



Local Development Plan 2021 > 2036

Cardiff Council - May 2026

Cardiff Replacement LDP Examination

Hearing Session 1
Housing Numbers

CD08 Council Statement in
Response to Inspectors Questions
in ID08a



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Cardiff Council
Replacement Local Development Plan
Examination

Hearing Session 1 – 09.30, 9 June 2026

County Hall

Housing numbers

Issue – Is the LDP’s target of 26,400 dwellings supported by robust evidence and sufficient to meet the housing needs of the city up to 2036?

1. Opening and introductions

2. Cardiff Council to provide an update on completions and numbers of homes under construction, with planning permission and a resolution to grant planning permission.

3. Cardiff Council to outline its reasoning and evidence base supporting the target of 26,400 units.

- i. Is the target of 26,400 units justified? Should it be higher as argued by the HBF and others?

Response:

The Council maintains that the 26,400-dwelling requirement is robust, justified, and sound, being based on a comprehensive evidence base. The Council does not consider that an uplift is warranted. Increasing the requirement would undermine deliverability and is not supported by demographic, economic, or land supply evidence.

The housing requirement is underpinned by the demographic modelling prepared by Edge Analytics ([RLDP35](#) and updated May 2026), which incorporates the latest Welsh Government household projections, local migration trends, adjustments for household formation and alignment with the Council’s economic growth strategy. The updated modelling demonstrates that 26,400 dwellings is sufficient to accommodate projected population and household growth while supporting the Plan’s economic objectives and concludes that the dwelling growth target of 1,600 dwellings per year is still considered a reasonable basis for planning in Cardiff.

The updated Edge Demographic report notes that this level of growth is slightly higher than the more realistic of the WG-2022 projection scenarios (‘WG-2022-10 yrMig’ (at

1,314 dwellings per year) and 'WG-2022-15yrMig' (1,311 dwellings per year) that do not carry forwards the higher levels of net international migration seen in recent years, as well as being higher than the dwelling growth figure from the 'Trend-15yr scenario' (at 1,223 per dwellings per year). The 'Trend-15yr scenario' is, however, considered to be towards the more prudent end of the growth spectrum and the 1,600 dwellings per year would accommodate this level of population growth and any improvements to rates of household formation that could occur (e.g. through improved housing supply and affordability).

The Plan's housing requirement has been tested and shows that it supports the anticipated job growth, avoids constraining labour supply, does not require a higher housing figure to maintain economic alignment. The Council does not accept the HBF's assertion that a higher housing requirement is necessary to support economic growth. The evidence demonstrates that the proposed requirement already provides an appropriate balance between jobs and homes.

A key strength of the 26,400 figure is that the requirement can be met through existing LDP strategic sites (all of which are progressing), extant planning permissions, brownfield and windfall opportunities and housing led regeneration sites identified in the Plan. The Council's assessment confirms that the supply is realistic, deliverable, and capable of supporting the requirement over the Plan period.

The Council has carefully considered the representations made by HBF and other but does not agree that they justify a higher requirement for the reasons set out below:

- **Market Signals** - While the Council recognises affordability challenges, increasing the housing requirement beyond what is deliverable would not guarantee improved affordability. The Plan already provides a significant supply of housing, including between 5,000 and 6,000 affordable homes, supported by land supply and viability evidence.
- **Economic Growth** - The Council's economic evidence demonstrates that the 26,400 figure is sufficient to support the Plan's employment strategy. No credible evidence has been provided to demonstrate that a higher housing requirement is necessary or justified.
- **Migration and Demographic Assumptions** - The demographic modelling already incorporates realistic migration assumptions. The HBF has not provided alternative modelling that would justify a materially higher requirement.

The consequences of increasing the housing requirement would undermine the Plan's brownfield-first strategy, increase infrastructure burdens, conflict with sustainability

and climate objectives and risk non-delivery and weaken the soundness of the Plan. The Council considers these outcomes unacceptable and unnecessary.

The Council concludes that the 26,400-dwelling housing requirement is justified, appropriate, and sound. It is supported by robust demographic and economic evidence, is deliverable within identified land supply, and aligns with the Plan's spatial strategy and sustainability objectives. The Council therefore does not support the HBF's, and others request for a higher housing requirement.

- ii. The housing target is a dwelling led figure, based on expectation of urban land supply and existing greenfield sites in the adopted LDP. Is this an appropriate way to assess need?

