



Cardiff Replacement LDP Examination

Hearing statement of Lightwood Strategic

Context for participation

Lightwood Strategic and The Wyndham Lewis Trust are promoting a strategic urban extension and green infrastructure opportunity to the north of the M4 at Capel Gwilym Road and Thornhill Road. Further details, including a site location plan and concept masterplan, are appended to our Deposit Plan representations. The following statement draws on our representations and supplements them in respect of the ‘Cardiff Demographic Evidence Update’ (Edge Analytics, May 2026).

Session 1 – Housing Numbers, Tuesday June 2026

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?

No. The target in Policy SP1 of 26,400 (including a 10% flexibility allowance) is too low and should be at least 29,000 to reflect the WG-2022 principal household projection +10%. Our answers to questions ii-vii of this agenda set out our principal reasoning for this, focused on both the ‘need’ and the ‘target’.

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?

This question appears to use housing ‘need’ and the housing ‘target’ interchangeably, but they are conceptually different.

It is never appropriate to establish housing 'need' from such a supply-based perspective. Housing 'need' should and must be separately determined and documented before establishing the housing target/requirement. Dwellings led projections of population change for an area, the age profile and workers are useful but are not in themselves housing 'need' outcomes.

The eventual housing 'target' may be shaped by planning issues, constraints and achievability. Only where there are 'absolute' issues restricting supply should the housing target be less than the need.

Evidence of the need for housing exists independently of the level of housing that might be said to square with economic and jobs growth forecasts. The 'English' planning system recognises this in the application of the standard method, which sets a minimum level of housing need for authorities without reference to economic forecasts.

iii. Is a 10% flexibility allowance appropriate?

At least a 10% allowance is appropriate as a floor, though it is not necessarily a ceiling. For the proposed Cardiff Plan, a 10% allowance equates to 2,400 homes and is therefore 1.5 years' worth of the submitted 'Dwelling Requirement/ Growth Scenario' of 2,400 homes. Much depends on the risk profile of the sites that are identified as being available and capable of delivering the housing requirement (both in terms of sites actually starting and the housing trajectory assumed).

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

No. Past build out rates provide a useful indicator of what the house building sector has delivered and, if sold, what the market has absorbed. Where vacancy rates within the total housing stock do not rise it can be concluded that the properties were demanded, in a strategic housing market sense, and that there was a need for them. This does not imply that the need was or is not in fact greater than the market was able to deliver.

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

Yes, this is a key issue and relates very strongly to question vii, both in the immediate context of the Cardiff RDLP examination and as the preparation of the South East Wales SDP begins.

The proposed housing target of 26,400 (1,760 per annum), including the 10% flexibility allowance) flows from the preferred dwellings growth scenario (the need figure) of 24,000 (1,600 per annum).

The Plan’s need figure of 1,600 pa sits just below (by 32 dwellings) the bottom end of the range of the WG 2022-based household projections, once converted to a dwelling projection, with the principal and higher projections being 1,758 pa and 1,842 pa. The only other higher projection is the 5 -year migration trend at 1,931 per annum. Plan preparation tested an upper scenario (Option C) of 30,500 homes (2,033 per annum) and so all the latest demographic outcomes in play are within the range of options considered (albeit 10% on top of 1,931 per annum would require a supply of 31,860)

