

Cardiff Council Replacement Local Development Plan Examination

Hearing Session 2 - Strategy

Redrow Homes South Wales

15 May 2026

LICHFIELDS

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

2. Strategic

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?

- 1.1 It is not evident that the figures attributed to allocations and assumed windfalls robustly account for the Plan's policy requirements. These include, but are not limited to, open space provision, play areas, allotments and food growing space, Sustainable Drainage Systems (SuDS), 3:1 tree replacement, energy efficiency standards, and wider placemaking and design expectations.
- 1.2 As previously highlighted in Lichfields Deposit representations, the Plan appears to rely on headline capacities that reflect maximum theoretical yields rather than realistic delivery outcomes once policy requirements are applied. This is particularly relevant for large and strategic sites. The identified housing supply should represent a realistic and deliverable estimate of housing provision over the plan period rather than assuming that maximum tested capacities will be achieved in practice.
- 1.3 We note that the Council have prepared an Updated Housing Background Technical Paper¹ alongside an updated Housing Trajectory (2025). The Updated Housing Technical Paper does acknowledge that reductions to site capacity are necessary in certain circumstances. For example, paragraph 4.6 confirms that a site-specific reduction has been applied at Plasdŵr to reflect SuDS, biodiversity and green infrastructure requirements.
- 1.4 However, there is lack of transparency between the Topic Paper and the Housing Trajectory. It is not possible to reconcile the figures set out in the trajectory with the updated landbank position contained within the Topic Paper. The sources of housing supply set out in the RLDP and Technical Paper are not properly evidenced by reference to the contribution from each site with planning permission.
- 1.5 The Council should have appended the trajectory to the Technical Paper to also demonstrate how amendments to site capacities and delivery rates have informed the overall housing supply position.
- 1.6 As set out in our deposit representations our client considers that additional delivery could come forward at Plasdŵr but this would be dependent upon additional outlets rather than higher build rates from the same outlets. Plasdŵr should not be regarded as one site but instead a series of sites in northwest Cardiff ranging from Radyr in the north through central Plasdŵr to Pentrebanne in the south. Provided outlets are spread across these different market areas then development output can be maximised.

¹ <https://www.cardiffldp.co.uk/wp-content/uploads/CD07-Updated-Housing-Background-Technical-Paper-en.pdf>

1.7 The Council's updated assumptions do not therefore appear to align with the Development Plans Manual, Edition 3, Section 5 'Preparing an LDP – Core Issues' (DPM), which states that:

“A housing trajectory must be prepared to support the Deposit Plan and embedded in the plan as an Appendix, clearly articulating the anticipated annual and cumulative build rate”.

1.8 Planning Policy Wales (“PPW”) also emphasises that development plans must be founded on deliverable and sustainable placemaking principles, ensuring sites can accommodate green infrastructure, biodiversity enhancement, SuDS, design quality and community infrastructure requirements.

1.9 Moreover, the current approach lacks transparency and consistency across the wider housing supply. In particular:

- There is no clear evidence within the Updated Housing Background Technical Paper that equivalent adjustments have been applied to other allocations or sites with planning permission; and,
- There is limited evidence demonstrating how policy requirements have informed the assumed yields across rolled-forward allocations and windfall assumptions.

1.10 Lichfields acknowledge that the Council has factored in a 20% non-delivery allowance in relation to sites with planning permission (but not implemented) to account for possible reduced dwelling yield and/or some sites not coming forward.

1.11 However, the application of a blanket 20% non-delivery allowance to sites with planning permission is not intended to compensate for known policy requirements that may reduce developable capacity. Furthermore, such requirements will equally apply to allocations that must still progress through the planning process. Accordingly, it would be logical and consistent to apply a similar 20% non-delivery allowance to rolled-forward allocations. This would better reflect the likelihood that actual delivery will fall below estimated capacities, as evidenced by other consented strategic sites such as Plasdŵr.

1.12 More fundamentally, the Plan's reliance on a brownfield-first approach limits its ability to deliver key policy requirements and objectives. Brownfield sites are typically more constrained and less capable of accommodating the full range of infrastructure, affordable housing, and placemaking requirements. Greenfield allocations will therefore play a critical role in helping to deliver sustainable, policy-compliant development.

1.13 The Plan does not identify sufficient realistic opportunities to meet its housing requirement once policy requirements and development constraints are properly accounted for. The result is an over-reliance on optimistic and inconsistent capacity assumptions, undermining the robustness of the housing trajectory and the soundness of the Plan.

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?

