CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN (RLDP) 2021-2036

Matters Arising Consultation

Hearing Session - Matter 1 (Housing Numbers)

This response has been prepared and submitted by Boyer on behalf of Rep No: 133: Taylor Wimpey (TW). The scope of which responds to the Matters Arising and Action Points raised in respect of Hearing Session 1 (Housing Numbers).

Action Point HS1.5

TW note that the Addendum continues to conclude that 1,600 homes a year "is still considered a reasonable growth target" and sits "within the middle of the range" (para 5.10).

However, using Table 9 of the Addendum (average homes needed per year, 2021–2036) TW provide Table 1, as produced below, in which the last two columns compare the adjusted figure with 1,600 a year, which is 24,000 homes over the 15-year plan period.

Scenario	Unadjusted (homes a year)	Adjusted (homes a year)	Adjusted v 1,600 (a year)	Adjusted v 1,600 (15 years)
WG High Population (revised)	1,970	2,139	+539	+8,085
Trend-5yr (May 2026)	1,931	2,101	+501	+7,515
WG Principal	1,758	1,923	+323	+4,845
Trend-5yr MYE25 (updated)	1,663	1,830	+230	+3,450
WG Low Population (revised)	1,495	1,655	+55	+825
WG 10-year migration	1,314	1,469	−131	−1,965
WG 15-year migration	1,311	1,465	−135	−2,025
Trend-15yr (May 2026)	1,223	1,374	−226	−3,390
Trend-15yr MYE25 (updated)	1,130	1,281	−319	−4,785

Table 1. Scenario Comparison

The table clearly shows that:

- Five of nine scenarios exceed 1,600 once the household adjustment is applied. Four of nine exceed it even without the adjustment.
- The WG Principal projection needs 1,923 homes a year. That is about 28,800 homes over the plan period, around 4,800 more than 1,600 a year delivers.
- Even the WG Low Population projection exceeds 1,600 once adjusted.
- Every adjusted scenario below 1,600 is based on migration over 10 or 15 years. Those long periods include years before 2021.
- The 10% flexibility allowance (26,400 homes) is a delivery buffer, not extra supply to meet need. The Principal projection with adjusted rates exceeds even that total by around 2,400 homes.

Furthermore, the statement that 1,600 dpa sits "in the middle of the range" is a description of where the number falls, not a justification for it. The range is set by the scenarios chosen, and the Addendum's approach to "caution" in effect discounts every scenario above 1,600 dpa.

Moreover, the 1,600 dpa figure arises from the "Dwelling-led 1600" scenario, which the Addendum confirms retains all assumptions from the 2021 study (Table 5). TW questions if those assumptions pre-date the 2021 Census results and the 2022-based WG projections. Para 2.4 of the Addendum accepts that household growth in Cardiff is higher under the 2022-based projections than under the 2018-based projections, and that the 2022-based population projections show higher growth. TW therefore maintain the question as to whether the evidence base underpinning the requirement is therefore out of date.

TW also note that the Dwelling-led 1600 scenario assumes net international migration of 2,068 per year and population growth of 10.7% (Table 6). That is below every WG 2022-based variant and below all but the lowest trend scenarios. By contrast, Table 4 shows revised net international migration averaging 6,043 per year across 2021/22–2024/25. Even allowing for the fall to 1,000 in 2024/25, the observed figure is close to three times the migration assumed in the scenario that generates 1,600 dpa.

TW also maintain concern over the Addendum which again requires "caution" on the Principal, High and Low Population scenarios and on Trend-5yr MYE25 (paras 3.9–3.10 and 5.6–5.8). Taken together, this discounts every scenario that exceeds 1,600 dpa, leaving the lower-growth outcomes as the only ones treated as reliable. TW maintain that this is not a balanced reading of the evidence.

