**Response by Penllergaer Community Council to the “Analysis of Housing Supply” dated December 2024.**

**Introduction**

In essence, if we are to believe the success the City Council continually lauds upon its adopted Plan, there should be no reason for LDP2 and the unnecessary further drain on public finances that is required to undertake this costly exercise.

This is no more evident than in the instance of assessing housing needs for the next 15 years, but this is all lost in the draft Preferred Strategy.

This document identifies that 11 410 new homes are required to be built in this period, of which 5355 will need to be affordable. **PCC challenge these figures.**

The 11 410 figure includes a *20% flexibility allowance to allow for instances that may arise where site specific circumstances, unknown at the Plan making stage, delay the delivery of some sites.* **PCC further challenge this allowance**, **which we will explain later.**

In assessing the housing supply requirement and the contribution made by the existing SD sites allocated in LDP 1, the City Council has taken into *account the potential for delivery issues that might arise on these largescale sites, and a* further *25% deduction has been applied as a conservative approach*. **PCC further challenge this allowance, which we will also explain later.**

The Development Plans Manual sets out that:

*“An LDP should be focussed, succinct and relevant to the key issues it is seeking to address. An LDP should not repeat national policy. Plans should not be a compendium of policies to cover every eventuality. Succinct LDPs should* ***use plain language, avoid jargon, be accessible to the reader*** (Emphasis added) *and enable effective plan review and revision”.*

And goes on to say:

*“A plan will demonstrate how ……… development is deliverable, financially viable, phased and supported by infrastructure………….. An LDP which is repetitive, and complex is likely to result in more lengthy consultation and examination processes, adding unnecessary cost and delay. An LDP should be succinct and clear.”*

The draft Preferred Strategy and its supporting documents, to date, fail to meet any of the criteria set out above, in particular, the use of plain language, avoiding jargon and being accessible to the reader. If the City Council is to embrace the strategy it has set out for community involvement in its CIS, it also has to satisfy the above requirements of the Development Plans Manual.

**Background**

In August 2016, PCC provided a detailed response to the Swansea Local Development Plan 2010-2025, Deposit Plan.

PCC, under the direction and advice offered by the late Councillor Wendy Fitzgerald, urged the City Council to *undertake economic remodelling to reflect the changing circumstances affecting both population and economic growth in Swansea since the commencement of the LDP process.*

Councillor Fitzgerald vehemently challenged the population growth figures used by the City Council to support its house building projections.

The City Council ignored this request, and subsequent events have now proven Councillor Fitzgerald to be totally correct in her analysis. The City Council has confirmed there has been no population growth in this period, and consequently, and by definition, the housing figures applied to LDP 1 are overstated. This is further confirmed by reference Welsh Government’s statistical article “Estimates for Additional Housing Need in Wales (2019 based)”

LDP 1 will eventually provide more housing than was required, but this surplus provision will be a benefit to LDP 2, but that does not appear to be the case.

**PCC’s Analysis of Perceived Housing Supply.**

In July 2020, Welsh Government issued its statistical article “Estimates for Additional Housing Need in Wales (2019 based).”

Whilst Welsh government accepts that it should not be used for housing targets, it does accept that it provides a range of need for additional housing units based on past trends and best available data and should form a basis of discussion for policy decisions.

“Future Wales – The National Plan goes on to say that “*the estimates do provide part of the evidence and context on which housing policy and requirements can be based. The estimates of market and affordable housing need should inform the housing requirements set out in* *Strategic and Local Development Plans and it is expected the housing requirements will differ from the estimates of housing need”.*

And concludes by saying:

*“The housing need estimates also indicate that the provision of affordable homes should become a key focus for housing delivery.”*

It is against this background and the City Council’s failure to recognise the statistical housing data produced by Welsh Government that PCC challenge the housing need identified in the Preferred Strategy.

The base timeline of Welsh Government’s statistical date conveniently coincides with the commencement period for LDP 1.

