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 3: Water quality and protection of water resources

5. Does the Plan evidence identify necessary developer contributions that may be needed to improve and restore SACs? Have the impacts of likely costs on development viability been assessed?

> *The only reference to developer contributions that the HBF can find is in the Councils report to committee which is referenced in document (ED26) Council note on nutrient credit trading scheme. Although the actual committee report appears to have not yet been uploaded to the examination web site. The report includes the following estimated costs of:*
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> Nitrogen - a single dwelling would need to mitigate for an average anticipated load of 3.15 kg giving an estimated cost per dwelling of £1,025.32
>
> Phosphorus - A one dwelling requirement for phosphorous (using an average load across Local Development Plan 2 (excluding Package Treatment Plant proposals) would be an estimated 0.29kg requirement per dwelling which would cost £4,442.23.

8. Is reliance on the production of Supplementary Planning Guidance to provide further detail on measures, mitigation, developer contributions and delivery, reasonable as a measure to conclude there would be no adverse effect on site integrity?

The HBF notes that it is common practise to rely on SPG's to provide additional information to support a plan policy. It would however be helpful to understand the timeframe associated with production of this SPG to ensure it doesn't delay affected development coming forward. Examination document (ED25) Outline of supplementary Planning Guidance on water quality, appears to be a positive step forward in the production of the SPG.