There are several other comments:

1. **It rests on one year of data.** Net international migration fell to 1,000 in 2024/25 and Cardiff's population fell slightly. The Addendum says the fall was driven by people moving to other parts of the UK. Migration is volatile (Figure 9), and one year is not a basis for cutting a 15-year requirement.
2. **The population tracked the official projection until 2024.** In 2022 and 2023 the MYE was at or above the Principal projection (369,640 v 369,851, and 379,539 v 379,042). The gap to Principal only opens in 2024 and 2025.
3. **The updated trend scenario still exceeds 1,600.** Trend-5yr MYE25 uses migration from 2020/21–2024/25, which already includes the very low 2024/25 year, and still yields 1,663 dpa unadjusted and 1,830 dpa adjusted. Para 5.8 nonetheless asks that it be treated with caution because it draws on a "period of high growth". That period is the most recent evidence of how Cardiff is actually growing.
4. **The official projections are being updated.** WG will start updating its projections this autumn (para 3.6). The result is unknown. Until then the Principal, High and Low projections remain the official starting point. Going below them needs strong evidence, and a short-term fall in one year of the MYE does not meet that standard.

Membership Rates

TW welcome the Addendum's acceptance (paras 2.17–2.24) that household formation in Cardiff shows indicators of suppression, and that trend-based projections carry that suppression forward. However, the correction it applies is too small and comes too late.

- Average household size stayed at 2.35 between 2011 and 2021. Over the same period it fell in South East Wales (2.35 to 2.30) and Wales (2.31 to 2.27) (Figure 4).
- Concealed families rose from 1,057 in 2001 to 1,681 in 2011 and 1,757 in 2021. Cardiff's share is above the Welsh average (Figure 5).
- 3.9% of Cardiff households are overcrowded, against 2.2% in Wales. For ages 15–24 the figure is 12.8% (Table 2).
- Owner-occupation fell from about 69% to 58%, while private renting roughly doubled from 13% to 25% (para 2.23).
- House prices have risen much faster than earnings since 2001 (Figure 6).

Against this evidence, the adjustment applied is modest, and the Addendum says so (para 2.27). TW identify the following limitations:

1. **Too late.** The adjusted rates only reach their target in 2047 (para 2.27). The plan ends in 2036, so only part of the effect shows in the plan period. The figures in Table 9 therefore understate it.
2. **Too low a target.** Rates return to their highest point between 2001 and 2047. That peak comes from a period of worsening affordability, so it is not a truly unconstrained rate.
3. **Too narrow.** Adjustments stop at age 39 (para 2.29), although the Addendum accepts that people now buy their first home and have their first child later.
4. **Built on suppressed data.** WG gives 75% weight to 2011–2021, the period in which household size stopped falling and concealment rose. That carries the suppression forward.

The Addendum therefore understates the uplift. Even so, it shows an uplift of around 150–170 dpa across all scenarios (Table 9). Applied to the Principal projection, the figure rises from 1,758 to 1,923 dpa. A more complete adjustment would increase it further.

Conclusion

For the reasons above, TW consider that:

1. The 1,600 homes a year is not an appropriate housing requirement for Cardiff.
2. A requirement of at least 1,900 homes a year. That is based on the Principal projection with adjusted rates (1,923) and should apply the minimum 10% flexibility allowance on top.

CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN (RLDP) 2021-2036

Matters Arising Consultation

Hearing Session - Matter 2 (Housing Strategy)

This response has been prepared and submitted by Boyer on behalf of Rep No: 133: Taylor Wimpey (TW). The scope of which responds to the Matters Arising and Action Points raised in respect of Hearing Session 2 (Housing Strategy).

Action Point HS2.2 – Urban Capacity Study

This representation is submitted in response to the Urban Capacity Study prepared by Expedite on behalf of Cardiff Council, in response to Examination Action Point HS2.2.

It is acknowledged that the purpose of the study is to identify vacant and under-utilised sites, together with sites situated along arterial routes and close to public transport nodes, which may have potential to contribute towards Cardiff's housing supply through windfall development.

The study is therefore a useful exercise in identifying the potential capacity of urban sites, however, there is a fundamental distinction between identifying the theoretical capacity of sites and demonstrating that those sites are genuinely available, viable and deliverable and windfall sites within the Replacement Local Development Plan period to 2036.

The fact that a site has the physical capacity to accommodate a particular number of dwellings does not, of itself, demonstrate that those dwellings will be delivered within the plan period.

