.pdf

2.10 Several adjusted scenarios produce figures around 1,800-1,900 dpa, comfortably above the Plan requirement[2].

2.11 Edge has also demonstrated that, once reasonable household formation adjustments are made to address overcrowding, concealed households and affordability pressures, the official Principal projection supports close to 1,900 dwellings per annum rather than 1,600.

2.12 Planning Policy Wales Edition 12[3] paragraph 4.2.6 is clear that the latest Welsh Government local authority level Household Projections for Wales should be used to set development plan housing requirements.

2.13 The latest official projection remains the Welsh Government 2022-based population and household projections (published 2025, corrected in 2026). The principal projection forecasts 15.8% population growth between 2021-2036, around 1,758 dpa using unadjusted household assumptions, and around 1,923 dpa using the adjusted household formation assumptions tested in the addendum. The latest official projection is the WG 2022-based Principal projection, and therefore the Plan should give significant weight to it.

2.14 Persimmon maintains its argument that the current requirement of 26,400 homes (1,600 per year) is too low and lacks ambition for a capital city in a National Growth Area. The RLDP should therefore adopt the highest growth option to address accumulated need and previous under-delivery.

2.15 The housing requirement should be policy-led as well as evidence based. Persimmon argues that even if demographics alone do not require a higher figure, Cardiff's strategic role within a National Growth Area should support a much more ambitious housing requirement.

[2] Shown in Figure 11: Cardiff scenario dwelling growth summary, of the Cardiff Demographic Evidence Addendum (Edge Analytics, September 2026)

[3] https://www.gov.wales/sites/default/files/publications/2024-07/planning-policy-wales-edition-12.pdf

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Cardiff Council RLDP Consultation on Further Information – Statement 2

Date of report: October 2026

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Contents

1. Introduction 2
2. Urban Capacity Study 3
3. Housing supply 7

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- Cardiff Council Replacement Local Development Plan 2021–2036 Deposit Plan (Savills, April 2025).
- Cardiff RLDP Examination Hearings - Session 2 Statement (Savills, June 2026, ref. HS2.03)

1.4 This statement will comment on the following additional information:

a) Cardiff Urban Capacity Study (incl. appendices)
b) Revised Figure 11 Summary Housing Supply Table

2. Urban Capacity Study

2.1 The Inspector's Examination Action Point HS2.2 requests the LPA to "*carry out an urban capacity study to identify the vacant/under-utilised sites and sites on arterial routes and public transport nodes the Council referred to in the Hearing. Identify ownership and any constraints to delivery.*"

2.2 The Cardiff Urban Capacity Study (CUCS) has therefore been prepared in response to Examination Action Point HS2.2. The purpose of the study is to identify sites within the Cardiff urban area falling within those basic categories, to establish ownership, and to identify the constraints and opportunities to their delivery. This should mean that the Council's position on the contribution of windfall development may be tested against specific sites rather than against projection alone.

2.3 The CUCS was prepared specifically to demonstrate that there are sufficient identifiable urban sites capable of delivering the proposed windfall housing supply.

2.4 The study identifies capacity for 6,081 dwellings across 26 urban sites. The RLDP's large-site windfall allowance is 3,929 dwellings. The identified capacity therefore exceeds the allowance by 2,152 dwellings, representing 1.55 times the required amount.

2.5 The 5 largest sites by dwelling capacity identified in the Cardiff Urban Capacity Study are:

Site	Capacity (dwellings)
NCP Adam Street Car Park (S19)	1,110
Utilita Arena Cardiff (S31)	1,000
NCP Knox Road Car Park (S20)	441
Land north of John Street, Butetown (S56)	417
Land at Custom House Street (S55)	400

2.6 Together these five sites account for 3,368 dwellings, which is around 55% of the total identified capacity of 6,081 dwellings. They are all located in Cardiff City Centre, and will all be flats.

2.7 The study itself notes that the two largest sites, NCP Adam Street Car Park and Utilita Arena Cardiff, together provide 2,110 dwellings and make up around 35% of the total capacity identified.

2.8 However, there are clear issues with this approach and Persimmon argue that they are not realistically deliverable over the plan period (**which ends in 2036 – less than 10 years from adoption of the plan**). The reasons are explained below.

Limited range and choice

2.9 Firstly, the top five sites totalling over half of the 6081 sit in the "hardcore" City Centre, with all five located within the proposed Central & Bay Business Area allocated by the Replacement LDP.

2.10 Research undertaken by Lichfields in June 2022 (Banking on Brownfield Research Paper)[1] explores issues with a "brownfield-first" or "brownfield-only" approach which risks under-delivering housing. The report contends that Brownfield strategies often deliver the wrong type of housing. Brownfield developments tend to be high-density flatted schemes. The report estimates that 48% of potential brownfield homes would be flats or apartments, whereas only around 17% of households are likely to live in that type of accommodation. This creates a mismatch between what these sites can typically provide and market demand, particularly for family housing with gardens.

