

Geraint John

tel. [REDACTED]
mob. [REDACTED]
email. [REDACTED]
web. gjplanning.co.uk
address. Office 16, House 1,
2nd Floor, The Maltings East
Tyndall Street, Cardiff CF24 5EA

29th May 2026

fao. Kerry Trueman / Programme Officer / Kerry.trueman@cardiff.gov.uk

address. Pendragon House
1 Bertram Drive
Wirral
CH47 0LG

CARDIFF COUNCIL REPLACEMENT LOCAL DEVELOPMENT PLAN EXAMINATION

RESPONSE TO MATTERS AND ISSUES – MATTER 1: HOUSING NUMBERS

Please find enclosed, on behalf of, and under instruction from the landowner and promoting party, Mr Andrew Evans, a submission to the Examination of the Replacement Local Development Plan (RLDP) in relation to site Land at Goitre Farm, St Mellons (Site ID: CS54).

This submission comments on matters and issues raised by, and set out in, the Inspectors' Matters and Issues Agenda to cover 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?"*

We look forward to attending the Hearing Session in respect of the matter above in due course. In the meantime, we hope and trust that all is in order with the submission. Please do not hesitate to contact us in the event that further information is considered beneficial.

Yours sincerely,



Geraint John
Director
Geraint John Planning Ltd.

PREFACE

This submission relates to the matters and issues raised by, and set out in, the Inspectors' Matters and Issues Agenda to cover 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?*

Each of the relevant issues raised in relation to the above matters are considered in detail below.

QUESTIONS

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?"

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?"

As set out in our previous representations, we do not consider that the strategic growth strategy adopted for the RLDP is adequate to meet the identified needs over the Plan period. It is considered that the target of 26,400 no. units does not align with Cardiff's status as the Capital City of Wales, and its identified role within Future Wales.

The LDP Annual Monitoring Report (AMR) (2025) sets out that the cumulative build rate from the start of the adopted Plan period (2006) to 1st April 2024 was 24,204 no. units, representing a 15,140 no. unit shortfall in housing delivery of the Plan period to-date (-38%). For affordable housing, the adopted Plan set a target for the delivery of 6,646 affordable units to be provided for the 12 years between 2014 and 2026, however, the AMR confirms that 2,831 new build affordable units were completed since 2014, representing 43% of the 6.646 Plan target for provision of affordable units by 2026. Over the same period, the average house price has risen by approximately 57% in Cardiff, as confirmed in the AMR.

Accordingly, the LDP has significantly undelivered against its housing requirement to-date, resulting in a substantial cumulative shortfall in delivery. In turn, this has resulted in significant unmet need, and has contributed to resultant effects such as increased house prices. There is a requirement for the RLDP to address this accordingly.

The 'Background Technical Paper 1 Housing' sets out the Housing Supply Table which underpins the RLDP, and identifies how the housing requirement will be met over the Plan period. Within the housing supply, 20,664 no. units are attributed to the 'completions and anticipated landbank total'. This confirms that a significant proportion of housing within the Plan will be delivered through existing allocations and approved sites (67%). Of the 20,664 no. units forming part of the landbank, 16,064 no. units are with planning permission, and are not under construction / implemented, and are anticipated to be built out within the RLDP Plan Period.

It is not considered that this makes for a robust or sound strategy, given that these sites are being carried forward from the previous Plan period. The approach effectively 'double counts' a significant proportion of unit numbers intended to make up a large provision of the adopted LDP. Given that the adopted LDP severely under delivered in regard to its target unit numbers over the Plan period, it is considered that the identified need is still present – indeed it has grown, and will continue to do so.

Accordingly, it is considered that the number of targeted units should be increased to account for the residual need carried over from the LDP, and to ensure that the need arising within the RLDP is also met. This would ensure that yield from the existing allocations and windfall sites is not the majority of the provision going forward. Whilst this would translate into a higher housing supply, this is a figure which is within the realm of, indeed less than, that required in the current (adopted) LDP – which made a provision for 41,456 no. new dwellings over the Plan period.

Moreover, it is considered that given the identified low housing completion rates over the adopted Plan period, opportunities to deliver housing within the RLDP period should be maximised accordingly – to offset any economic

and/or social challenges that may arise, and to ensure deliverability. A higher housing target would ensure that there is built-in contingency in housing supply to overcome any challenges.