Consequently, the conclusions drawn by the study, particularly that the large-site windfall allowance of 3,929 dwellings is not an overestimate, are considered insufficiently robust.

Capacity and Deliverability

The study identifies capacity for 6,081 dwellings across 26 sites, representing 1.55 times the large-site windfall allowance of 3,929 dwellings.

However, the study itself acknowledges at paragraph 5.3 that sites predominantly fail on availability rather than suitability, and that many sites carry no evidence that anyone intends to bring them forward.

The purpose of the assessment should not simply be to establish how many dwellings might theoretically be accommodated across the urban area. It must also provide a realistic assessment of the likelihood of those dwellings being delivered within the plan period.

Whilst the study allocates sites to delivery periods and applies confidence ratings, these remain professional judgements based on the information available at the time of the assessment. They do not necessarily demonstrate that the relevant landowners have firm development intentions, that funding and viability are established, that land assembly can be achieved or that the necessary planning and technical requirements can be resolved within the anticipated timescales.

Of those 26 sites, only six, carrying 1,142 dwellings, are rated High confidence. Fifteen sites carrying 4,331 dwellings (71.2%) are rated Medium, and five sites carrying 608 dwellings are rated Low (UCS Table 9). The High confidence capacity alone is equivalent to roughly 0.29 of the allowance. The UCS counts Medium and Low sites in full and applies no non-delivery discount (UCS paras 3.24 and 3.27). By contrast, the Council applies a 20% non-delivery allowance to the residential landbank, which consists of sites with planning permission or a resolution to grant (UCS para 2.10). It is not logical to discount permitted sites by 20% while counting unpermitted windfall capacity at 100%.

The UCS justifies the absence of a discount on the basis that the Council has already applied a 25% reduction to the windfall trend rate (UCS paras 2.8 and 3.27). That reduction adjusts the projected *rate* for depletion of opportunities. It does not address the separate question of whether *particular identified sites* will in fact be released, funded, consented and built. The two are different risks and should not be treated as one.

In terms of the timescales the study identifies:

- 1,685 dwellings (27.7%) within the three-to-five-year delivery period.
- 3,788 dwellings (62.3%) within the six-to-ten-year delivery period.
- 608 dwellings (10%) within the period beyond ten years to 2036.

Nearly two thirds of the counted capacity (62.3%) is placed in the six to ten year delivery band, and a further 608 dwellings (10.0%) is placed "beyond 10, to 2036" (UCS Table 10). This creates a considerable concentration of delivery towards the latter part of the plan period, leaving relatively little time to address delays, planning complications, viability issues or changes in landowner intentions. Even where such sites come forward, a start in years six to ten will not result in completion of a large scheme by 2036. Large, high density, high rise schemes are built out over several years. The UCS counts the whole capacity of these sites as if it will complete within the plan period.

The assumption that these sites will all progress within the identified delivery bands is optimistic, particularly where there is no firm commitment to development.

Large Development Sites

A particular concern is the extent to which the study relies upon a relatively small number of large development opportunities to demonstrate that the windfall allowance can be achieved.

The report acknowledges at paragraph 7.9 that the two largest sites account for 2,110 dwellings, representing approximately 35% of the total capacity identified.

These are:

- NCP Adam Street Car Park – 1,110 dwellings.
- Utilita Arena Cardiff – 1,000 dwellings.

The reliance on these sites is significant because any delay or failure to bring either forward would have a material effect on the overall windfall contribution.

The study attempts to address this through sensitivity testing, including the removal of both sites. However, this exercise demonstrates the fragility of the Council's position rather than providing complete reassurance. When both sites are removed, the identified capacity falls from 6,081 to 3,971 dwellings. This leaves only 42 dwellings above the large-site windfall allowance of 3,929.

In other words, the entire headroom relied upon by the Council is effectively exhausted if these two sites do not come forward.

It is not considered reasonable to place such reliance on a limited number of major redevelopment opportunities without a sufficiently robust demonstration that they are genuinely deliverable within the plan period.

NCP Adam Street Car Park

The NCP Adam Street Car Park is particularly important to the conclusions of the study, with an assumed capacity of 1,110 dwellings on a site of approximately 1.11 hectares.