Response:

The Council considers that using a dwelling-led figure informed by realistic land supply, demographic evidence, and the existing spatial strategy is an appropriate and justified way to assess housing need for the Plan. The approach is proportionate, evidence-based, and consistent with national policy requirements for deliverability, sustainability, and a brownfield-first strategy.

Planning Policy Wales (PPW) and the Development Plans Manual (Edition 3) emphasise that housing requirements must be evidence-based, deliverable, aligned with the spatial strategy, and supported by a realistic assessment of land supply. The Council's approach meets these requirements. National policy does not mandate a purely demographic or unconstrained "need" figure; rather, it requires a balanced judgement that integrates need, capacity, and sustainable development principles.

A dwelling-led approach is appropriate as the Plan strategy of focuses growth within the urban area, maximises brownfield regeneration and proposes completion of the existing strategic sites, A dwelling-led figure grounded in this strategy ensures that the housing requirement is deliverable within sustainable locations, consistent with PPW's emphasis on placemaking and reducing car dependency.

The 26,400-dwelling requirement is not simply a product of land availability. It is supported by robust demographic modelling (Edge Analytics - [RLDP35](#) and updated May 2025), economic alignment testing, household formation analysis and migration trends. The land supply assessment is used to test deliverability, not to artificially constrain need.

All strategic sites from the adopted LDP are permitted or under construction, delivering at scale and supported by infrastructure already in place or committed. This provides a strong and reliable basis for forecasting future delivery and supports the Council's dwelling-led approach.

In response to representors the Council rejects the suggestion that the requirement is constrained by land supply. The figure is evidence-led, and the fact that it aligns with available land is a strength, not a weakness.

While affordability pressures are acknowledged, increasing the requirement beyond deliverable levels would not guarantee improved affordability. The Plan already provides for significant overall supply, and between 5,000 and 6,000 affordable homes.

The Council's economic evidence demonstrates that the dwelling-led figure is sufficient to support anticipated job growth. No evidence has been provided to show that a higher requirement is necessary to maintain economic alignment.

In conclusion the Council consider that a dwelling-led housing requirement informed by realistic land supply, demographic evidence, and the proposed spatial strategy is an appropriate and justified method of assessing need. It ensures that the Plan is deliverable, sustainable, aligned with national policy, and capable of supporting Cardiff's economic and social objectives. The Council therefore considers the approach sound.

iii. Is a 10% flexibility allowance appropriate?

Response:

The Council considers a 10% flexibility allowance to be appropriate, justified, and consistent with national guidance. It provides a reasonable buffer to ensure the housing requirement can be met in full while avoiding unnecessary over-allocation of land.

The Development Plans Manual (Edition 3) advises that plans should include a reasonable flexibility allowance to account for non-delivery of sites, unforeseen delays, changes in market conditions and infrastructure constraints. It does not prescribe a specific percentage, but Inspectors across Wales have consistently accepted allowances in the 5–15% range depending on local circumstances. A 10% buffer sits comfortably within this accepted practice and reflects the flexibility allowance in the current adopted LDP.

The Council considers 10% is appropriate as Cardiff benefits from a strong and diverse land supply with multiple large strategic sites already under construction, a strong pipeline of brownfield regeneration sites, and a proven track record of delivery. This reduces the need for a higher contingency buffer.

The 10% is also supported by the deliverability evidence which demonstrate that the identified supply is robust, the risk of widespread non-delivery is low, and the existing strategic sites provide certainty. A 10% allowance is therefore proportionate to the level of risk.

Across Wales, Inspectors have typically endorsed 10% where supply is strong and strategic sites are progressing, higher allowances only where delivery risks are significant. Cardiff clearly falls into the former category.

Some representors argue for a higher flexibility allowance. The Council does not agree, for the following reasons:

- No evidence has been provided to demonstrate that a higher allowance is necessary.
- Delivery risks are already accounted for within the 10% buffer.
- Increasing the allowance would artificially inflate the housing requirement.
- This would undermine the Plan's spatial strategy and sustainability principles.
- The Council therefore considers that a higher allowance would be unjustified and unsound.

In conclusion a 10% flexibility allowance is proportionate to Cardiff's delivery risks, consistent with national guidance and Welsh examination practice, aligned with the Plan's brownfield-first strategy, sufficient to ensure the housing requirement can be met in full. The Council therefore considers the 10% allowance to be appropriate and sound.

iv. Should housing need be determined by past build rates?

Response:

The Council consider that housing need should not be determined by past build rates. Past delivery is a measure of supply performance, not future need, and using it as the primary basis for setting a housing requirement would be inconsistent with national policy and the evidence-led approach required for LDP preparation.

