



Cardiff Council Replacement Local Development Plan 2021 to 2036, Urban Capacity Study

Prepared in response to Examination Action Point HS2.2



EXPEDITE

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Executive Summary

Action Point HS2.2 required the Council to carry out an urban capacity study identifying the vacant and under utilised 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. This study is the Council's response.

The study examines large sites of ten or more dwellings within the Cardiff urban area. It supports the large site component of the windfall allowance in the submitted Replacement Local Development Plan, which is 3,929 dwellings. The small sites and change of use components, together 1,608 dwellings, are separately evidenced and are outside the scope of this study.

Sites were identified from seven search categories, tested against the site identification criteria and assessed individually. Each site carries an appraisal recording ownership, existing use and the Policy H9 position, constraints to delivery, capacity and the basis on which it is derived, and a confidence rating. The appraisals are at Appendix 1.

The method was settled with the Council. The site list, the density bands, the large site threshold, the definition of arterial routes, the treatment of double counting and the ground floor commercial assumption were each put to the Council in a formal query schedule and confirmed. Sixty two queries were raised and answered between 30 July and 8 September 2026, and the schedule of queries and responses is at Appendix 5.

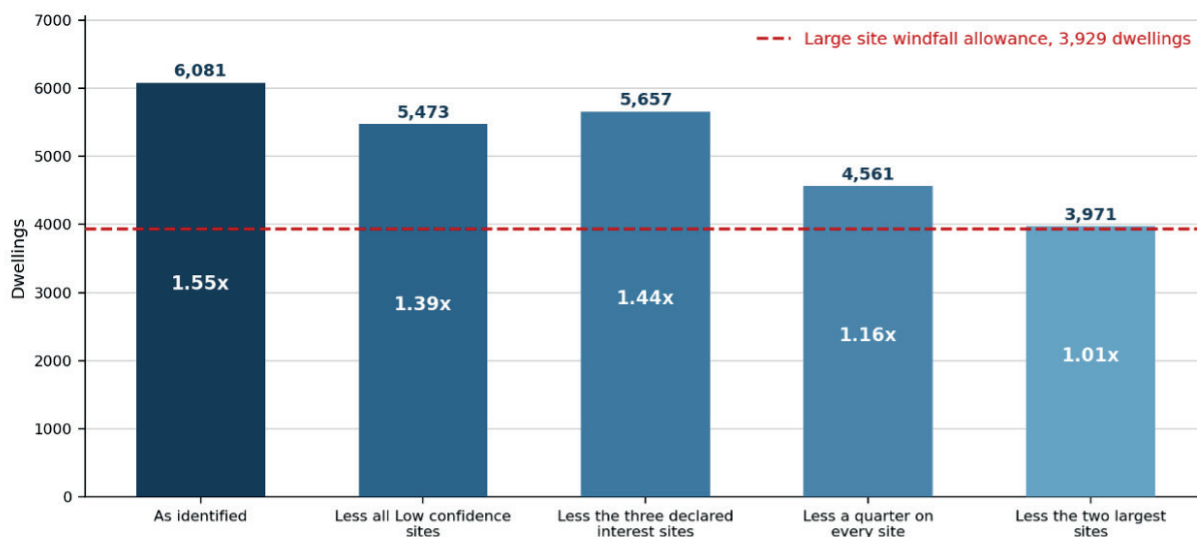
The study identifies capacity for 6,081 dwellings on 26 sites. That is 1.55 times the large site allowance, with headroom of 2,152 dwellings.

Sixty six sites were examined. Twenty five were removed from the schedule, each with a stated reason, and are reported at Appendix 2. A further fifteen remain on the schedule at nil capacity. Sites fail predominantly on availability rather than on suitability: very few sites are physically or in policy terms incapable of residential development, but many carry no evidence that anyone intends to bring them forward.

Expedite and its associated companies hold or have held interests in, or acted for parties with interests in, four of the sites assessed, three of which are counted. Those interests are declared at Section 8 and identified on each appraisal. No site has been included in or excluded from the study by reason of any such interest, and each affected appraisal was prepared and certified by members of the team holding no interest in it.

The conclusion is tested by sensitivity analysis at Section 8. Excluding every site subject to a declared interest, which is the three counted sites, the capacity identified is 5,657 dwellings, or 1.44 times the allowance. Excluding every site rated Low confidence, it is 5,473 dwellings, or 1.39 times. Excluding the two largest sites on the schedule, it is 3,971 dwellings, or 1.01 times. Reducing every capacity figure in the study by a quarter, it is 4,561 dwellings, or 1.16 times. On the test combining the declared interest exclusion with a reduction of a quarter on every figure, the identified capacity is 4,243 dwellings and still exceeds the allowance.

Figure 1 Capacity identified against the large site windfall allowance



The conclusion of the study is that the large site windfall allowance in the submitted Plan is not an overestimate. The capacity exists, it is identifiable site by site, and it is supported by a margin which allows for a substantial proportion of the sites identified not to come forward within the plan period.

Introduction and the Inspectors' requirement

Purpose of this Study

1.1 - This Urban Capacity Study has been prepared by Expedite on behalf of Cardiff Council. It has been prepared in response to an action point arising from the Examination of the Replacement Local Development Plan 2021 to 2036, and forms part of the Council's evidence to that Examination.

1.2 - At the hearing session on the housing strategy held on 10 June 2026, the appointed Inspectors issued Action Point HS2.2 in the following terms:

"In order to support the Council's position on windfalls [by 30/9/26], Council 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."

1.3 - The purpose of the study is accordingly to identify sites within the Cardiff urban area falling within those categories, to establish ownership, and to identify the constraints bearing on their delivery, so that the Council's position on the contribution of windfall development to housing supply may be tested against identified sites rather than against projection alone.

What the study addresses

1.4 - The Council's windfall allowance comprises three components: large sites, small sites and changes of use. The sites with which this study is concerned are large sites, being those capable of accommodating ten or more dwellings. The study therefore addresses the large site component of the windfall allowance. The small site and change of use components are trend based projections derived from monitoring data and are not the subject of this study.

Table 1 - The Windfall Allowance and the Scope of this Study

Component of the Windfall Allowance	Dwellings	Treatment
Large sites of ten or more dwellings	3,929	Evidenced by this study, site by site
Small sites of fewer than ten dwellings	581	Separately evidenced. Outside the scope of this study
Change of use of existing buildings	1,027	Separately evidenced. Outside the scope of this study
Total windfall allowance in the submitted Plan	5,537	

1.5 - Each element of the action point is addressed as set out in the table below, and the structure of this report follows that sequence.

Table 2 - How each element of Action Point HS2.2 is Addressed

Requirement of Action Point HS2.2	Addressed at
Support the Council's position on windfalls	Sections 7 and 9
Identify vacant and under-utilised sites	Section 4
Identify sites on arterial routes and at public transport nodes	Section 4
Sites the Council referred to at the hearing	Section 4
Identify ownership	Section 5 & Appendix 1
Identify constraints to delivery	Section 5 & Appendix 1

1.6 - The reference in the action point to sites the Council referred to at the hearing is understood as a reference to the categories of site identified by the Council, namely vacant and under-utilised sites and sites on arterial routes and at public transport nodes, rather than to a schedule of named sites. The study identifies sites falling within those categories, and records for each site whether it was identified by Council officers or by the study team. This is set out at Section 4.

Status of this Study

1.7 - The methodology applied in this study was set out in a methodology statement prepared in advance of site assessment. That statement was agreed with the Council at a meeting held on 30 July 2026 and confirmed by the Council on 31 July 2026. Site assessment was undertaken thereafter, applying the criteria recorded in that statement. The statement is reproduced at Section 3.

1.8 - The sequence matters. The criteria, definitions and assumptions which govern how sites were identified, tested and counted were fixed and agreed before any site was assessed, and were applied consistently to every site considered. Certain numerical inputs, and in particular the density bands, were supplied by the Council during the assessment period rather than at the outset; that sequence is described at paragraphs 3.1 and 3.18. The findings recorded in this report are the outputs of that method. Where the study has departed from the agreed method in any respect, that departure is recorded with reasons at Table 5, and the methodology statement as agreed is reproduced at Appendix 6.

What this study is, and what it is not

1.9 - The appraisals in this study are high level. They are intended to inform the Council as to the development potential of each site identified and its likely contribution to the windfall allowance. They are not a substitute for the detailed technical, environmental and viability assessment that would accompany a planning application.

1.10 - The identification of a site within this study does not indicate that a future planning application in respect of that site would be determined favourably. The suitability of any site falls to be considered at planning application stage, having regard to all material considerations.

1.11 - Equally, the absence of a site from this study does not indicate that the site is unsuitable for windfall development. The study is not a comprehensive register of every site in Cardiff capable of accommodating housing, and by their nature windfall sites will continue to come forward which are not identified here.

1.12 - The study does not allocate land, and nothing in it should be read as doing so.

Authorship

1.13 - This study has been prepared by Expedite. The site appraisals have been undertaken by the study team, and all planning judgements, including the assessment of suitability, availability and achievability, delivery banding and confidence ratings, have been reviewed and certified by the named chartered planning lead.

1.14 - Interests held by Expedite and its associated companies in sites within the study area are declared at Appendix 3, and the sensitivity of the findings to those sites is reported at Section 8.

Policy & Evidence Context

National Policy

2.1 - Planning Policy Wales establishes a sequential preference for the use of previously developed land. Planning authorities are required to prioritise the use of suitable and sustainable previously developed land and under-utilised sites within existing settlements in advance of the consideration of other land. Planning Policy Wales also recognises that infill and windfall sites can make a useful contribution to the delivery of housing.

2.2 - Future Wales: The National Plan 2040 identifies Cardiff, Newport and the Valleys as a National Growth Area. Policy 12 of Future Wales provides that land in close proximity and with good access to metro stations is an important and finite resource which will play a key role in delivering sustainable urban places. That policy informs the treatment of sites at and around public transport nodes in this study.

2.3 - The Development Plans Manual provides that small and large site windfall rates should be considered as separate components of housing supply, and that the review of windfall delivery rates over different time periods should shape the consideration of a future extrapolation rate. It cautions against the use of abnormal trends for that purpose. The Manual further provides that an urban capacity study may be used to inform the identification of site allocations and to assist in demonstrating delivery of the windfall allowance in the plan. This study is prepared for the latter purpose.

Windfall development in Cardiff

2.4 - Windfall development is development which comes forward on land not identified in the development plan. Cardiff has a compact and predominantly urban form, and windfall development has historically made a substantial contribution to housing delivery in the city. Over the period from 2001 to 2025, windfall sites accounted for approximately 77 per cent of total completions in Cardiff. Over the most recent ten years that figure was approximately 66 per cent. In all but one year since the adoption of the current Local Development Plan in 2016, completions on windfall sites have exceeded completions on allocated sites.

2.5 - Over the last ten years more than 90 per cent of windfall completions in Cardiff took place on previously developed land. Windfall delivery in the city is therefore predominantly a brownfield phenomenon, and is closely associated with the redevelopment and repurposing of land and buildings within the existing urban area.

2.6 - The Council's evidence records that windfall opportunities have not diminished over time. Completions on windfall sites in 2024 to 2025 exceeded those recorded in the first year for which data is available. The composition of that supply has changed, with the reduction in traditional industrial redevelopment opportunities offset by the emergence of higher density forms of urban living, including co-living and build to rent development, and by continued pressure for the repurposing of commercial floorspace within the city centre and Cardiff Bay.

The windfall allowance in the submitted Plan

2.7 - The Council's Updated Background Technical Paper Number 1: Housing derives the windfall allowance from monitored completion rates over the ten year period to 2024 to 2025. Windfall completions are recorded in three categories, and an annual average is established for each. That average is then projected forward over the remainder of the plan period, subject to the adjustments described below.

2.8 - Three features of that derivation are material to this study. First, large site windfalls are excluded from the first two years of the trajectory, in accordance with national guidance, in order to avoid double counting with commitments already recorded in the residential landbank. Second, a reduction of 25 per cent has been applied to the large and small site projections to allow for the depletion of opportunities over time. The allowance is therefore already a conservative figure. Third, no allowance has been made for empty homes.

2.9 - The large site component of the allowance, being the component with which this study is concerned, is 3,929 dwellings over the remainder of the plan period.

The Residential Landbank

2.10 - At 1 April 2025 the residential landbank in Cardiff comprised some 20,056 units, being units under construction, units with planning permission not yet implemented, and units subject to a resolution to grant planning permission. A non-delivery allowance of 20 per cent has been applied to that landbank within the housing trajectory.

2.11 - The landbank is already counted within the trajectory. Sites which benefit from planning permission, or a resolution to grant planning permission, are therefore not included in this study. The cross-checks by which this has been secured are described at Sections 3 and 4, and the sites concerned are recorded at Appendix 2.

Local policy relevant to the assessment of sites

2.12 - A number of policies of the Replacement Local Development Plan bear directly upon the deliverability of unallocated sites for residential development, and have informed the assessment of individual sites in this study:

- Policy H9, which requires an applicant proposing the change of use or redevelopment of an unallocated site for residential use to demonstrate that there is no overriding need to retain the existing use.
- Policy H8, concerning the change of use of residential land or properties.
- Policy EC3, concerning protected employment land and premises.
- Policy EC6, concerning the protection of offices within the Central and Bay Business Area.
- Policy EC7, concerning the alternative use of employment land and premises not identified within Policies EC3 or EC6.
- Policies SP3 and SP4, concerning the efficient use of land, density and sustainable development patterns.
- Policy BG7, which resists development resulting in an increase in visitor pressure upon

European sites.

2.13 - Policies H9, EC3, EC6 and EC7 are of particular significance to this study, because a substantial proportion of the sites identified are in active or partial commercial use, and a number lie within the Central and Bay Business Area. The approach taken to those policies is described at Section 3 and the findings are reported at Section 5.

Comparable Practice

2.14 - Urban capacity studies have been prepared elsewhere in Wales in support of replacement local development plans, and the methodology applied here has had regard to that practice, in particular the Vale of Glamorgan Urban Capacity Study and the Bridgend Urban Capacity Study. Both studies derive from the Strategic Housing Land Availability Assessment practice guidance and are informed by the Development Plans Manual.

2.15 - Two features of that practice have been adopted here. The first is the publication of a schedule of sites removed from the study, together with the reason for removal in each case, so that the basis of the site selection is transparent. The second is the adoption of deliberately conservative capacity assumptions, so that the figures reported may be relied upon as a realistic rather than a theoretical maximum.

Matters raised at the Examination

2.16 - The reliability of the windfall allowance was the subject of representations at the hearing session held on 10 June 2026. Participants raised, in summary, the period over which the historic trend was calculated; the effect of plan policy requirements upon the area of a site available for development; the viability of brownfield development, having regard to contamination and abnormal costs; the operation of Policy H9; and the implications of recreation mitigation arising from the European sites.

2.17 - Those matters are addressed at Section 6, and the study has been designed so that each may be answered by reference to identified sites.

Methodology

3.1 - The methodology applied in this study was set out in a methodology statement issued to the Council, discussed at a meeting on 30 July 2026 and confirmed in writing on 31 July 2026. This section reproduces that statement so far as it bears on the findings, and the statement itself is at Appendix 6.

The criteria, definitions and assumptions which govern how sites were identified, tested and counted were fixed and agreed before any site was assessed. What was not fixed at that stage, and could not have been, were the numerical inputs the Council was to supply. The methodology statement records the approach to density as application by context band informed by recent Cardiff consents; it contains no figure for any band. The bands themselves were provided by the Council during the assessment period, on 19 August and 8 September 2026, and are described at paragraph 3.18. The distinction matters and the study does not claim more than it can show: the method was settled in advance, the Council's figures arrived while the work was in progress, and where the study has departed from what was agreed the departure is recorded at Table 5.

Study area, and the definition of windfall

3.2 - The study area is land within the Cardiff settlement boundary, as defined by the Council under Policy SP17.

3.3 - Windfall is defined as new dwelling completions on land not identified in the development plan, following Background Technical Paper Number 1. A site submitted as a candidate site but not allocated, and not otherwise counted within the identified housing supply, remains capable of being windfall; what matters is whether the capacity is already counted, not whether the site has previously been considered.

3.4 - The Council's monitoring categories are adopted without modification: large sites, being those delivering ten or more new build dwellings; small sites, being those delivering fewer than ten; and change of use, being existing buildings converted to residential use. The corresponding components of the windfall allowance are 3,929, 581 and 1,027 units, giving 5,537 in total.

3.5 - This study evidences the large site component only. That is the component to which Action Point HS2.2 is directed and which the objectors have questioned. The small site and change of use components are trend based projections and are not the subject of this study. It follows that capacity properly belonging to those components is excluded here. The site threshold is accordingly ten or more dwellings, and several sites have been excluded on that ground alone, since counting them would count the same units twice against two components of the same allowance.

Site Identification Criteria

3.6 - Action Point HS2.2 requires the identification of vacant and under utilised sites, and of sites on arterial routes and at public transport nodes. Each limb has been given an objective test.

3.7 - Public transport nodes comprise rail stations, metro stops and bus interchanges. A site is taken to be at a node if it lies within 500 metres walking distance of one, following Future Wales Policy 12. The catchment has been applied by measurement in every case rather than by impression.

3.8 - Arterial routes were defined in the methodology statement as principal radial corridors as defined by the Council. In place of that description the study adopts the Strategic Bus Route designation under Policy T2 of the Deposit Plan, as shown on the Proposals Map, which the Council confirmed. Adopting a published designation in place of the study team's own judgement removes a matter which would otherwise be open to argument. The substitution is a departure from the agreed methodology and is recorded as such at Table 5.

3.9 - Two sites illustrate the effect of applying these tests by measurement. Hadramowt at 39 Wedal Road and land off Wolfs Castle Avenue are both suburban and both outside any station catchment. Wedal Road adjoins Eastern Avenue, a designated Strategic Bus Route, and so passes the location test, although it carries no counted capacity for reasons unrelated to location. Wolfs Castle Avenue lies some 450 to 500 metres from the nearest designated route and is recorded as considered and discounted. The two sites are otherwise closely comparable, and the different outcomes follow from the measurement and not from any view taken about the sites.

