



# Local Development Plan 2021 > 2036

Cardiff Council - May 2026

## Cardiff Replacement LDP Examination

Hearing Session 9  
Other Housing Matters

CD16 Council Statement in  
Response to Inspectors Questions  
in ID08i



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**Cardiff Council**  
**Replacement Local Development Plan**  
**Examination**

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**Hearing Session 9 – 14.00-17.00, 17 June 2026**

**Virtual**

**Other housing matters**

**Issue - Whether the Plan makes appropriate provision for specific housing types and related controls**

**1. Opening and introductions**

**2. Accessible and adaptable homes**

2.1. Should the plan include requirements for accessible and adaptable homes to meet the needs of disabled and older residents? (Lucy Dunhill, 91)

**Response:**

The Council consider that the Plan already provides a strong and balanced framework for meeting the needs of disabled and older residents and adding further prescriptive accessibility requirements is neither necessary nor proportionate. The Plan's approach is justified for several key reasons.

Firstly, Planning Policy Wales (PPW) and the Building Regulations already establish clear, enforceable standards for accessible and adaptable homes. These national requirements apply uniformly across Wales and are updated regularly to reflect best practice. Because these standards already govern the design of new homes, duplicating or expanding them in the Plan would add complexity without improving outcomes. The Plan correctly avoids unnecessary overlap and ensures consistency with the national policy framework.

Secondly the Plan takes a strategic, evidence-led approach to housing need and is grounded in the Local Housing Market Assessment (LHMA), which identifies the scale and type of specialist housing required. The Plan responds to this evidence by:

- Supporting the delivery of specialist and supported housing
- Encouraging adaptable design where appropriate
- Ensuring that affordable housing providers can meet identified needs

This targeted approach is more effective than imposing blanket accessibility requirements on all new homes, which may not reflect actual demand or the specific needs of different communities.

Thirdly introducing mandatory percentages of accessible or wheelchair-adaptable homes risks undermining housing delivery by increasing build costs, reducing site viability, slowing down housing delivery and limiting the ability of developers to respond flexibly to market needs. At a time when Cardiff must deliver significant numbers of new homes, including affordable housing, the Plan's balanced approach avoids placing additional burdens on development that could compromise delivery.

Fourthly developers, housing associations, and care providers need the flexibility to design homes that respond to site-specific constraints, market conditions, evolving demographic trends and technological and design innovation. A rigid, one-size-fits-all accessibility requirement would restrict this flexibility. The Plan instead enables accessible and specialist housing to come forward where it is most appropriate and most needed.

Finally, the Plan already promotes mixed-tenure, mixed-age neighbourhoods, walkable communities, access to services, green space, and public transport and high-quality design and placemaking principles. These wider spatial and design policies are essential for supporting older and disabled residents. Accessibility is not just about the internal layout of homes it is about creating inclusive environments, and the Plan addresses this comprehensively. Indeed, further opportunity to introduce good practice guidance is better suited to the planned review of all design-led Supplementary Planning Guidance (SPG) for the above reasons.

In conclusion the Council consider that the Plan does not need additional requirements for accessible and adaptable homes. It already provides a strong, evidence-based framework that:

- Aligns with national policy
- Supports specialist housing where needed
- Protects housing delivery and viability
- Promotes inclusive, age-friendly communities
- Avoids unnecessary duplication or over-regulation
- Does not preclude Supplementary Planning Guidance being prepared at a later date

The Plan's balanced and flexible approach is the most effective way to meet the needs of disabled and older residents while ensuring Cardiff can deliver the homes its growing population requires.

### **3. Homeless hostels**

#### **3.1. Should the plan include a policy to prevent an over-concentration of homelessness hostels? (Cllr H Gunter, 132)**

The Council consider that a policy preventing the over-concentration of homelessness hostels should not be included in the Plan because such a restriction would be inflexible, and inconsistent with both the city's homelessness strategy and the

principles of evidence-based planning. The challenges Cardiff faces require responsive, needs-led provision, not spatial limits that risk undermining the Council's ability to meet statutory duties. The Development Plan framework, including but not limited to, those policies advocated in the Deposit Replacement LDP provide sufficient control over the location of new homeless hostel accommodation in terms of addressing their impacts from the perspective of the Local Planning Authority.

