Geraint John
tel. 02920 105361
mob. [redacted]
email. [redacted]
web. gjplanning.co.uk
address. Office 2, House 3,
1st Floor, The Maltings East
Tyndall Street, Cardiff CF24 5EA

6th November 2026

fao. Kerry Trueman / Programme Officer / Kerry.trueman@cardiff.gov.uk

address. Pendragon House
1 Bertram Drive
Wirral
CH47 0LG

CARDIFF COUNCIL REPLACEMENT LOCAL DEVELOPMENT PLAN EXAMINATION

RESPONSE TO MATTERS ARISING FROM HEARING SESSIONS 1 – 15

Please find enclosed, on behalf of, and under instruction from the landowner and promoting party, Mr Andrew Evans, a submission to the Consultation on Matters Arising from the Cardiff Replacement Local Development Plan Examination Hearing Sessions in relation to the site: Land at Goitre Farm, St Mellons (Site ID: CS54).

This submission comments on both the Schedule of Proposed Changes and the additional information subject to this consultation. This submission relates specifically to the information provided in respect of Hearing Sessions 1 (Housing Numbers) and 2 (Strategy), reflecting our previous Statements which were also submitted in relation to these sessions.

We look forward to attending the Hearing Sessions in respect of the above matters in due course. In the meantime, we hope and trust that all is in order with the submission. Please do not hesitate to contact us in the event that further information is considered necessary and/or beneficial.

Yours sincerely,

[redacted]

Geraint John
Director
Geraint John Planning Ltd.

PREFACE

As set out above, this submission relates to the additional information / work prepared to date on the Draft Replacement LDP Deposit Plan. Given that our submissions to date have related specifically to Hearing Sessions 1 (Housing Numbers) and 2 (Strategy), this submission will only relate to those matters accordingly.

Our comments on the additional information in relation to the above Hearing Sessions are considered in turn below.

This Submission

It should be noted that this submission does not respond to all of the Actions Points to arise and all of the additional information that has been provided / consulted on, as not all of the information necessitates a response by us, and/or earlier submissions made on behalf of the Landowners (Representor ID. 99) are considered sufficient. Accordingly, these representations only provide responses where it is considered necessary and relevant to do so, with reference made to previous submissions where necessary.

That said, it should also be noted that the purpose and reason for embarking on this exercise is to ensure, and provide clarity on, the deliverability of the Plan. As such, it is all the more important for this exercise to comprise a detailed review of the information provided. This is even more so the case given that the Council's position has been to maintain (and justify) the previous position and strategy put forward.

We do appreciate that some of the additional work / information provided has come about specifically as a result of the detailed submissions made by others. This includes the Cardiff Demographic Evidence Addendum, which seeks to respond to representations submitted by Lichfields (on behalf of Barratt Redrow Homes). This submission, and particularly our responses to this document, will be limited in scope accordingly.

Notwithstanding the above, the issues raised, and the subsequent request for further information by the Inspectors, have a bearing on the underlying supply of housing land, and contribute to our view and opinion that inadequate provision has been made in and by the Plan. This is set out in detail within our submissions to date, and remains our view in light of the additional information / work produced.

Hearing Session 1 – Housing Numbers

In respect to the Action Points arising from Hearing Session 1 (Housing Numbers), the following additional information has been provided.

- Cardiff's response to why the last 3 years of the Housing Trajectory show negative figures and what this means for the LDP housing target;
- An affordable housing delivery programme; and
- Cardiff Demographic Evidence Addendum;
- Details on which LDP in Wales has a 5% flexibility rate.

The above documents are discussed in detail below.

Response to the Housing Trajectory (Action Point HS1.2)

Further information has been provided in respect to the Housing Trajectory, where the Council has clarified that the negative figure within the trajectory reflects an over-provision, rather than an under-supply. The negative value has been suggested to come about as a result of the formula comparing the dwelling requirement (24,000) against anticipated cumulative completions (27,242) and becomes negative (-3,242) once projected delivery exceeds the requirement. As such, the Council have suggested that the Plan requirement of 24,000 dwellings is expected to be met during the Plan period, with forecast completions exceeding that requirement and therefore resulting in a surplus.