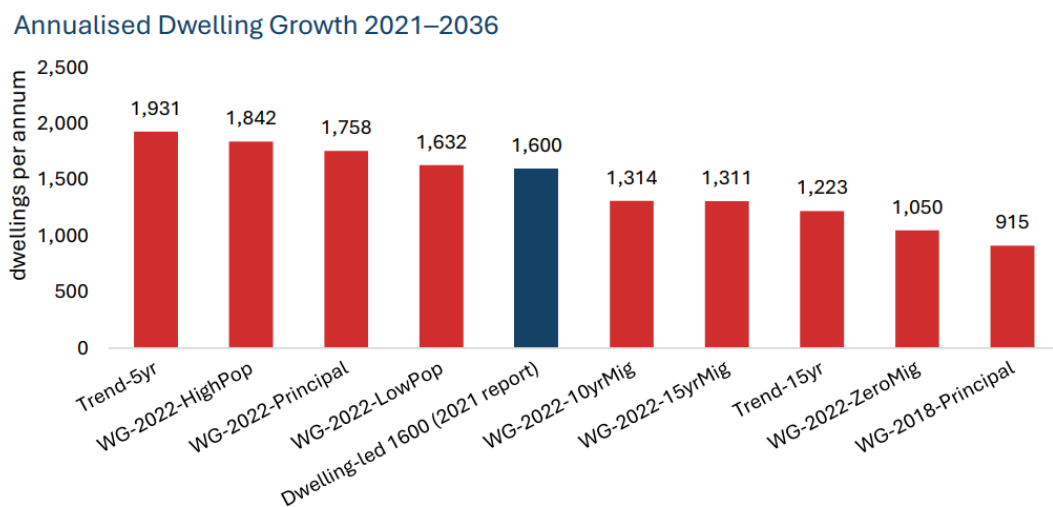


Figure 19: Annualised dwelling growth outcomes 2021–2036

Page 28 of the May 2026 Edge Report characterises 1,600 as being in the middle of the range of scenario outcomes in terms of population, household and labour force growth, and the average annual dwelling growth. Naturally, the Edge Report is then drafted to assist the Council in defending its proposed Plan.

Lightwood characterises 1,600 per annum as being at the lower end of the reasonably conceivable outcomes that should be tested as the growth strategy for the ‘economic engine’ of Wales. The proposed Plan is therefore towards the lower end of a spectrum of ambition. The WG 10-year migration outputs are noted but these reflect a time when housing delivery came nowhere near what was required to deliver the adopted housing requirement and is still well short of the now proposed need (1,600) or housing target (1,760). Lightwood is dismissive of all the outcomes that are less than 1,600 which, in our view, is the ‘floor’ for planning for Cardiff.

In preparing the Plan, the Council correctly considered that the WGs 2018-projects were ‘too cold’. Its most recent assessment is that the WGs 2022-based projections are ‘too hot’, and therefore that its Plan is ‘just right’. As expressed in our Deposit Plan representations, this is not an assessment that we share. Whilst respecting that Wales has devolved powers, we benchmarked the proposed need

figure of 24,000 of the Cardiff Plan against the English system's standard method (a stock /affordability approach). This enabled the ambition of the Cardiff Plan to be assessed in a wider context, i.e. against a key policy driver for the neighbouring Bristol sub-region. It is now possible to compare that output to the latest WG projections.

We generated a baseline stock-based need figure of 1,270 pa for Cardiff, increasing to 1,880 pa when applying the affordability adjustment. This squares with (exceeds a little) the WGs 2022-based high household projection. Our Deposit Plan representations set out what this would mean for the housing need figure (28,200) and the target (31,000 with a 10% buffer).

The WG 2022-based projections therefore identify a plausible demographic led scenario that reflects the outcome generated by the English standard method, although it can now be seen that the benchmarking exercise generates an output that exceeds the higher principal (central) WG projections.

Such benchmarking matters, as further set out under question vii, because documents like the Cardiff Capital Regions Investment Strategy (2025) celebrate phrases such as '*Cardiff is the fastest-growing city outside London in 2024 and 2025*'. The Cardiff Plan needs to back up its endorsement of these statements and move up the ambition spectrum in respect of embracing a higher housing need figure, and housing target.

<https://www.cardiffcapitalregion.wales/wp-content/uploads/2025/10/ccr-investment-strategy-1-9.pdf>

Accepting that the English standard method has no role in Wales but noting the output and that in the real world intercity /inter region competitiveness matters, we consider that it is difficult for the Council to argue that the Plan should not adopt a higher housing need figure and therefore a more stretching housing target. At the very least the WG-2002 principal projection (1,758) should be adopted as the 'floor' for the Plan. This would increase the overall need to 26,370 and the requirement (+10%) to 29,000 to 2036.