- 1.14 There is limited evidence that viability considerations have been suitably factored into the allocations and assumed windfalls.
- 1.15 This is a significant issue in the context of a brownfield-led strategy. Brownfield sites are frequently subject to abnormal costs, including (but not limited to) remediation, demolition, and infrastructure provision. These costs are compounded by policy requirements such as affordable housing, transport improvements, education provision, environmental standards, and design expectations.
- 1.16 Viability concerns therefore raise even greater concerns regarding the deliverability of more constrained brownfield allocations which are likely to involve additional remediation costs, abnormal infrastructure requirements and more complex delivery circumstances.
- 1.17 The Council's approach to windfalls relies heavily upon historic delivery rates, with a 25% reduction applied to large and small site windfalls. However, we note that this reduction has not been applied to change-of-use windfalls, with no clear justification or explanation provided within the Updated Housing Background Technical Paper.
- 1.18 Change of use developments are often complex and constrained, typically involving challenges in relation to conversion, structural limitations, heritage, retrofit requirements, and higher per-unit build costs. In many cases, change-of-use schemes can be more difficult and costly to deliver than demolition and rebuild proposals. As such, they are not necessarily lower-risk forms of development and therefore should be subject to a degree of flexibility or a non-delivery allowance like that applied to large and small site windfalls.
- 1.19 There is no clear evidence within the Technical Paper that viability has been explicitly tested or that assumptions have been adjusted accordingly. This is a significant omission and without robust viability evidence it is uncertain whether allocated sites will come forward as anticipated and windfall delivery, particularly on complex brownfield sites, is likely to be overstated. This reinforces concerns that the Plan's housing supply is likely overstated.
- 2.3. Should the LDP specify minimum densities? (Policy SP3(1c) & SP4(ix)).**
- 1.20 Policies SP3(1c) and SP4(ix) reinforces that higher densities are typically more appropriate in district centres and along transport corridors whereas lower densities provided elsewhere to deliver an overall range and choice of housing to meet different needs. This approach is supported.
- 1.21 However, we consider that the specification and application of minimum densities at a strategic policy level is neither necessary nor appropriate.
- 1.22 Large-scale developments, such as Plasdŵr, demonstrate that a range of densities is essential to respond to site-specific characteristics, including edges, interfaces, topography, and environmental constraints. Higher densities may be appropriate in highly accessible locations, but a mix of medium and lower densities are often required elsewhere to achieve high-quality placemaking.
- 1.23 Density is most effectively addressed through site-specific masterplanning, design codes and the development management process. A blanket minimum density requirement reduces opportunity to respond to local context and ensure design quality. Lichfields

therefore consider that a flexible, site specific and design-led approach is more consistent with national policy and placemaking principles.

2.5. Has the requirement in Policy H9 to demonstrate no overriding need to retain the existing use on unallocated sites informed the windfall estimate?

- 1.24 Policy H9 is directly relevant to windfall delivery, as it provides the policy framework enabling residential development on unallocated sites, subject to a range of criteria. Critically, criterion (i) requires demonstration that there is no overriding need to retain the existing use, which introduces an important constraint on the availability of such sites.
- 1.25 The Updated Housing Background Technical Paper identifies that many windfalls arise from:
- Redevelopment of employment land;
 - Conversion of commercial buildings;
 - Re-use of previously developed sites.
- 1.26 However, Policy H9 may limit the availability of such sites, introduce additional policy hurdles and delay or prevent delivery.
- 1.27 The Housing Background Technical Paper does not appear to explicitly address how the criteria contained within Policy H9 have informed the windfall estimate. Specifically:
- There is no clear evidence that the policy tests in H9, particularly the ‘no overriding need’ requirement, have been applied when estimating the likely supply of windfall sites.
 - The windfall figure appears to rely on historic delivery rates, with no adjustment to reflect the policy requirements.
 - There is no assessment of how likely it is that proposals might fail to meet H9 criteria, which would directly influence the realistic level of windfall delivery.
- 1.28 There is no clear evidence that the windfall allowance has been adjusted to reflect these constraints. Given that Policy H9 introduces potentially significant constraints on the redevelopment of unallocated sites for housing, the lack of explicit recognition of these criteria suggests that the windfall estimate may be overly optimistic.
- 1.29 The Technical Paper assumes that there will be a steady source of under-used and/or outdated office and other buildings that will convert to residential use during the plan period and so it is assumed that 100% of the average rate for the last 10 years will apply. By applying 100% of past delivery rates, the Council appears to assume that all historically available opportunities will continue to come forward. This therefore suggests that no allowance has been made for the requirements of Policy H9 to demonstrate no overriding need to retain the existing use, failing to reflect the more restrictive policy framework introduced by H9.
- 1.30 As such, the Plan again appears to rely on optimistic assumptions, therefore undermining the supply position.

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.

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?