It is our view and opinion that, despite this clarification, the overall dwelling requirement attributed to the RLDP, and the reliance on the existing landbank, is not a sound or robust position. This has been set out in detail in our previous submissions.

There has been a considerable shortfall in housing delivery over the LDP Plan period to-date. The LDP has significantly undelivered against its housing requirement, resulting in a substantial cumulative shortfall in delivery. In turn, this has resulted in significant unmet need, and the requirement for the RLDP to address this accordingly. The clarification provided by the Council in respect to the Housing Trajectory, whilst attending to explain how the figures are expressed, is not considered to appropriately address these underlying and more fundamental concerns. This is considered to be the case not least given the "step change" in yield and delivery projected to come about as compared to past rates of delivery, and that "step change" is to be realised from existing sites as opposed to contributions from new allocations.

Affordable Housing Delivery Programme (Action Point HS1.3)

In respect to the Affordable Housing Delivery Programme, while it is useful, it is considered that the Programme does not provide any certainty on the delivery of affordable housing over the remaining plan period.

It should be noted that the Delivery Programme, specifically in relation to the site Land at Channel View – Other Phases, questions ('?') whether the site has Planning Permission. As such, given that this exercise (the additional work undertaken) has been done for the purposes of removing doubt about / around the delivery of Plan, this cannot be considered to be a robust and sound position.

Cardiff Demographic Evidence Addendum (Action Point HS1.5)

As set out above, the updated Cardiff Demographic Evidence Addendum has come about as a result of representations made by other parties. As such, our comments on this documents will be brief.

The Demographic Evidence Addendum evaluates the impact of adjusted 2022-based membership rates on the scenarios developed for the May 2026 Demographic Update for Cardiff, as well as providing an overview of the latest mid-year population estimates and migration estimates. With the adjustment to the rates and scenarios, the report concludes that as set out in the May 2026 report, the figure of 1,600 dwellings per year is still considered a reasonable growth target for Cardiff, and sits within the middle of the range of outcomes. The report suggests that scenarios that generate higher dwelling growth outcomes are to be treated with caution due to their reliance on a period of unprecedented growth linked to international migration.

As set out within our submissions to the Hearing Sessions held in June 2026, we do not consider that the strategic growth strategy adopted for the RLDP is adequate to meet the identified needs over the Plan period, and is not commensurate with the role and status of Cardiff as a / the Capital City. Our stance and position remain unchanged from the submissions made in May 2026, and reference should be made to our previous submissions accordingly.

Details on which LDP in Wales has a 5% flexibility rate (Action Point HS1.6)

Additional information has been provided by the Council to set out that the Vale of Glamorgan Revised Deposit Local Development Plan (LDP) 2011-2026 proposed a flexibility allowance of 5%. This has been clarified and confirmed in the submission to have been subsequently uplifted to 10% percent following a consultation exercise which received a considerable amount of objection, including objections raised by the Welsh Government.

The Cardiff Replacement Local Development Plan assumes a 10% flexibility rate. The Council's previous reference to a 5% allowance is clearly of no justification – given its adjustment to 10%. If the Council's position is that increasing this to 10% justifies and supports the 10% level factored into the Plan, then this is considered to be unrobust.

Firstly, the increase brought about to the VofGCo LDP was in respect to their current adopted LDP, and was a change brought about to respond to comments and objections raised by Welsh Government at that time (some 13 years ago). This was a considerable time ago, in a very different climate, and in connection with an earlier generation of LDPs.

Moreover, and more importantly and significantly, the make-up and profile of the two plans are materially different and should be considered / treated as such.

The Vale of Glamorgan Local Development Plan (adopted in 2017) was based on a substantial amount of new greenfield allocations – in areas that had not seen housing allocations and growth in years, and in areas where there was considerable latent demand for housing. The emerging RLDP continues this form of provision – albeit in a different way / spatial area: a 'Strategic Growth Area'. Approx. 45% of the overall supply of housing is made up by new allocations (30% of which are 'key sites'). The remaining 55% is made up by the existing housing supply and windfall opportunities. The Strategy for the Cardiff RLDP relies upon the existing landbank, and the rolling over of sites that did not yield during the previous Plan period – which is much more susceptible to risk of under delivering. It is in this context that the flexibility allowance should be reconsidered.