Search Categories

3.10 - The search categories fixed in the methodology statement are:

- Vacant land and previously developed land;
- Under-utilised sites and buildings;
- Surplus and under-used surface car parks;
- Obsolete commercial and employment premises;
- Opportunities for redevelopment and intensification, including vertical intensification and space above commercial premises;
- Sites on arterial corridors; and
- Sites within the agreed catchment of public transport nodes.

Policy Tests

3.11 - Policy H9 permits the change of use of redundant premises and the redevelopment of redundant previously developed land. Criterion (i) requires additionally that there be no overriding need to retain the existing use and no overriding alternative local land use requirement. Redundancy has been treated as requiring evidence rather than assertion, and a site in active occupation has not been treated as redundant merely because an alternative

use would be more valuable.

3.12 - Three employment policy regimes may apply. Policy EC6 applies to offices within the Central and Bay Business Area and requires the retention of a significant element of commercial floorspace where they are lost to alternative use. Policy EC3 designates twenty five protected employment areas outside that designation, within which B1, B2 and B8 use is protected; sites within those areas are removed from the study. Policy EC7 applies where neither designation bites. The position of every site has been established against the Proposals Map. The Council confirmed on 26 August 2026, in response to query 23, that Policy EC5A may be subject to change following the action points arising from the hearing sessions, and that there will be a Matters Arising Change to its wording. That change is expected in October 2026, after the date of this study. Any conclusion in this report which turns on EC5A should be read subject to that.

3.13 - Policy EC6 is understood to bite on the loss of office floorspace. It follows that a site within the designation containing no office floorspace, such as cleared land, a surface car park or vacant brownfield land, does not engage the retention requirement.

Ground Floor Commercial Provision

3.14 - Where a site lies within the Central or Bay Business Area, or where the Council has indicated a ground floor commercial requirement, the ground floor is assumed to contain no residential accommodation. It is assumed to accommodate commercial floorspace together with the entrance, refuse and cycle stores, plant and residents' amenity. There is a second and independent basis for the same assumption. Revised Technical Advice Note 15, published in March 2025, treats all housing as highly vulnerable development, and the Council records at paragraph 9.160 of its committee report on Custom House (25/02351/FUL) that proposals which include residential development in a mapped flood zone must ensure that those uses do not occur at ground floor level. Almost every site in the study south of the Cardiff Central railway line lies in a mapped zone. The assumption is therefore applied to those sites whether or not they fall within the Central or Bay Business Area. It is also what the Council has asked for in practice: the committee report on Curran Embankment (21/00783/MJR) records at paragraph 2.15 that a Ground Floor Commercial Use Zone was proposed at the Council's request. The Council have since confirmed the position directly. In response to query 20 on 26 August 2026 they stated that under Policy EC6 each case will be assessed on its merits by reference to the scale of floorspace to be lost, and that retention of ground floor commercial or employment floorspace is likely to be a minimum requirement. In response to query 21 they confirmed that a Section 106 obligation will apply to the loss of employment floorspace, by reference to the Planning Obligations SPG, and that a commercial ground floor element is likely to be required. The assumption applied in this study is therefore the Council's own stated requirement, and is supported on three independent bases: employment policy, national flood policy under Technical Advice Note 15, and the Council's express confirmation.

3.15 - Where the building is of eight or more storeys, and so a tall building for the purposes of Policy D1, no deduction is made from the derived capacity on that account, because the ground floor of a tall residential building is given over to core, servicing and amenity in any event. Where the building is below eight storeys the ground floor is deducted and the

deduction stated. Where capacity is derived from a comparable which already embeds a non-residential ground floor, no further deduction is made, and the basis used is stated on each appraisal so that the deduction is not applied twice. Separately, a Section 106 contribution for the loss of employment floorspace is assumed as a cost on delivery wherever employment floorspace is lost, following the Council's confirmation at query 21. It is a cost on the scheme rather than a deduction from capacity, and it is addressed in the viability discussion at Section 6.

Capacity, Gross to Net, and Plan Policy Requirements

3.16 - Gross developable area has been established from Ordnance Survey mapping and checked against the registered title. Gross area is not used as the basis for yield. Net developable area is derived by applying the benchmark gross to net ratios agreed with the Council, following the Bridgend Urban Capacity Study: 100 per cent up to one hectare; 85 per cent from one to two hectares; 80 per cent from two to four hectares; and 75 per cent above four hectares.

3.17 - The benchmark ratios are understood to encompass the land take arising from plan policy requirements, including open space and play provision, sustainable drainage, tree replacement, biodiversity net benefit, green infrastructure, and access and active travel provision. Where a site carries an exceptional requirement beyond the benchmark, a site specific deduction is applied and the basis recorded. No general further deduction is made on account of policy requirements, since to do so would apply the same allowance twice.

3.18 - Density is applied by context band, using figures provided by the Council. The Council supplied on 19 August 2026, in answer to query 28, a range of up to 2,500 dwellings per hectare for a city centre tall building, derived from Custom House and Central Square Plots 4 and 5; 250 dwellings per hectare for the inner city; 50 to 120 for the outer city; and 35 to 50 at the edge of settlement. No figure was given at that stage for the ordinary city centre, into which the majority of the schedule falls. A figure of 1,000 dwellings per hectare for city centre mid rise of approximately eight to twelve storeys was put to the Council, applied to the schedule site by site with the Council at the meeting of 2 September 2026, and confirmed in writing by the Council on 8 September 2026. The figures used in this study are accordingly the Council's own. Two qualifications are applied to the highest band. The Council observed that the upper densities are very high and require a degree of pragmatism, and this study agrees: the 2,500 figure is used only where a tall building is separately justified on the particular site under Policy D1 and the Tall Buildings Supplementary Planning Guidance of January 2017, which the Council confirmed remains current, and not as a general city centre rate. And where an existing building is to be retained and converted rather than redeveloped, capacity is derived from the floorspace of the building and an assumed unit size rather than from a density multiplier applied to the site area, since a plot density applied to a conversion produces a figure unrelated to the building which will actually be converted.

Table 3 - Density Bands Applied

Band	Dwellings per Hectare	Application
City Centre, Tall Building	2,500	Only where justified under Policy D1 and the Tall Buildings SPG
City Centre	1,000	
Inner City	250	
Outer City	50 to 120	
Edge of Settlement	35 to 50	

3.19 - Where a site is the subject of a planning permission, a resolution to grant or a pre-application scheme, the capacity figure from that scheme is used in preference to any figure derived from density, since a capacity produced by a design team for a defined scheme and tested by the Council is better evidence than a multiplier. Where such a figure is used its source and status are stated, and a figure taken from an undetermined application is identified as the applicant's own.

3.20 - Capacity derived from pre-application discussion is treated differently from capacity derived from a permission or an application. Pre-application consultation between an owner and the Council is ordinarily confidential, and the schemes discussed are not settled. A figure produced by that process is therefore recorded as an approximation, rounded to the nearest five dwellings, and the scheme it rests on is not described. What is reported is the order of capacity the Council considers the site to hold, which is what this study needs, rather than the content of a confidential discussion, which it does not. Three sites are affected: Eastgate House, 24 Cathedral Road and 118 Maindy Road. The rounding is not material to the total, the three adjustments cancelling to nil.

Table 4 Density evidence: recent Cardiff consents and current applications, compared with the bands applied

Scheme	Reference	Decision	Units	Area (ha)	Dwellings per ha	Interest
Harlech Court, Bute Terrace	24/02946/ FUL	Granted Oct 2025	340	0.19	1,789	
Custom House Street	25/02351/ FUL	Resolved to grant Jun 2026	400	0.16	2,500	
51-59 Penarth Road	25/01022/ FUL	Granted Feb 2026	168	0.14	1,200	Declared Interest
Asset House, Traders Yard	24/02716/ FUL	Granted Dec 2025	182	0.16	1,138	Declared Interest
Principality House, The Friary	25/02366/ FUL	Un-Determined	237	0.21	1,129	Declared Interest
The Wharf, Schooner Way	26/00631/ FUL	Un-Determined	151	0.13	1,162	Declared Interest

3.21 - The recommended development form is recorded for each site, describing the scheme the capacity assumes: infill, conversion of an existing building, comprehensive redevelopment or residential led mixed use, and where the evidence supports it the tenure or product, whether development for sale, build to rent or co-living.

What counts as a Dwelling

3.22 - Capacity is counted in C3 dwellings. Co-living is treated as C3 and counted at one unit to one dwelling. The Council confirmed on 30 July 2026 that it treats co-living as falling within Class C3 for the purposes of the study, and its decisions are consistent with that treatment: on application 25/02351/FUL it applied the 20 per cent affordable housing requirement to all 400 units, screened the application under the EIA Regulations as exceeding the threshold of 150 dwellings, recorded the application type as major dwellings, and concluded that it was appropriate to treat the units as genuine residential accommodation.

3.23 - Purpose built student accommodation is discounted, save where it is evidenced that a consent has lapsed, remains unimplemented, or is unlikely to be completed having regard to the time elapsed since it was granted. That approach was confirmed with the Council on 13 August 2026.

Confidence, Delivery and Discounting

3.24 - Each site carries a confidence rating of High, Medium or Low, measuring the likelihood of the site contributing to housing delivery within the plan period. The rating does not measure the quality of the research undertaken, and the two are not to be confused. High and Medium confidence sites are counted. A site rated Low is counted only where it appears on the site schedule signed off by the Council on 2 September 2026 and the Council has confirmed that no Policy H9 or land use policy objection arises in respect of it; where a Low rated site is counted on that basis, the appraisal records the fact and the basis expressly. Five sites are counted on that basis, carrying 608 dwellings between them. The sensitivity analysis at Section 8.6 reports the capacity identified with all five excluded, so that the conclusions of the study may be read without them.

3.25 - Availability has been treated as the criterion requiring the most evidence, because it is the criterion on which most sites fail. Marketing particulars, pre-application activity, planning history, a completed disposal, a confirmed disposal intention or direct owner engagement are treated as evidence of availability. The ownership structure of a site is not. Where no evidence of availability exists, the appraisal records that fact rather than inferring intent.

3.26 - Delivery is assigned to bands: years one and two; years three to five; years six to ten; and beyond ten years to 2036. Sites falling within years one and two are reported separately and excluded from the counted contribution, consistent with the Council's exclusion of large site windfalls from the first two years of the trajectory.

3.27 - No further non-implementation discount is applied within the study. The Council has already applied a reduction to the large site windfall projection to allow for depletion of opportunities. A second discount would understate capacity by applying the same caution twice.

Avoiding Double Counting

3.28 - Every site has been checked against the Housing Monitoring Schedule 2024-25, base date 1 April 2025, comprising 360 landbank entries; against the housing commitments, allocations and housing led regeneration areas shown on the Proposals Map; and against the Replacement LDP Candidate Sites Register and Background Technical Paper Number 10. The 2024-25 schedule is the one against which the study is calibrated, and the base date of 1 April 2025 governs throughout.

3.29 - The check has since been repeated against the Housing Monitoring Schedule 2025-26, base date 1 April 2026, which the Council issued on 16 September 2026 and which comprises 321 entries. That schedule is not the basis of the study, but the second check is reported because it is the more onerous test. It identified two sites where a permission granted after the base date has since entered the landbank, and those are dealt with at Section 3.32. It confirmed no other overlap, and it confirmed the exclusion of Medallion House at Crwys Road recorded at Section 3.33.

3.30 - The methodology statement records at paragraph 6.1 that sites benefiting from planning permission or a resolution to grant are not included in the study. That rule exists

to prevent capacity being counted twice, and it has been applied to that end. The operative test is accordingly whether the capacity of a site is already counted elsewhere, whether as a commitment in the landbank, as an allocation, or within the identified supply. The existence of a permission is strong evidence that it is, and in most cases the two coincide.

3.31 - Where a site is not counted elsewhere, it is included. Application 25/02351/FUL at Custom House Street is the material example. The application was received on 13 October 2025 and resolved for approval on 4 June 2026, both after the base date of 1 April 2025. The site does not appear in the Housing Monitoring Schedule, and no entry in that schedule carries a date granted after the base date. Its capacity is therefore counted nowhere else, and to exclude it would understate the very thing the study exists to measure, namely large windfall sites coming forward in Cardiff. It is counted, and it is recorded expressly that its capacity will enter the landbank once permission is issued and is not additional to the landbank at any subsequent base date. The Council confirmed in answer to query 17 that it is content with this treatment.

3.32 - Two sites now demonstrate the second limb of that rule. Asset House at Traders Yard was consented in December 2025 and 51-59 Penarth Road in February 2026, both after the base date, and both appear in the 2025-26 schedule. Their consented capacity is accordingly no longer additional to the landbank as it now stands, and the treatment of each is recorded at Section 7. Both are declared interest sites, identified at Appendix 3, and the adjustment falls against the capacity this study reports rather than in its favour.

3.33 - The converse also follows. Medallion House at Crwys Road is recorded in the landbank at entry CS300 under application 23/01914 at 67 units, is therefore already counted, and is excluded. At The Wharf, 121 Schooner Way, the landbank records 107 units not started at entry BU138A across the whole of the consented scheme under 16/00660, on a site of 0.58 hectares. The present application covers blocks G and H alone, being 0.13 hectares, on which 19 of those 107 units sit. Those 19 cannot be delivered if the co-living scheme proceeds and are therefore deducted; the remaining 88 units lie outside this red line, are unaffected, and remain counted in the landbank. The net addition counted here is accordingly 151 less 19, being 132.

3.34 - Where two sites on the schedule adjoin one another, the capacity of each is derived from its own area alone and the red lines are checked so that no land falls within both.

Departures from the agreed methodology

3.35 - Paragraph 1.8 records that where this study has departed from the methodology agreed with the Council, the departure is recorded with reasons. Those departures are set out below. The methodology statement as agreed on 31 July 2026 is reproduced in full at Appendix 6, so that the reader may test each one against the source.

Table 5 Departures from the agreed methodology, and the reason in each case

Matter	What the agreed methodology provides	What the study has done	Reason
Gross to net	The agreed statement provides that gross area is not used as the basis for yield, and that the benchmark ratios are applied by site size.	On two sites over one hectare the counted figure equates to the gross area at the applicable band, without the 85 per cent ratio: CC.UCS.S19 and CC.UCS.S45. On a third, CC.UCS.S31, the ratio is likewise not applied, the counted figure of 1,000 sitting between the net figure the ratio would give and the gross figure at the band.	The benchmark ratios exist to account for the land take arising from plan policy requirements. On a city centre flatted scheme that land take is accommodated within the building envelope rather than at ground level, so deducting the ratio as well would apply the same allowance twice. The reasoning is recorded on each appraisal at Net Developable Area. Each figure is in any event the capacity signed off by the Council on 2 September 2026.
Arterial Routes	Defined as principal radial corridors as defined by the Council.	The Strategic Bus Route designation under Policy T2 of the Deposit Plan is adopted in its place.	The agreed description was not a designation capable of being applied by measurement. Substituting a published designation removes a matter which would otherwise rest on the study team's judgement. See paragraph 3.8.
Reporting as a range	Paragraph 7.4 provides that findings are reported as a range, comprising upper, central and lower figures, rather than as a single point estimate.	A single figure of 6,081 dwellings is reported, tested by the sensitivity analysis at Section 8.6 and Table 11.	The sensitivity analysis performs the function the range was intended to serve, and does so by reference to stated tests rather than to an unexplained spread. The capacity identified ranges from 6,081 to 3,971 across those tests.

Permissions granted after the base date	Paragraph 5.7 provides that capacity already carried in the landbank is not counted again. The landbank base date is 1 April 2025.	Two sites are counted whose permissions or resolutions post-date the base date and which will therefore appear in a later landbank: CC.UCS.S26 and CC.UCS.S55.	The capacity is not double counted at the base date this study reports against, which is the date on which the allowance was struck. The position was put to the Council at query 17 and confirmed. At CC.UCS.S26 the consented capacity has already entered the 2025-26 landbank and only the net addition above it is counted, so the figure reported is 55 rather than the 223 of the wider scheme. The reader should have that in mind when comparing this study with a later monitoring report. See paragraphs 3.31 and 3.32.
Confidence ratings and counting	The agreed statement defines High, Medium and Low but does not state which are counted.	Paragraph 3.24 provides that High and Medium sites are counted, and that a Low rated site is counted only where the Council has signed it off and confirmed no policy objection.	This is an addition rather than a departure. Five sites are counted on that basis, carrying 608 dwellings, and the sensitivity analysis reports the capacity with all five excluded.

Site Identification

4.1 - The schedule distinguishes between three categories of site, as required by the methodology statement and by Action Point HS2.2 itself.

4.2 - First, the sites to which the Council referred at the hearing. Action Point HS2.2 asks the Council to identify the vacant and under utilised sites, and the sites on arterial routes and public transport nodes, to which it referred at the hearing session. Those sites are the starting point of the study and are identified as such in the schedule at Appendix 1.

4.3 - Second, sites identified by Council officers at inception, and through the officer comments received from Planning Policy, Economic Development and City Centre Strategy on 13 August 2026.

4.4 - Third, additional sites identified by the study team through desktop review, geographic analysis and site survey, including the station catchment survey described below.

4.5 - The sources searched comprise the Council's own list of suggested windfall sites; the Replacement LDP Candidate Sites Register and Background Technical Paper Number 10; the Housing Monitoring Schedule; the planning register; previous capacity and brownfield studies; and the regeneration, transport and placemaking strategies identified in the methodology statement.