Within Appendix 7 'Housing Trajectory' of the RLDP, a table is provided which sets out the anticipated annual build rate and the completion of units over the Plan period. The table is extracted below for reference:

LDP Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Year	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34	2034-35	2035-36
Remaining Years	15	14	13	12	11	10	9	8	7	6	5	4	3	2	1
Total Housing Provision	1,760	1,760	1,760	1,760	1,760	1,760	1,760	1,760	1,760	1,760	1,760	1,760	1,760	1,760	1,760
Total LDP Housing Requirement	1,600	1,600	1,600	1,600	1,600	1,600	1,600	1,600	1,600	1,600	1,600	1,600	1,600	1,600	1,600
Actual completions large sites	817	1,613	1,355												
Actual completions small sites	98	68	46												
Anticipated completions on allocated sites				0	20	260	540	1,280	960	815	710	456	350	275	0
Anticipated landbank completions <10				61	61	22	22	22	22	22	22	22	22	22	22
Anticipated landbank completions >10				1,378	2,069	1,412	1,418	914	1,039	1,238	1,231	1,257	953	740	720
Anticipated completions large windfall*				0	0	390	390	390	390	390	390	390	390	390	390
Anticipated completions small windfall				54	54	54	54	54	54	54	54	54	54	54	54
Anticipated completions change of use windfall				91	91	91	91	91	91	91	91	91	91	91	91
Total Completions (E,F,G,H1,H2,I,J1,J2)	915	1,681	1,401	1,585	2,296	2,229	2,516	2,751	2,557	2,611	2,499	2,270	1,860	1,572	1,277
Anticipated Annual Build Rate	915	1,681	1,401	1,415	2,050	1,991	2,246	2,456	2,283	2,331	2,231	2,027	1,661	1,404	1,141
Cumulative completions (AABR)	915	2,596	3,997	5,412	7,462	9,452	11,699	14,155	16,438	18,769	21,000	23,027	24,688	26,092	27,232
Remaining housing completions (housing requirement minus projected completions by year)	23,085	21,404	20,003	18,588	16,538	14,548	12,301	9,845	7,562	5,231	3,000	973	-688	-2,092	-3,232

Extract of Anticipated Annual Build Rate Calculation Table

The above table demonstrates how the overall housing requirement of 24,000 no. units will be met over the Plan period, which equates to 1,600 no. units per annum. That said, from the period 2025-26 to 2032-33 it is forecasted that the annual delivery rates will be in excess of 2,000 no. units per annum. This, it is envisaged and predicted, will be achieved through the delivery of the strategic sites allocated in the current LDP – which make up a significant proportion of the landbank. This number then drops below 2000 no. units per annum as the majority of the landbank and allocated sites would have been delivered by this stage (2033-34).

Whilst the table evidences that the identified requirement of 24,000 no. units will be met within the Plan period, as set out above, there is a residual unmet need arising from the adopted LDP that needs to be factored in. Given that it is expected that the Plan will deliver its housing requirement by year 2032-33, there is clearly scope to expand the housing requirement to ensure that need is met. The final row of the above table evidences that the final three years of the Plan period there will be a 'negative' figure of housing completions, given that the housing requirement is predicted to be met by this period. Indeed, it is forecasted that there will be no anticipated completions on allocated sites in the final year of the Plan, given it is anticipated that these sites would have yielded in full by this stage. This therefore confirms that very few homes will be delivered in the latter part of the Plan.

Accordingly, in light of the above, it is considered that the RLDP can deliver a higher housing requirement, and as such, the housing requirement should be increased – which would then go further in addressing need arising from both the adopted Plan and the emerging Plan period. After all, the Plan cannot be viewed and approached in an entirely isolated way – Development Plans ought to provide steady and reliable housing land supply consistently, and beyond its terms, not just in an insular way. Any increase would be best met and supported through new allocations on sites considered to be available and deliverable to yield housing over the Plan period.

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?"

We consider that a dwelling-led figure based on land supply and existing greenfield allocations is not an appropriate way to assess housing need for the RLDP. This approach confuses capacity with need, given that housing need must be assessed independently of how much land is allocated or deliverable.