It is acknowledged that the RLDP allocations for the VofG do comprise some rolled forward sites. However, if these are taken as a separate percentage, the 'new sites' make up approx. 29.5% of VofG's housing requirement for the RLDP – which as stated above, is a materially different make up and profile to the assumption made for the Cardiff Replacement Local Development Plan.

In light of the above, it cannot reasonably be considered that adopting the same flexibility rate as a materially different plan is 'sound' – this is the case not least given that the housing requirement and strategy for Cardiff is proposed to rely entirely upon the existing landbank and windfall opportunity. As such, and in line with our submissions to date, additional housing and flexibility ought to allocated / given accordingly. This would in turn reduce the risk of the Plan under delivering – which the VofG have ensured through their provision of 'new' sites. This same strategy ought to be employed for The Cardiff Replacement Local Development Plan accordingly. Without this, the 'soundness' and deliverability of the Plan remains in questions

Hearing Session 2 (Strategy)

As set out above, this submission does not respond to all of the additional information that has been provided / consulted on, as not all of the information necessitates a response by us. The additional information provided in respect to Hearing Session 2 (Strategy) that we considered it appropriate to comment on is as follows:

- The Schedule of Proposed Changes;
- The Housing Trajectory; and
- The Urban Capacity Study.

It should be noted that our previous submissions have commented on the Housing Strategy in considerable detail. As such, our comments to / on these documents will focus primarily on the changes made accordingly.

Each of the above documents are discussed in detail below.

Schedule of Proposed Changes

One of the key changes that has been made in respect to the Strategy, relates to the Schedule of Proposed Changes where the following is set out:

"The following non-strategic site~~s are~~ is allocated for housing:

Site Ref	Site Name	Estimated Units	Site Size (HA
~~H1.1~~	~~Land at areas 9-12, St Melons~~	~~150~~	~~3.98~~
H1.~~2~~1	Rookwood Hospital	90	3.4

As demonstrated above, the Plan has 'lost' one of the non-strategic sites, and as such, the estimated 150 units have fallen away from the overall total of housing.

During the Hearing Sessions held in June 2026 it was questioned whether the Plan was robust in demonstrating that Cardiff could adequately provide the level of housing required. Removing / losing an allocation (and 150 units) is not considered to provide a robust position, indeed it adds to the concerns previously expressed.

Considerable detail was provided within our submissions ahead of the Hearing Statements in June 2026 in relation to the need to allocate more housing / sites. As such, reference should be made to those submissions accordingly.

The Housing Trajectory (Action Point HS2.1 and HS2.7)

The updated Housing Trajectory provides a table which sets out the total completions attributed to the existing landbank and allocations over the Plan period. The table demonstrates how the overall housing requirement will be met and apportioned over the Plan period.

The previous Trajectory (which we appreciate included the total quantum of housing from windfall sites etc.) forecasted that from the year 2025-26 to 2032-33 there would be an annual delivery rate in excess of 2,000no. units per annum, which was to be substantially achieved through the delivery of the strategic sites allocated in the current LDP. This number was forecasted to drop below 2000no. units per annum later in the Plan period as the majority of the landbank and allocated sites would have been delivered by that stage (2033-34).

The updated Trajectory, has been revised to ensure there is 'no double counting', and provides an approach that, if anything, is more drawn back / reserved – with only 2 years / periods (2028 and 2029) forecasted to have an annual delivery rate in excess of 2000no. units – facilitated and enabled by large strategic committed sites. Some of the others years not currently suggested to yield over 2000no. units per annum will be as a result of, and reliant on, the windfall sites. There is no certainty that this will be realised – please refer to our comments in the below 'Urban Capacity Study'. Please also refer to our previous submissions in respect to the existing landbank and the deliverability of those sites accordingly.

The largest difference in the Trajectory is of course the total capacity – which has been set at 22,836. This difference / change does of course represent the fact that Windfall sites have not been accounted for within the total numbers, and the trajectory is effectively the 'existing landbank' (not least as no new allocations are made). This total number is made up of the total completions in the period 2025-2026 (1,176) and the total number of units remaining (21,983).