2.11 As stated above, the five biggest sites of the CUCS, totalling over half of the allowance, identify high-rise, high-density developments in the city centre. This severely limits the choice available across the whole Cardiff urban area.

2.12 **Given the plan's timescales, it is virtually impossible to see how all sites can be developed in the next ten years**.

Development Constraints

2.13 At this stage, the urban capacity study does not identify the viability of these sites or any constraints that could limit development.

2.14 The study itself notes that the appraisals are basic and high level.

2.15 They are intended to establish whether a site is capable housing development, not to demonstrate that any particular scheme would be granted permission. The identification of a site does not indicate that the Council would support development on it, and the absence of a site does not indicate that it is incapable of development.

2.16 Specific issues in relation to the top three largest identified sites are outlined below.

Utilita Arena

2.17 The site is occupied and fully operational, with events scheduled into late 2026, at least. The timescales are reliant on the progress of the Atlantic Wharf Arena targeted to open in 2028.

2.18 The report declares medium confidence in the site due to its availability reliant on the completion of the replacement facility. No application or masterplan has yet been brought forward for this site.

2.19 Additionally, the relationship of the adjoining car park, which is not in Council ownership, to any comprehensive scheme has not been established.

Adam Street

2.20 This site is currently in active use as a car park. It has fragmented ownership (16 separate titles across 4 owners). There is no public evidence of a live development proposal, marketing exercise, or planning application by the land promoter to suggest that there is any intention of developing the site.

2.21 The site also faces a number of environmental constraints. There is the potential for hydrocarbon contamination, following its long-term use as a car park. Additionally, air quality has not been assessed, which would be material to an application considering the site's proximity to Adam Street, the Central Link corridor, and the Cardiff Central to Newport railway. The appraisal states that '*On a car free or low parking city centre fringe scheme this is not expected to be determinative.*'

[1] https://lichfields.uk/media/7062/banking-on-brownfield_jun-22.pdf

2.22 This means that the assessment is reliant on Cardiff being a 'car free or low parking city centre', which is not realistic expectation to achieve during the coming plan period.

2.23 Lastly, the site faces noise issues as it adjoins an active railway corridor (Cardiff Central–Newport line) as well as the Utilita Arena, which whilst also identified as a potential windfall site and there is no certainty of its redevelopment. Potential event-related noise and rail noise constraints for any sensitive (e.g. residential) redevelopment will need to be considered.

2.24 Overall, the report declares medium, rather than high, confidence in the site.

NCP Knox Road

2.25 The site is currently occupied and in active commercial operation as a car park and therefore is not available for development.

2.26 Similar to the Adam Street site, the site also faces a number of environmental constraints. There is the potential for hydrocarbon contamination, following its long-term use as a car park. Air Quality has also not been assessed. The site is located off Fitzalan Place and Newport Road, the A4161, which is a principal arterial route into the city centre. The appraisal states that *'on a car free or low parking city centre fringe scheme, and on a site whose existing use is the storage of vehicles, this is not expected to be determinative',* which as stated above, should not be relied upon until the Council have made active policy-based efforts to reduce.

2.27 The appraisal also states that redevelopment removes a vehicle destination from the local network, which is a benefit rather than a burden in air quality terms. Persimmon state that this removal would be negligible, as the introduction of circa 450 dwellings as part of the redevelopment will have an impact on city centre-based traffic and parking in its own right.

2.28 The site is highly unlikely to deliver 450 flats.

2.29 Noise has not been assessed in detail. Due to being located off a principal arterial route into the city, the surrounding area is a high traffic zone. Detailed noise assessments are required to consider the site's suitability for redevelopment (for any scheme).

2.30 The report rates the site at Medium rather than High because the site remains in active leasehold commercial operation and the two intersecting leasehold interests must be determined before development can proceed. This is because the inception schedule records the operator as being in administration which introduces uncertainty as to timing and as to who controls the interest, and because demolition of the multi-storey structure is a material abnormal cost on a scheme which makes the Viability Assessment marginal.

2.31 It is evident from the above that the sites in question face issues with their deliverability and therefore should not be relied upon for the RLDP.

Uncertainty

2.32 Windfall sites, as identified by the CUCS, should not be relied upon as the degree of certainty is limited.

2.33 None of these sites are allocated in the new LDP, and their delivery is very uncertain – especially for the next 10 years. From the above analysis of the top three CUCS sites, a number of factors will need to be resolved quite quickly to free up these sites for development. This is mainly because they have an existing function and they are not being put forward for development.