PPW requires housing requirements to be based on demographic evidence, household formation trends, economic alignment, local circumstances and deliverability. It does not support setting housing need based on past completions.

The Development Plans Manual (Edition 3) is explicit that past build rates reflect historic supply, they do not represent an objective measure of future need and plans must be based on forward-looking evidence, not retrospective performance. Inspectors across Wales have consistently endorsed this interpretation.

Past build rates are not a measure of need as they are shaped by the timing of major site releases, infrastructure delivery, market cycles, developer behaviour and policy decisions in previous plans. These factors do not equate to underlying housing need.

Housing need must be evidence-led, not supply-led and be determined by population change, household formation, migration and economic forecasts. Past completions do not measure any of these.

In conclusion housing need should not be determined by past build rates. Past delivery reflects historic supply, not future need, and relying on it would be inconsistent with national policy and sound plan-making principles. The Council therefore considers that the housing requirement must be based on demographic, economic, and deliverability evidence and past build rates should play no determinative role in assessing need and that no uplift is justified based on historic completions.

- v. Does the target need to be changed in light of the 2022-based Local authority household projections for Wales?

Response:

The Council does not consider that the housing target needs to be changed in light of the 2022-based Local Authority Household Projections for Wales. The new projections do not provide evidence that would justify altering the housing requirement or reopening the demographic basis of the Plan. As set out above in response to question 3(i) above this approach is supported in the updated Demographic Paper prepared by Edge Analytics which has reviewed the implications of the 2022- based Local Authority Projections for the housing target set out in the Plan. Significantly this updated modelling concludes that the dwelling growth target of 1,600 dwellings per year is still considered a reasonable basis for planning in Cardiff.

PPW and the Development Plans Manual (Edition 3) are explicit that Welsh Government household projections are a starting point for assessing need, they are not a housing requirement and must be considered alongside local evidence, economic forecasts, and deliverability. The Council's approach remains fully consistent with this guidance.

Projections are trend-based and sensitive to short-term fluctuations The 2022-based projections are trend based and sensitive to short-term fluctuations. The latest projections reflect the immediate post-pandemic period, suppressed migration and short-term demographic volatility. These conditions are not considered a reliable basis for long-term plan-making.

The 26,400-dwelling requirement is not projection-led and is based on demographic modelling (Edge Analytics - - RLDP35 and updated May 2025), economic alignment testing, household formation assumptions, migration trends and deliverability and land supply. The projections are only one input into this broader evidence base.

The Plan's requirement remains deliverable and justified The Council's land supply evidence demonstrates that the 26,400 figure is deliverable, it aligns with the spatial strategy and supports affordable housing delivery. There is no evidence that the requirement is excessive or undeliverable.

In conclusion the 2022-based Local Authority Household Projections do not provide a basis for changing the housing target. The Council's requirement remains sound, evidence-based, economically aligned, deliverable, and consistent with national policy.

- vi. Should the target be increased to facilitate the delivery of affordable homes to meet the need identified in the Local Housing Market Assessment?

Response:

The Council does not consider that the housing target should be increased solely to facilitate the delivery of affordable homes identified in the LHMA. The Plan already provides a significant and deliverable supply of affordable housing and increasing the overall housing requirement would not guarantee additional affordable homes, nor would it represent sound plan-making.

National policy in PPW and the Development Plans Manual is clear that affordable housing need is a material consideration, but it does not determine the overall housing requirement, and the housing requirement must remain deliverable, sustainable, and aligned with the spatial strategy. The Manual explicitly warns against inflating housing numbers beyond deliverable levels simply to increase affordable housing output.

Increasing the target would not necessarily deliver more affordable homes as affordable housing delivery is driven by viability, not volume. Increasing the housing requirement would release more land but would not change the viability constraints that limit affordable housing percentages. Developers would continue to deliver affordable housing at the rates justified by viability evidence, regardless of the overall target.

In relation to the figures in the LHMA, it is noted that the LHMA is a high-level strategic document, whose purpose is to give broad estimates at a Housing Market Area (HMA) level, of what future local housing need might be, rather than any precise estimate.

It is also noted that whilst the LHMA is a core piece of baseline evidence informing the scale, type, and location of growth within the geographical boundary, and indicates the scale of housing need, it is unlikely to directly equate to a housing requirement or reflect the affordable housing target in any development plan.