The study identifies this as a medium-confidence site, with delivery anticipated within years six to ten.

Whilst the report sets out reasons why the site is considered to have development potential, it also acknowledges a number of unresolved matters:

- The ownership comprises 16 registered titles, with three titles outside the principal ownership.
- Potential hydrocarbon contamination associated with the former service station at 3–6 Adam Street has not been investigated.
- Previous outline planning permissions for residential development on car park land within the block expired without being implemented.

The study places considerable weight on the fact that the majority of the site is controlled by Marcol Asset Management Limited and that the same estate has successfully delivered residential development elsewhere in the city centre.

Whilst this is relevant evidence, it does not establish that the Adam Street site itself is available for development within the anticipated period.

Previous residential permissions on land within the block also failed to progress, which should be recognised as a material consideration when assessing the likelihood of future delivery.

The fact that a landowner has successfully delivered a separate development elsewhere does not necessarily demonstrate that it intends to release this particular site, that the outstanding ownership interests can be resolved, or that the necessary technical and viability issues can be overcome.

In particular, the presence of potentially contaminated land introduces an additional layer of uncertainty in relation to abnormal development costs and viability.

The assessment also relies on a theoretical density of 1,000 dwellings per hectare to arrive at the 1,110-unit capacity. Whilst this may be consistent with the density band adopted by the study, it remains a capacity calculation rather than an approved development scheme.

There is no certainty that a scheme of this scale would ultimately be acceptable, viable or deliverable in the form assumed. Moreover, the Flood Map for Planning shows that the site (and others in this immediate area) fall within Flood Risk Zone 3 – making this area in the highest-risk category for flooding.

Moreover, the site has been included within the Central & Bay Business Area (Polices SP8 and EC6) and the Cardiff Central Enterprise Zone (Policy EC1). Policy SP8 states that residential uses above ground floor are considered appropriate, however, it also included a range of other uses to be acceptable within the Central and Bay Business Area including offices, commercial uses, leisure uses, enhanced retail, and complementary facilities as well as "*Other uses most appropriately located in city centres, including uses that support the night time economy and music scene".* Policy EC1 states: "*The Cardiff Central Enterprise Zone and Regional Transport Hub as shown on the Proposals Map is* ***designated for the retention, development and redevelopment of land for employment opportunities****…"* and that "*high density residential units* ***together with a diversity of complementary mixed uses, including commercial, leisure and service uses"*** will be supported.

Both these policies seek to promote employment, commercial and leisure uses as well as residential. However, the assumption that this site could accommodate a large amounts of high-rise residential units fails to take into account the range of other uses which are also allocated for these areas.

The study also confirms that the delivery of the site for housing is acceptable under Policy H9 (Change of Use or Redevelopment to Residential Use on Unallocated Sites). However, Policy H9 relates to the *"Change of use of* ***redundant premises*** *or redevelopment of* ***redundant previously developed land".*** However, given the car park remains open, and that no evidence has been submitted that this will be closing in the near future, arguably it is premature for this site to be assessed favourably under this policy.

It is noted that the study includes a number of existing and operational car parks. The total number of units accounted for within these car parks is 1,904 units. However, there does not appear to be any evidence to support consideration of the loss of these parking spaces and it is unclear whether the loss of the car parking has been fully assessed and is supported in principle, given these are open and in use.

The site should therefore not be treated as an assured source of housing supply simply because the Council has accepted its theoretical capacity.

The medium-confidence rating and six-to-ten-year delivery period should be given appropriate weight when considering the robustness of the overall windfall allowance.

The Utilita Arena

Similar concerns arise in relation to the Utilita Arena site, which is assigned a capacity of 1,000 dwellings.

The study provides a stronger narrative in relation to availability because the site is Council-owned and its release is linked to the opening of the replacement arena.

Nevertheless, the delivery of the replacement facility and the subsequent release and redevelopment of the existing site introduce dependencies which must be recognised.

The report acknowledges that the replacement arena programme has experienced changes to its anticipated opening date, moving from 2023 to 2026 and 2027, and subsequently to 2028.