Station catchment survey

4.6 - The station catchment survey was undertaken as a discrete exercise. Every rail station in Cardiff was taken in turn and the land within a 500 metre walking catchment examined for vacant, cleared or under utilised sites capable of accommodating ten or more dwellings. The survey was confined to existing stations. Sites at proposed stations were not included, on the basis that their delivery and timing carry greater uncertainty; that is a conservative approach and is recorded as such.

4.7 - The survey matters to the standing of the study as well as to its content. Action Point HS2.2 asks for sites at public transport nodes, and a station by station survey demonstrates that the requirement was addressed methodically across the whole city rather than by assessing whatever was brought to the study team.

The Council's review of the schedule

4.8 - The Council reviewed the site schedule and returned comments on 13 August 2026 from Planning Policy, Economic Development and City Centre Strategy. Those comments identified sites already counted within the Council's own figures, sites holding extant permission for other uses, sites subject to policy designation, and duplication. The Council's review and the resulting decisions are reproduced at Appendix 2.

4.9 - The treatment applied follows the methodology statement. Sites whose capacity is already counted elsewhere are excluded, for the reasons at Section 3.30. Sites within protected employment areas are removed. Duplicated entries are removed. Co-living schemes are retained and counted. Purpose built student accommodation is discounted, save where a lapse or non-implementation case is evidenced.

4.10 - The schedule reported to the Council on 13 August 2026 comprised 63 sites under investigation. Three were added subsequently, two of them reinstated once the Council confirmed they formed no part of the identified supply, so that 66 sites have been examined in total. Following the Council's written comments of 13 August, its responses to the query schedule between 19 August and 8 September 2026, and the meetings of 13 August and 2 September 2026, 40 of those sites carry no capacity in the figures reported at Section 7. Twenty five were removed from the schedule outright and fifteen remain on it but contribute nothing, either because the Council has not signed them off or because the site is held pending a matter which does not affect the conclusions. All forty are listed together, in site reference order and with the reason in each case, at Appendix 2. Twenty six sites carry capacity, and those sites are the subject of Section 7.

Table 6 Site Identification and Testing

Stage	Sites	Note
Sites examined	66	Identified from the seven search categories and tested against the criteria
Removed from the schedule, with a stated reason	25	Reported at Appendix 2
Retained on the schedule at nil capacity	15	Assessed but contributing no capacity. Also reported at Appendix 2
Counted towards the windfall contribution	26	Carrying 6,081 dwellings. Appraisals at Appendix 1

4.11 - Every site considered, including those subsequently removed, is recorded against the sift criteria with reasons. The schedule of sites removed from the study, with the reason for removal in each case, is at Appendix 2. A study which can be seen to have tested sites against stated criteria and rejected those which failed them is of more value than one which counts everything it examined.

Site Assessment Findings

5.1 - This section reports the findings of the site assessment. The appraisals are at Appendix 1 and record, for each site: location, area and existing use; planning status, and whether the site appears in the Housing Monitoring Schedule or on the Candidate Sites Register; environmental and physical constraints; the Policy H9 position; gross and net developable area, density and yield; ownership, including the registered owner and the title number where known; suitability, availability and achievability; the likely delivery timescale and the confidence rating; and whether the site is counted and at what figure.

5.2 - Certain findings are already established and are recorded here because they bear on the schedule as a whole rather than on individual sites.

5.3 - Sites fail predominantly on availability rather than suitability. Very few sites on the schedule are physically or in policy terms incapable of residential development. A great many carry no evidence that anyone intends to bring them forward. That is a normal outcome for a study of this kind, and it is the reason the study has sought owner engagement through the Council.

5.4 - Ownership is a mandatory field, being expressly required by Action Point HS2.2. It has been established from Council records, Land Registry title information and other publicly available sources. Where ownership could not be established, that is stated expressly on the appraisal rather than left blank.

Table 7 Basis on which capacity is derived

Basis of Capacity	Sites	Dwellings	Share	Site References
Scheme	8	1,436	23.6%	S6, S24, S27, S39, S50, S53, S55, S56
Band	12	4,133	68.0%	S2, S13, S19, S20, S22, S23, S31, S36, S37, S40, S45, S49
Indicative	6	512	8.4%	S3, S9, S26, S30, S47, S62
Total	26	6,081	100.0%	

5.5 - The employment designation position, which at the outset appeared likely to be determinative on a substantial number of sites, has proved less restrictive than expected. No Policy EC3 designation affects the sites at Dominion Way, Clydesmuir Industrial Estate, either Maindy Road site, Cowbridge Road East, Asset House at Traders Yard, St Mary's House, Pierhead Street or the Dumballs Road corridor.

5.6 - Conversely the Central and Bay Business Area extends further than expected, taking in the Newport Road group, Charles Street, Queen Street, Custom House Street, Cardiff Central, James Street, John Street, Bute Street and the Pierhead Street sites. The effect is smaller than the extent suggests, for the reason at Section 3.13: Policy EC6 bites on the loss of office

floorspace and a majority of those sites contain none.

Recreation mitigation

5.7 - Every site lies within the 12.6 kilometre catchment of the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar site, and a number lie within the 6 kilometre buffer around the Cardiff Beech Woods Special Area of Conservation. Policy BG7 requires mitigation, and contributions towards Strategic Access Management and Monitoring and towards Suitable Alternative Natural Greenspace are anticipated on each site.

5.8 - The Council's Strategic Access Management and Monitoring and Suitable Alternative Natural Greenspace study, prepared by Footprint Ecology, is in preparation and will set the mechanism and the contribution per dwelling. The Council advised on 30 September 2026 that the latest figures are £555.75 per dwelling within the 12.6 kilometre Severn Estuary catchment and £1,721.61 per dwelling on those sites lying within 6 kilometres of the Cardiff Beech Woods. Those figures supersede the indicative costs given on 8 September. Recreation mitigation is a standard cost falling on every residential scheme in the study area, including the Plan's allocated sites, and is not a constraint peculiar to windfall development. No site in this study has been discounted, and no capacity reduced, on this ground. The appraisals record the requirement as a cost to delivery rather than as a limit on capacity, and the position is addressed at Section 6.6.

Environmental and physical constraints

5.9 - The deposit plan Constraints Map, RLDP-10, dated January 2025, has been checked against every site. It carries the designations that sit over the policy designations on the Proposals Map: flood risk data prepared for the revised Technical Advice Note 15, Health and Safety Executive Development Proximity Zones, Archaeologically Sensitive Areas, conservation areas, scheduled ancient monuments, historic parks and gardens, sites of importance for nature conservation, air quality management zones, and the potential rapid transit corridor and proposed rail station network.

5.10 - Flood risk is the constraint that bears most widely. Almost the whole of the study area south of the Cardiff Central railway line lies within mapped flood data, including Butetown, Cardiff Bay, the Dumballs Road corridor, Penarth Road and Grangetown, Atlantic Wharf, and Splott and Tremorfa. The sites in Cathays, Roath and the northern suburbs are largely unaffected, save for the Taff corridor at Maindy and the Roath Brook small watercourse corridor.

5.11 - Revised Technical Advice Note 15 was published in March 2025 and replaces the 2004 note. The Flood Map for Planning is now the operative map in place of the Development Advice Map, and all housing is highly vulnerable development. The framework therefore changed part way through the plan period. The Council's committee report on Curran Embankment, determined before that date, records the Flood Map for Planning as having no official status pending implementation. The report on Custom House, determined afterwards, applies it directly.

5.12 - The great majority of the affected land is previously developed land within a Defended Zone, benefiting from the Cardiff Bay Barrage and from the Taff and Ely defences. Technical Advice Note 15 treats that combination more favourably than undefended land, but it does not disapply the tolerability tests in sections 10 and 11 of the note.

5.13 - Flood risk does not reduce the capacity identified by this study, for three reasons. First, the Council has continued to grant permission for residential development in these zones under the revised note. Custom House lies in Flood Zone 2 for rivers and sea and Flood Zone 3 for the sea, within a Defended Zone. Natural Resources Wales advised that hazard ratings along Bute Terrace in an extreme event would range from danger to most to danger to all, which does not meet the tolerability criteria at Figure 6 of the note, and left the judgement to the Council. Officers recommended approval, reflecting the intention to prioritise redevelopment of the brownfield site. Second, Curran Embankment, at up to 2,500 homes the largest scheme in the study area, lies largely in Flood Zone 3 within a Defended Zone and was approved. Third, the same constraint lies over the Plan's own strategic allocations in the city centre and the Bay and over the great majority of the existing landbank. A constraint which defeated windfall capacity here would equally defeat the allocated supply.

5.14 - What flood risk does affect is form rather than quantum. It requires finished floor levels to be set by reference to the design event, it requires a flood consequences assessment and an emergency plan, and it requires that residential accommodation is not provided at ground floor level. The last of those is reflected in the ground floor assumption at Section 3.14, and is a further reason why the capacity figures in this study are conservative rather than optimistic.

5.15 - Health and Safety Executive Development Proximity Zones are mapped in the Rover Way and East Moors area, in the Queen Alexandra and Roath Dock area, and in the Ferry Road and Penarth Road area. A site within a consultation zone is not incapable of residential development, but the Executive is a statutory consultee and an adverse response is a material constraint on delivery. The sites at Dominion Way and Clydesmuir Industrial Estate, and the Penarth Road and Bay sites, have been screened against the mapped zones. Only the vacant land at Pier Street lies within a kilometre of a notifiable installation, at approximately 980 metres, and that site carries no counted capacity. Clydesmuir Industrial Estate and Dominion Way both lie outside the mapped zones. No counted site is affected, and the screening was reported to the Council on 2 September 2026.

5.16 - One of the four Archaeologically Sensitive Areas covers the city centre, running from Cathays Park south across the retail core and the St Mary Street and Callaghan Square area to the Butetown edge. It catches the majority of the city centre sites. Its effect is to require archaeological mitigation, ordinarily a watching brief during groundworks secured by condition, as was required at Custom House. It affects programme and cost at the margin. It does not reduce yield.

5.17 - Twenty seven conservation areas are designated, of which the Charles Street, Churchill Way, Queen Street, St Mary Street, Windsor Place, Cathays Park, Cathedral Road, Mount Stuart Square and Pierhead areas bear on sites in the study. The scheduled ancient monument at Cardiff Castle and the Roman Fort lies immediately north west of the retail core and its setting is capable of being material to tall building proposals in the city centre. Four air

quality management zones are designated, of which zone 1 covers part of the city centre and zone 4 lies on Newport Road. Each of these is a design and mitigation matter addressed at application stage. None of them reduces the capacity identified.

5.18 - The Constraints Map also assists the study. It shows a potential rapid transit corridor network and a substantial number of proposed rail stations, neither of which appears on the Proposals Map. Corridors run along Bute Street and Lloyd George Avenue, along Bute Place towards Roath Basin and Ocean Way, north to south through Splott, along Penarth Road through Grangetown, and north through Cathays. Proposed stations are shown in Butetown, along the Bay and Ocean Way corridor, along the Splott and Tremorfa alignment, at Cathays, and in the Callaghan Square area south of Cardiff Central. This is the Council's own mapped evidence of where the public transport nodes referred to in Action Point HS2.2 lie, and a number of the study sites fall within the 500 metre catchment of a proposed station. The legend records that alignments remain subject to further work, and they are treated in this study as indicative rather than safeguarded.

Matters Raised at the Hearing Session

6.1 - This section addresses the matters raised in the hearing statements on the housing strategy, and in particular the reliability of the large site windfall allowance.

The effect of plan policy requirements on developable area

6.2 - It was suggested that the study would overstate capacity by failing to allow for the land take arising from plan policy requirements. The benchmark gross to net ratios applied are understood to encompass that land take, including open space and play provision, sustainable drainage, tree replacement, biodiversity net benefit, green infrastructure, and access and active travel provision. Gross area is not used as the basis for yield in any case. Where a site carries an exceptional requirement beyond the benchmark, a site specific deduction is applied and recorded. A general further deduction is not made, because that would apply the same allowance twice.

Brownfield viability

6.3 - The Viability Assessment of May 2024 records negative residual values on several city centre flatted brownfield typologies before affordable housing is applied, and an updated assessment is in preparation. The study should not be read as assuming viability is unproblematic on the sites it identifies.

6.4 - The most recent Cardiff evidence is set out here rather than left to be found. On application 25/02351/FUL at Custom House Street, a 33 storey scheme of 400 co-living units in the highest value part of the city, the policy compliant affordable housing contribution was £7,316,800. The applicant submitted a viability appraisal concluding the scheme would be unviable were the contributions required in full. The Council commissioned an independent review, which concluded that the scheme would not be financially viable if required to meet the full level of contributions sought but could support a reduced level. The agreed package is £1.3 million, of which £935,000 is affordable housing, being 12.78 per cent of the sum requested.

6.5 - Two conclusions follow and they point in different directions. City centre brownfield development in Cardiff is marginal in viability terms, and policy compliant contributions are not being achieved even on the strongest sites. But the scheme is nevertheless coming forward, having been resolved for approval on 4 June 2026. Viability constrains what such sites contribute by way of planning obligations. It has not prevented them being brought forward, and the trend evidence at 6.8 shows that they continue to be.

Recreation mitigation

6.6 - It was suggested that recreation mitigation under Policy BG7 would render sites undeliverable. The requirement applies across the study area and to the Plan's allocated sites equally, so it does not bear differentially on windfall capacity, and it has not prevented

consents coming forward in Cardiff since Policy BG7 took effect. It is a cost to delivery, not a limit on capacity. No site has been discounted on this ground.

Policy H9

6.7 - It was suggested that Policy H9 would prevent the redevelopment of sites in active use. The study accepts that proposition and applies it. Redundancy is treated as requiring evidence, and a substantial number of sites have been discounted precisely because the premises are in active occupation and the redundancy limb is not satisfied. Those sites are listed at Appendix 2.

Whether the allowance is supported by the trend evidence

6.8 - The large site trend rate rose from 519.7 to 582.1 dwellings a year over the most recent monitoring period, because 2024-25 delivered 893 units against 269 dropped from the rolling window. That is direct evidence against the proposition that the supply of windfall sites is depleting.

Whether capacity is double counted

6.9 - The controls applied are at Sections 3.28 to 3.34. Every site has been checked against 360 landbank entries, against the commitments and allocations on the Proposals Map, and against the candidate sites register. Sites already counted have been removed, including Medallion House at Crwys Road.

Whether the allowance is an overestimate

6.10 - Three points are relevant. The study addresses only the large site component and applies a threshold of ten dwellings to prevent capacity belonging to the other components being counted here. Capacity in years one and two is reported but not counted. And the identified supply in the Plan has reduced since deposit: the Statement of Common Ground with Associated British Ports of 17 April 2026 agrees the deletion of allocation H2.4 Roath Dock (North Side) with its estimated 316 dwellings, and a reduced boundary for allocation H2.5 Porth Teigr and Alexandra Head which the Council accepts may reduce its capacity. The windfall allowance is accordingly doing more work in the supply than it was at deposit, not less.

Contribution to Windfall Supply

7.1 - The study identifies capacity for 6,081 dwellings on 26 sites. The large site component of the windfall allowance which this study is required to support is 3,929 dwellings. The capacity identified is accordingly 1.55 times the allowance, with headroom of 2,152 dwellings.

Table 8 Counted sites schedule

Site	Name	Area (ha)	Capacity	Basis of Capacity	Confidence	Delivery Years
S2	Admirals Landing, Schooner Way	0.14	60	Band	Low	Beyond 10, to 2036
S3	Cardiff Bute Terrace Hotel	0.28	165	Indicative	Medium	6 to 10
S6	Eastgate House, Newport Road	0.31	120	Scheme	Medium	6 to 10
S9	Former HMRC Tax Office, Ty Glas Road	7.49	100	Indicative	Medium	6 to 10
S13	Howard Gardens, Adamsdown	0.13	128	Band	Medium	6 to 10
S19	NCP Adam Street Car Park	1.11	1,110	Band	Medium	6 to 10
S20	NCP Knox Road Car Park	0.44	441	Band	Medium	6 to 10
S22	Orchard Media, Curran Road	0.35	346	Band	Medium	6 to 10
S23	Plot 6, Pierhead Street	0.74	184	Band	Medium	6 to 10
S24	Principality House, The Friary	0.21	237	Scheme	Medium	3 to 5
S26	St Mary's House and 51-59 Penarth Road	0.16	55	Indicative	Medium	3 to 5
S27	The Wharf, Schooner Way (Blocks G and H)	0.13	132	Scheme	High	3 to 5
S30	University Halls, Birchwood Road	3.07	100	Indicative	Low	Beyond 10, to 2036
S31	Utilita Arena Cardiff	1.07	1,000	Band	Medium	6 to 10

S36	Clydesmuir Industrial Estate	1.65	93	Band	High	3 to 5
S37	Bute Street Car Park	0.13	132	Band	Medium	6 to 10
S39	James Street (former Merthyr House)	0.19	47	Scheme	High	3 to 5
S40	Cardiff Central Station Car Park (Plot 4)	0.09	221	Band	Medium	3 to 5
S45	Cardiff Theatrical Services, Ellen Street	1.15	288	Band	Low	Beyond 10, to 2036
S47	5-7 Queen Street	0.06	30	Indicative	Low	Beyond 10, to 2036
S49	64 Charles Street	0.13	130	Band	Low	Beyond 10, to 2036
S50	24 Cathedral Road	0.23	53	Scheme	High	3 to 5
S53	118 Maindy Road	0.10	30	Scheme	Medium	3 to 5
S55	Land at Custom House Street	0.16	400	Scheme	High	3 to 5
S56	Land north of John Street, Butetown	0.45	417	Scheme	High	3 to 5
S62	Former Star Centre, Splott Road	0.41	62	Indicative	Medium	6 to 10
	Total, 26 Counted Sites		6,081			

7.2 - One point of principle governs how the arithmetic should be read. This study is a snapshot of the capacity available at a point in time. Windfall is by its nature a rolling process in which sites enter and leave the pool continuously, and the study does not purport to identify every site which will come forward over the remainder of the plan period. What it can properly demonstrate is that a substantial stock of urban capacity exists at the present time; that the stock is consistent with the annual rate assumed in the allowance; and that it replenishes, which the trend evidence at Section 6.8 shows.