Importantly, Page 6 of the *Undertaking Local Housing Market Assessments (LHMAs) Guidance (2022)* states "...the additional housing need estimate indicates the scale of housing need within the geographical boundary. Whilst this estimate will inform the development plan, it is unlikely to directly equate to a housing requirement or the affordable housing target in a development plan".

In addition, Para 3.11 states "the calculations within the LHMA Tool are formula-driven using the data inputs and assumptions to form a best assessment of additional

housing need and demand. It is important to note that these are estimates and not a target”.

In target setting it is important that other factors need to be considered, such as land availability and land capacity, as well as costs and viability and timing. Given the level of housing need in Cardiff, the focus needs to be on ambitious, yet realistic delivery rather than on any arbitrary target. In this regard, the Deposit RLDP recognises the importance of Affordable Housing and seeks to promote and maximise delivery through various policy approaches.

A significant affordable housing contribution is already embedded in the Plan which is expected to deliver at least 5,000 to 6,000 affordable homes, based on the 26,400-dwelling requirement, site-specific viability evidence and policy-led affordable housing percentages. This represents one of the largest affordable housing programmes in Wales. A higher target would risk undermining the spatial strategy and would require additional infrastructure and greater environmental impacts.

Inflating the requirement beyond what the evidence supports would risk non-delivery, an unsound plan and a mismatch between infrastructure capacity and growth. No evidence that higher targets improve affordability. Research across the UK shows that increasing market housing supply does not automatically increase affordable housing delivery especially where viability constraints persist.

The Council concludes that the housing target should not be increased to facilitate affordable housing delivery. The Plan already provides a significant and deliverable affordable housing programme, a robust policy framework to maximise delivery and a sustainable spatial strategy. Increasing the target would not guarantee additional affordable homes and would undermine the soundness of the Plan.

- vii. Does the target of 26,400 reflect Cardiff’s designation as a National Growth Area in Future Wales?

Response:

The Council considers that the 26,400-dwelling housing requirement appropriately reflects Cardiff’s designation as a National Growth Area in *Future Wales*. The target provides for significant growth in a way that is deliverable, sustainable, and aligned with the spatial strategy.

Future Wales identifies the Cardiff, Newport and the Valleys region as a National Growth Area, and sets clear expectations that these areas should:

- accommodate the majority of Wales’s future growth,
- support economic development,
- focus development in sustainable, accessible urban locations,

- make best use of brownfield and existing strategic sites,
- deliver high-quality placemaking.

Crucially, *Future Wales* does not prescribe a specific housing number for Cardiff or require an unconstrained uplift. Instead, it expects Local Development Plans to plan positively for growth, align with regional economic ambitions and ensure deliverability and sustainability. The Council's approach meets these expectations.

A requirement of 26,400 dwellings over 15 years represents a substantial level of growth and supports Cardiff's role as the capital city, reflects its economic significance, provides for continued population and household growth and enables major regeneration and infrastructure investment. This level of growth is fully consistent with Cardiff's strategic role.

The requirement focuses growth on sustainable locations and is deliverable through existing strategic sites already under construction, major brownfield regeneration areas, urban intensification opportunities and public transport nodes. This approach aligns directly with *Future Wales* emphasis on compact, sustainable growth.

The housing requirement is aligned with Cardiff's economic growth forecasts, the Cardiff Capital Region ambitions and the need to support labour supply for key sectors. *Future Wales* expects National Growth Areas to drive economic performance; the Plan's housing requirement supports this.

Future Wales promotes sustainable growth patterns. Increasing the target beyond 26,400 may require new greenfield allocations, additional infrastructure and greater carbon and environmental impacts. This would conflict with the principles of *Future Wales* and PPW.

Significantly Welsh Government have confirmed in their comments on the Plan that it is in 'general conformity' with *Future Wales*.

Representors argue that Cardiff's National Growth Area status requires a higher housing target. The Council does not agree, because *Future Wales* does not set numerical requirements for National Growth Areas and the designation is about where growth should be focused, not how much growth must be delivered. The 26,400 figure already represents a significant and ambitious level of growth and no evidence has been provided to demonstrate that a higher target is necessary to fulfil Cardiff's strategic role. A higher target would undermine sustainability objectives and may require unjustified greenfield release. The Council's approach is therefore fully consistent with national policy.

The Council concludes that the 26,400-dwelling housing requirement appropriately reflects Cardiff's designation as a National Growth Area in *Future Wales*. It delivers substantial growth, supports economic ambitions, focuses development on sustainable locations, aligns with regional and national policy and remains deliverable within identified land supply. There is no evidence that the target should be increased to meet the expectations of *Future Wales*.

4. Action Points