The Council has legal duties to provide suitable accommodation for people experiencing homelessness. Introducing a policy that restricts where hostels can be located could delay the delivery of urgently needed provision, reduce the number of viable sites, increase costs by forcing provision into areas with higher land values and create barriers to meeting statutory duties during periods of rising demand. Planning policy should support, not constrain, the Council's ability to respond quickly and effectively to homelessness pressures.

The evidence base does not demonstrate that concentration causes planning harm. The RLDP must show clear evidence of the demonstrable harm caused by clustering to justify any such policy. At present, the evidence base does not establish that existing concentrations of hostels in Cardiff create planning-related harm such as amenity loss, safety issues, or unsustainable pressure on local services. Without such evidence, a concentration policy risks being unsound, vulnerable to challenge, and inconsistent with PPW which requires proportionate, evidence-led policy making.

Hostels are specialist infrastructure that often benefits from being located near each other and homelessness services frequently rely on shared staffing, proximity to health and support services, access to transport, economies of scale and established networks of specialist providers. Artificially dispersing provision across the city could weaken service quality, increase operational costs, and reduce the effectiveness of support. The close proximity of such facilities in dense urban areas is not inherently negative; in many cases, it is functionally necessary for delivering high-quality, specialist accommodation.

Embedding a "no over-concentration" rule in the Plan sends an implicit message that homelessness hostels are undesirable land uses that must be controlled or kept apart. This risks reinforcing stigma around homelessness, discouraging investment in supported accommodation and creating public narratives that associate hostels with harm. Planning policy should avoid language or mechanisms that inadvertently marginalise vulnerable groups or frame essential services as problematic.

Importantly existing planning tools already allow the council to manage impacts. If a proposed hostel would create unacceptable impacts, the planning system already provides mechanisms to address this through amenity assessments, cumulative impact considerations, design and management conditions and location-specific mitigation. Furthermore, our statutory and technical consultees are well placed to provide any evidence required for the Local Planning Authority to appropriately consider applications on the planning merits. A new, blanket concentration policy is

unnecessary in the absence of evidence, and when existing tools can manage impacts on a case-by-case basis.

In conclusion the Council consider that a policy preventing the over-concentration of homelessness hostels would be inflexible, insufficiently evidence-based, and potentially harmful to both service users and the Council's ability to meet its statutory duties. Cardiff needs a planning framework that supports responsive, needs-led provision and not one that restricts it through arbitrary spatial limits. For these reasons, such a policy should not be included in the Plan.

#### **4. Policy H5, HMOs**

4.1. Are the thresholds in Policy H5 (i) & (ii) justified by evidence of harm? (John Winter Student Houses, 88 and Quin & Co & CPS Homes, 124)

##### **Response:**

The Council in conjunction with neighbouring authorities (Newport and Rhondda Cynon Taf) have prepared a robust, methodologically sound assessment that directly underpins the need for threshold-based policy intervention to manage concentrations of HMOs and protect community cohesion, housing mix, and residential amenity. This Regional HMO study (RLDP39) demonstrates clear evidence of harm at higher HMO concentrations and supports the thresholds set out in Policy H5 (i) and (ii).

Although the three authorities differ in housing stock and demographic pressures, the Study identifies consistent patterns of harm where HMO concentrations exceed certain levels. These harms are not speculative; they are empirically demonstrated through spatial analysis, survey data, and service-level evidence.

The Study shows that areas with elevated HMO concentrations experience:

- Significantly higher population turnover, often exceeding regional averages by a substantial margin.
- Reduced long-term residency, weakening social networks and community stability.
- Lower levels of civic participation, including reduced engagement with local schools, GP practices, and community organisations.

These findings support the principle that thresholds are necessary to prevent further erosion of community cohesion in already fragile neighbourhoods.

The Study also identifies a clear relationship between high HMO demand and:

- Inflation of property values above local income levels, making family housing less affordable.
- Conversion pressure on traditional terraced housing, reducing the supply of homes suitable for families.
- Displacement of households seeking stable, long-term accommodation.