7.3 - The study is not therefore to be read as failing if the capacity it identifies is less than 3,929 units, nor as proving the allowance if it exceeds it. The question is whether the identified capacity is consistent with the assumed annual rate over the remainder of the plan period, and that is the question this section addresses.

7.4 - The figure of 6,081 dwellings reported at paragraph 7.1 is the Council's own. Capacity was recorded site by site with the Council at the meeting of 2 September 2026, producing a total of 6,620 dwellings, and eight adjustments have been made since, each of them on the Council's own information and the schedule as it finally stands having been settled with the Council on 25 September 2026.

7.5 - Three sites have been removed. Dominion Way comes off following the Council's advice that a refurbishment of some £2.25 million has future proofed the estate for industrial use, reducing the total by 15. The former Natural Resources Wales headquarters at Ty Cambria comes off, the Council having confirmed on 8 September that no residential figure survives the enquiry now before it, reducing the total by 218. And Asset House at Traders Yard comes off, for the reason given below, reducing the total by 181.

7.6 - Two sites are reduced to the net addition they make over capacity already counted in the landbank. The Wharf is reduced from 151 to 132, being the net addition after the 19 dwellings already consented on blocks G and H. St Mary's House and 51-59 Penarth Road is reduced from 303 to 55, again for the reason given below, a reduction of 248.

7.7 - Three sites are increased. Eastgate House, previously carried at nil, is entered at 120, the Council having confirmed that the site has capacity for residential use on its upper floors with the lower floors remaining in commercial use. Principality House is increased from 218 to 237, the Council having adjusted the figure on 25 September to reflect the proposal now before it. And 24 Cathedral Road is increased from 50 to 53 on the pre-application figure supplied by the Council. 118 Maindy Road is carried at the 30 dwellings originally recorded, the Council having confirmed that figure as the appropriate one. Eastgate House rests on a pre-application figure and is rounded in accordance with the convention at Section 3.

7.8 - The two reductions arise from the same point and are made against this study rather than for it. Asset House was consented on 10 December 2025 under 24/02716/FUL for 182 dwellings, and now appears in the Housing Monitoring Schedule 2025-26 at entry BU182. Its capacity is accordingly counted in the landbank, there is no wider scheme and no additional land, so no net addition arises and the site is removed to Appendix 2. At St Mary's House and 51-59 Penarth Road, 168 dwellings were consented on 12 February 2026 under 25/01022/FUL and likewise appear in the landbank, at entry BU185. What the site adds beyond that is the

capacity of St Mary's House itself, which the consent does not develop. That is counted at 55 dwellings, being 768 dwellings per hectare on the 716 square metre title, which is below the city centre band of 1,000 applied elsewhere in this study. Both are sites in which an interest is declared, and both are identified at Appendix 3.

Table 9 Capacity by confidence rating

Confidence Rating	Sites	Dwellings	Share	Site References
High	6	1,142	18.8%	S27, S36, S39, S50, S55, S56
Medium	15	4,331	71.2%	S3, S6, S9, S13, S19, S20, S22, S23, S24, S26, S31, S37, S40, S53, S62
Low	5	608	10.0%	S2, S30, S45, S47, S49
Total	26	6,081	100.0%	

7.9 - The capacity is spread across the schedule, although two sites carry a material share of it. Two sites account for 2,110 dwellings, four for a further 1,604, twelve for 1,937 and eight for 430. The two largest, at NCP Adam Street and the Utilita Arena, together represent 35 per cent of the total. Concentration of that order is a normal feature of urban capacity, large sites being what an urban capacity study is for, and the answer to it is the evidence that those two sites will come forward. That evidence is set out at Section 7.10 rather than left to the appraisals. The arithmetic effect of removing both is reported at Table 11 for completeness, and on that test the remaining capacity of 3,971 dwellings still exceeds the allowance.

Table 10 Capacity by delivery band

Delivery Band	Sites	Dwellings	Share	Site References
3 to 5	10	1,685	27.7%	S24, S26, S27, S36, S39, S40, S50, S53, S55, S56
6 to 10	11	3,788	62.3%	S3, S6, S9, S13, S19, S20, S22, S23, S31, S37, S62
Beyond 10, to 2036	5	608	10.0%	S2, S30, S45, S47, S49
Total	26	6,081	100.0%	

Availability of the two largest sites

7.10 - Two sites carry a third of the capacity identified, and the evidence of their availability is set out here rather than left to the appraisals alone.

7.11 - The Utilita Arena is in the ownership of Cardiff Council, and the event which releases the site is a scheme the Council is itself delivering. The replacement venue, the New Cardiff Bay Arena at Atlantic Wharf, received its final go-ahead in August 2025 and construction commenced on 21 July 2025, with McLaren Construction Group appointed as main contractor alongside Robertson Group. Enabling works were completed through 2024 and 2025 and

the structural frame was being erected during 2026. The venue is programmed to open in 2028 with a capacity of approximately 16,500, and Live Nation UK will operate it under an arrangement in which the Council remains the owner. The existing arena is expected to become surplus to requirements on the opening of its replacement. That is a stronger form of availability evidence than most sites in any urban capacity study can offer: the landowner is the Council itself, the release of the site does not depend on a third party forming an intention, and the replacement is under construction rather than proposed. The delivery band of six to ten years applied to the site is conservative against a 2028 opening. The programme has moved from 2023 to 2026 and 2027 and now to 2028, and the study records that slippage openly; it has been cost driven rather than consent driven, so the principal risk to the date is construction inflation rather than planning.

7.12 - NCP Adam Street is a surface car park of 1.11 hectares occupying a series of cleared parcels between Adam Street, Pellett Street, Duffryn Street, Garth Street and Taff Street. The Council confirmed in its written comments of 13 August 2026 that the site carries no Policy H9 risk and no land use policy concerns, and the capacity of 1,110 dwellings is the figure the Council signed off on 2 September 2026.

7.13 - Ownership is fragmented on its face and stronger in substance. Sixteen registered titles are involved, but thirteen of them are held by one owner, Marcol Asset Management Limited. Of the remaining three, one is a nineteen square metre electricity substation which can be retained or diverted by agreement, and the other two are held by Transport for Wales and by Amodeo Holdings Limited. The greater part of the assembly is therefore already in a single hand, and that owner is not a passive holder of the land. The Marcol Estate also holds land at Guildford Crescent within the same quarter of the city, where a thirty storey build to rent development of 272 dwellings has been consented and built. An owner which has assembled thirteen titles across a single block, and which has delivered a residential tower a short distance away, is an owner capable of bringing this site forward. The principle is established here too: the Council's schedule of expired permissions records two outline consents on car park land in this block at St David's 2, Site B, Adam Street, references 05/00502 and 05/00503, both granted in September 2005. Those consents did not come forward, which the study records rather than passes over, but they show the Council has accepted the principle of residential development here before.

7.14 - The study does not overstate what remains outstanding. The pre-application recorded on the schedule has not been confirmed with a reference; three titles sit outside the principal ownership; and possible hydrocarbon contamination from the former service station at 3 to 6 Adam Street has not been investigated. Those are the reasons the site is rated Medium rather than High and placed in the six to ten year band, and the reasons the sensitivity analysis at Table 11 reports the position with both of the two largest sites removed. On that test the capacity identified is 3,971 dwellings, which still exceeds the allowance. On density the figure applied is conservative: 1,000 dwellings per hectare is the ordinary city centre band, and measured on the same basis the Council granted 1,789 dwellings per hectare at Harlech Court, Bute Terrace in October 2025 under 24/02946/FUL. The band applied here is approximately 56 per cent of the density the Council has recently consented in the same part of the city.

7.15 - Reconciled against historic delivery, the identified capacity is consistent with the annual rate assumed in the allowance, and the reconciliation can be shown rather than asserted. The large site trend rate reported at Section 6.8 is 582.1 dwellings a year. Reduced by a quarter, being the depletion allowance the Council has applied and which is described at Section 3.27, that rate gives 436.6 dwellings a year. Applied across the nine years of the remainder of the plan period it produces 3,929 dwellings, which is the large site allowance exactly. The allowance is therefore the historic rate, discounted for depletion, carried forward. The capacity identified by this study, 6,081 dwellings, is 1.55 times that figure, so the stock identified is sufficient to sustain the assumed rate over the remainder of the plan period with a substantial margin for non delivery.

7.16 - No counted site falls within years one and two. Paragraph 3.26 provides that any site falling in those years is reported separately and excluded from the counted contribution, consistent with the Council's own exclusion of large site windfall from the first two years of the trajectory. The position is recorded here for completeness: the figure reported separately is nil, and no capacity has been excluded on that ground.

Sensitivity and Assurance

Declared Interests

8.1 - Expedite and its associated companies operate as planning, property and design consultancies in Cardiff, and hold or have held interests in, or act or have acted for parties with interests in, land within the study area and in schemes which would otherwise serve as evidence within it. Those interests are declared at Appendix 3.

8.2 - No site has been included in, or excluded from, this study by reason of any such interest. All sites have been identified and assessed against the criteria at Section 3, agreed with the Council before assessment commenced and applied consistently to every site considered. A site subject to a declared interest has been assessed against those same criteria, to the same evidential standard, without modification.

8.3 - Where an interest is declared in respect of a site, the appraisal has been prepared and scored by members of the study team holding no interest in it, and certified by a chartered town planner holding no interest in the site and no involvement in the matter giving rise to the interest. The certifying planner is identified in each case at Appendix 3.

8.4 - The density evidence requires a word of explanation. Four of the six Cardiff decisions and applications relied upon at Table 4 are schemes in which Expedite or its associated companies have a declared interest. That is a function of the Cardiff market rather than of selection: the group is among the most active promoters of city centre residential development in the city, and the recent co-living consents which establish the density evidence are consequently its own. A study which excluded them would be excluding the most directly relevant decisions the Council has made.

Three points are made so that the reader may weigh the evidence. First, each of these schemes is a decision of Cardiff Council, and the unit numbers, site areas and resulting densities are matters of public record which any consultant applying this method would cite. Second, the schemes in which an interest is declared are identified as such at Table 4, so that a reader may discount them and consider the remaining evidence. Third, and most importantly, the density bands applied in this study are the Council's own figures, supplied in answer to query 28 and confirmed in writing on 8 September 2026. The bands do not rest on these comparables. The comparables are reported to show that the bands are consistent with what Cardiff has actually consented, and the study would apply the same bands if the table were omitted altogether.

Sensitivity analysis

8.5 - Paragraph 8.6 and Table 11 report the contribution both including and excluding all sites subject to a declared interest, so that the sensitivity of the conclusions to those sites may be assessed directly.

8.6 - Five further tests are reported so that the range within which the conclusion holds is visible. Excluding all three sites subject to a declared interest, which together carry 424 dwellings, the capacity identified is 5,657 dwellings, or 1.44 times the allowance. Excluding the five sites rated Low confidence, which together carry 608 dwellings, it is 5,473 dwellings, or 1.39 times. Excluding the two largest sites on the schedule, it is 3,971 dwellings, or 1.01 times. Reducing every capacity figure in the study by a quarter, which is a more severe test than any adjustment to a single density band would produce, it is 4,561 dwellings, or 1.16 times. Applying the declared interest exclusion and the quarter reduction together, the capacity identified is 4,243 dwellings, which still exceeds the allowance. The allowance is exceeded on every test.

8.7 - One of those tests calls for a word of explanation. No policy or guidance requires an urban capacity study to demonstrate that it survives the removal of its largest sites, and the test is not a standard against which this study should be judged. It is reported because the concentration of capacity in a small number of large sites is a fair question to ask, and it is better answered than left. But no urban capacity study anywhere would be unaffected by the removal of its two largest sites: that is a property of urban capacity, where the large sites are the point, rather than a defect in this study. The proper answer to the question is not the arithmetic but the evidence, and the evidence that the two largest sites will come forward is set out site by site at Section 7.10.

Table 11 Sensitivity Analysis

Test	Capacity Identified	Multiple of the Allowance	Headroom above the Allowance
Capacity identified	6,081	1.55	2,152
Excluding all Low confidence sites (608 dwellings)	5,473	1.39	1,544
Excluding the three declared interest sites (424 dwellings)	5,657	1.44	1,728
Reducing every capacity figure by a quarter	4,561	1.16	632
Excluding the two largest sites on the schedule	3,971	1.01	42
Declared interest exclusion and quarter reduction combined	4,243	1.08	314

Double counting cross-checks

8.8 - The cross-checks undertaken are at Sections 3.28 to 3.34 and the results are reported site by site at Appendix 1. Sites excluded because their capacity is counted elsewhere are identified at Appendix 2 with the entry or allocation concerned.

Certification

8.9 - Every site judgement is certified by a named chartered town planner. Where an interest is declared, certification is by a chartered town planner holding no interest in that site. Certification is site by site rather than by general clearance.

Limitations

8.10 - The appraisals in this study are high level. They are intended to establish whether a site is capable of contributing and at what order of capacity, 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. The study does not allocate land, and nothing in it should be read as doing so.

8.11 - The study is a snapshot at the date stated. It has been prepared to a short programme in response to an Examination action point, and the appraisals reflect the information reasonably available in that period. Where a matter was not resolved at the date of this report, that is stated on the face of the paragraph which deals with it rather than collected in a separate schedule.

Conclusions

9.1 - Action Point HS2.2 asked the Council to carry out an urban capacity study identifying the vacant and under utilised 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. This study does that, and concludes that the large site windfall allowance in the submitted Plan is supported by identified capacity.

9.2 - The study identifies capacity for 6,081 dwellings on 26 sites against a large site allowance of 3,929, a ratio of 1.55 to one. That conclusion does not rest on optimism about any individual site. It survives the removal of the two largest sites on the schedule, it survives the exclusion of every site in which the authors have declared an interest, it survives the exclusion of every site rated Low confidence, and it survives a reduction of a quarter applied to every capacity figure in the study. Two further matters bear on how the figure should be read.

9.3 - The first is the relationship between the capacity identified here and the wider stock of urban capacity in Cardiff. This study is confined to large sites of ten or more dwellings, identified at a point in time. It does not capture the small sites and change of use components of the allowance, which are separately evidenced, nor sites which will come forward within the plan period but are not currently identifiable. The capacity identified here is accordingly a subset, and the conclusions say so.

9.4 - The second is the treatment of sites examined and discounted. Those sites are reported at Appendix 2 with the reason recorded in each case, to demonstrate that the criteria were applied consistently and that the schedule is the product of testing rather than of collection.

9.5 - The exercise has been conducted with the Council throughout. The site list, the density bands, the treatment of double counting, the definition of arterial routes, the large site threshold and the ground floor commercial assumption were each put to the Council and confirmed in writing. Where the Council directed that a site be discounted, it has been discounted, and the direction is recorded on the appraisal where the site has one, and otherwise in the schedule at Appendix 2. The figures in this study are not the consultants' view of what the Council might accept; they are the Council's own judgements, recorded.

9.6 - It follows that the windfall allowance in the submitted Plan is not an overestimate on the evidence of this study. The capacity exists at the base date, it is identifiable site by site with ownership and constraints recorded, and it is supported by a margin sufficient to absorb a substantial proportion of the identified sites failing to come forward within the plan period. The allowance is a conservative reading of the urban capacity available to Cardiff.



Appendices

Appendix 1: The appraisal proforma for each of the 26 sites counted towards the windfall contribution, as assessed and certified, with the mapping, constraints plans and site photographs for each site.

Appendix 2: The forty sites examined and not counted, with the reason in each case, and the Council's review of the site schedule of 13 August 2026.

Appendix 3: Declaration of interests, and the assessor and certifier for each affected site.

Appendix 4: Mapping and searchable site database, issued separately.

Appendix 5: Schedule of queries raised with the Council and the responses received.

Appendix 6: The methodology statement, as agreed with the Council on 31 July 2026, reproduced in full.

Appendix 1

Site appraisals

Cardiff Urban Capacity Study, prepared in response to Examination Action Point HS2.2. Expedite, September 2026.

This appendix contains the completed appraisal proforma for each of the 26 sites counted towards the windfall contribution reported at Section 7, in site reference order. Each appraisal is the assessment record as certified, followed by the mapping, constraints plans and site photographs for that site.

The appraisals are bound as a separate volume on account of their size, and are also held as individual files named by site reference so that any single site can be read on its own. All twenty six are listed below, with the capacity counted for each, which reconciles to Table 8 of the report.

All twenty six appraisals are enclosed, and the counted capacity on each is the figure reported at Table 8 of the report. Asset House at Traders Yard, carried in the draft of 14 September 2026, is no longer counted: its consented capacity has entered the landbank and is no longer additional to it, and the site is reported at Appendix 2. Three sites are subject to a declared interest and are identified at Appendix 3.