The Development Plans Manual (DPM) clearly sets out that housing requirements must be derived from demographic and market-based evidence, and not from land availability. Such evidence includes household projections, migration, Local Housing Market Assessment, economic growth assumptions, and affordability pressures.

A dwelling-led approach focuses on what land is available, as opposed to what housing is needed. This reverses the approach required in the DPM - which requires housing need to be established first, with land supply responding to that need rather than determining it.

Accordingly, for these reasons, a dwelling-led figure based on urban land supply and existing greenfield sites cannot be considered an appropriate or sound basis for assessing housing need – not least that it fails to comply with the requirements set out in the DPM.

iii. “Is a 10% flexibility allowance appropriate?”

It is considered that the proposed 10% flexibility allowance is not appropriate for the RLDP within the context of the past under-delivery of housing within the adopted LDP, and the brownfield strategy adopted for the RLDP. As raised in our Deposit Plan representations, there are serious concerns and uncertainties surrounding the delivery of the sites allocated under Policy H2 ‘Housing Led Regeneration Areas’, and whether these will yield in full over the Plan period.

The Development Plan Manual sets out that the flexibility allowance for any Plan could be 10% flexibility, however, this should be considered within the context of local issues, and the need to account for non-delivery and unforeseen issues. A 10% approach is accordingly a ‘do minimum’ approach, and is not considered sufficient nor robust. A higher flexibility allowance is increasingly implemented in RLDPs across Wales, with examples provided below:

- Bridgend County Borough Council – 14% (Adopted);
- Monmouthshire County Council – 15% (Examination);
- Neath Port Talbot – 20% (Preferred Strategy); and
- Swansea – 20% (Preferred Strategy).

Accordingly, it is considered that the flexibility allowance should be increased to 20%, to ensure that the Plan is robust and sound in meeting its housing requirement over the Plan period. Greater flexibility built into the Plan will offset and compensate for the loss of any allocated sites that do not yield over the Plan period – not least given the past under-delivery of the adopted LDP. Moreover, a greater flexibility allowance would help to alleviate the concerns of the proposed housing regeneration area sites, where typically such sites take longer to yield as a result of the associated costs and timescales to remediate brownfield land for development.

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

Paragraph 5.57 of the DPM sets out that *“just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement.”*

It is considered that need should be determined on estimated population growth, affordable housing need (LHMA), and employment land availability – as it is these factors that need to be met through the delivery of housing, not past-build rates. Past-build rates may set out an indication of what is achievable in terms of housing delivery, but it should not be an indicator of need. Accordingly, this approach fundamentally fails to comply with the requirements of the DPM, and cannot be considered as ‘Plan-led’ approach as a result.

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

The 2022-based population projections from Welsh Government project a higher level of growth compared to the previous 2018-based projections for Cardiff – which informs the current level of growth proposed in the RLDP. This is equally the case for the household projections, which produce a higher projected level of household growth than the previous 2018-based projections. The 2022-based projections are informed by the 2021 Census, and therefore represents the most up-to-date and accurate population and household estimates.

A comparison between the 2018-based projection and the 2022-based projection is provided in the graphs below, which evidence that the latest estimates are significantly higher than what was previously projected, and which the RLDP in its current form is based on.

Population Projection Comparison: Principal Scenario

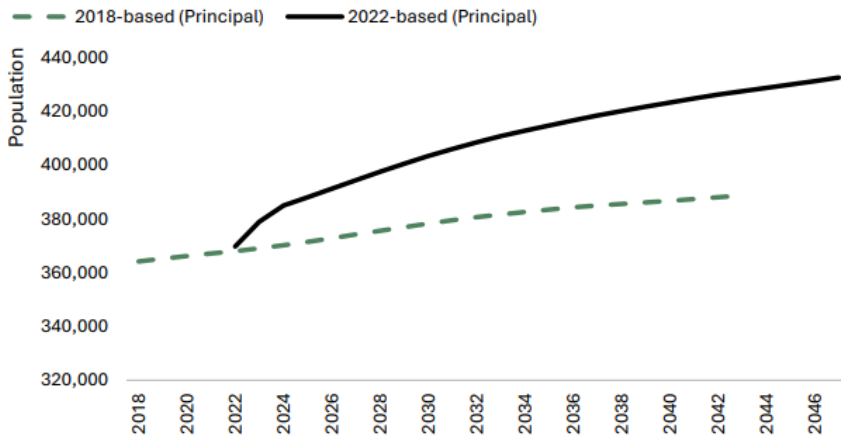


Figure 13: Principal projection comparison: 2018-based and 2022-based, Cardiff
 Source: WG

