



CARDIFF REPLACEMENT LOCAL DEVELOPMENT PLAN (RLDP) 2021-2036

Hearing Session - Matter 1 (Housing Numbers)

This Hearing Statement has been prepared and submitted by Boyer on behalf of Participant/ Rep No: 133: Taylor Wimpey (TW). The scope of which responds to the questions raised in respect of Hearing Session 1 (Housing Numbers) in accordance with the agenda published on 26th March 2026.

For completeness this Statement should be read in conjunction with all previous representations prepared by Boyer including:

- 250411 Cardiff RLDP Deposit Plan - Brummell Drive Creigiau (Written Reps) V3
- 2310005 Cardiff RLDP Preferred Strategy Brummell Drive (PS Reps)
- 220121 Cardiff LDP Growth Options Representations

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?

Q2. Cardiff Council to provide an update on completions and numbers of homes under construction, with planning permission and a resolution to grant planning permission.

LPA to provide information.

Q3. 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?

TW strongly believe there are sufficient circumstances to justify higher growth targets within the emerging RLDP.

For instance, Section 5 of the Deposit RLDP sets out the different options considered as part of the plan making process. Whilst we note that Option B/ Medium Growth has been selected by CCC as the most appropriate we fundamentally disagree with this position. TW maintain that Option C/ High Growth would be more reflective of Cardiff’s position as the capital city of Wales and National Growth Area defined by Future Wales: The National Plan 2040.



- Option B / Medium Growth – 24,000 new homes (or 26,400 including 10% Flexible allowance) and 32,300 new jobs, resulting in a growth of 1% per year over the plan period. This equates to an additional 23,103 households and is driven by a target of 1,600 dwellings per year.
- Option C / High Growth – 30,500 new homes (or 33,550 including 10% flexible Allowance) and 43,000 new jobs, resulting in a growth of 1.6% per year over the plan period. This equates to an additional 29,363 households and a dwelling completion rate of 2,034 per annum

Whilst Paragraph 5.6 of the Deposit Plan suggests that Option C would “*propose a growth in population more than twice the latest Welsh Government projections*”. Having reviewed the technical evidence base we understand these figures were informed by the trends set out within the 2018-based demographic projections. These have since been formally superseded by more recent findings which includes Welsh Government’s 2022-Based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

The former provides updated demographic projections from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. Cardiff is one of the local authorities projected to see the largest percentage increases of around 11.1% which significantly exceeds the national average.

In turn these trends are carried through into WG’s 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it’s imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the emerging RLDP’s overall housing requirement.

From a statistical perspective the need for a step change is further reinforced by the CCC’s latest Annual Monitoring Report (9th Edition) (October 2025), which confirms that over the past 16 years the Council failed to meet their annual housing targets. According to the latest figures from the start of the adopted plan period in January 2006 to 1st April 2024 the Council have delivered a total of 26,245 new dwellings. When compared to the projected target of 41,415 / 2,071 homes per annum, this represents a shortfall of 15,170 dwellings, which in turn is equivalent to 37% of the Council’s overall housing requirement for the same period.

On that basis, there is sufficient evidence to demonstrate that, in order to address this level of historic under-provision, it is paramount that the emerging RLDP should accommodate the highest growth option. This approach would ensure that the RLDP is capable of delivering the requisite number of homes up to 2036, whilst proactively accounting for unmet need that has been compounded year on year. It would also better align the Plan with the latest 2022-based population projections published by the Welsh Government, which confirm that



higher levels of housing growth will be required to meet future demand across Cardiff and the wider region. Collectively, these principles would align with the Welsh Government's ambitions for Cardiff as both a city and the wider capital region and, in doing so, ensure that the RLDP is consistent with Future Wales: The National Plan 2040 by prioritising growth within a National Growth Area.

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?

TW do not oppose the principle of using a 'brownfield first approach' to inform the Council's housing target. However, it is imperative that the level of provision factored into the RLDP is proportionate to the realistic development capacity of Cardiff's existing urban area. Over relying on the contribution that can be made by brownfield land and other urban sites (i.e. housing led generation areas) risks artificially restricting the RLDP's housing requirement based on theoretical capacities rather than opportunities to maximise growth in accordance with both local and regional aspirations.

By virtue of their nature, brownfield sites present a number of well-documented delivery risks. The supply of suitable previously developed land is finite and as set out within Paragraph 3.55 of PPW12 not all sites are capable of accommodating residential development. Background Technical Paper 1 Housing (Examination Ref 12) confirms that these sites alone could not feasibly accommodate the level of growth required to achieve the Cardiff's strategic priorities.