Although the report considers the remaining delivery period to be achievable, the history of programme changes demonstrates that major regeneration projects are susceptible to delay.

The redevelopment of the existing arena site will also require a separate process of planning, design, funding and implementation.

There are possible constraints to development also highlighted within the study, including the Flood Map for Planning shows that the site (and others in this immediate area) fall within Flood Risk Zone 3 – making this area in the highest-risk category for flooding. Matters such as these should be addressed through further detailed technical evidence before being relied upon for delivery of housing within the plan period.

Moreover, the site has been included within the Central & Bay Business Area (Polices SP8 and EC6) and the Cardiff Central Enterprise Zone (Policy EC1). As set out above, these policies seek to promote employment, commercial and leisure uses as well as residential. However, the assumption that this site could accommodate a large amount of high-rise residential units fails to take into account the range of other uses which are also allocated for these areas.

It should not automatically be assumed that the release of the existing site will translate into the delivery of 1,000 dwellings within the anticipated timescale.

Taken together, the Adam Street and Utilita Arena sites account for a substantial proportion of the total capacity identified. This creates an inherent risk in the Council's reliance on a small number of large and complex redevelopment opportunities.

Sensitivity Analysis

The study relies heavily on its sensitivity analysis to demonstrate that the large-site windfall allowance remains supported even if some of the identified capacity does not come forward.

However, the sensitivity analysis largely considers individual scenarios, such as:

- Excluding sites where the consultants have declared an interest.
- Excluding all low-confidence sites.
- Removing the two largest sites.
- Applying a 25% reduction to all site capacities.

Whilst these tests are useful, they do not necessarily demonstrate that the identified capacity is robust when multiple delivery risks occur together.

In particular, the removal of the two largest sites leaves only 3,971 dwellings against the requirement of 3,929 dwellings. The study's assumption that the remaining capacity is sufficient therefore depends on nearly all of the other identified sites progressing successfully.

That is an optimistic position when the report itself acknowledges that availability is the principal reason why sites fail to progress. It is also important to recognise that delays do not necessarily result in sites being completely undeliverable. A site may eventually come forward but do so outside the relevant plan period. From the perspective of the housing trajectory, however, the distinction is critical to the delivery of the plan and it would be more appropriate to allocate additional sites for surety and deliverability.

The sensitivity analysis should therefore give greater consideration to the cumulative effect of delayed delivery, rather than simply testing whether sufficient theoretical capacity remains following the removal or reduction of individual sites.

Conclusions and requested action

In conclusion, the Urban Capacity Study provides a useful assessment of potential urban development opportunities across Cardiff and identifies a number of sites which may contribute to future housing delivery.



Boyer

However, the assessment should not be interpreted as demonstrating that all, or even a sufficiently reliable proportion, of the identified capacity will be delivered within the Replacement Local Development Plan period.

There is a clear distinction between identifying development capacity and establishing a realistic and deliverable housing supply.

The reliance on NCP Adam Street Car Park and the Utilita Arena is particularly concerning. Together, these sites account for approximately 35% of the capacity identified. Removing them leaves only 42 dwellings above the large-site windfall requirement, demonstrating that the apparent surplus is not particularly robust.

It is therefore considered that the Council has not adequately demonstrated that the large-site windfall allowance of 3,929 dwellings is realistically achievable within the plan period.

The Inspectors are respectfully requested to:

1. Give appropriate weight to the distinction between theoretical urban capacity and sites which can realistically be expected to deliver housing within the plan period.
2. Require greater evidence of the availability, viability and deliverability of the larger sites, particularly NCP Adam Street Car Park and the Utilita Arena.
3. Give greater consideration to the cumulative effect of delays and non-delivery across the identified sites, rather than relying primarily on individual sensitivity tests.
4. Ensure that the housing trajectory does not rely on unsubstantiated assumptions that all identified sites will come forward within their anticipated delivery periods.

Ultimately, whilst the Urban Capacity Study demonstrates that Cardiff has considerable potential for further urban development, it does not provide sufficient certainty that the identified capacity will translate into completed dwellings within the plan period.