Site	Site name	Counted capacity	Appraisal
CC.UCS.S2	Admirals Landing, Schooner Way	60	Enclosed
CC.UCS.S3	Bute Terrace Hotel, Bute Terrace	165	Enclosed
CC.UCS.S6	Eastgate House, Newport Road	120	Enclosed
CC.UCS.S9	Former HMRC Tax Office, Llanishen	100	Enclosed
CC.UCS.S13	Howard Gardens	128	Enclosed
CC.UCS.S19	NCP Adam Street Car Park	1,110	Enclosed
CC.UCS.S20	NCP Knox Road Car Park	441	Enclosed
CC.UCS.S22	Orchard Media, Curran Road	346	Enclosed
CC.UCS.S23	Plot 6, Pierhead Street	184	Enclosed
CC.UCS.S24	Principality House, The Friary	237	Enclosed
CC.UCS.S26	St Mary's House and 51-59 Penarth Road	55	Enclosed
CC.UCS.S27	The Wharf, 121 Schooner Way	132	Enclosed
CC.UCS.S30	University Hall, Birchwood Road	100	Enclosed
CC.UCS.S31	Utilita Arena Cardiff	1,000	Enclosed
CC.UCS.S36	Clydesmuir Industrial Estate	93	Enclosed
CC.UCS.S37	Bute Street Car Park	132	Enclosed
CC.UCS.S39	James Street	47	Enclosed
CC.UCS.S40	Plot 4, Cardiff Central Station Car Park	221	Enclosed
CC.UCS.S45	Cardiff Theatrical Services, Ellen Street	288	Enclosed
CC.UCS.S47	5-7 Queen Street	30	Enclosed
CC.UCS.S49	64 Charles Street	130	Enclosed
CC.UCS.S50	24 Cathedral Road	53	Enclosed



Site	Site name	Counted capacity	Appraisal
CC.UCS.S53	118 Maindy Road	30	Enclosed
CC.UCS.S55	Land bound by Custom House Street, Bute Street and Hope Street	400	Enclosed
CC.UCS.S56	Land north of John Street	417	Enclosed
CC.UCS.S62	Former Star Centre, 2 Splott Road	62	Enclosed
	Total, 26 counted sites	6,081	

Appendix 2

Sites examined and not counted

Cardiff Urban Capacity Study, prepared in response to Examination Action Point HS2.2. Expedite, September 2026.

Sixty six sites have been examined. Twenty six carry capacity in the figures reported at Section 7 and are the subject of Appendix 1. The remaining forty carry no capacity and are listed below in site reference order, with the reason in each case.

Twenty five of the forty were removed from the schedule outright and fifteen remain on it carrying nil capacity. Those are the second and third rows of Table 6, and the Status column records which group each site falls in.

No site has been removed on grounds of viability, and no site has been removed on grounds of recreation mitigation.

Part A Sites examined and not counted

Site	Site name	Status	Category	Reason
CC.UCS.S1	ACT Head Office, Ipswich Road	Removed	Protected employment land	The site lies within a protected employment area under Policy EC3. The Council confirmed the designation on 30 July 2026.
CC.UCS.S4	Booker Wholesale, Batchelor Road	Removed	Protected employment land	Within protected employment land at EC1.17. The Council also identifies the site as a transport hub opportunity, which is inconsistent with residential redevelopment.
CC.UCS.S5	Coopers Yard, Curran Road	Removed	Availability not evidenced	Land assembly would be required across fragmented leasehold interests. Policy H9 and Policy EC6 are not satisfied, and the marketing evidence relates to a single unit. The Council was told on 2 September 2026 that the principal tenant may have entered liquidation.
CC.UCS.S7	Excelsior Road Industrial Estate	Removed	Protected employment land	Within protected employment land at EC1.17. Excelsior Road is one of the twenty five areas designated under Policy EC3 in the Deposit Plan.
CC.UCS.S8	Former Engineering Building, Newport Road	Removed	Discounted by the Council	In active University use and listed, so capable of conversion only. The Council said at the meeting of 13 August 2026 that the site should be discounted, and 1,000 dwellings came off the reserve list.

Site	Site name	Status	Category	Reason
CC.UCS.S10	Former NRW HQ, Newport Road	Nil capacity	Not signed off by the Council	A pre-application is in play for student accommodation, with a sixth form college use also referred to. The site was not signed off by the Council and carries no counted capacity.
CC.UCS.S11	Friary House, Greyfriars Road	Removed	Extant student accommodation consent	Extant consent for purpose built student accommodation under 23/01174/FUL. The site is not in the landbank and there is no lapse or non-implementation case, so under the test agreed with the Council on 13 August 2026 it is discounted.
CC.UCS.S12	Hastings House, Newport Road	Removed	Below the site size threshold	At 985 square metres the site is too small to be brought forward on its own. The schedule records it only as a possible combination with Howells at Fitzalan House, which is itself not counted.
CC.UCS.S14	Howells, Fitzalan House	Nil capacity	Fails Policy H9	An occupied office within the Central Business Area, so Policy EC6 applies, with no pre-application or other evidence of availability.
CC.UCS.S15	Jacobs Antiques, Wharf	Removed	Fails Policy H9	A trading antiques business within the Central Business Area. No evidence of redundancy, marketing or owner intent was identified.
CC.UCS.S16	Land Adjoining Schooner Way	Removed	Extant student accommodation consent	Extant consent for student accommodation under 24/01635/FUL. The Council was told on 2 September 2026 that the site would be reinstated if that consent were superseded.
CC.UCS.S17	McKenzie House, Newport Road	Nil capacity	Not signed off by the Council	The site was reinstated on 19 August 2026, being owned by Cardiff University, vacant, and marketed by Savills from 18 May 2026 with vacant possession. It was not signed off by the Council and so carries no counted capacity.
CC.UCS.S18	Meanwhile House, Trade Street	Nil capacity	Fails Policy H9	Well occupied by creative industries with no pre-application. The site also has daylighting and access constraints, the access being taken directly off an adopted lane.
CC.UCS.S21	One Kingsway	Nil capacity	Fails Policy H9	A trading hotel within the Central Business Area. The schedule records a conservation area risk and no evidence of redundancy or availability.

Site	Site name	Status	Category	Reason
CC.UCS.S25	Snelling House, Bute Terrace	Removed	Fails Policy H9	A trading 83 bedroom hotel. The freehold title is registered to Harlech Court Limited, whose adjoining redevelopment at 24/02946/FUL is already reflected in the consented density evidence at Table 4.
CC.UCS.S28	Asset House, Traders Yard, Penarth Road	Removed	Double counted	Counted at 181 dwellings in the draft. Full permission was granted on 10 December 2025 under 24/02716/FUL for 182 dwellings, and the site now appears in the Housing Monitoring Schedule 2025-26 at entry BU182 at that figure. The capacity is accordingly counted in the landbank and is not additional to it. There is no wider scheme and no additional land, so no net addition arises. Declared interest site, identified at Appendix 3.
CC.UCS.S29	UK Visas and Immigration, Newport Road	Nil capacity	Fails Policy H9	Occupied. Policy H9 is not satisfied until long term vacancy is evidenced.
CC.UCS.S32	Whitchurch Hospital	Removed	Counted in the allocated supply	The site relates to allocation H2.2 and its capacity is counted within the Plan's allocated supply, not as windfall.
CC.UCS.S33	Cardiff Arms Park	Removed	Availability not evidenced	An operational stadium in sporting use. No evidence of redundancy, disposal or owner intent was identified.
CC.UCS.S34	Plot 4, Pierhead Street	Nil capacity	Fails Policy H9	Occupied by Arup. No capacity is recorded.
CC.UCS.S35	8-9 Dominion Way	Nil capacity	Not signed off by the Council	The Council confirmed on 13 August 2026 that the site carries no employment designation and no Policy H9 risk. It was not signed off and carries no counted capacity.
CC.UCS.S38	Tyndall Street	Removed	Duplicate entry	The same land as CC.UCS.S45, Cardiff Theatrical Services at Ellen Street, confirmed on 2 September 2026 at a combined 13,619 square metres. The capacity is counted once, at S45.
CC.UCS.S41	Hallinans House, 22 Newport Road	Removed	Extant student accommodation consent	Consent for student accommodation under 17/01063/MJR, extended by 22/02641/VAR. The Council confirmed lawful implementation under 23/00239/CLU, so the consent is implemented rather than lapsed and the site is discounted under the agreed test.

Site	Site name	Status	Category	Reason
CC.UCS.S42	Hadramowt, 39 Wedal Road	Nil capacity	Held pending a matter	In Council ownership and in restaurant use, with a possible brewery covenant. Whether the premises are a community facility for the purposes of Policy H9 criterion (i), and whether the site is surplus to the Council's requirements, were put to the Council on 2 September 2026 and are unresolved.
CC.UCS.S43	2 Caspian Point, Caspian Way	Removed	Fails Policy H9	An occupied Grade A office held on eleven leases with an eleven to fifteen year horizon.
CC.UCS.S44	Vacant land north of Pierhead Street	Nil capacity	Boundary unresolved	Recorded as within a protected employment area, a position the study questioned on 19 August 2026. The site also requires a boundary against landbank entry BU179, Scott Harbour, Pierhead Street and Bute Place, at 101 units in progress. The boundary was not resolved.
CC.UCS.S46	Helmont House, Churchill Way	Removed	Fails Policy H9	An occupied office building. No evidence of redundancy, marketing or owner intent was identified.
CC.UCS.S48	Trinity Court, Newport Road	Nil capacity	Fails Policy H9	An occupied office within the Central Business Area with no pre-application.
CC.UCS.S51	119-133 Cowbridge Road East	Removed	Fails Policy H9	An active builders merchant with no evidence of availability.
CC.UCS.S52	137 Maindy Road	Removed	Fails Policy H9	Active multi let industrial occupation with several interests to extinguish. The site also carries a student accommodation consent at 17/03026/MJR.
CC.UCS.S54	Meridian Gate, Bute Terrace	Removed	Fails Policy H9	An operational 21 storey hotel and residential complex. No evidence of redundancy or availability was identified.
CC.UCS.S57	Cardiff Food Centre, Dumballs Road	Nil capacity	Held pending a matter	Held pending confirmation of whether any part falls within the Dumballs Road allocation at BU107A and BU107B or the consented Embankment masterplan at 21/00783/MJR. The site survives only in combination with S58 and S59.
CC.UCS.S58	Express House, Dumballs Road	Nil capacity	Below the ten dwelling threshold	Below the ten dwelling threshold on its own, and subject to the same Dumballs Road allocation question as S57. It survives only as part of a combined site.

Site	Site name	Status	Category	Reason
CC.UCS.S59	Bayside Garage, Dumballs Road	Removed	Double counted	Within Housing Commitment 19, Land West of Dumballs Road. In any event an active garage and MOT station, so Policy H9 redundancy is not met, and at 0.033 hectares below the ten dwelling threshold.
CC.UCS.S60	Land off Wolfs Castle Avenue	Removed	Outside the accessibility criterion	Fails the accessibility criterion. The nearest core bus route is 450 to 500 metres away and the site lies in no station catchment, so it meets neither limb of Action Point HS2.2. A live application is recorded.
CC.UCS.S61	Medallion House, Crwys Road	Removed	Double counted	Already in the Housing Monitoring Schedule at CS300, application 23/01914, at 67 units, with a resolution to grant confirmed at query 14. A commitment rather than windfall.
CC.UCS.S63	Image House and Jubilee Trading Estate, East Tyndall Street	Removed	Too small in isolation	The land at Image House is the subject of candidate site entries 65 and 68, with a potential yield of 24 units in mixed tenure or wholly affordable. That was considered too small to put forward on its own. The wider 2.77 hectare site including Jubilee Trading Estate, East Tyndall Street, was suggested by the Council on 6 August 2026, after the schedule had been reported to it, and the relationship between the two was not resolved. No appraisal was completed. The Council has confirmed that the employment land protection boundary has been revised in the Replacement LDP to facilitate a potential change of use on this land.
CC.UCS.S64	Jeff White Motors, 211 Ninian Park Road	Nil capacity	Excluded as a candidate site	Excluded on the basis that the site is submitted as candidate site CS100. The Council confirmed at query 49 that it is not in the identified supply, and Background Technical Paper 10 numbers the candidate sites 1 to 86 and does not include it. Reinstatement was under consideration and was not concluded.
CC.UCS.S65	Sloper Road trade parks	Nil capacity	Excluded as a candidate site	Excluded on the basis that the land is covered by candidate submissions in Grangetown and Leckwith. The Council confirmed at query 49 that it is not in the identified supply. Reinstatement was under consideration and was not concluded.
CC.UCS.S66	Atlantic House, 16 Dumballs Road	Removed	Added too late to assess	Offered late in the study, with a housing association expecting some 50 units. No appraisal was completed and the site carries no capacity.

Categories

Category	Meaning	Sites
Fails Policy H9	The existing use is active and no redundancy, marketing or owner intent is evidenced.	13
Protected employment land	Within an area designated under Policy EC3.	3
Extant student accommodation consent	A live consent for purpose built student accommodation stands on the site.	3
Double counted	The capacity is already recorded in the landbank or in a commitment.	3
Counted in the allocated supply	The capacity is counted within an allocation rather than as windfall.	1
Duplicate entry	The same land appears elsewhere on the schedule.	1
Below the ten dwelling threshold	The site is below the large site threshold applied by this study.	1
Below the site size threshold	The site is too small to come forward independently.	1
Outside the accessibility criterion	The site meets neither limb of Action Point HS2.2.	1
Availability not evidenced	Nothing indicates the site will be brought forward.	2
Not signed off by the Council	The Council did not sign the site off, so no capacity is counted.	3
Held pending a matter	A question remains open which does not affect the conclusions of the study.	2
Boundary unresolved	The site boundary against another entry was not settled.	1
Discounted by the Council	The Council asked that the site be discounted.	1
Excluded as a candidate site	Excluded as covered by a candidate site submission.	2
Added too late to assess	Offered after the assessment was complete; no appraisal was undertaken.	1

Part B The Council's review of the site schedule, 13 August 2026

The Council reviewed the site schedule and returned comments on 13 August 2026, from Planning Policy, Economic Development and City Centre Strategy. They are reproduced below as written, without paraphrase, and they are the source of a number of the decisions recorded at Part A.

The review is published because it is the double counting and policy cross-check evidenced. A study which can be seen to have put its schedule to the authority, and to have acted on what came back, is of more value than one which asserts that it did so.

Site	Site name	Planning Policy and City Centre Strategy	Economic Development
CC.UCS.S2	Admirals Landing, Schooner Way, CF10 4BH	Check if this is 26/00631/FUL? (might be the site next door)	
CC.UCS.S3	Big Sleep Hotel, Bute Terrace, Cardiff, CF10 2EP	No comments aside from the loss of hotel use.	
CC.UCS.S5	Coopers Yard, Cardiff, CF10 5HD	RLDP Policy EC1:Cardiff Central Enterprise Zone and Regional Transport Hub. Consider reducing numbers to reflect a more mixed use approach including new employment, or commercial opportunities within new development. Marked as employment on KP4 current masterplan in adopted plan.	Agree, mixed use preference to replace current uses
CC.UCS.S6	Eastgate House, Cardiff, CF24 0AB	Within CBA. Policy EC4 (Adopted Plan), EC6 (RLDP) .Offices have been refurbished back in 2018. Pre-app on this one. Acceptability based on the retention of floorpace equivalent to that of current occupiers. Implications in regards to potential numbers?	Pre-app already in, city centre fringe, ground & first floor preference for commercial space.
CC.UCS.S8	Former Engineering Building, Cardiff, CF24 0TB	Edge of CBA, University use. No H9 risk/Land use policy concerns. Is this likely to come forward? Surely a significant part of the University estate?	Hotel / Mix use would be preference over resi but open to discussion

Site	Site name	Planning Policy and City Centre Strategy	Economic Development
CC.UCS.S10	Former NRW HQ , Newport Rd, CF24 0TP	CBA. Protected Office Policy EC4 (Adopted Plan), EC6 (RLDP) apply. Pre-app on this one. The provision of a ground floor commercial/co-working space is supported, however, there is potential to accommodate additional high-quality office/flexible workspace, as part of development. Implications for numbers. Section 106 for loss of office will apply. Implications for numbers.	Agree, city fringe - preference for ground floor commercial space
CC.UCS.S11	Friary House, Greyfriars Roads, CF10 3AE	Consent for: 23/01174/FUL. 30 Storey student accommodation development with ground floor commercial uses. Not yet started, so could be opportunity for another application in the future.	
CC.UCS.S13	Howard Gardens, Cardiff, CF24 0FA	No Comments	
CC.UCS.S14	Howells Solicitors, Fitzalan House, CF24 0ED	CBA. Protected Office Policy EC4 (Adopted Plan), EC6 (RLDP) apply. No current pre-app. Would need Employment Statement to satisfy policy tests. Current occupier sqm to consider. Any numbers should consider the retention of ground floor commercial/employment use. One to discount at this stage.	Agree, city fringe - preference for ground floor commercial space. Agreed
CC.UCS.S17	McKenzie House, Newport Road, CF24 0DE	Discuss?? No current pre-apps. CBA. Protected Office Policy EC4 (Adopted Plan), EC6 (RLDP) apply. Consider other sites. H9 risk at this stage.	City Fringe, would need to see demand / marketing evidence Agreed.
CC.UCS.S18	Meanwhile House, Cardiff CF10 5DY	RLDP Policy EC1:Cardiff Central Enterprise Zone and Regional Transport Hub. Well occupied by creative industries, independent business. No pre-app. Carries risk unless relocation as part of wider master planning. Marked as mixed use on current KP4 masterplan. One to potentially discount.	No pre-app, well occupied and popular provision, would discount. Agreed.

Site	Site name	Planning Policy and City Centre Strategy	Economic Development
CC.UCS.S19	NCP Adam St, Cardiff, CF10 4FB	No H9 risk/No land use policy concerns. (From memory) The 2006 application for St Davids 2 provided artist impressions for this area and showed a mix of commercial uses at ground floor and resi etc above. Would assume that there would be opportunities for a reasonable degree of height in this area.	Agree but would like to see commercial element built in...
CC.UCS.S20	NCP, Knox Road, CF24 0BL	No H9 risk/No land use policy concerns.	As above Agreed.
CC.UCS.S21	One Kingsway, Cardiff, CF10 3AQ	CBA. Protected Office Policy EC4 (Adopted Plan), EC6 (RLDP) apply. Pre-app. Would need Employment Statement to satisfy policy tests. Current occupier sqm to consider. Any numbers should consider the retention of ground floor commercial/employment. Conservation considerations likely to restrict height of development. Tall Buildings SPG: The importance of the setting of the Castle and Cathays Park is acknowledged in the SPG which states (page 15) that: "In particular, the area surrounding Cardiff Castle along Castle Street is especially sensitive to any buildings which break the height of the walls of the castle. Any proposals that can be viewed in the vicinity of Cardiff Castle and the Civic Centre need careful attention. Area of very high sensitivity. Implication for numbers?	If not retained as office then preferred Hotel use over resi - new square and public realm being progressed outside building. Agreed, but (if loss of office was considered acceptable) nothing policy wise that would technically rule out a resi proposal being put forward? Occupied office, so is there anything in the public domain to indicate why we would be putting this site forward?
CC.UCS.S22	Orchard Media, Curran Road, Cardiff, CF10 5DT	RLDP Policy EC1:Cardiff Central Enterprise Zone and Regional Transport Hub. Well occupied by creative industries, independent business. No pre-app. Carries risk unless relocation as part of wider master planning. Marked as business/employment use on current KP4 masterplan. One to potentially discount.	Agree, no-pre app, occupied business premises.
CC.UCS.S23	Plot 6, Pierhead Street, CF10 4PH	Likely Metro route/station in future phases, but could still potentially accommodate 2 buildings with commercial GF and resi above?	