This demonstrates that without thresholds, the cumulative impact of incremental HMO conversions would undermine the Plans strategic objective of maintaining a balanced housing stock.

In terms of environmental and amenity impacts, the Study finds that high-density HMO areas exhibit:

- Higher levels of waste and recycling contamination
- Greater incidence of noise complaints
- Parking stress and increased vehicle ownership per household
- Higher demand for enforcement interventions

These impacts correlate strongly with HMO concentration levels, reinforcing the need for a policy mechanism that prevents intensification beyond sustainable limits.

Significantly, the study supports the use of thresholds and concludes that threshold-based controls are effective in preventing harmful clustering, transparent for applicants and decision-makers, consistent with approaches used successfully in other UK cities and proportionate to the scale of the identified impacts. Thresholds are therefore not arbitrary; they are a direct response to the evidence of cumulative harm.

While the Study does not prescribe specific percentages, it provides a clear evidential basis for street-level thresholds, where amenity impacts are most acute and neighbourhood-level thresholds, where cumulative effects on housing mix and cohesion become apparent. Policy H5's two-tier approach mirrors the Study's conclusion that both micro- and macro-level controls are necessary to prevent harmful concentrations. The thresholds chosen by the Council are therefore rooted in the Study's evidence, aligned with regional best practice, consistent with the Plans strategic objectives and necessary to prevent demonstrable harm

In conclusion the Council consider that the Regional HMO Study (RLDP39) provides a robust, multi-authority evidence base demonstrating that high concentrations of HMOs lead to identifiable and measurable harms relating to community cohesion, housing market balance, and residential amenity. Policy H5(i) and (ii) respond directly to these findings. The thresholds are justified, proportionate, and essential to ensuring that Cardiff maintains sustainable, balanced, and cohesive communities. The evidence therefore supports the soundness of Policy H5 and demonstrates that the thresholds are firmly grounded in demonstrable harm.

## **5. Policy H6, PBSA**

5.1. Policy H6 states that PBSA will only be permitted when it is located in the Central and Bay Business Area or when it is located in close proximity to existing university and college campuses. Is this too restrictive and does it prevent the development of suitable and accessible sites on the fringes of the city centre, or between the city centre and Bay? (Watkin Jones Group, 19 and John Winter Student Houses, 88)

**Response:**

The Council notes that Policy H6 adopts a focused and plan-led approach to the delivery of Purpose-Built Student Accommodation (PBSA), ensuring that new development is located either within the Central and Bay Business Area or in close proximity to existing university and college campuses. This approach is appropriate, justified, and necessary to manage growth sustainably and to avoid the negative impacts associated with an uncoordinated dispersal of PBSA across the city.

The Plan establishes a clear spatial hierarchy that concentrates major trip-generating uses (such as PBSA) within the most accessible parts of the city. The Central and Bay Business Area is the primary hub for public transport, active travel routes, and higher-order services, making it the most sustainable location for high-density student accommodation. Locating PBSA outside these areas would undermine the plan's spatial coherence and risk creating isolated pockets of student housing that are poorly integrated with the city's transport network and service infrastructure.

Students are a population group with high levels of active travel, and their accommodation must be located where walking and cycling to campus is realistic and safe. The Council's approach ensures that PBSA is within practical walking distance of teaching facilities, well connected to existing student movement patterns and integrated with areas already designed to support student life. Allowing PBSA to spread into less sustainable locations risks creating locations that are neither close enough to campuses nor well served by the public transport and active travel network, leading to increased reliance on private vehicles.

The suggestion that Policy H6 is "too restrictive" overlooks the fact that the policy does not prohibit development on fringe sites; it simply requires that such sites demonstrate genuine proximity to campuses, or a functional relationship with the Central and Bay Business Area. Many fringe locations already meet these criteria. The policy ensures that only those sites that are truly sustainable and accessible come forward, rather than supporting proposals in areas that would not support student needs or the city's infrastructure.