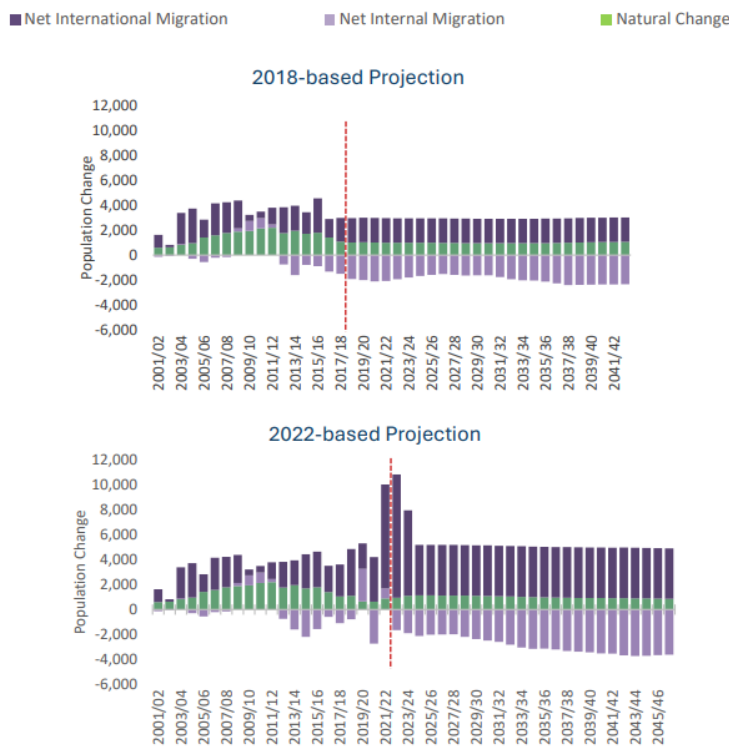


Figure 14: Principal projection comparison: 2018-based and 2022-based components, Cardiff
 Source: WG

As can be seen and noted from these two extracts above, the differences are pronounced. In terms of how this translates into the annual housing requirement, a graph is provided within the Report which compares the annualised dwelling growth over the Plan period for the various population estimates, and compares this to the chosen dwelling-led approach for the RLDP.

Annualised Dwelling Growth 2021–2036

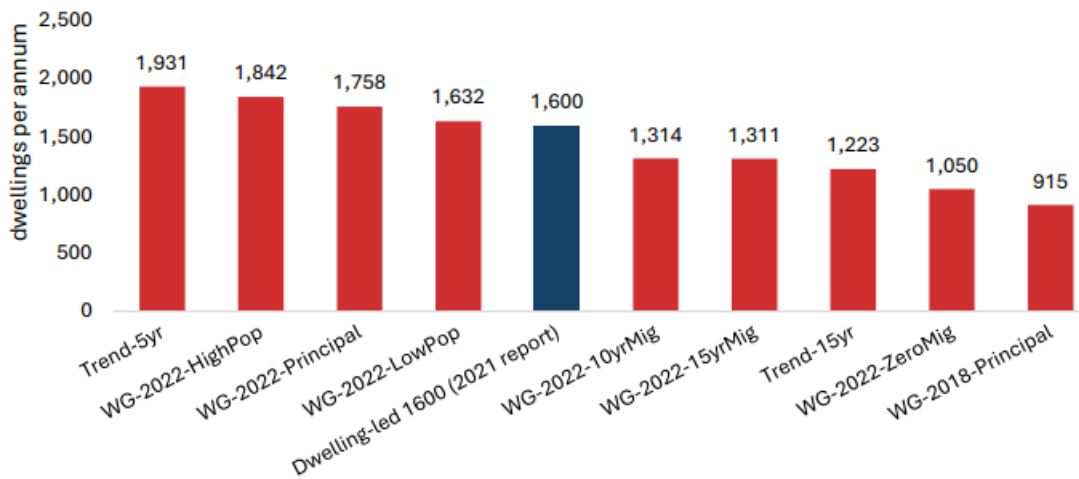


Figure 19: Annualised dwelling growth outcomes 2021–2036

As identified in the graph above, the proposed dwelling-led approach for the RLDP is lower than the WG-2022 principal projection, which predicts 1,758 no. annual dwellings. This would equate to a higher housing requirement of 26,370 no. dwellings. As evidenced above, it is not considered that this would be an unachievable figure based on expected build rates. The dwelling-led figure of 1,600 no. homes was informed by available population data relating to the 2018 population estimates, and as evidenced above, it is considered that this does not reflect the 2022 population projections for Cardiff.

