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

Further to our response to the “*Analysis of Housing Supply*”, made on the 16th of April 2025, Penllergaer Community Council (PCC) would submit additional critical observations for the Council’s consideration.

We refer to Para 6.8 of the Pre-Deposit Plan (Preferred Strategy) dated December 2024, in particular the following concluding statement:

“*From this analysis, a* ***longer-term population growth trend scenario*** *(option 2) has been identified, which projects forward based on a much longer historic period (2001/02 – 2021/22) and uses the more current Census data. This suggests growth of 8,430 dwellings over the Plan period which would support the growth of 8,085 jobs.”*

PCC consider the Council’s reliance on this to be truly remarkable and totally unacceptable.

Using historical data that reflects historical trends and events to forecast the future where immigration was at record levels and other contributory factors to population growth prevailed is not the way forward.

We would again remind you that 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.

The Council’s failure to properly consider this data will lead to an over allocation of housing land in its Plan, adding to the landbanks built by developers and inevitably, in light of the Council’s continuing preference to actively consider greenfield sites, a further and greater loss to both biodiversity and agricultural land.

18th of April 2025.