

Consultation Response

About HBF

The Home Builders Federation represents home builders in England and Wales. HBF's members build the majority of new homes built in England and Wales each year. Its membership includes national developers and hundreds of SME builders.

Representor ID no. - 85

Cardiff Council Replacement Local Development Plan Examination Hearing Session 2 – Housing strategy

Issue – Will the brownfield-first approach, only carrying over greenfield allocations, deliver?

2.1. Do the figures attributed to the allocations and assumed windfalls take account of plan requirements such as, open space, play areas, allotments, food growing space, SuDs, 3:1 tree replacement, energy efficiency, securing good quality and sustainable design?

HBF supports this question and agrees that there is an ever-increasing demand for non-developable areas within housing developments. Although there is the potential for a number of the non-developable areas identified in the question to be 'stacked' (an area of land serving more than one purpose) there is currently no policy guidance contained in the plan on such an approach. Further SuDS guidance has recently been updated by the Welsh Government with an increased onus on biodiversity (Para 2.55 -2.63). In addition, changes made to PPW12 in 2024 significantly increased the biodiversity requirements for new developments. HBF understands from members that the issue of reduced density has been seen in some of the strategic sites already coming forward so this could be an area where the inspector asks for more information from the Council who will have been dealing with these planning applications.

2.2. Do the figures attributed to the allocations and assumed windfalls take account of viability, particularly on brownfield sites which may be contaminated and plan requirements such as affordable housing, public transport, infrastructure, education in addition to those above?



The HBF notes that the high-level viability assessment carried out to support the plan has not looked at brown field sites separately.

2.3. Should the LDP specify minimum densities? (Policy SP3(1c) & SP4(ix)).

Although the HBF would not object in principle to setting minimum densities in reality any policy wording would need to be flexible enough to allow for specific site characteristics/ circumstances.

2.6. Only two non-strategic sites are allocated, and these are still large, 90 and 150 units. The Housing Led Regeneration Areas have allocations from 200 to 2,310 units. HBF and others argue allocating only large sites/discriminates against SME builders. Further redeveloping brownfield sites presents challenges that may be beyond the resources of smaller firms.

HBF would support the allocation of smaller sites (below 50 units) , giving more opportunities for SME developers, increasing the range of developers to deliver the much-needed homes. Several sites have been identified by the Inspectors which may not be deliverable, therefore if these sites are removed from the plan there is an opportunity to replace at least some of these with a range of smaller sites. HBF notes that some of the current larger strategic sites have offered parcels for sale to SME developers providing a 'shovel ready site', however these sites have to wait for the main site to complete its initial infrastructure works before development can take place on the smaller parcels. Smaller sites are less likely to need this level of initial infrastructure provision so should come forward quicker.

2.7 Does the size of the allocations and the challenge of redeveloping complicated brownfield sites limit the number of developers able to contribute to meeting the housing targets? Should consideration be given to allocating a range of smaller sites to provide flexibility in sources of delivery?

HBF supports this suggestion, please see response to previous question.

2.8. The core recreational catchment of the Severn Estuary Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar sites and Cardiff Beech Wood SAC are 12.6km and 6km respectively. Policy BG7 resists development which would result in an



increase in visitor pressure. LDP paragraph 7.395 indicates the best approach to mitigating recreation impacts at a strategic level, likely through contributions to Strategic Access Management and Monitoring (SAMM) or Suitable Alternative Greenspace (SANG). NRW point out a number of allocations are within the core recreation areas, SH1.2, SH1.4, SH1.5, H1.1, H2.2 & H2.3 and it is likely many windfalls will be too.

- i. When will a SAMM or SANG strategy be developed?
- ii. What is the impact of the need to produce a SAMM or SANG strategy on the delivery of the proposed allocations within the core recreation areas in terms of density, timing and financial viability?
- iii. Has this been factored into the estimates of windfalls?

In general response HBF is concerned that unless the above questions can be answered fully then there is potential for the delivery of development to be delayed. If there is likely to be delay around these issues this would be another reason to increase the flexibility allowance / not to use the flexibility allowance prior to the plan adoption following the potential removal of sites.

Allocations

Although it is not HBF's role to comment on individual allocations we note that the sites raised by the Inspector total 3,026 units. If all of these are shown to be undeliverable or require a reduction in numbers due to measures required to make the site acceptable for development taking account of the surrounding issues identified by the Inspector. Then replacement sites should be included to replace them. The plan currently only allows a 10% flexibility. HBF considers it would not be appropriate to start reducing this allowance at this stage as an alternative to finding additional sites, an approach seen in some previous LDP inquiries.