The Council should therefore adopt a more cautious and realistic approach to the contribution of windfall development to the housing supply, ensuring that the Replacement Local Development Plan is founded on a deliverable and robust housing trajectory, including the allocation of additional sites, such as Brummell Drive Creigiau, rather than an optimistic assessment of theoretical capacity.

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Hearing Session - Matter 2 (Housing Strategy)

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Action Point HS2.3 – Allocation Sites

H2.5 –Porth Teigr and Alexandra Head

Following a review of the additional information made available, TW agree with the boundary amendments to reflect the ownership issues. However, this amendment has implications on the actual Net Developable Area (NDA) of the Site.

Within the additional information there is no indication provided regarding density, nor is there a specific NDA for the residential element provided. Paragraph 3.2.2 suggests that the total residential ground floor area equates to 99,616 m2. For ease this has been rounded to circa 10ha. There is no other indication given in the information.

TW reiterate that the Draft Regeneration Strategy (2025-2030), although not formally adopted, sets out the desired placemaking requirements for future development within Cardiff. It states that "*future development should focus on creating compact, well-connected neighbourhoods with medium to high housing densities (approximately 50–100 dwellings per hectare)*".

Using the 10ha for residential at the highest density, the revised estimate quantum of development would equate to 1,000 units. In turn this would lead to a reduction of 1310 units in comparison to the current proposed allocation. Even in f the density is increased to 200 dph then this would still result in a total deficit of 310 dwellings across the whole site. Other densities are indicated in the table below.

Net Residential Developable Area	Dwellings Per Hectare	Estimated Quantum of Development	Shortfall Compared to Allocation
10ha	200 dph	2000 dwellings	-310
10ha	100 dph	1000 dwellings	-1310
10ha	85.5 dph	855 dwellings	-1,455
10ha	50 dph	500 dwellings	-1,810

Table 1. Assessment of Estimated Development Based on Different Dwellings per Hectare Scenarios for 10ha

TW consider that insufficient information has been provided to demonstrate the required density on site to accommodate the total allocation (both in this Plan period and beyond).

H2.3 – Cardiff Gate Business Park

TW are aware of the additional information provided in respect of accessibility, sustainability, placemaking and employment need.

Following a review, TW still maintain the following concerns. Firstly, that whilst additional information has been provided for accessibility, it is still considered that the active travel and pedestrian routes are convoluted to access wider facilities. Moreover, in terms of vehicular access there is a still the requirement to come through the Business Park from M4 Jct 30. There are no direct private vehicle access points to the wider strategic development to the west and the facilities contained therein.

As for placemaking, TW maintain that the inclusion of residential development would be incongruous to the existing character of the area and will likely result in an unsustainable pattern of development given the level of separation from local amenities required to support future residential occupants.

TRW also note that the updated information promotes circa 170 dwellings across three plots, down from the original 200. Whilst minimal, the cumulative impacts are discussed below.

Sites Removed/Amended

TW note that 2 No. sites have now been removed from the Plan.

- Firstly H1.1 - Land at areas 9-12 St Mellons has been deleted from the Plan and has removed 150 dwellings.
- Secondly, H2.4 - Roath Dock (North Side) has been deleted and has removed a further 316 dwellings.

In total, with the reduction in H2.3 by 30 dwellings, the amendments result in the reduction of circa 350 dwellings. From the information provided there appears to be no suggestion that this reduction is to be replaced.

The removal of the proposed housing numbers creates a need to identify and allocate alternative sites to ensure that the overall housing requirement for Cardiff continues to be met as a minimum. Any reduction in the anticipated housing capacity arising from the removal of these allocations should be appropriately addressed through a new housing allocation capable of delivering an equivalent level of provision, namely TWs proposed site at Brummell Drive Creigiau (Ref. 20) for 300 dwellings.

This would ensure that the Plan maintains a sufficient and deliverable supply of housing to meet identified housing needs over the plan period, whilst also providing a range and choice of housing types, sizes and tenures. The identification of the suitable replacement allocation would therefore be essential to maintaining the Plan's housing trajectory, supporting early delivery in the Plan period and ensuring that the removal of sites H1.1 and H2.4 does not undermine the Council's ability to meet its overall housing requirement.