

Consultation Response

About HBF

The Home Builders Federation represents home builders in England and Wales. HBF's members build the majority of new homes built in England and Wales each year. Its membership includes national developers and hundreds of SME builders.

Representor ID no. – 85

Cardiff Council Replacement Local Development Plan Examination Hearing Session 1 –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?

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

HBF supports a higher figure particular following the recent housing need figures released by the Welsh Government in 2026, which indicate a growing need for new homes in Wales. A higher housing figure would also help deliver and increased level of affordable housing of which there is a significant need identified by the LHMA and the latest Welsh Government housing need data.

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?

The HBF considers that this approach has restricted the potential housing levels in Cardiff and does not appear to align with its status as a centre for growth within the South East Wales region.

III. Is a 10% flexibility allowance appropriate?

HBF considers this should be a minimum and not be reduced during the examination, which has happened in other LDP inquiries as sites are removed or numbers delivered on sites are reduced.



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

Although HBF notes that this is a common approach used in LDP's in Wales, it is considered that unless there has been a consistent high level of housing delivery over the previous 10 year period then it is an approach which is likely to stifle house building. Due to the nature of the very large strategic sites allocated by Cardiff in the previous plan delivery rates have been affected.

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

Both the Development Plan Manual and Planning Policy Wales state that the most up-to-date suite of Welsh Government Population and household Projections are a fundamental part of the evidence base. Further, LPAs should use these projections and the resultant household numbers when considering the level of housing provision for a plan period.

The 2022 based household projections project annual average growth for Cardiff of 1,758 dwellings per annum approximately 10% higher than the RLDP annual dwelling requirement of 1,600.

HBF notes that the 2026 Edge report identifies that the 2022-based population projections from Welsh Government project a higher level of growth compared to the previous 2018-based projections for Cardiff; with an increase from 6.8% growth to 17%. Further it states, 'The 2022-based household projections from Welsh Government similarly produce a higher level of household growth than the previous 2018-based projections.' HBF notes that although reference is made to an adjustment to take account of UPC in the 2006 document, no reference is made to this in the previous 2021 document, this requires clarification.

The 2026 document includes Figure 19. a graph showing 'Annualised Dwelling Growth 2021—2036' page.28, although this graph does not appear in the earlier document dated 2021. However, comparing where possible it is clear that the figures under the different identified scenarios have all increased, however the Council have still concluded that the previous annual growth figure of 1,600 is still a reasonable middle ground. In HBF's view by sticking with the same annual growth figure they have ignored the growth identified in the latest population projections.

The main justification for not increasing the proposed housing figure seems to be based around predicted changes in migration. However, due to a range of factors including



Cardiff's status as the Capital City, the number and range of jobs available, the university and colleges, the existing diverse ethnic population, sustainability and its good transport links. HBF considers that international migration is likely to continue to play a strong role in the housing requirements for the city.

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

HBF supports the suggestion that by increasing the overall number of homes to be delivered by the plan. Across Wales historically private house builders have deliver around a third of the affordable home through S106 agreements.

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

HBF considers that the plan should be more aspirational because of Cardiff's status as a National Growth Area in Future Wales. The importance of Cardiff is identified in Policy 33 where it is described as 'an internationally competitive city and a core city on the UK stage' and 'the primary settlement in the region'.

In addition to these policies drivers Cardiff is the capital city a centre for economic growth and a very sustainable location.