- 1.31 It is acknowledged that the Plan contains a limited number of non-strategic allocations and that a significant proportion of the housing supply is expected to come forward through larger strategic and regeneration sites. However, it is overly simplistic to characterise strategic allocations as being delivered only by large volume housebuilders.
- 1.32 In practice, strategic sites are typically delivered through a phased approach involving multiple developers, including SMEs and affordable housing providers. Large strategic sites are therefore capable of supporting a diverse range of delivery mechanisms over the plan period.
- 1.33 This is clearly demonstrated at Plasdŵr. Whilst the strategic infrastructure and overarching delivery framework are being coordinated by the lead developer BDWR, the site is not being developed exclusively by them. Approximately 50% of the site is being released to the market in a phased in parallel with BDWR activity.
- 1.34 At Plasdŵr, this approach has already enabled SME builders to participate in delivery. For example, Lewis Homes has completed a scheme of approximately 58 dwellings, whilst Edenstone Homes, in partnership with Codi (previously Pobl), has recently secured Reserved Matters consent for approximately 180 dwellings and is expected to commence development shortly.
- 1.35 Strategic allocations can therefore provide important opportunities for SME builders rather than constrain them. The model of phased land release to the market at Plasdŵr reduce barriers and risk by providing serviced parcels with strategic infrastructure already delivered, outline planning permission secured, and Section 106 obligations clearly established. This significantly reduces upfront risk and uncertainty for SME developers compared with independently promoting and delivering sites.
- 1.36 A key benefit of Plasdŵr and large strategic sites more generally is the provision of fully serviced development parcels, where the risks associated with delivering infrastructure and services are already addressed. This significantly simplifies matters from a funding perspective.
- 1.37 Where funders and their advisors are involved, schemes become more complex, costly, and risk-sensitive when development carries greater infrastructure uncertainty. The provision of development-ready parcels therefore represents a significant advantage for SME developers, reducing both financial and delivery risk.

- 1.38 The aim at Plasdŵr will be to have up to eight outlets operating at any one time and this will only work if there are a arrange and choice of operators both spatially and in terms of market offer.
- 1.39 Strategic allocations also provide the scale necessary to deliver essential strategic infrastructure and placemaking principles that smaller sites may not be capable of supporting independently. At Plasdwr, green infrastructure, high-quality design and integrated active travel plans and policies are already established, providing SME builders with greater certainty, reduced upfront risk and a clear framework for delivery.

3. Allocations

- 1.40 Lichfields maintain concerns regarding the suitability, deliverability and evidence basis underpinning a number of the housing-led regeneration allocations identified under Policy H2. There is insufficient robust evidence to demonstrate that several of these rolled-forward allocations can deliver the anticipated housing numbers within the plan period.
- 1.41 A consistent issue across several of the allocations is the absence of clear and up-to-date evidence addressing deliverability constraints, including land ownership, compatibility with surrounding uses, viability, and infrastructure requirements.
- 1.42 In respect of Cardiff Gate Business Park (West) and Hadfield Road, concerns remain regarding the suitability of residential development within established commercial and employment contexts. In both cases, there is insufficient evidence demonstrating how residential uses can be integrated whilst addressing matters including amenity, noise, air quality, compatibility with surrounding employment uses and alignment with Policies SP4 and PC1. Similarly, we have concerns regarding the deliverability of the Porth Teigr and Alexandra Head allocation. There is uncertainty regarding landowner intentions and the extent of the developable area.
- 1.43 Despite these significant issues, the Updated Housing Background Technical Paper provides no updated evidence demonstrating how these constraints have been resolved or to justify the assumed delivery rates.
- 1.44 The removal of the Roath Dock (North Side) allocation from the housing trajectory is welcomed. However, the Council has not provided any explanation or evidence regarding the reasoning and implications of this in relation to the overall housing supply. Given the estimated loss of 316 units, alternative deliverable sites, including greenfield allocations, will be required to ensure the housing requirement is met and to maintain flexibility in the supply. There is no evidence that the Council has identified alternative, deliverable sites to offset this reduction, including the potential need for additional greenfield allocations.
- 1.45 More broadly, the Council has not demonstrated that rolled-forward allocations have been subject to robust assessment in accordance with the requirements of the Development Plans Manual, Edition 3, Section 5 *'Preparing and LDP – Core Issues'* (DPM). The DPM is clear that:
- “Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered.”*

- 1.46 The DPM further confirms that rolled-forward sites should be subject to the same candidate site assessment requirements as new allocations and must be demonstrated to be sustainable and deliverable.
- 1.47 There is insufficient evidence within the Updated Housing Background Technical Paper to demonstrate that these requirements have been met. Moreover, the most recent Housing Trajectory (2025) provides no detail regarding the anticipated delivery rate of the Housing-Led Regeneration Areas identified under Policy H2. The absence of clear assumptions regarding lead-in times and delivery rates therefore undermines the robustness of the trajectory and supply assumptions.

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