Furthermore, in the interest of soundness, it is also important to recognise that not all previously developed land is suitable for development. Many are affected by constraints such as contamination, abnormal remediation costs, restricted access arrangements and infrastructure requirements. All of which can undermine viability and on occasions prevent development coming forward altogether.

Research undertaken by Lichfield in June 2022 (Banking on Brownfield Research Paper) emphasises the fact that a key characteristic of brownfield development is the need for developers to deal with the legacy of existing or previous uses which often requires extensive remediation works at a significant cost to the project's overall viability. As such, an over-reliance on brownfield/ urban land creates unnecessary risk with regard to deliverability and arguably undermines the RLDP's ability to effectively respond to need over the plan period.

The same concerns apply to the continued inclusion of existing greenfield allocations that have failed to deliver over the adopted LDP. Table 18 of the DPM is explicit that "*Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered*". Based on the information available via the public register we are not aware of any evidence to indicate there have been significant changes in respect of the circumstances associated with the following sites:

- i) SH1.7 Former Gas Works, Ferry Road (Adopted LDP Site B)



- ii) H1.1 Land at St Mellons (Adopted LDP Site H1.1)
- iii) H1.2 Rookwood Hospital (Adopted LDP Site H1.3)

Despite having been allocated for more than 15 years, these sites have failed to deliver any housing. In the absence of robust evidence demonstrating that these longstanding constraints have been resolved, their inclusion within the RLDP is considered contrary to the overall soundness of the Plan. TW therefore query their suitability to accommodate growth and maintain that other alternative sites (such as Brummel Drive Creigiau) should be prioritised for future residential development.

In light of the above, TW consider that a more appropriate and robust approach would be to establish the Council's housing targets using the latest population and household projections. This would provide a more objective evidence-based assessment of need, rather than relying on the assumed capacity of brownfield land/urban sites and historic allocations that have failed to come forward in the past.

Using up-to-date demographic projections as the starting point would better reflect Cardiff's role as the capital city for Wales and economic driver for the wider region. In turn it would also support the identification of more diverse portfolio of sites, including a more sustainable balance of small to medium greenfield plots which can help maintain a supply of housing throughout plan period.

Conversely, an approach that relies on the theoretical capacity of brownfield land and rolling forward allocations from the adopted LPD that have previously failed to deliver risks unnecessarily restricting growth. In turn, this could stifle opportunities for inward investment and undermine the RLDP's ability to meet local housing need up to 2036. To avoid such circumstances its important the Council's targets are informed by the latest 2022-based Population Projections and thus aligns with the Welsh Governments aspirations for Cardiff as a National Growth Area.

In turn this provides an opportunity to incorporate a more diverse portfolio of sites within the plan itself and thus demonstrate the RLDP has been prepared with a suitable level of flexibility from the outset. Collectively these principles will provide greater certainty that the emerging plan is capable of effectively meeting housing need irrespective of potential slippages on larger strategic allocations and/ or challenges associated with unlocking more intricate brownfield sites.

iii. Is a 10% flexibility allowance appropriate?

TW continues to reiterate that the 10% flexibility allowance currently within the Cardiff RLDP Deposit Plan is insufficient to ensure the Plan is sound. Having regard to the tests of soundness, and in particular the requirement that a plan be effective, TW maintains that a minimum flexibility allowance of 15% is necessary to provide a robust and deliverable framework for housing supply over the plan period to 2036.

Whilst Para 5.59 of the DPM suggests that the starting point for consideration should be 10% flexibility for Local Development Plans in Wales, evidence from other recently examined and



adopted plans in Wales demonstrates, this threshold is increasingly being found inadequate — particularly in respect of plans that are heavily reliant upon a limited number of large-scale strategic allocations where delivery risks are materially higher.

For example, in Bridgend the Council adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Cardiff, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

In the context of the above TW therefore maintains that the 10% flexibility provision is demonstrably inadequate, for the following reasons.

- Firstly, Cardiff's housing strategy is heavily reliant upon a limited number of large-scale strategic site allocations. Such sites carry significant lead-in times, infrastructure dependencies and phasing complexities, all of which are proven to result in significant delays when it comes to delivery. A 10% allowance provides insufficient headroom to absorb these risks without placing the overall housing requirement in



jeopardy and, as a result, fails to ensure sufficient flexibility has been factored into the plan to respond to changing circumstances, contrary to Test 3 of the DPM.

- Secondly, CCC's own Annual Monitoring Reports evidence a sustained pattern of underperformance against annual housing targets throughout the current adopted LDP. The Inspector must give serious weight to this evidential record when considering whether a 10% flexibility allowance constitutes a sound and realistic basis for the RLDP.
- Lastly, Cardiff is Wales' capital city and the primary growth area within the Cardiff Capital Region as identified in Future Wales: The National Plan 2040. In the interests of soundness it is important the RLDP incorporates an equally ambitious level of growth to maximise opportunities for sustainable development and thus align more closely with the regional aspirations established through national policy.