Without getting too much into matters of supply, the effect of this on Figure 11 Summary Housing Supply Table (Background Technical Paper Number 1 – Housing March 2026 (CD07)) is identified below. Cardiff Council's figures are shown in black and Lightwood's figures are shown in red. No changes to specific sources of supply to 2036 are made. Essentially, as submitted the Plan provides a 10% supply buffer over the requirement (less a di minimis 33 homes). Under the WG-2022 principal projection, the Plan delivers its minimum requirement (short of 3 homes) to 2036 but falls 2,633 homes short of the 10% buffer that the Council advocates.

Supply Effect of WG-2022 Principal Projection (no adjustment to sources of supply)

Fig 11 Row	Item	Submitted Plan	WG-2022 Principal
1	Requirement	24,000	26,370
3	Minimum SP1 Provision	26,400	29,000
9	Landbank (pre and post 2036)	20,664	20,664
13	Losses	-576	-576
17	Windfall Allowances	5,537	5,537
21	Allocations (Policies H1A, H1B H2)	5,145	5,145
22	Net Supply (pre and post 2036)	30,770	30,770
23	Balance vs Row 1	6,770	4,400
24	Balance vs Row 1 to 2036	2,367	3
A	Balance vs Row 2 to 2036	-33	-2,633
B	Net Supply to 2036	26,367	26,367

NB Figure 11 of CD07 already accounts for the deletion of H2.4 (300 homes at Roath Dock (North side). Supply figures (summed in Lightwood Row B) may further change subject to the examination process

vi. Should the target be increased to facilitate the delivery of affordable homes to meet the need identified

As set out under question v, the overall need and target should be reassessed, and this will likely generate a need for further greenfield supply to be delivered to 2036. Additional affordable housing will mitigate the non-achievement assumed provision that is at higher risk of being delivered on account of viability issues in Policy H2 Housing-led Regeneration Areas.

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

No.

Firstly, the positive general conformity assessment given by the Welsh Government to the Deposit Cardiff RDLP is dated April 2025 and pre-dates the publication and assessment of the 2022-based household projections. Only the 2018 projections were available in April 2025. The conformity assessment was based on the WG's own evidence at the time, not its latest projections. Its conformity statement was supportive of Cardiff being ambitious. The new projection recalibrates that level of ambition being proposed.

Secondly, the housing need/requirement basis on which the Cardiff Plan is adopted has the capacity to affect the way that the WG projections (2022-based and any further update) are utilised or not in the forthcoming SE Wales SDP. The requirement of 26,400 is pinned to a need figure of 24,000, which is below the WG most up-to date lower household /dwellings growth projection. In Lightwood's assessment there is an inconsistency between Cardiff's primacy in Wales economy, including the daily in-commuting it receives from its neighbouring authorities versus the level of proposed supply to 2036. This goes to the WGs Deposit Plan comment that *"further evidence is required to demonstrate how regional collaboration has influenced the scale of growth at Cardiff and the relationship to adjoining LAs"*. In simple terms, even if housing needs arise elsewhere based on demographics, if a high percentage of new occupants are going to commute to Cardiff, it would be better to deliver those needs at Cardiff if more sustainable travel to work options can be available.

Thirdly, not only is this a do minimum plan in terms of new supply, but it is also a do minimum plan in terms of the proposed plan period. At adoption it will not cover a full 10 monitoring years, although it may 'just about' achieve a 10-year operational period to December 2036 if adopted during 2026. Cardiff's significance as the core of the National Growth Area would, notwithstanding a forthcoming SDP, would be better recognised by a longer, more strategic plan period. Should adopted be delayed, the plan period may need to be extended in any case.