Without clear locational criteria, PBSA development risks encroaching into established residential neighbourhoods, driving up land values, displacing family housing and creating imbalanced communities. Policy H6 provides the necessary safeguards to ensure that PBSA growth does not undermine the Council's wider housing objectives or the character and cohesion of existing communities.

The Council's approach is grounded in evidence of student travel patterns, assessment of campus locations, infrastructure capacity analysis and the need to maintain balanced communities. The policy strikes the right balance between enabling PBSA delivery and ensuring that development occurs in the most sustainable and appropriate locations.

In conclusion the Council consider that Policy H6 is not overly restrictive; it is a necessary and proportionate mechanism to ensure that PBSA development supports the city's spatial strategy, protects residential neighbourhoods, and delivers accommodation in locations that are genuinely accessible and sustainable for students. The Council's approach is justified, effective, and consistent with national planning principles promoting

5.2. Does the policy risk an over-concentration of student accommodation, particularly in Butetown? (Grange Pavillion Youth Forum CIC, 143)

**Response:**

The Council notes that Policy H6's spatial focus is a deliberate and evidence-based strategy designed to ensure that Purpose-Built Student Accommodation (PBSA) is located in the most sustainable, accessible, and appropriate parts of the city. Far from creating a risk of over-concentration in Butetown, the policy provides a clear, controlled framework that directs PBSA to areas where it can be successfully integrated without undermining community balance or regeneration objectives.

The Central and Bay Business Area (CBBA) is the most accessible part of Cardiff, well served by public transport, close to key services and amenities, characterised by higher-density, mixed-use development and already planned for significant growth and regeneration. These characteristics make it the most appropriate location for PBSA. Concentrating student accommodation in areas with strong infrastructure is a sound planning principle, reducing pressure on residential neighbourhoods and avoiding the dispersal of student demand into areas less able to accommodate it.

While parts of Butetown fall within the CBBA, the policy area also includes the city centre, this means PBSA demand is distributed across a broad geography, not funnelled into a single ward. The CBBA is intentionally large to avoid the very risk of over-concentration the question raises. The main teaching campus for Cardiff university is within Cathays, with other universities located in Adamsdown as well as the UHW being located beyond these areas.

The Plan identifies the CBBA as the city's primary location for high-density residential development, commercial growth, mixed-use regeneration, tall buildings and strategic infrastructure investment. PBSA is entirely consistent with these objectives. Locating PBSA here supports sustainable travel, maximises the use of brownfield land, promotes the highest density developments in the most sustainable locations and reduces pressure on suburban housing stock. This is precisely the type of area where higher concentrations of PBSA are appropriate and policy-aligned.

By limiting PBSA outside the CBBA to locations near campuses, Policy H6 prevents student accommodation from spreading into established communities, protects the housing mix in suburban areas, reduces the risk of displacement of family housing and avoids the creation of new student "hotspots" in inappropriate locations. This is a protective measure, not a permissive one.

Even within the CBBA, PBSA proposals must satisfy design and amenity criteria, transport and access requirements, management plan expectations and cumulative impact considerations (through the Development Management process). This ensures that no single area, including Butetown, becomes saturated.

In conclusion the Council consider that Policy H6 does not create a risk of over-concentration in Butetown. Instead, it provides a clear, controlled, and sustainable spatial strategy that directs PBSA to the parts of the city best equipped to accommodate it. The approach protects residential neighbourhoods, supports regeneration, and ensures that student accommodation is delivered in locations where it can be successfully integrated without adverse impacts.

5.3 Is it necessary to amend criterion (iv) to acknowledge some units may have their own kitchens?

**Response:**

The Council agrees it is necessary to amend criterion H6(iv) to acknowledge that some PBSA units may include private kitchens. This reflects modern PBSA design, avoids ambiguity, supports inclusivity, and maintains the policy's core purpose of ensuring high-quality, well-managed student accommodation. The suggested changes to paragraph criterion H6 (iv) are set out below (deletions shown as strikethrough) and it is proposed these are included in the forthcoming Matters Arising Changes consultation.

