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 4: Other housing policies and Gypsy and Traveller accommodation

1. Is Policy GN 15 sufficiently clear? Are the policy and supporting text consistent with, and based on, up-to-date evidence?

a. How would the 'local community' needs be determined within the first paragraph? Is this a reasonable basis upon which to assess needs?

> *HBF suggests the first paragraph could be reworded as follows:*
>
> *New and existing residential development should contribute to the creation of balanced communities by were possible meeting market and affordable housing needs.*

2. Is criterion B effective?

a. How would an applicant demonstrate an 'appropriate mix' of housing types, tenures and bedroom numbers?

> *The HBF suggests that the use of the word 'appropriate' make it difficult for a developer to fully understand the policies requirements making it harder to prepare a planning applications bring forward development. HBF suggests deleting the word 'appropriate'*

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3. Is criterion C effective?

a. How would an applicant be able to demonstrate an 'appropriate balance' of housing? How would this be applied by proposed use and/or location?

For the reason given in answer to question 2 a HBF suggests deleting the word 'appropriate'

c. What development cost assumptions have been made in the Financial Viability Report (SD28 and ED10a) to reflect the requirement for 20% of private units to meet Lifetime Homes standards or equivalent?

Based on HBF understanding of the high-level viability work in which it was involved no specific allowance has been made for any extra cost associated with this requirement.

5. Is criterion E effective?

b. Is the policy clear on which standards apply to specific housing types?

The HBF do not consider it is, however, para 5.101 of the following supporting text suggest that it is a space standard which is yet to be written specifically by the Council. If this is the case, was then this will result in extra cost and delays to the delivery of new homes particularly for any builder who uses standard hose types all of which will have to be redesigned not just for planning but for all the other technical approval processes including Building Regulations.

c. Is it necessary to duplicate Building Regulations provisions within this policy?

It appears from the supporting text at para 5.101 that the Council plan to go over and above Building Regulations and create their own space standard. If this space standard results in a larger property, then this is likely to affect viability as well as site coverage/densities.