Site	Site name	Planning Policy and City Centre Strategy	Economic Development
CC.UCS.S24	Principality House, The Friary, CF10 3AE	Current Application. CBA (undetermined). Protected Office Policy EC4 (Adopted Plan), EC6 (RLDP) apply.Pre-app previously. Section 106 for loss of employment floorspace. Retention of ground floor commercial uses. H9 Risk minimal.	Comments made via pre-app, agree Occupied office and reasonably new buildings. Application aside is it one that we want to promote as a COU?
CC.UCS.S26	St Mary's House & 51-59 Penarth Road, CF10 5DN	CBA, Central Enterprize Zone. No pre-app. Employment policies apply (protected offices). H9 medium until further marketing evidence is submitted. Marked as business/employment use on current KP4 masterplan. One to potentially discount.	Agree
CC.UCS.S27	The Wharf, 121 Schooner Way, CF10 4EQ	Might be some useful info under 16/00660/MJR	
CC.UCS.S28	Asset House, Traders Yard, Penarth Road, CF10 5DL	Check 24/02716/FUL - Asset House, 63 Penarth Road and 25/01022/FUL - 51-59 Penarth Road for surrounding context	
CC.UCS.S29	UK visas and migrations, Newport Road, CF24 0AA	Edge of the CBA. No pre-app. Employment policies apply (protected offices). Premise currently occupied. H9 high/medium until units becomes vacant and is a long term vacancy. One to potentially discount.	Occupied, would need to see demand evidence and marketing after long term vacancy, city centre fringe so would like to see mixed use if possible. Agreed.
CC.UCS.S30	University Hall, Birchwood Rd, Cardiff, CF23 5YB	No H9 risk/No Land use policy concerns.	
CC.UCS.S31	Utilita Arena Cardiff, Cardiff, CF10 2EP	No H9 risk/No Land use policy concerns.	
CC.UCS.S34	Plot 4 Pierhead St, Cardiff, CF10 4QP	BBA. Employment policies apply (protected offices). Premise currently occupied (Arup). H9 high/medium until units becomes vacant and is a long term vacancy. One to potentially discount.	Agree. Agreed - Don't want to promote if currently occupier offices.
CC.UCS.S35	8-9 Dominion Way, Cardiff,CF24 1TP	No H9 risk/No Land use policy concerns.	Agee

Site	Site name	Planning Policy and City Centre Strategy	Economic Development
CC.UCS.S36	Clydesmuir Industrial Estate, Cardiff, CF24 2QS	Current Application 26/00645/FUL (undetermined) for 96 affordable units on adjoining land. Not protected employment land. Land and premises, to the south-west of the site could provide an opportunity fo provide a more comprehensive mixed-use residential development.	Application currently in, south west to provide more comprehensive scheme, protect leisure uses to north.
CC.UCS.S37	Bute street Carpark, Cardiff, CF10 5AH		If it is the surface car park behind Merchant House - fine. Had a historic consent (mid 2000's) for a Hampton by Hilton hotel.
CC.UCS.S38	Tyndall Street, Cardiff, CF10 4TT	Edge of the CBA, but still Capital Quarter Area, No pre-app. Employment policies apply (protected offices). Would need Employment Statement to satisfy policy tests. Multi-occupancy office complex. Current occupier sqm to consider. One to discount, without further evidence.	Need further evidence, currently occupied. Map is highlighting the Driscoll Workshops which I am assuming is incorrect as they have only been recently built as part of the Capital Quarter.
CC.UCS.S39	James Street, Cardiff, CF10 5EZ	No H9 risk/No Land use policy concerns. Vacant brownfield Site.	Think we have a pre-app on this site for an AH scheme from Dave Jacques team (c.47 units)
CC.UCS.S40	Plot 4, Cardiff Central Station, Cardiff, CF10 1EP	No H9 risk/No Land use policy concerns.	
CC.UCS.S41	Hallinans House, 22, Newport Road, Cardiff, CF24 0EL		22/02641/VAR to extend consent by 5 years
CC.UCS.S42	Hadramowt, 39 Wedal Rd, Cardiff CF14 3QX	No H9 risk/No Land use policy concerns.	
CC.UCS.S43	2 Casper point, Caspian Way, Cardiff CF10 4DQ	H9 Risk. BBA Protected Office Policy EC4 (Adopted Plan), EC6 (RLDP) apply. No current pre-app. Would need Employment Statement to satisfy policy tests. Current occupier sqm to consider. Any numbers should consider the retention of ground floor commercial/employment use. One to discount at this stage.	Agree. Agree

Site	Site name	Planning Policy and City Centre Strategy	Economic Development
CC.UCS.S44	Vacant land, Pier Street, Cardiff, CF10 4NS	H9 Risk Rapid Transport Corridor Route	Agreed.
CC.UCS.S45	Cardiff Theatrical Services Ltd (CTS) - Ellen St, Cardiff CF10 4TT	No H9 Risk. Site is adjacent Site 9 (East Bay Close) Housing Commitment in the RLDP.	
CC.UCS.S47	5-7 Queen St, Cardiff CF10 3FD	No H9 Risk. Would need to retain ground floor commercial frontages.	
CC.UCS.S48	Trinity Court, Newport Rd, Cardiff CF24 0AA	CBA. Protected Office Policy EC4 (Adopted Plan), EC6 (RLDP) apply. No current pre-app. Would need Employment Statement to satisfy policy tests. Current occupier sqm to consider. Any numbers should consider the retention of ground floor commercial/employment use. One to discount at this stage. Agreed.	No current pre-app but city fringe, mixed use with commercial ground floor...
CC.UCS.S49	64 Charles St, Cardiff CF10 2GB	No H9 Risk. Would probably seek retention of commercial at ground floor and Agent of Change would be required given the presence of clubs and late night premises in the vicinity.	Agree. Agreed.
CC.UCS.S50	24 Cathedral Rd, Pontcanna, Cardiff CF11 9FB	Pre app on site (50 dwellings approx). No H9 Risk	
CC.UCS.S51	119-133 Cowbridge Rd E, Cardiff CF11 9AG	Adjacent Cowbridge Road East District Centre No H9 Risk.	
CC.UCS.S52	137 Maindy Rd, Cardiff CF24 3AB	No H9 Risk.	
CC.UCS.S53	118 Maindy Rd, Cardiff CF24 4JL	Pre app on site. No H9 Risk	
CC.UCS.S55	Custom House, Bute Terrace, Cardiff CF10 1GH	Amended plans submitted April 2026	Ongoing

Site	Site name	Planning Policy and City Centre Strategy	Economic Development
CC.UCS.S56	John Street, Cardiff CF10 5BT	Is this 25/02700/FUL - Land North of John Street, Callaghan Square	
CC.UCS.S57	Cardiff Food Centre, Cardiff CF10 5FG	No H9 Risk	
CC.UCS.S58	Express House, Dumballs Rd, Cardiff CF10 5FE	No H9 Risk	
CC.UCS.S59	Bayside Garage, Dumballs Rd, Cardiff CF10 5NR	No H9 Risk	
CC.UCS.S60	Wolfs Castle Ave, Cardiff CF14 5JS	No H9 Risk	
CC.UCS.S61	Medallion House, Crwys Road, Cardiff, CF24 4NP.	23/01914/FUL for 64 affordable flats subject to 106 (16/01/25) NO H9 RISK	
CC.UCS.S62	Former Star Centre, 2 Splott Road, Cardiff, CF24 2BZ	Pre app on site. No H9 Risk.	

Appendix 3

Declaration of interests, and the assessor and certifier for each affected site

Expedite and its associated companies operate as planning, property and design consultancies in Cardiff. They hold or have held interests in, or act or have acted for parties with interests in, land within the study area and in schemes which would otherwise serve as evidence within it. Those interests are declared here.

No site has been included in, or excluded from, this study by reason of any such interest. All sites have been identified and assessed against the criteria at Section 3 of the report, which were agreed with the Council before assessment commenced and applied consistently to every site considered. A site subject to a declared interest has been assessed against those same criteria, to the same evidential standard, without modification.

Sites subject to a declared interest

Site	Site name	Counted	Nature of the interest	Assessed by	Certified by
CC.UCS.S24	Principality House, The Friary	237	Expedite acts in relation to the co-living scheme at the site, application 25/02366/FUL, which is undetermined.	Ian Carter MRTPI, 7 September 2026	Ian Carter MRTPI, 8 September 2026
CC.UCS.S26	St Mary's House and 51-59 Penarth Road	55	Expedite acts for Urban Centric (Penarth Road) Ltd in respect of pre-application consultation SP819 on this site. The covering letter of 5 June 2026 was signed by Ross Bowen MRTPI.	Ian Carter MRTPI, 11 September 2026	Ian Carter MRTPI, 11 September 2026



Site	Site name	Counted	Nature of the interest	Assessed by	Certified by
CC.UCS.S27	The Wharf, Schooner Way (Blocks G and H)	132	Expedite acts in relation to the co-living scheme at the site, application 26/00631/FUL, which is undetermined.	Ian Carter MRTPI, 9 September 2026	Ian Carter MRTPI, 10 September 2026
CC.UCS.S28	Asset House, Traders Yard, Penarth Road	Not counted	Expedite acts in relation to the consented scheme at the site, application 24/02716/FUL, granted 10 December 2025 and under implementation.	Ian Carter MRTPI, 7 September 2026	Ian Carter MRTPI, 10 September 2026

Three of the four sites are counted, and carry 424 dwellings between them. Asset House is not counted: its consented capacity has entered the landbank and is no longer additional to it, so the site is reported at Appendix 2 rather than counted here. Section 8.6 of the report reports the capacity identified with all three counted sites excluded, being 5,657 dwellings or 1.44 times the large site windfall allowance, so that the sensitivity of the conclusions to these sites may be assessed directly. Figure 1 charts the same test.

Who assessed and who certified, and why

On each of the four sites the assessment and the certification were both carried out by Ian Carter MRTPI, Development Director. That is stated here rather than left to be noticed, because it is a limitation a reader is entitled to weigh.

The reason is the size of the firm. Expedite has two chartered town planners working on this study, and the interest which requires the safeguard arises through the other of them, Ross Bowen MRTPI, Director of Planning Services, who signed the pre-application letter at CC.UCS.S26 and whose firm acts on the schemes at the other three. Mr Carter holds no interest in any of the four sites and had no involvement in any of the matters giving rise to the interests declared. He is therefore independent of the interest, which is the safeguard that matters, but he is not a second pair of eyes on his own assessment.

The counterweight is that none of the four figures is the study team's own. Each was put to Cardiff Council site by site at the meeting of 2 September 2026 and signed off by the Council, and each is reported in the study at the Council's figure. The Council is the check on these four sites, and it is an external one.

The remaining twenty three counted sites were assessed and certified by Ross Bowen MRTPI, Director of Planning Services. Certification is site by site rather than by general clearance.

Interests attaching to the evidence rather than to a site

A declared interest also attaches to some of the schemes relied upon as density evidence at Table 4 of the report. The study does not conceal this and does not exclude the schemes. Four of the six Cardiff decisions and applications in that table are schemes in which Expedite or its associated companies have an interest, which is a function of the Cardiff market rather than of selection: the group is among the most active promoters of city centre residential development in the city, and the recent co-living decisions which establish the density evidence are consequently its own. The reasoning is set out at Section 8.4 of the report. Each is a decision of Cardiff Council and the unit numbers, site areas and resulting densities are matters of public record.

One scheme has been excluded from that table on this ground. Friary House is the study's own assessment of CC.UCS.S11 rather than a Council decision, which would make it circular as evidence for the bands the study applies. It is recorded here for completeness: the site carries no counted capacity, and its indicative figure of 212 co-living studios on 0.15 hectares is a co-living density which the appraisal records as not directly comparable with conventional schemes.

Appendix 4

Mapping and searchable site database

This appendix is issued separately from the report, in digital form, because its content is spatial and is of more use to the reader as data than as paper.

What the appendix comprises

- The site mapping prepared for the study. For each site identified this shows the red line boundary, the relationship of the site to the Proposals Map designations and to the deposit plan Constraints Map RLDP-10, and the position of the site relative to the 500 metre walking catchments of rail stations and of the Strategic Bus Route network under Policy T2.
- The constraints overlays applied in the assessment, comprising the flood data prepared for revised Technical Advice Note 15, Health and Safety Executive Development Proximity Zones, Archaeologically Sensitive Areas, conservation areas, scheduled ancient monuments, historic parks and gardens, sites of importance for nature conservation and air quality management areas.
- The searchable site database. This carries one record for each of the sixty six sites examined, holding the fields recorded on the appraisal proforma, so that the schedule can be sorted, filtered and interrogated rather than read only in the order in which it is printed.

Relationship to the printed appendices

The database holds the same figures as the printed schedules. Where the two differ the printed schedules at Appendix 1 and Appendix 2 govern, those being the records which carry certification.

The mapping is the study team's own and is prepared from Ordnance Survey digital mapping, Land Registry title information and the Council's published map base. It is provided to assist the reader and is not a substitute for the Council's own Proposals Map or Constraints Map.

Appendix 5

Queries raised with the Council, and the responses received

The method applied by this study was settled with the Council, and the inputs on which the capacity figures rest were supplied by the Council. The mechanism for both was a numbered query schedule. Sixty two queries were put and sixty two were answered, between 30 July and 8 September 2026. They are reproduced below in the order in which they were raised, with the Council's response against each and the date on which it was given.

The queries are reproduced from the schedule issued to the Council on 26 August 2026, which carries the settled text and numbering. The responses are reproduced from the Council's replies. Queries 55 to 62 were added on 26 August and answered on 27 August; queries 1 to 54 kept their original numbers throughout, so the Council's earlier responses read across without renumbering.

The schedule is published because the standing of the study depends on it. The site list, the density bands, the large site threshold, the definition of arterial routes, the treatment of double counting and the ground floor commercial assumption were each put to the Council in writing and confirmed in writing. The figures in the study are, on those matters, the Council's own.

No.	Query	The Council's response	Answered
1	Please confirm which version of the Proposals Map is current. The version we have used, dated January 2025, still shows allocation H2.4 Roath Dock (North Side), which the Statement of Common Ground with ABP of 17 April 2026 agreed to delete.	This remains the latest published version but as noted we have agreed subsequent changes through the deletion of H2.4 and amendment to the boundaries of H2.5 and SP9.	Response of 26 August 2026

No.	Query	The Council's response	Answered
2	When will the Matters Arising Changes be published? The ABP Statement of Common Ground records three changes proposed for the forthcoming MAC consultation, and ID08o indicates MACs will be reviewed at Hearing Session 15. If MACs affecting the employment designations or the Business Area are published before 30 September our mapping would be superseded.	Aiming to do this in October for 4 weeks, after the Inspectors deadline of 30 September.	Response of 26 August 2026
3	We propose to define arterial routes for Action Point HS2.2 by reference to the Strategic Bus Route designation under Policy T2. Please confirm that is acceptable.	Yes, confirm agreement to this.	Response of 24 August 2026
4	The ABP Statement of Common Ground deletes the residential reference from Policy SP9 and expands the Port designation westward into land removed from H2.5. Please confirm whether any of the Pierhead Street sites fall within the revised SP9 boundary, and the effect of the deletion of residential flexibility.	Confirm none of the Pierhead Street Sites fall within the revised SP9 boundary Where your comments differ from the Proposals Map	Response of 26 August 2026
5	2 Caspian Point. You recorded the site as being in the Bay Business Area with EC6 applying. On the Proposals Map the designation stops at the Pierhead Street roundabout and does not extend north-east to Caspian Way. Please confirm which is correct.	Yes confirm the site is within the Bay Business Area in both the adopted and proposed Replacement LDP	Response of 26 August 2026
6	Pier Street. You recorded a Rapid Transport Corridor Route across the site. No such designation appears anywhere on the Proposals Map, and the site is not within any EC3 designation. Please confirm what the corridor is, on what basis it is safeguarded, its alignment and width, and whether it affects all or only part of the site.	Confirm that the site is within the EC1.2 protected employment designation in the adopted LDP but is not included within the equivalent SP9 boundary in the proposed Replacement LDP . The alignment of the Rapid Transit Corridor is still being firmed up but the constraints map shows the proposed corridor running along the northern edge of the site https://www.cardiffldp.co.uk/wp-content/uploads/RLDP-10-Constraints-Map-English-Final- Feb-25-Consultation.pdf	Response of 26 August 2026

