HBF Home Builders Federation
Cymru | Wales

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. – 1533

Pembrokeshire County Council Replacement Local Development Plan

Matter 2: Housing need, supply and Affordable housing

1. Is the housing requirement in Policy SP 2 appropriate and justified?

a. Should the requirement be adjusted to account for the 2022-based local authority household projections for Wales?

The HBF believes that the plan should be based on the latest information available. As stated in para 5.28 of the Development Plans Manual Edition 3.

d. Should the requirement be increased to facilitate delivery of affordable housing to meet the needs in the Local Housing Market Assessment (SD27)?

If these additional 1,000 jobs have not been allowed for in the current calculations of the housing requirement, then this should be reviewed. As stated in para 5.49 of the Development Plans Manual Edition 3. 'LPAs should not consider employment forecasts in isolation, but the relationship between economic and demographic/population projections.'

e. How has the flexibility allowance been decided? Is it justified based on local circumstances?

The HBF notes that the 10% is described as the starting point in para.5.59 of the Development Plans Manual Edition 3. In view of the 67% reliance on urban sites (brown field) the HBF consider it would be sensible to increase the flexibility allowance to 15%.

Affordable Housing

6. Is the Financial Viability Report (SD28, ED10a and ED10c) based on robust and credible evidence?

a. Are the component assumptions on costs, values, planning obligations and other associated requirements realistic and justified?

The HBF suggests that the additional cost associated with Part L, F & O Building regs have not been properly considered. In the recent Swansea Viability meeting a figure of £65 per sqm. (£5,720 3 bed 88m2) was agreed to be used, HBF's understanding is that this is based on the Welsh Governments own cost analysis of the proposed changes.

The HBF also questions what evidence there is to support the following paragraph of document ED10a.

3.12 In the absence of a final decision on what level of change will be introduced to the Building Regulations, BHL maintains its view that extra costs arising from the changes ought to be matched by an increase in the market values for the new, more energy-efficient homes. Whilst this may not apply to all dwelling types equally, BHL considers that the overall uplift in construction costs for a majority of developments will be recoverable through higher selling prices that reflect the cost savings for the occupiers of the new homes.