The make-up of the numbers is acknowledged and appreciated, however, it would be helpful to have an additional column to left of the 'Completions 2025-2026' setting out the total number of completions over the Plan period (i.e since 2021 and pre 2025-2026). This will provide transparency over the totals attributed to each site, and cumulatively. While it is acknowledged that the total number of units completed to date can be found in other documents (Revised Figure 11 Summary Housing Supply Table), without this, the total capacity of the existing landbank (including the allocated sites) does not tally with the total completions and the units remaining for each site, leaving a 'missing number' of approximately 853no. units. It is assumed that this number is a result of the completions that have taken place on these sites prior to 2025-2026. for the avoidance of doubt, it would be helpful for this to have been provided.

In terms of our comments on the total number of units forecasted per year, as set out above, our submissions to the Hearing Sessions held in June 2026 are considered to still be of relevance. As such, reference should be made to those submissions accordingly.

Urban Capacity Study (Action Point HS2.2)

In response to Action Point HS2.2 the Council have provided an updated Urban Capacity Study identifying the vacant and underutilised sites, and the sites on arterial routes and at public transport nodes, to which it referred at the Hearing, and to identify ownership and any constraints to delivery.

The study is intended to inform the Council as to the development potential of each site identified, and its likely contribution to the windfall allowance. While this is helpful, we consider the same questions raised at the Hearing Session Held on 10th June 2026 to still be relevant – whether the windfall allowance is reliable.

The Study sets out that City centre brownfield development in Cardiff is marginal in viability terms, and policy compliant contributions are not being achieved even on the strongest sites – this is evidenced through reference to application ref, 25/02351/FUL at Custom House Street. The report, however, continues by stating that the scheme is nevertheless coming forward, and the viability constraints relate to what would ordinarily be expected by way of planning obligations, rather than the actual and underlying (without planning obligations position) preventing them being brought forward.

While this has been the position for larger sites, it is not considered that the same can be said for smaller schemes. The development at Custom House Street comprises a 33-storey scheme of 400 co-living units in the highest value part of the city. Smaller schemes on less favourable sites, which are more sensitive to viability constraints and have tighter margins, account for a considerable proportion of the identified capacity. It therefore cannot be assumed that their delivery is constrained solely by contributions that would be payable by way of planning obligations.

Moreover, it should be noted that the study identifies capacity for 6,081 dwellings on 26 sites. The large site component of the windfall allowance which the study is required to support is 3,929 dwellings, and as such, the capacity identified is 1.55 times the allowance, with headroom of 2,152 dwellings. However, this headroom is / can be removed almost entirely through the capacity attributed to NCP Adam Street Car Park (1,110) and Utilita Arena Cardiff (1,000) – which have been identified as having 'medium' confidence of coming forward. The capacity is entirely reliant on either of these sites coming forward within the Plan period, and cannot be considered as entirely robust accordingly.

Finally, even if viable and deliverable, the timescale for bringing forward and realising units from such sites is often long-term and protracted – a product of their complex and urban setting / locations, and issues that come about by association.

Given the above, the reliance on, and robustness of the contributions from such sites and a 'pool' of supply is questioned.

It should be noted that we are not seeking to question the numbers / capacity attributed to each site. However, given the purpose of this exercise / consultation is to demonstrate that the Plan is sound and deliverable, and that it is evidently reliant on commitments and windfall sites / opportunities, these details ought to be provided – this is the case not least given that brownfield viability cannot solely be reliant on the LPA coming to an agreement in respect to Planning Obligations.

Our submissions to the Hearing Sessions held in June 2026 set out our comments in full in respect to the viability of brownfield sites. These comments are still considered to be highly relevant, and reference should be made to them accordingly.

Conclusion

In summary, it is considered that while the additional information does provide some additional context to the points raised by Inspectors, the stance and overall position of the Plan is largely unchanged. The Plan is evidently reliant on commitments and windfall opportunities, and a step change in the delivery of, and yield from, these sites. This is the case in a context and climate of challenging viability – with viability and deliverability very much at risk.

On this basis, it is considered that our comments at / to the Hearing Sessions remain of relevance, and it is considered that the RLDP would fail to meet the test of 'Soundness' and is contrary to the requirements of the Development Plan Manual accordingly.

Additional, new, unconstrained, and readily deliverable sites ought to be allocated accordingly to sit alongside, and assist, the delivery of committed and inner urban sites.