No.	Query	The Council's response	Answered
7	Tyndall Street and Cardiff Theatrical Services. Our title search shows Tyndall Street (S38) as 0.21 ha, WA172966, Threadneedle Pensions; and Cardiff Theatrical Services (S45) as 1.15 ha, WA794290, Wyndham Lewis, occupied by CTS. Your comments describe them the other way round, and your Economic Development comment notes the mapping may be wrong. Please confirm which is which. Both appraisals are on hold.	Tyndall Street reference is showing Driscoll Buildings. Map is correct but this site should be discounted based on the policy reasoning and Economic Development comments. Edge of CBA.	Response of 26 August 2026
8	You record no H9 risk at Cardiff Theatrical Services on the basis it is vacant. It is occupied by a scenery workshop which has traded there some 38 years. Does that alter your view?	Outside of protected employment land, only office protection in CBA, Site should be considered in study, despite being occupied. Policy	Response of 26 August 2026
9	Plot 4, Cardiff Central Station Car Park. Housing Commitment 13, Central Square Plots 4 and 5, sits on Scott Road. Does it include the land we have identified, for which you give 256 units? Please provide the CS289 boundary.	Plan attached. A different site to Cardiff Central Station Car Park.	Response of 26 August 2026
10	James Street. Please confirm the street numbers of the site you have identified. There is a landbank entry at 68-72 James Street, BU164, application 20/02376, carrying 20 units not started.	The pre-app referred to relates to the site you have identified (47 Units). Please see site location plan provided for the pre-app site (Cardiff Council Scheme)	Response of 20 August 2026
11	Bute Street Car Park. Your windfall list refers to a sixth form. Is the site still required for that?	Car park is not included in red line boundary for permission for sixth form college so assume not required Landbank and double counting	Response of 26 August 2026
12	The Wharf, BU138A, 107 units not started. Please confirm blocks C and D and F are built, and A-B, E, G and H outstanding. Application 26/00631/FUL covers blocks G and H only, 19 units consented, so the net addition is 132 and the landbank entry would fall from 107 to 90.	Yes confirm that this is correct	Response of 26 August 2026

A5



No.	Query	The Council's response	Answered
13	Curran Embankment, 21/00783/MJR. Committee resolved 9 November 2023 but the application remains awaiting decision. Please confirm the current position, the expected date of issue, and whether the full 2,500 units remain in the housing trajectory.	Yes this site is shown as a commitment in the proposed Replacement LDP and is included in the housing trajectory for completion by 2036	Response of 26 August 2026
14	Please identify any site on our list with permission, or a resolution to grant, since 1 April 2025.	There are two sites with a resolution to grant - Medallion House - 23/01914/FUL and Custom House for co-living - 25/02351/FUL and the Wolfs Castle was granted planning permission on 22nd July 2026. Two sites have applications pending on them - Principality House for co-living - 25/02366/FUL undecided and the Wharf for co-living - 26/00631/FUL undecided.	Response of 26 August 2026
15	Please identify any site on our list counted within the identified supply in Background Technical Paper 1.	Just The Wharf - 19 units already in supply	Response of 26 August 2026
16	Do you agree that a candidate site which was not allocated, and is not counted in the identified supply, can still be windfall?	Yes	Response of 26 August 2026

No.	Query	The Council's response	Answered
17	Double counting, and sites permitted since the base date. Methodology paragraph 5.7 records that sites benefiting from planning permission or a resolution to grant are not included in the study. We read that rule as existing to prevent capacity being counted twice, so that the operative test is whether a site is already counted elsewhere, in the landbank, as an allocation or within the identified supply, a permission being strong evidence that it is. On that basis Custom House Street is counted, because it does not appear in the Housing Monitoring Schedule at the base date of 1 April 2025 and its capacity is counted nowhere else, while Medallion House is excluded because it is counted at CS300, and The Wharf is counted only at the net increase. The treatment is at paragraphs 3.28 to 3.30 of the draft report. Please confirm you are content with that reading.	Can confirm we are content with this approach	Response of 26 August 2026
18	Clydesmuir. Please provide the red line for application 26/00645/FUL, for 96 affordable units on adjoining land, so we can establish the relationship to our site.	Map Sent. Please see site location plan attached from application. Please note the application is for 93 units.	Response of 20 August 2026
19	Application 21/02687 is recorded against Red Dragon Centre and County Hall at 890 units. Which site does it relate to?	It is all the same site - plan attached.	Response of 26 August 2026
20	Policy EC6. Where offices are lost, is the requirement retention of ground floor commercial, or retention of floorspace equivalent to the current occupiers? Your comment on Eastgate House suggests the latter. Your decisions at Knox Court, 22/02604/FUL, which retained office space at ground floor only, and at Scott Harbour, 23/01103/FUL, suggest the former. Please confirm which applies, and whether it varies between sites.	Each case will be assessed on its merits, relating to the scale of the floorspace to be lost. Retention of ground floor commercial/employment floorspace is likely to be a minimum requirement.	Response of 26 August 2026

No.	Query	The Council's response	Answered
21	If floorspace equivalence is required, can it be provided off site or offset by a contribution? Your comment on Principality House refers to a Section 106 for loss of employment floorspace.	Yes, a Section 106 will apply to loss of employment floorspace. Please see Planning Obligations SPG. A commercial ground floor element likely to be required.	Response of 26 August 2026
22	EC3.10 Penarth Road Area. The boundary runs along the railway at Grangetown station. Does it include the trade counters on the Penarth Road and Clare Road approach?	If you are referring to Baileys. Middletons, etc, Gripoly Mills Retail Park etc, yes excluded from boundary.	Response of 26 August 2026
23	Please provide Policy EC5A, referred to at paragraph 7.58.	See RLDP please. Policy may be subject to change, following Action points from Hearing Sessions. Will be a MAC on new wording.	Response of 26 August 2026
24	Is any site on our list required, or likely to be required, for education, health or community use?	Health and community uses could be considered as part of a mixed use scheme where appropriate.	Response of 26 August 2026
25	Does any policy resist the loss of existing visitor accommodation? EC9 appears to deal with new hotels rather than retention.	No policy protection in RLDP .	Response of 26 August 2026
26	What is the threshold for a large site in your monitoring? We have assumed 10 or more dwellings.	Yes, confirm 10 or more dwellings	Response of 26 August 2026
27	Please confirm that capacity below that threshold, and change of use of existing buildings, falls within the small sites and change of use allowances rather than this study.	Yes, confirm that is the case	Response of 26 August 2026

A5



No.	Query	The Council's response	Answered
28	Density. You offered at the meeting of 13 August to provide density guidance. Please provide, for each of the following bands, the density you consider appropriate expressed as dwellings per hectare of net developable area, together with the recent Cardiff consents you consider should be used as comparables: (a) city centre tall building; (b) city centre; (c) inner city; (d) outer city; (e) edge of settlement. We would prefer the comparables to be selected by the Council rather than by us, so that the density evidence in the study is the Council's own. See the declaration below.	See e-mail dated 19th August which sets out a range of densities	Response of 26 August 2026
29	Please also confirm the density you consider appropriate for co-living, and the Cardiff consents to be used as comparables. We would again prefer the Council to select these.	See e-mail dated 19th August which sets out a range of densities	Response of 26 August 2026
30	Co-living as dwellings. On 25/02351/FUL you applied the 20 per cent affordable housing requirement to all 400 units, being 80 units, screened the application under the EIA Regulations as exceeding the threshold of 150 dwellings, and recorded the application type as major dwellings. Please confirm that co-living units are likewise counted one for one as dwellings in the housing monitoring and trajectory.	Yes, that is the case	Response of 26 August 2026
31	How have co-living and build to rent been recorded in your monitoring to date, and are any such completions included in the historic windfall rates from which the allowance is derived?	They are treated no different to other sites and included in the housing monitoring schedule. They would also be included in the historic windfall rates where applicable appreciating that these sites have only just started coming through the planning system	Response of 26 August 2026
32	NCP Adam Street 1,000, Utilita Arena 1,000, Former Engineering Building 1,000 and McKenzie House 600. How were these figures arrived at, and are you content for us to restate them on the agreed basis? Restating may move them either way.	Might want to revisit them in light of the densities provided in query 28 above.	Response of 26 August 2026

A5



No.	Query	The Council's response	Answered
33	How should cumulative capacity be treated where sites adjoin, for example along Bute Terrace and at Tyndall Street and Ellen Street?	Prefer to combine the sites if deliverable, as it would result in a larger development footprint.	Response of 26 August 2026
34	Does the Tall Buildings SPG of January 2017 remain current?	Yes	Response of 26 August 2026
35	Do you hold Cardiff evidence on gross to net ratios, as an alternative to the Bridgend benchmarks?	Can we discuss when we meet next? Student accommodation consents	Response of 26 August 2026
36	Please identify all sites with extant but unimplemented student consents. You mentioned at least four, and named Porth Teigr and Hallinans House.	Please see attached pdf, which lists all student developments within the city and has a base date of September 2023.	Response of 26 August 2026
37	Hallinans House. Is consent 17/01063/MJR, extended by 22/02641/VAR, in the landbank, and has it been implemented?	Confirm site not included in landbank and site and Council have agreed the lawful implementation of the planning permission (23/00239/CLU)	Response of 26 August 2026
38	Friary House. Is consent 23/01174/FUL in the landbank?	Confirm site not included in landbank	Response of 26 August 2026
39	Where student accommodation is retained, are bedspaces converted to dwelling equivalents, and on what basis?	No student accommodation is included in the housing landbank as not C3 Information held by the Council	Response of 26 August 2026
40	Availability. This is the criterion on which most sites on the schedule currently fail. For any site where we have recorded no evidence of availability, do you hold anything which bears on it: marketing history, vacancy records, pre-application enquiries which did not proceed, correspondence with owners, or expressions of interest? We are not asking the Council to approach owners; we are asking what is already on your files. In particular, is the surface car parking at Plot 4, Cardiff Central Station surplus to operational requirements, and do you hold anything on Bute Street Car Park or on Threadneedle Pensions and Wyndham Lewis at Tyndall Street and Ellen Street?	Yes, the surface car park at Cardiff Central Station has been submitted as a candidate site which demonstrates availability. The Bute Street Car Park also has a permission granted in 2016 for hotel use https://www.cardiffidoxcloud.wales/publicaccess/applicationDetails.do?activeTab=summary&keyVal=ZZZHYYECCDR342	Response of 27 August 2026

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No.	Query	The Council's response	Answered
41	Pre-application reference and unit numbers for 24 Cathedral Road.	Confirmed at 53 dwellings.	Response of 26 August 2026
42	Pre-application reference and unit numbers for James Street, understood to be around 47 affordable units.	The pre-application relates to the former Merthyr House, James Street, Butetown: demolition of the existing substation building and development of 14 affordable multi generational houses, 33 community living flats for older persons, commercial units, community facilities and associated works.	Response of 27 August 2026
43	The Council position as landowner at Clydesmuir Industrial Estate and at 64 Charles Street.	Economic Development colleagues are supportive subject to retention of commercial uses on ground floor of 64 Charles Street	Response of 27 August 2026
44	Expiry date of the DWP lease at 64 Charles Street.	We would need to check with colleagues in Strategic Estates	Response of 27 August 2026
45	Outcome of the Clydesmuir pre-application consultation which closed 15 February 2026.	Assume you are referring to the pre-application prior to Application 26/00645/FUL. The LPA were supportive of the scheme as it delivers affordable housing and provided comments on housing mix, tenure, open space, car parking and landscaping. No land use policy concerns. These comments have been considered as part of the planning application.	Response of 20 August 2026
46	Copy of the Council list of suggested windfall sites.	Not sure there is a separate list - be good to discuss when we meet next week	Response of 27 August 2026
47	Landbank and candidate site boundaries as GIS layers.	There is not a schedule, but can be viewed online, and filtered by ward. Our GIS officer has also put the GIS maps in the shared folder. Please also see Candidate sites - Cardiff Council - Local Development Plan. I have also attached the background paper, which references all the sites, and there initial assessment. I hope this is of use.	Response of 27 August 2026

A5



No.	Query	The Council's response	Answered
48	Are you content for us to add the Radyr, Cathays, Waun-Gron Park, Llanishen and Grangetown station sites? Is there any you would rather we did not pursue? You noted Radyr was a candidate site which attracted objection.	It may be better to look at all the existing station sites for completeness. Most will not have any opportunities within 500 metres, but at least we can demonstrate a consistent approach.	Response of 27 August 2026
49	Are Jeff White Motors at Ninian Park, and the trade parks on Sloper Road, counted within the identified supply? If not we propose to reinstate them, following your confirmation at query 16. Please disregard the reference CS100 previously given against Jeff White Motors. That was our error: the CS series in the monitoring schedule covers Cathays and Canton and contains no CS100, and we believe a candidate site number was intended. A plan of both sites will follow.	Confirm these are not included within the existing supply.	Response of 27 August 2026
50	Date for the updated Viability Assessment, and how you would like us to treat viability meanwhile. We note the independent review on 25/02351/FUL concluded the scheme could not meet the full contributions sought, and that affordable housing was secured at £935,000 against a policy requirement of £7,316,800.	Avison Young are working on a draa and will share it with you asap - likely mid-September	Response of 27 August 2026
51	Date for the SAMM and SANG study, the mitigation mechanism and likely cost per dwelling. Recreation mitigation is a cost falling on every site in the study.	Footprint Ecology are working on draa and will share it with you - likely early September	Response of 27 August 2026
52	Status of the reserve list, 2,280 units across nine sites. Is it to be assessed? This affects whether the end of August packaging date holds.	This depends on where we are in terms of numbers with the main list - be good to discuss when we meet next week	Response of 27 August 2026
53	Are further sites to be added, and by when?	We can discuss when we meet next week	Response of 27 August 2026
54	Contract administration. Not a matter bearing on the findings of the study.	Answered. The exchange concerned the purchase order for this commission rather than the study, and is not reproduced.	Response of 27 August 2026

A5



No.	Query	The Council's response	Answered
55	Is the Constraints Map, RLDP-10, dated January 2025, still the current version, or has it been superseded alongside the Proposals Map? Query 1 raised the same point on the Proposals Map and has not yet been answered for this one.	Yes, that is the current version. We will be preparing a new version to sit alongside the adopted plan next year.	Response of 27 August 2026
56	Do any of the study sites fall within a Health and Safety Executive Development Proximity Zone, and if so in which band? Zones appear to be mapped in the Rover Way and East Moors area, in the Queen Alexandra and Roath Dock area, and in the Ferry Road and Penarth Road area. Dominion Way and Clydesmuir Industrial Estate are our immediate concern. A schedule or the GIS layer would settle it.	See attached GIS layers.	Response of 27 August 2026
57	Pier Street. Please confirm the extent of the land take for the potential rapid transit corridor along the northern edge of the site, or confirm that a stated percentage deduction from the net developable area is acceptable pending the alignment being fixed.	Yes, agree with this approach. Not sure what figure you are proposing, 20 per cent?	Response of 27 August 2026
58	Please confirm that residential accommodation at ground floor level is not acceptable in the mapped flood zones, following paragraph 9.160 of the committee report on Custom House, and that the study is right to apply that assumption to every site in a mapped zone rather than only to sites within the Central and Bay Business Area.	Yes, would agree with that approach.	Response of 27 August 2026
59	Is there a schedule of the proposed rail stations shown on the Constraints Map, with any indication of programme? It would support the public transport node search category directly.	The proposed stations are shown on the Constraints Map. In terms of delivery the most progressed stations are Loudoun Square, under construction; Crwys Road, with planning permission and construction expected to commence shortly; and St Mellons Parkway, with planning permission. The other proposed stations are at the early stages of planning with no firm funding or timescales.	Response of 27 August 2026



No.	Query	The Council's response	Answered
60	Wolfs Castle Avenue. You confirm at query 14 that permission was granted on 22 July 2026. The site was discounted from our study on accessibility, lying some 450 to 500 metres from the nearest Strategic Bus Route under Policy T2 and so outside the criterion agreed on 30 July. It is not in the Housing Monitoring Schedule at the base date, so on the double counting rule at paragraphs 3.28 to 3.30, which you have confirmed you are content with, it would be counted. How would you prefer a consented site that falls outside the accessibility criterion to be treated, given it will enter your monitoring schedule at the next base date in any event?	Might be better to leave this out given the planning status.	Response of 27 August 2026
61	Application 21/02687, Atlantic Wharf Butetown Masterplan. Thank you for the location plan, which settles query 19. Could we have the red line as a GIS layer or shapefile so that we can overlay it against the sites at Admirals Landing, The Wharf, Tyndall Street and John Street? The plan indicates all four lie outside, but we would prefer to demonstrate that by overlay rather than by eye.	The Council has already sent this through.	Response of 27 August 2026
62	Your inception schedule records against John Street a hybrid planning permission for commercial development and a figure of 414 units. That does not correspond to 25/02700/FUL, Land North of John Street, Butetown, which is the application we have identified and which remains awaiting committee, nor to 21/02687. Could you confirm the source of the 414 figure so the schedule can be corrected?	The Council has provided a response on this.	Response of 27 August 2026

Note on reproduction

The Council's responses were given by email, in most cases as entries in a returned copy of the query schedule. They are reproduced here as written, save that salutations, signature blocks and the bilingual correspondence notice have been removed, and obvious transcription artefacts arising from the printing of those emails have been corrected. Nothing has been paraphrased and no response has been shortened. The originals are held on the study file.

Appendix 6

The methodology statement, as agreed with the Council on 31 July 2026

The statement below is reproduced in full and without amendment. It is the document dated 31 July 2026, being the version confirmed with the Council following the meeting of 30 July 2026. It is reproduced so that the reader may test the study against the framework which was fixed before any site was assessed, and so that the departures recorded at Table 5 of the report may be checked against their source.

Cardiff Council

Replacement Local Development Plan 2021 to 2036

Urban Capacity Study

Methodology Statement

Prepared in response to Examination Action Point HS2.2

31 July 2026

Expedite

1. Introduction and status

1.1 This statement sets out the methodology, definitions, criteria and assumptions applied in the Cardiff Urban Capacity Study. It has been prepared for agreement with the Council in advance of site assessment.

1.2 Once agreed, this statement fixes the analytical framework for the study. The findings are the outputs of the method recorded here, applied consistently to every site considered. Any departure from the method is recorded, with reasons, in the audit trail described at Section 11.