*'They include communal facilities and services that are sufficient to meet residents requirements and offer convenient access to communal ~~kitchen, dining area as well as communal amenity~~ spaces to ensure a social and inclusive environment can be delivered'*

5.4. Would removing reference to minimum space standards risk the provision of sub-standard accommodation?

**Response:**

The Council considers that removing reference to minimum space standards in Policy H6 would materially increase the risk of sub-standard PBSA being delivered, because space standards are one of the few objective tools the planning authority has to ensure quality, amenity, and long-term usability.

Space standards are the primary safeguard against over-densification. Without minimum space standards, developers have a clear incentive to reduce room sizes, increase the number of units per floor, minimise communal space and push density to commercially optimal rather than socially acceptable levels. PBSA is a high-value asset class, and the absence of standards often leads to micro-units that compromise liveability. Minimum standards prevent this.

Students are entitled to the same basic amenity protections as other residents. Removing them for PBSA would create a two-tier system, implying that students can be housed in smaller, lower-quality accommodation than other groups. This would be inconsistent with equality principles, wellbeing objectives and the Plans commitment to high-quality design.

PBSA is no longer just for first-year undergraduates. Many residents live in PBSA for multiple years, study intensively, work part-time and require private space for research and remote learning. Sub-standard room sizes would undermine the ability of these residents to live and study effectively.

There is strong evidence that cramped living conditions, lack of natural light, insufficient storage, inadequate workspace all contribute to poor mental health outcomes. Students are already a group with elevated wellbeing risks. Removing space standards would weaken an important protective measure.

Minimum space standards provide clarity for applicants, consistency for decision-makers, defensibility at appeal and certainty for residents. If the reference is removed, officers must rely on subjective judgements about “adequacy,” which are harder to defend and easier for developers to challenge.

PBSA is a long-term asset. Units built today will still be in use in 30–40 years. If the policy allows sub-standard sizes now, Cardiff risks locking in poor-quality stock, buildings that cannot be repurposed and long-term management issues. Minimum space standards ensure the city’s PBSA remains adaptable and fit for purpose.

In conclusion the Council consider that removing the reference to minimum space standards in Policy H6 would significantly increase the risk of sub-standard PBSA being delivered. Space standards are a critical safeguard that ensure liveable accommodation, student wellbeing, design quality, long-term sustainability, and consistency with wider housing policy. For these reasons, retaining minimum space standards is both necessary and justified.

## **6. Policy H7, Co Living Accommodation**

6.1. Are the changes to the reasoned justification sought by the Watkin Jones Group (19) necessary to make the plan sound?

### **Response:**

Whilst the Council do not consider that the changes sought are necessary to make the Plan sound, the Council agree the following changes to paragraph’s 7.48 and 7.49 of the reasoned justification sought by the Watkin Jones Group (see deletions shown as strikethrough) and it is proposed these are included in the forthcoming Matters Arising Changes consultation.

*'7.48 Developments will be classified as co-living when they include at least 10 units and where an element of typical domestic provision is communal. A good array of communal facilities, relevant to the buildings location and design, should also be provided ~~Typical services can include room cleaning, bed linen, on site gym and concierge service, none of these are typical domestic provision.~~ Anything smaller will typically be considered as an HMO'*

*'7.49 Communal cooking and dining spaces are to be inclusively designed for occupants they serve ~~per floor~~ and will provide a variety of suitable spaces to maximise the potential for social interactions, communal cooking and comfortable living. Developments may provide access to on-site managed facilities, relevant to the buildings location and design ~~such as a cleaning service, the provision of bed linen and a concierge.~~ To encourage a communal lifestyle, spaces such as lounges, gyms, cinemas, games rooms, libraries, and communal work/ study spaces should be considered. Linking internal and external amenity spaces is encouraged.'*

In addition, the Council note the comments made by Watkins Jones Group on the SPG referenced in paragraph 7.51 of the Plan. This SPG will set out further information and guidance on the implementation of Policy H7. The Council confirm they will work closely with stakeholders on preparing this SPG and indeed, are already doing so.

## **7. Policy CP2. Conversion, extension and replacement buildings in the countryside**

7.1. The Inspectors note the Council's responses to the Initial Comments and Questions but wish to discuss the matter further. The Council is not expected to provide a statement.

## **8. Action Points**