

Home Builders Federation Representor ID: 78

Hearing Session 4

AFFORDABLE HOUSING, GYPSY AND TRAVELLER ACCOMMODATION AND SPECIALIST HOUSING PROVISION

Matters & Issues Agenda

With regard to the Inspectors Agenda the HBF would make the additional comments with regard to the questions listed below.

Affordable Housing

4. Are the required affordable housing contributions founded on a credible assessment of viability?

Although the HBF note the various reports and updates which have been carried out, due to the different methodologies and presentation used it is a very difficult to compare the studies. It is however clear that the studies have looked at the issue in different ways and with a 2 year gap yet have surprisingly reached the same conclusion.

a) Are the affordable housing contributions sought by Policy H4 based on robust viability evidence?

See answer above.

b) How have the levels of contribution taken into account rising build costs, planning obligation and other associated requirements?

The HBF note that there has been no allowance made for 'Abnormal development costs' even though the report identifies a list of exactly the type of additional costs encountered on nearly all site. The dismissal of unknown infrastructure costs related to drainage and other services is also a surprise particular due to the rural nature of the authority. The uncertainty over such costs was highlighted in the recently published WG study Longitudinal Viability Study of the Planning Process.

c) Are the levels of contribution for Central Powys and South West Powys appropriate?

The HBF maintain their objection to the 30% level in the Central Area but support the removal of the requirement for affordable housing in the South West.

d) Is the proposed site threshold of 5 or more dwellings or sites over 0.25 hectares supported by robust viability evidence? And how will this work in practice?

The HBF support the decision to retain the threshold at 5 units or more, particularly as the viability testing shows that to go below this level is likely to increase the likelihood that sites will be unviable. Such an approach also supports current thinking that SME's are critical to the delivery of housing in Wales and even more so in rural areas where larger national house builders are less likely to build.

f) Does Policy H4 provide an appropriate framework for affordable housing contributions? or should the requirements of Criteria 2 (part), 3, 4 and 5 be contained in the reasoned justification?

The HBF agree that the wording in the paragraph at the end of criteria 2 along should be included in the supporting text rather than the policy as this is not a specific policy requirement. Further with regard to Criteria 5 the word 'must' should be replaced by 'should' to allow some flexibility.