Taking these matters together, TW considers that the Cardiff RLDP, as currently drafted, fails to meet the relevant tests of soundness in respect of the level of flexibility that has been factored into the plan to date and in turn its ability to effectively meet housing need up to 2036. The 10% threshold is not justified by the evidence, remains inconsistent with the approach taken in comparable plans across Wales, and does not provide sufficient contingency which past trends demonstrates are likely to arise at both a local and regional level.

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

TW strongly believe that CCC's housing need should not be determined by past build rates.

In considering the appropriate level of housing provision, Paragraph 5.34 of the Development Plans Manual is explicit that the most up-to-date suite of Welsh Government population and household projections should form the foundation of the evidence base. LPAs are then required to apply an appropriate household conversion factor when translating projected households into dwellings in order to establish the overall housing requirement.

The DPM also makes clear that failure to apply a robust conversion rate from the outset is a high-risk strategy that may undermine the overall soundness of any emerging plan. On this basis, we consider it essential that the Local Market Needs Assessment is updated to reflect the latest 2022-based population and household projections together with the Welsh Government's most recent estimates of additional housing need. This would ensure that the RLDP is underpinned by a robust, credible and proportionate evidence base and that the resulting housing requirement more accurately reflects the level of need up to 2036 to be sound.



Total household growth over plan period x 1.04 = Total Dwellings Required

Figure 1. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

Again, using up-to-date demographic projections as the starting point would better reflect Cardiff's position in a national growth area and role as the catalyst to attract inward investment to support growth across the Cardiff Capital Region. In turn it would also provide the framework for the inclusion of a more diverse portfolio of sites, including small to medium-sized greenfield plots (such as Brummell Drive Creigiau) capable of maintaining a more continuous supply of housing throughout the plan period.

Conversely, an approach that relies on past build rates and rolling forward allocations from the adopted LPD that have failed to deliver any homes over the past 15 years risks unnecessarily restricting growth. To do so, would unnecessarily restrict opportunities to attract inward investment and cap growth at levels dictated by historic under-delivery rather than capitalising on Cardiff's development potential.

In addition to the above it's essential that the proposed housing requirement actively accounts for historic under delivery that has be compounded over successive plan periods. Failure to address this shortfall would contradict the RLDP's objective of meeting the needs of the local communities it intends to serve. In the interests of soundness higher levels of growth should be prioritised to ensure that both future demand and historic under-provision are proactively addressed over the plan period.

Overall, TW consider that the Council's housing requirement should be informed by the latest 2022-based population projections and adjusted to reflect historic unmet need, rather than constrained by past build rates. This approach would provide a more robust foundation from a plan-making perspective whilst also aligning with the Welsh Governments aspirations for Cardiff in accordance with Future Wales: The National Plan 2040 and PPW12.

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

Yes, TW believe it is essential the proposed housing targets are uplifted in proportion with the findings of the latest 2022-based Household and Population Projections.

Whilst we note Edge Analytics latest report (published May 2026) suggests that the dwelling growth target of 1,600 dwellings per year is theoretically still be applicable. The 2022-based projections from Welsh Government clearly demonstrate that significantly higher levels of growth will be required to meet Cardiff's housing needs over the plan period.

Although the proposed figure of 1,600 homes may have represented a reasonable benchmark when the plan was initially prepared. The latest evidence shows a significantly stronger growth trajectory than the earlier 2018-based projections. For instance, under the Principal 2018-based projection, Cardiff's population was expected to increase by 6.8%



over the period 2018 to 2043. By comparison, the Principal 2022-based projection forecasts population growth of 17% over the same period. This level of change provides compelling evidence that the scale of housing provision previously assumed is no longer deemed sufficient and needs to be increased accordingly.

As part of the report Edge Analytics assessed a range of different scenarios using assumptions relating to population change, household projections, and migration patterns. This provides a basis for understanding the likely scale of future housing need and consistently points to a requirement above the currently proposed figure of 1,600 dwellings.

The main scenarios considered include the following:

- WG-2022-LowPop (Low Population Variant): Replicates the Welsh Government's 2022-based Low Population projection and identifies a requirement for 1,842 dwellings per annum, equivalent to 27,630 dwellings over the plan period.
- WG-2022-Principal (Principal Variant): Replicates the Welsh Government's 2022-based Principal projection and identifies a requirement for 1,758 dwellings per annum, equivalent to 26,370 dwellings over the plan period.
- WG-2022-HighPop (High Population Variant): Replicates the Welsh Government's 2022-based High Population projection and identifies a requirement for 1,632 dwellings per annum, equivalent to 24,480 dwellings over the plan period.