1.3 The positions recorded in this statement were agreed between the Council and Expedite at a methodology meeting held on 30 July 2026, and confirmed by the Council on 31 July 2026. Site assessment proceeds on the basis of the criteria recorded here.

1.4 This statement forms the first component of the study's audit trail and is capable of publication alongside the final report.

2. The Inspectors' requirement

2.1 The study responds to Action Point HS2.2, arising from the Housing Strategy hearing session held on 10 June 2026:

"In order to support the Council's position on windfalls [by 30/9/26], Council 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 Each element of the action point is addressed as set out below. The final report is structured so that this correspondence is apparent on its face.

Requirement of HS2.2	How addressed	Report section
Support the Council's position on windfalls	Quantification of realistic capacity, and comparison against the large site component of the windfall allowance	Sections 6 and 7
Identify vacant and under-utilised sites	Site identification at Stage 2	Section 4

Requirement of HS2.2	How addressed	Report section
Identify sites on arterial routes and public transport nodes	Site identification at Stage 2, applying the agreed catchment definition	Section 4
Sites the Council referred to in the Hearing	The Council referred at the hearing to the categories of site in question, rather than to a specific schedule. The study identifies sites falling within those categories, distinguishing between sites identified by Council officers and sites identified by the study team	Section 4 and Appendix 1
Identify ownership	Mandatory field for every assessed site	Section 5 and site appraisals
Identify constraints to delivery	Constraints assessment and deliverability judgement for each site	Section 5 and site appraisals
Delivery by 30 September 2026	Final report issued in advance of that date	Section 12

2.3 The reference in the action point to sites the Council referred to at the hearing is to the categories of site identified by the Council, namely vacant and under-utilised sites and sites on arterial routes and at public transport nodes, rather than to a schedule of named sites. The study identifies sites falling within those categories and records, for each, whether it was identified by Council officers or by the study team.

2.4 The study additionally addresses capacity, density and delivery timescale for each site. These matters are not expressly required by the action point, but are necessary in order to demonstrate the contribution that identified capacity can make to the Council's position on windfalls, and are consistent with established practice in comparable studies.

Related matters raised at the hearing

2.5 Action Point HS2.2 falls to be read alongside other questions put to the Council at the same session, several of which bear directly on the reliability of the windfall estimate. The study is designed to address them:

- Whether the figures take account of plan requirements, including open space, play provision, allotments, food growing space, sustainable drainage, tree replacement, biodiversity and energy efficiency, which reduce the area available for development. Addressed through the approach to net developable area at Section 5.
- Whether viability has been taken into account, particularly on brownfield sites which may be contaminated. Addressed through viability screening at Section 5.
- Whether Policy H9, which requires demonstration that there is no overriding need to retain the existing use on unallocated sites, has informed the estimate. Addressed through a Policy H9 assessment for every site in active use.

- Whether recreation mitigation arising from the Severn Estuary and Cardiff Beech Wood European sites has been factored in. Addressed through the constraints assessment at Section 5.

3. Policy and evidence framework

3.1 The study is prepared having regard to the following:

- Development Plans Manual (Edition 3), and in particular its provisions on windfall allowances, urban capacity studies and the housing trajectory.
- Planning Policy Wales (Edition 12), and in particular the sequential preference for previously developed land, and its provisions on placemaking, density and the efficient use of land.
- Future Wales: The National Plan 2040, and in particular Policy 12 concerning land in proximity to metro stations.
- The Council's Updated Background Technical Paper Number 1: Housing (March 2026), which defines the windfall categories and derives the windfall allowance.
- The Council's housing trajectory, Housing Monitoring Schedule, Candidate Sites Register and Background Technical Paper Number 10: Candidate Site Assessment.
- Replacement Local Development Plan policies bearing on unallocated sites and on employment land and premises, in particular Policy H9, Policy H8, Policy EC3 concerning protected employment land, Policy EC6 concerning the protection of offices in the Central and Bay Business Area, Policy EC7 concerning the alternative use of employment land and premises not identified within Policies EC3 or EC6, Policies SP3 and SP4, and Policy BG7.
- The Council's Viability Assessment, as updated.
- Comparable practice in Wales, in particular the Vale of Glamorgan Urban Capacity Study (2025 update) and the Bridgend Urban Capacity Study (2020), together with the Strategic Housing Land Availability Assessment practice guidance from which those studies derive.

4. Definitions and parameters

4.1 The following definitions and parameters apply throughout the study.

Parameter	Position
Study area	Land within the Cardiff settlement boundary, as defined by the Council.
Windfall	New dwelling completions on land not identified in the development plan, as defined in Background Technical Paper Number 1.
Windfall categories	The Council's monitoring categories are adopted without modification: large sites, being those delivering ten or more new build dwellings; small sites, being those delivering fewer than ten; and change of use, being existing buildings converted to residential use.

Parameter	Position
What the study evidences	The large site component of the windfall allowance. The small site and change of use components are trend based projections and are not the subject of this study.
Site threshold	Sites capable of accommodating ten or more dwellings, consistent with the Council's definition of a large windfall site.
Arterial routes	Principal radial corridors as defined by the Council.
Public transport nodes	Rail stations, metro stops and bus interchanges as defined by the Council.
Transit catchment	500 metres walking distance of a public transport node, following Future Wales Policy 12.
What counts as a dwelling	Capacity is counted in C3 dwellings. Co-living is treated as C3 and counts towards the contribution. Purpose built student accommodation is discounted, save where it is evidenced that a consent has lapsed, remains unimplemented, or is unlikely to be completed having regard to the time elapsed since it was granted.
Likely delivery model	Recorded for each site as development for sale, build to rent, co-living, purpose built student accommodation or mixed.
Density	Applied by context band, informed by recent Cardiff consents and by the placemaking principles in Planning Policy Wales.
Gross to net	Benchmark gross to net ratios are applied by site size, following the Bridgend Urban Capacity Study: 100 per cent up to one hectare; 85 per cent between one and two hectares; 80 per cent between two and four hectares; and 75 per cent above four hectares. Gross area is not used as the basis for yield.

Parameter	Position
Plan policy requirements	The benchmark ratios are understood to encompass the land take arising from plan policy requirements, including open space and play provision, sustainable drainage, tree replacement, biodiversity net benefit, green infrastructure, and access and active travel provision. Where a site carries an exceptional requirement beyond the benchmark, a site specific deduction is applied and the basis recorded.
Delivery bands	Years one and two, years three to five, years six to ten, and beyond ten years to 2036. Sites falling within years one and two are reported separately and excluded from the counted contribution, consistent with the exclusion of large site windfalls from the first two years of the trajectory.
Confidence ratings	High, medium and low, as defined at Section 5.
Discounting	No further non-implementation discount is applied within the study. The Council has applied a reduction to the large site windfall projection to allow for depletion of opportunities, and a second discount would understate capacity by applying the same caution twice.

5. Method

Stage 1: Evidence review and data assembly

5.1 The study begins with a review of the Council's evidence base, comprising the Updated Background Technical Paper Number 1: Housing, the housing trajectory, the Housing Monitoring Schedule, the Candidate Sites Register, Background Technical Paper Number 10, previous capacity and brownfield studies, and relevant regeneration, transport and placemaking strategies.

5.2 A structured programme of inception meetings is held with Council officers across planning policy, regeneration and estates, in order to confirm the evidence base, to identify land in Council ownership and other sites known to officers, and to confirm data and geographic information system access. Meetings are minuted and a record of information received is maintained.

5.3 Data supplied by the Council comprises base mapping, the settlement boundary, planning history, the local land and property gazetteer, Council land ownership, aerial imagery, constraint layers and quiet area mapping.

Stage 2: Site identification

5.4 The starting point is the sites to which the Council referred at the hearing, as required by Action Point HS2.2. The site schedule distinguishes between sites referred to by the Council at the hearing, sites identified by Council officers at inception, and additional sites identified by the study team through desktop review, geographic analysis and site survey.

5.5 The search categories comprise vacant land and previously developed land; under-utilised sites and buildings; surplus and under-used surface car parks; obsolete commercial and employment premises; opportunities for redevelopment and intensification, including vertical intensification and space above commercial premises; sites on arterial corridors; and sites within the agreed catchment of public transport nodes.

5.6 Sift criteria are fixed in advance of their application. Decisions to include or exclude a site are recorded against those criteria, with reasons, for every site considered, including sites subsequently removed. A schedule of sites removed from the study, together with the reason for removal in each case, is published in the final report.

5.7 The Council has reviewed the site schedule and identified sites already counted within its own figures, sites holding extant permission for other uses, sites subject to policy designation, and any duplication. The treatment of those sites is as follows. Sites which benefit from planning permission or a resolution to grant planning permission are not included in the study. Sites within protected employment areas are removed. Duplicated entries are removed. Co-living schemes are retained and counted. Purpose built student accommodation is discounted, save where a lapse or non-implementation case is evidenced in accordance with Section 4. In each case the site is recorded in the schedule of sites removed from the study, together with the reason. The Council's review and the resulting decisions are reproduced in the final report.

Stage 3: Site assessment

5.8 A standard appraisal proforma is completed for every identified site. The proforma records:

- Site location, boundary and mapping; gross site area; current and previous uses; occupancy; notable structures and features; and surrounding land uses.
- Ownership. Ownership is expressly required by Action Point HS2.2 and is a mandatory field. It is established from Council records, Land Registry title information and other publicly available sources. Where ownership cannot be established, that is stated expressly, together with the searches undertaken.
- Planning history and current planning status, including any extant permission or live application with its reference and date, and any pre-application activity. Pre-application activity is treated as evidence of landowner or developer intent.
- Policy H9, and the policies protecting employment land and premises. Completed for every site in active or partial use. The proforma records the existing use, whether the use is protected by designation under Policies EC3, EC6 or EC7, evidence of relocation, disposal or marketing, the condition and functional obsolescence of buildings, and a conclusion as to whether an overriding need to retain the existing use can be discounted. Where it cannot, the site is carried at low confidence or excluded, and the reason recorded.
- Constraints to delivery. Constraints are expressly required by Action Point HS2.2 and comprise flood risk, ecology and trees, heritage and archaeology, air quality, noise including proximity to designated quiet areas, contamination and likely remediation, ground conditions, access, utilities, land assembly, planning policy compliance, and recreational pressure on European sites.
- Capacity, comprising the net developable area derived from the benchmark ratios, the context band and density applied together with the Cardiff comparables relied upon, the recommended development form and delivery model, and the resulting indicative yield.

- Deliverability, comprising an assessment of suitability, availability and achievability, evidence of availability, an indicative delivery band and a confidence rating.

5.9 Recreational pressure is assessed by reference to the core recreational catchments of the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar sites, and Cardiff Beech Wood Special Area of Conservation. The study area falls within those catchments. The requirement for mitigation under Policy BG7 is recorded for each site. The Council has confirmed that a study of strategic access management and monitoring, and of suitable alternative greenspace, is being undertaken, and the findings of that study are applied where available.

5.10 Viability is addressed by high level screening referenced to the development typologies tested in the Council's Viability Assessment. Site specific viability appraisal is outside the scope of the study. The Council has confirmed that the Viability Assessment is being updated, and the study applies the updated assessment where available, stating the version and date of the document relied upon. Where a site is likely to come forward as build to rent or co-living, the appraisal model applicable to that form of development is identified, with reference to comparable Cardiff schemes. Viability is recorded as a constraint to delivery and is reflected in the confidence rating. It is not applied as a numerical discount to yield.

Confidence ratings

5.11 Confidence ratings are applied as follows.

Rating	Definition
High	Ownership established; no unresolved constraint identified; no overriding need to retain the existing use; and positive evidence of availability, such as marketing, pre-application activity, planning history or a confirmed public sector disposal intention.
Medium	Ownership established or reasonably inferred; constraints identified but capable of mitigation; the existing use capable of relocation or nearing the end of its useful life; and no positive evidence of availability but no known impediment.
Low	Ownership unresolved; land assembly required; an overriding need to retain the existing use cannot be discounted; or a constraint identified that cannot be shown to be resolvable within the plan period.

5.12 The level of evidence required increases with the delivery band claimed. Sites placed in the earlier bands require firmer evidence of availability than those placed later in the plan period.

6. Avoiding double counting

6.1 The residential landbank is already counted within the housing trajectory, subject to the non-delivery allowance applied by the Council. A site which benefits from planning permission or a resolution to grant planning

permission is therefore already counted, and is not included in this study. Such sites are recorded in the schedule of sites removed, with the reason, so that the cross-check is evidenced.

6.2 Each identified site is cross-checked against the Housing Monitoring Schedule, extant commitments, allocated sites and the Candidate Sites Register. The cross-check is recorded on each site proforma. Sites already counted within committed supply, or as allocations, are not included in the study and are recorded in the schedule of sites removed.

6.3 Where a site was assessed and rejected through the candidate site process, the study either states the reason for reaching a different view or excludes the site accordingly.

7. Quantifying the contribution to windfall supply

7.1 Theoretical capacity and counted capacity are reported separately. Only sites meeting the agreed confidence threshold contribute to the counted figure.

7.2 Capacity is reported in C3 dwellings, co-living being treated as C3. Capacity on sites holding extant permission for purpose built student accommodation is excluded, save where the study evidences that the consent has lapsed, remains unimplemented, or is unlikely to be completed having regard to the time elapsed. Any such case is set out for the site in question, with the planning history relied upon.

7.3 No further non-implementation discount is applied, for the reason given at Section 4.

7.4 Findings are reported as a range, comprising upper, central and lower figures, rather than as a single point estimate.

7.5 The counted contribution is reconciled against the Council's historic large site windfall delivery rate and against the allowance derived from it. The study tests whether the identified pipeline is consistent with continued delivery at that order, having regard to the Council's position that windfall opportunities are not depleting.

7.6 Sensitivity analysis is reported, including the contribution excluding sites carried at low confidence and excluding any site subject to a declared interest.

7.7 The report addresses expressly the matters raised by participants at the hearing session in relation to the reliability of the windfall estimate, namely the effect of plan policy requirements on developable area, brownfield viability and abnormal costs, the operation of Policy H9, and recreation mitigation.

8. Quality assurance and certification

8.1 All planning judgements, including suitability, availability and achievability, capacity, delivery banding and confidence ratings, are reviewed and certified by the named chartered planning lead.

8.2 Design and density inputs are prepared by the design team and signed off by the design director.

8.3 A written guidance note is issued to all assessors to ensure the appraisal proforma is completed consistently across the study.

9. Declaration of interests

9.1 Interests held by the study team or its associated companies in any site within the study are declared in the final report.

9.2 Appraisals for sites subject to a declared interest are prepared and scored by members of the study team holding no interest in those sites. No site is included in, or excluded from, the study by reason of any such interest.

9.3 The report reports the contribution both including and excluding sites subject to a declared interest, so that the sensitivity of the conclusions to those sites may be assessed.

10. Limitations

10.1 The identification of a site within this study does not indicate that a future planning application would be determined favourably. The suitability of any site falls to be considered at planning application stage, having regard to all material considerations.

10.2 Equally, the absence of a site from this study does not preclude its acceptability for windfall development.

10.3 The appraisals are high level and are intended to inform the Council as to the development potential of each site and its likely contribution to the windfall allowance. Any subsequent development proposal would require a range of detailed technical and viability assessments.

11. Audit trail

11.1 The following are retained and, where appropriate, published: this statement as agreed; the sift criteria and the long list, with reasons for inclusion and exclusion; the schedule of sites removed from the study, with reasons; the record of the Council's review of the schedule; the double counting cross-check for each site; the completed appraisal proformas; the record of information received from the Council; and a log of any departure from this methodology, with reasons.

12. Programme

Milestone	Date
Methodology statement agreed with the Council	31 July 2026
Draft report, appraisals and database issued to the Council	11 September 2026
Council comments returned, in a single consolidated round	18 September 2026
Final report issued	25 September 2026
Deadline under Action Point HS2.2	30 September 2026

12.1 This statement, together with the site schedule agreed with the Council, constitutes the scoping output for the commission, provided in advance of the programme date originally anticipated.

12.2 The programme is dependent upon the timely provision of Council data, upon a single consolidated round of comments at draft stage, and upon the availability of the updated Viability Assessment and the recreation mitigation study. Where either of those documents is not available in time, the study records the position by reference to the evidence available.

Annex A: Report structure

A.1 The final report is structured as follows, so that Action Point HS2.2 is answered on its face.

Section	Content
Executive summary	The requirement, the method in summary, the headline findings and the conclusion on the windfall position.
1. Introduction and the Inspectors' requirement	Action Point HS2.2 in full, with a table showing where each element is addressed; the status and purpose of the study; and its limitations.
2. Policy and evidence context	National and local policy; the windfall allowance and its derivation; and comparable practice in Wales.
3. Methodology	This statement, as agreed, including definitions, parameters, sift criteria and assumptions.
4. Site identification	Sources searched; sites referred to by the Council at the hearing; sites identified by officers; additional sites identified; the Council's review of the schedule; and sites removed from the study with reasons.
5. Site assessment findings	Ownership; existing uses and the Policy H9 position; constraints to delivery, including recreation mitigation; capacity and density; suitability, availability and achievability; delivery bands and confidence ratings.
6. Matters raised at the hearing session	How the study addresses the effect of plan policy requirements on developable area, brownfield viability, Policy H9, and recreation mitigation.
7. Contribution to windfall supply	Theoretical and counted capacity; capacity in C3 dwellings reported separately from other accommodation; the range reported; reconciliation with historic windfall delivery; and the relationship to the allowance in the submitted Plan.
8. Sensitivity and assurance	Sensitivity analysis; double counting cross-checks; and the limitations of the study.
9. Conclusions	Whether identified capacity supports a windfall allowance of the order in the submitted Plan, and on what basis.
Appendix 1	Site schedule and appraisal proformas.

Section	Content
Appendix 2	Sites removed from the study, with reasons, and the Council's review of the schedule.
Appendix 3	Declaration of interests.
Appendix 4	Mapping and searchable site database, issued separately.