2.34 The plan should not place significant reliance on them to meet its housing requirement because their delivery, timing, scale and location are inherently uncertain. They are also located in the City Centre.

2.35 The Council's housing requirement should primarily be met through allocated sites and other clearly identifiable sources of supply. Windfall sites are, by definition, sites that have not been specifically identified or allocated within the Local Development Plan and whose future availability cannot be predicted with any degree of certainty.

2.36 **This is particularly important for a plan that has less than 10 years to run**.

Issue with Brownfield strategy

2.37 Brownfield sites raise a distinct set of risks for developers, such as contamination, high remediation costs, amenity issues and often fragmented ownership. These issues are generally more complex than other sites and can affect viability, programme and deliverability.

2.38 The Lichfields report argues that prioritising brownfield land for housing can reduce the availability of land for industrial, commercial and employment uses. In some cases, brownfield sites may be better suited to supporting jobs rather than housing. Converting them to residential use can displace businesses to less sustainable locations and put pressure on greenfield sites elsewhere.

2.39 Furthermore, brownfield sites carry additional remediation and infrastructure costs due to factors such as land remediation, contamination and demolition, risking their viability. In turn, this can affect money available to support affordable housing provision. The Lichfield's report notes a potential trade-off between regenerating brownfield sites and delivering affordable homes.

2.40 Overall, the report concludes that whilst Brownfield land can help meet housing needs, it should not be relied upon to the exclusion of other sources of land supply. Future brownfield strategy must be grounded in robust evidence of suitability, viability and deliverability, rather than simple land availability figures.

Conclusion

2.41 In conclusion, Persimmon's view is that the Council's windfall allowance should not be relied on – especially for the sites identified within the CUCS. The larger sites are all likely to be flatted schemes and will all be located in the City Centre – which limits range and choice.

2.42 An excessive allowance can artificially inflate housing supply figures.

2.43 Persimmon also questions the commercial delivery rate of these figures. Once adopted, the plan will be in place for less than 10 years, yet the Council is expecting the 6081 dwellings identified above to be completed.

2.44 **Persimmon recommend that none of the 6081 dwellings should be included in the housing supply**.

2.45 A sound plan should be based on robust and credible evidence demonstrating that its housing requirement can realistically be delivered. Significant dependence on unidentified windfall sites risks undermining delivery, as there is no certainty that the assumed level of windfall development identified by the CUCS will be completed over the next ten years.

3. Housing supply

Revised Summary of Housing Table

3.1 In response to action point 2.3, Cardiff Council have published their revised Housing Background Paper Figure 11, which is the summary of Housing Table. The Total Housing Provision 2021 to 2036 of 26,400 has not changed, but the net hosing supply has been adjusted from 29,429 to 35,007, including a landbank increase from 14,711 to 16,286, and windfall allowances have increased from 5,646 to 7,543.

3.2 **The total allocations have decreased from 5,666 to 4,965**. This is because of the loss of housing allocations following the previous hearing sessions, and amendments to the deposit plan which include the Former H1: Land at Areas 9-12, St Mellons for 150 dwellings and H2.4: Roath Dock (North Side) for 316 dwellings. These have been removed from the plan. Additionally, the Cardiff Gate allocation (H2.3) has been reduced by 30 units from 200 to 170. Land at Church Farm (Part of adopted LDP Strategic Site F) for 205 homes has been removed from strategic allocations due to gaining permission.

3.3 Overall, these changes reduce the allocations subtotal by 701 units.

3.4 The Net Housing Supply in the updated Table 11 shows an increase from 29,429 to 35,007 but these have not been based upon clear, evidenced allocations. Instead, the increase in this figure increase is due to the Urban Capacity Study Findings inflating the Large Windfall Sites figure, which as stated previously, do not have any certainty that these sites will come forward.

3.5 Persimmon argues that reliance on these figures undermines the soundness of the plan, and these numbers should be supported up by fixed and realistic allocations.

Current Residential Landbank (1st April 2025)

3.6 The Council have prepared an Updated Housing Background Technical Paper alongside an updated Housing Trajectory (2025) which includes the current residential landbank (1st April 2025).

3.7 The residential 'landbank' forms the largest component in the supply of additional homes in Cardiff. This comprises extant planning consents, together with planning applications that have been before Planning Committee, whereby it was resolved to grant planning permission subject to signing of a legal agreement.