Given that the latest dataset suggests that there will be higher population growth over the Plan period than what was originally projected, it is considered that the housing target should be increased accordingly to reflect this. Failure to do so would likely result in demand continuing to outstrip supply, thereby exacerbating existing issues of housing affordability, and the provision of affordable homes over the Plan period.

Accordingly, the Plan will fail to meet the housing needs of Cardiff over the Plan period based on the current housing requirement, and as such, it should be amended accordingly.

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

Firstly, the latest Local Housing Market Assessment (LHMA) is based on the 2018 Welsh Government population projections, and therefore, does not consider the higher level of population estimates identified in the 2022 projections. It is therefore considered that the affordable housing need within Cardiff is greater than what is estimated within the LHMA. Accordingly, on this basis alone the housing target should be increased to facilitate the delivery of affordable homes within the Plan period.

Notwithstanding this, the LHMA identifies an annual shortfall of 960no. affordable dwellings per annum. Accordingly, the current housing target does not make sufficient provision in meeting affordable housing need over the Plan period. Indeed, demand will continue to grow and therefore need will not be met within the Plan period. As such, the current housing target is not considered to be robust, undermining the credibility of the soundness of the Plan, given that it is predicted that affordable housing need will not be addressed.

Future Wales clearly advocates for the delivery of affordable housing, and sets out within Policy 7 that " *Through their Strategic and Local Development Plans planning authorities should develop strong evidence based policy frameworks to deliver affordable housing, including setting development plan targets based on regional estimates of housing need and local assessments. In response to local and regional needs, planning authorities should identify sites for affordable housing led developments and explore all opportunities to increase the supply of affordable housing.*"

It is considered that the RLDP is currently not in conformity with Policy 7, as insufficient provision for affordable housing is proposed within the Plan period, and that the Plan as such will fail to address the housing need. Accordingly, additional sites should be allocated for housing within the RLDP, including affordable-led housing sites which can deliver high numbers of affordable units, as suggested in page 18 of the RLDP – *“The Replacement LDP will need to ensure a range and choice of homes are incorporated within new developments and identify affordable housing-led sites.”* Such provision does not currently exist within the RLDP, and therefore, alongside the increase in the target of housing, affordable-led sites should also be identified as allocations to yield affordable housing over the Plan period.

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

It is not considered that the proposed housing target represents a positive or ambitious level of growth for the capital city of Wales, and is informed by previous low levels of housing delivery. The housing target does not reflect the aspirations of Future Wales as it uses the recent post-recession and Covid years as the benchmark against which to measure housing delivery for the RLDP.

As set out in these representations, it is anticipated in the housing trajectory of the RLDP that the housing requirement will be met before the end of the Plan period, with a remaining 3 years expected not to make any contribution to the housing supply. The bulk of the housing supply is made up of the landbank provision, where sites from the adopted LDP are counted as part of the housing delivery for the RLDP. As set out above, this ‘double counting’ approach does not make for a sound and robust strategy, given that these sites were expected to deliver and meet the need within the adopted LDP. Instead, the numbers attributed to these sites are rolled forward into the RLDP, and equate to a large proportion of the housing supply. It is not considered that this represents an aspirational approach to the contrary of Cardiff’s defined role within the National Growth Area and as the primary settlement within the region. Future Wales explicitly outlines that Cardiff *“must generate and support regional growth throughout the South East while enhancing its status as a vibrant capital city of Wales.”* The current housing target and the approach to achieve this does not reflect Cardiff’s role within Future Wales.

It is therefore considered that a higher target of housing would reflect Cardiff’s identified role within Future Wales, such that the approach (as presently taken) does not represent a strategy which largely hinges of the delivery of the landbank to meet the housing need – as opposed to new proposed allocations.