

## **Matter 19-Implementation and Viability**

*Issue- Taking account of the cumulative scale of obligations and policy requirements, is the Plan deliverable?*

Relevant policy: DS5PU

**19.1 Has Stage 2 Local Plan Viability Study (EVA2) 2022 (and predecessor documents) been subject to consultation/stakeholder engagement to ‘sense check’ the assumptions and approach used? How has any feedback been taken into account?**

1. The HBF considers that this is a question for the Council.

**19.2 Are the financial appraisal assumptions set out in Section 6 and Tables 6.7 and 6.10 of the EVA2 realistic and based on robust evidence?**

2. The HBF is concerned by some of the assumptions set out in tables 6.7, these include in relation to the cost of an EV Charging Point and the BNG contribution. It is noted that Cushman and Wakefield provided a more detailed response at Regulation 19 in relation to the viability assessment on behalf of a number of HBF members.

**19.3 Are the site assessments set out in section 7 robust? How have the costs per dwelling been arrived at?**

3. The HBF considers that this is a question for the Council.

**19.4 Overall, taking into account the cumulative scale of obligations and policy requirements, is the Plan deliverable?**

The HBF continues to have concerns in relation to the numbers of sites that are identified as potentially being unviable or marginal. The HBF is concerned that this could lead to issues with the deliverability of the Plan.