3.8 The updated RLDP Background Technical Paper 1: Housing uses results from the latest survey data available at the time, relating to the year 1st April 2024 to 31st March 2025. A summary of this land by brownfield/greenfield split is provided below:

Figure 1 Housing Landbank, 1st April 2025

	Brownfield		Greenfield		Total
	Units	%	Units	%	Units
Under Construction	1,967	85%	357	15%	2,324
Not Implemented	5,557	40%	7,077	60%	14,041
Subject to legal agreement	2,836	77%	855	23%	3,691
TOTAL	**10,360**	**52%**	**9,696**	**48%**	**20,056**

3.9 Results from the latest survey, indicate that 2,324 homes were under construction. A further 14,041 units had planning consent but were not yet implemented, while an additional 3,691 units had a resolution to grant planning permission, subject to a legal agreement. Overall, the current landbank of residential units in Cardiff totals 20,056 units.

3.10 It is important to note that 3,691 units do not have planning permission, but have a resolution to grant planning permission, subject to S106 and legal agreements. A resolution to grant is not the same as an implementable planning permission, it does not guarantee a permission will ever be issues, and the applicant is under no obligation to complete the agreement.

3.11 Sites with a resolution to grant planning permission remain subject to legal agreement and should not be afforded the same weight as extant planning permissions. There remains a risk that Section 106 negotiations are delayed or fail to conclude, resulting in permissions not being issued and anticipated housing delivery not materialising.

Allocations

3.12 In response to action point HS2.3, where the Inspector requested details of the assessment process supporting the numbers attributed to allocated sites, further information and masterplans have been provided to support the housing numbers for the former Gas Works site on Ferry Road, Porth Teigr and Cardiff Gate.

3.13 Persimmon have reviewed this information available and question the detail of the assessment process used to derive the housing numbers for allocated sites.

Gas Works Site

3.14 Arup has submitted a masterplan of the site and vision document, illustrating how circa 500 homes can be incorporated into the gas works site. The evidence is highly reliant on a high density, apartment-led development, as the dwelling figure has been based on a site area of roughly 10.2-11.7 ha and a target density of at least 50 dwellings per hectare. The evidence provided by Arup supports 500 dwellings as a site capacity, but much of that capacity is generated through apartment-led development.

3.15 Previously, a 2016 planning brief for the site undertaken by Nathaniel Lichfield & Partners (appended as technical information by Arup) presents an illustrative layout which provides one example of how the site could be developed. Whilst only illustrative, it is based upon a series of development principles informed by the site's current constraints, which they state should be used as a basis to guide future development. This layout suggested that only around 366 units would be achieved under a more traditional mixed housing layout. Despite the policy specifying 500 units, the 2016 brief stated that *'We consider that whilst it is technically possible to deliver 500 units (50 dwellings per hectare) on this site such a form of development would be restricted to predominantly flatted development'*.

3.16 Furthermore, flooding remains a key issue onsite and significant contamination exists that would need to be overcome before development.

Porth Teigr

3.17 The allocation case is supported by a some technical evidence, although some areas remain at a strategic rather than application-ready stage. The report itself acknowledges that several pieces of work remain outstanding before a planning application could be submitted. This includes detailed ecology surveys and a Flood Consequence Assessment.

3.18 Additionally, the report demonstrates that the site is well-connected, but there is a lack of Transport Assessment provided, with no detail specified on junction modelling, trip generation analysis or parking strategy.

Cardiff Gate

3.19 A masterplan has been provided in response to the Inspector's Action Point, which aims to show how the calculation of 170 homes has been reached with 100 homes south and 70 north of Malthouse Avenue. The site promoter, Lovell Partnerships, states that the capacity has been derived from the actual shape, constraints and opportunities of the land, rather than a simple gross-area calculation.

3.20 However, Persimmon argues that there remains a serious deficit in calculations. The masterplan does not provide density calculations, net developable area calculations or a capacity schedule. The report also does not clearly explain how it moved from the previous illustrative layouts (showing circa 200 homes) to the promoted capacity of circa 170 homes, nor have they justified the viability of this loss.

3.21 Overall, the masterplan provided supports the housing figures conceptually rather than quantitatively. It provides limited numerical evidence explaining why 170 homes is the adjusted capacity figure, especially when the illustrative layouts in the Vision Booklet appear capable of accommodating approximately 200 dwellings. That discrepancy is not explicitly addressed in the report.

Conclusion

3.22 Persimmon concludes that there are still limited details of the assessment process supporting the numbers attributed to allocated sites.

3.23 The above analysis strongly suggests that commitments and allocations have been maximised (and will not be delivered).

3.24 As stated earlier in this statement, Persimmon also recommend that the 6081windfall allowance should not be included in the land supply for a plan that ends in 2036.

3.25 Persimmons site at Began Road, St Mellons is deliverable as an extension to the current LDP's KP2(G) site – and for the reasons set out in Persimmons submissions to the new LDP. **As a relatively small and accessible site (about 130 homes) and with no constraints, the site can be completed well before the plan period runs out.**

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