Importantly, all of the scenarios exceed the target of 1,600 dwellings per year. Even the lowest variant demonstrates that the current requirement falls short of the level needed to respond to the latest demographic evidence. The Welsh Government Principal projection, which is generally regarded as the most likely demographic trajectory, suggests that housing provision should increase significantly above the existing target.

By virtue of the above, TW do not consider that the current housing requirement of 1,600 dwellings per annum is appropriate. The evidence clearly demonstrates that a higher level of housing growth is required for the RLDP to effectively meet local housing need over the plan period. The overall housing requirement should therefore be increased to reflect the 2022-based demographic figures and ensure the emerging plan is underpinned by the latest evidence and thus soundly prepared.

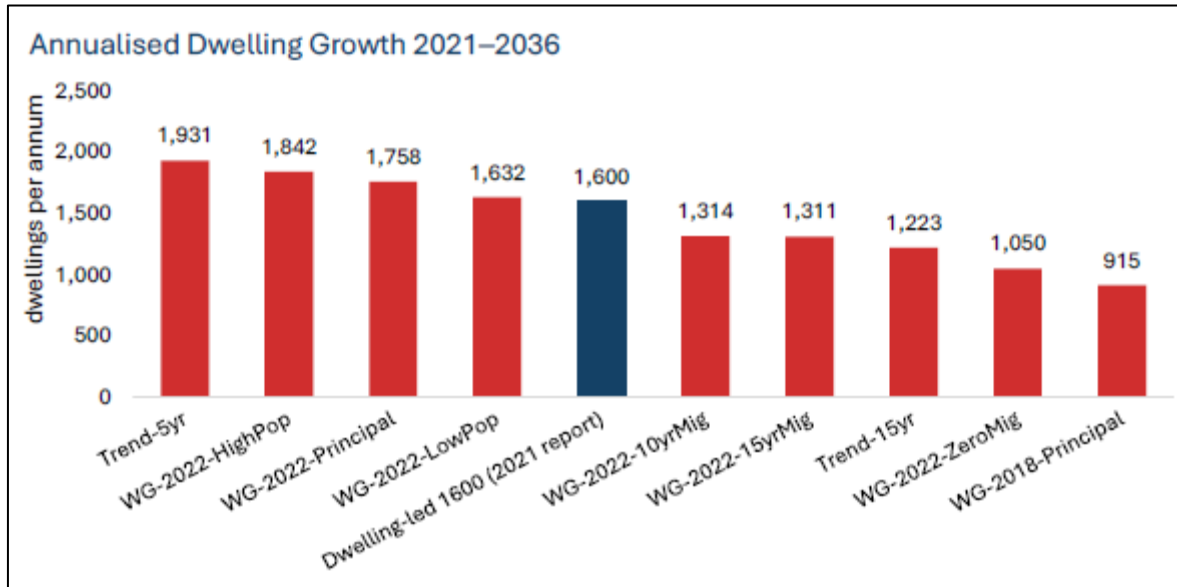


Figure 1. Extract of Edge Analytics Report Showing Annualised Dwelling Growth Outcomes 2021-2036

	Current Need Position	Required Uplift
Housing Need Based on Medium Growth Option	24,000 dwellings	24,000 dwellings
WG-2022-Principal Variant	N/A	+2,370 dwellings
Flexibility Allowance	+ 2,400 dwellings (10% Flexibility)	+ 3,955 dwellings (15% Flexibility)
Total	26,400 dwellings / 1,760 dwellings per annum	30,325 dwellings / 2,021 dwellings per annum

Table 1. Comparison of Current Housing Need Position and Required Uplift

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

Yes - the evidence clearly demonstrates a need to increase the overall housing requirement and by virtue of which the proportion of affordable homes delivered over the emerging RLDP.

Increasing the housing target would better align with the Welsh Government's 2025-based estimates of additional housing need, which identify an existing unmet need for 9,400



homes. This is further supplemented by a requirement to deliver an average of 8,700 new homes per annum over the next five years to meet newly arising need alone.

These figures illustrate the higher rates of housing delivery required at both the national and local levels to address existing shortfalls and respond to future need. Given Cardiff's position within a national growth area it is imperative the emerging plan accurately reflects the most up-to-date evidence regarding the need for both affordable and market housing.

Accordingly, the housing target should be increased to ensure that sufficient land is allocated and an appropriate level of growth can be delivered to effectively meet the needs of local communities across Cardiff.

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

No, having reviewed the accompanying evidence base TW maintain that there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period.

This approach would better reflect Cardiff's position as the capital of Wales and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling CCC to avoid having an over reliance on existing greenfield allocations being rolled forward and proactively address historic unmet need as shown within the latest Annual Monitoring Report.