

**St Fagans Community Council
(Representor Number 74)**

Cardiff Replacement LDP

Supplementary Submission to Hearing Session 1 – Housing numbers

1. Population and Household Forecasts

Since the original Cardiff RLDP Consultation, the Welsh Government have issued new population and household estimates, based on a 2022 baseline, for each local authority.

Key figures for the purposes of the Cardiff RLDP are as follows:

1.1. Population Growth

	Cardiff Population	% change in period	Annual Change in Population
2001-2011	346k	+13.3% in 10 years	
2011 - 2021	362k	+4.7% in 10 years	+ 1,600
2021-2036 WG 2022 Principal Projection	419k	+15.8% in 15 years	+ 3,800

The 2021 Census shows that there was a very significant reduction in population growth between 2011 and 2021 compared to the previous decade. Annual growth was around a third of that experienced in the previous ten years. Yet WG projections for the period 2021-36 revert to significant growth levels of +15.8%, or over twice the growth shown in the most recent Census. This is highly optimistic, and is driven primarily by net international migration.

1.2. Household Growth

	Cardiff Households	% change in period	Annual change in Households
2001-11	143k	+15% in 10 years	
2011 - 21	147k	+3.4% in 10 years	+ 400
2021-2036 WG 2022 Principal Projection	172k	+16.8% in 15years	+ 1,670

Likewise, the 2021 Census shows that household growth in the period 2011-21 was very slow in Cardiff, increasing by just 3.4% over the ten-year period, significantly slower than over the previous decade. Yet WG projections for the 2021-36 period are significantly higher, forecasting an increase of 16.8% or four times the growth shown in the most recent Census. Again, this is driven primarily by very high WG forecast levels of net international migration.

Edge Analytics point out (in their May 2026 report) that Cardiff, and the UK at large, experienced high net international migration in the immediate post 2021 years. However, they also emphasise that within the latest UK estimates, international migration has decreased, returning to levels more comparable to those seen before the 2021 Census. Also, policy and visa changes have taken place that are not expected to enable international migration to return to the high levels seen between 2021-24. This leads Edge Analytics to conclude that the high international migration included in the WG 2022 Principal projection (and other WG scenarios) should be treated with caution as it may not be a sound basis for planning purposes.

It is also important to consider the type of housing that is likely to be needed by international migrants, particularly younger people coming to Cardiff as students, or in entry level jobs. They are most likely to need student accommodation, social housing or low-cost private rentals. But recent regulatory and fiscal changes are making it increasingly unattractive for landlords to expand the stock of private rental property. It is clear that expensive, large properties on the outskirts of the city will not reduce the numbers on Cardiff's housing waiting lists. Low cost housing, built where infrastructure already exists, is essential.

It is also clear that the two thirds of the increase in households is forecast to come from small one and two person households, which emphasises the need to focus on the provision of small, lower cost flats on brownfield sites, close to the city centre. Small households are less likely to buy the large 4-bedroom detached houses that are typically built on greenfield developments on the edge of Cardiff.

2. House Building Rates

It is also important to consider the housing completion rates of recent years.

Since 2006/7, Cardiff has completed a total of circa 24,800 dwellings, an average of around 1,300 per annum. This compares to a target of 39,000. This is a significant shortfall, only around 60% of the total target has been achieved.

To take Strategic Site C in North West Cardiff as an example, between 2016/17 and 2024/25, Cardiff completed a total of 1,130 dwellings or 125 per year here. This compares with a target of 5,000 completions. In other words, only 23% of the target has been achieved, whereas, it should be close to 80% complete by now. Importantly, there are still 3,870 houses yet to be built. Given the current economic situation in Wales, and the UK at large, it is difficult to see this rate of completions accelerating significantly. At current build rates (taking the last 5-year average to account for a slow start to the site), it will take another 25 years to complete Strategic Site C, which takes us significantly past the end of the RLDP under discussion.

This shows why additional greenfield sites are not needed in North West Cardiff, and emphasises the importance of completing Strategic Sites that have already been started (along with critical community infrastructure) before further allocations are granted.

3. Impact on Surrounding Counties

It is important that the Cardiff RLDP is also considered in relation to surrounding counties. It is clear from a reading of the housing projections contained in other RLDPs that the housing target contained in Future Wales is likely to be far exceeded, once all RLDPs are complete. WG have made the point that there is limited evidence to support the view of the Cardiff RLDP that it has “no negative effect on neighbouring authorities”. This should be rectified.

4. Conclusion

St Fagans Community Council calls upon the Inspectors to recognise that:

- Population and household forecasts are very optimistic, and unlikely to be achieved;
- The type of properties needed to meet the needs of additional households in Cardiff are likely to be smaller, lower cost flats on brownfield sites, close to the city centre, where infrastructure already exists.
- Strategic sites already allocated within the current LDP (such as Site C in North West Cardiff), are unlikely to be complete even within the period of the Replacement LDP, and therefore no further greenfield allocations are necessary. It is important that developers complete those sites that have already been started, including the critical community infrastructure that has been promised, before new allocations are agreed.
- The impact of the Cardiff RLDP on surrounding counties is given further consideration.

St Fagans Community Council
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