The adopted Plan identified and allocated that in the remaining Plan period 11 515 new homes were to be built in the County, of which 2620 were to be affordable. Many of the new homes, 7109 in total, would be accommodated on the strategic sites. An additional housing allocation above that reflected in the adopted Plan for SD D of 862 new homes would take the total SD allocation to 7971, taking the total new homes now envisaged by the Plan to 12 377.

Welsh Government, however, identified that between 2019 and 2039 the total housing need for Swansea, Neath and Port Talbot, Carmarthenshire and Pembrokeshire ranged between only 2934 and 6794 new homes for the whole of this South West Wales area. Affordable housing would take up 50% of this perceived housing need.

Under normal circumstances, there should be no need to reassess the housing need to take Swansea’s allocation of the above up to 2039. We do accept, however, there is a need to satisfy the increased affordable housing requirement.

The Preferred Strategy, on the other hand, evaluates additional housing need from a baseline of 2024 and relies on the data reported in AMR 5.

AMR 5 records that 2025 additional new homes were completed during the remaining Plan period. This would logically leave 10 352 homes of the adjusted Plan allocation still to be built. (12377 – 2025). This would then be available to meet the housing need up to 2039.

AMR 5 also identifies that included within the above were 260 homes that had only been built from the SD adjusted allocation of 7 971, leaving a remaining balance from this allocation of 7 711. (7971 – 260)

These, however, are not the figures that are reflected in the Council’s “Analysis of Housing Supply” document, and this accordingly raises serious concerns and questions that need an answer.

This document identifies that the so called *current landbank total* to be only 4 497, as opposed to remaining 10 352 identified from the adopted Plan and AMR 5. This is largely taken up by the disappearance of 4 233 homes from the SD landbank total (7711 – 3478) for which no explanation has been provided, plus a further 830 dwellings from this category that fall under the 25% non-delivery allowance. In total 5063 homes have been omitted from the SD allocation in the adopted Plan. This is totally unacceptable and again is a clear indication of the abject failure of this costly exercise over a 9 year period.

The City Council needs to provide a full explanation for the disappearance of these housing numbers.

The 25% non-delivery allowance that applies to 830 of this loss raises further serious concerns over the accuracy, credibility and soundness of the information that the City Council was required to provide to ensure the delivery of a viable plan. This is required to provide certainty for communities on how development will affect their area. This criticism will also apply to the unexplained loss of the total of 4 233 homes from the remaining SD allocation.

This, of course, is of particular concern to our community as it only further reinforces the view that the Parc Mawr development will not proceed beyond its initial phase, leaving our community with all the consequences of this failure.

Finally, there is no justification to add an arbitrary 20% flexibility allowance for 1 900 additional dwellings to the housing supply. This is totally contrary to everything that the Development Plans Manual requires from a LDP.

We would remind you that the Plan should be focussed, succinct and relevant to the key issues it is seeking to address.

 It should **not** be a compendium of policies to cover every eventuality, which is exactly what the *flexibility allowance* does.

Succinct LDPs should use plain language, avoid jargon, be accessible to the reader and enable effective plan review and revision.

A plan will be based on robust evidence.

 It will shape and guide development proposals to sustainable locations, delivering the scale and type of growth and well-being required over the plan period.

 A plan will demonstrate that development is deliverable, financially viable, phased and supported by infrastructure.

 An LDP which is repetitive, and complex is likely to result in more lengthy consultation and examination processes, adding unnecessary cost and delay.

 An LDP should be succinct and clear.

The complexity of the Council’s “Analysis of Housing Supply” document appears to provide an inaccurate representation of the facts, which deliberately avoids addressing known failures that have been identified of the adopted Plan (LDP1).

The approach adopted by the City Council, to date, fails to meet many of the criteria that it is required to provide. It also becomes abundantly clear that explanations need to be also provided to address the loss of allocated housing numbers from the adopted Plan, without which there can only be an assumption that the Plan has failed. Until this is fully explained and there is an acceptance of this failure, only then is it possible to properly address the consequences of everything that flows from this failure.