

## Home Builders Federation

### Matter 7

#### **Matter 7: The Delivery of a Sufficient Supply and Mix of Homes**

##### **Issue 1: The robustness of the Housing Trajectory and whether there would be a deliverable supply on plan adoption and developable supply thereafter to meet the housing requirement.**

##### **7.1 Will the housing requirement in the Plan at 6,795 dwellings be delivered through the proposed sources of supply listed in Policy H1 over the plan period?**

The Council must provide a detailed trajectory for this to be properly considered. The only indication as to delivery timescale provided the SHLAA is whether they are considered to be deliverable or developable. No detail is provided as to when sites are expected to commence and the annual rates of delivery across the lifetime of the development. Without the necessary detail it is not possible to state whether the level of supply proposed in the local plan is deliverable or developable.

##### **7.2 Is the proposed housing trajectory at Appendix 4 soundly based and consistent with Strategic Housing Land Availability Assessment evidence and latest annual monitoring on housing land supply? Are any factual updates required to the trajectory?**

As outlined above the trajectory included at appendix 4 lacks the necessary detail for the effective scrutiny of housing supply on the island over the plan period and whether it is consistent with the SHLAA. The latest Housing Land Supply Position Statement (ED3a) does provide more detail on land supply between 2024/25 and 2027/28 setting out the sites that contribute to supply over this period. HBF recommend that a similarly detailed housing trajectory is required which provides details of the trajectories for all the sites that contribute to the delivery of development over the plan period. However, from the evidence provided in ED3a the council expect delivery to be higher in years



1 to 5 than what is proposed in Appendix 4 and is an indication that the whole trajectory will need to be updated to take account of any new information.

7.3 The trajectory at Appendix 4 is a relatively high-level table, with years 6- 10 and 11-15 amalgamated so there is no individual year profile. Would it be necessary for soundness to present the trajectory as a either a graph or a Gantt chart showing what the annual housing requirement is (whether that is a consistent average or, if required, a stepped requirement), and in a format that will show when the various sources of supply will come forward each year over the plan period? Would it be possible in the trajectory to specifically show when any particularly large or critical sites to overall delivery would contribute to the meeting the housing requirement? (for example: Medina Yard (535 homes), Key Priority Sites 1 and 2; Land at Horsebridge Hill (200 homes); Westridge Farm, Ryde (475 homes); Pennyfeathers, Ryde (800 homes)).

As a minimum the trajectory included in Appendix 4 should set out expected delivery for each year across the plan period. However, as is suggested in paragraph 74 of the NPPF, HBF would recommend that detail is also provide setting out expected delivery rates on each of the allocated sites.

7.4 Would at least 10% of the housing requirement be met on sites no larger than one hectare (NPPF paragraph 70)?

This is for the Council to answer.

7.5 Is there compelling evidence to make an allowance for windfall housing in the plan period as per NPPF paragraph 72? Is the windfall figure of 100 dwellings per annum soundly based? Is the 100 figure an amalgam of existing small sites with planning permission and additional unanticipated delivery on small sites of less than 10 dwellings?

The 100 dpa windfall figure would, based on paragraph 7.12 of the IPS, seem to be based on historic delivery rates which indicates windfall rate of 96 dwellings per annum. However, we could not find the data to support this. If the Council are to include a windfall allowance it must provide the compelling evidence to support its position.

7.6 Overall, would the submitted plan provide for a robust five-year supply of deliverable housing land on plan adoption (in 2025)?

Without a more detailed trajectory covering the 5 years post adoption, assumed to be 2025/26 to 2029/30 it is not possible to say whether there will be a five year housing land supply on adoption. At present the most recent data provided by the Council (ED3a) only includes information on supply for the first three years post adoption.

7.7 The Plan advocates that part of the Island's housing delivery issues arise from the rate at which planning permissions are implemented. Is this a serious issue for the Island and would Policy G5 provide a justified and effective approach to incentivising delivery that would be consistent with national planning policy?

G5 is based on the provisions in the Levelling Up and Regeneration Act (LURA) 2023 that provide powers to local planning authorities to require annual progress reports and to refuse permission where the Council considers the applicant to have a past history of non-implementation or slow delivery. Whilst HBF understands the importance of delivering new homes we are concerned with some of the provisions in G5 do not provide sufficient flexibility and will lead to delays in application being submitted where there is uncertainty as to when a development will commence and the rate at which the scheme will be built out. In particular HBF do not consider it necessary for all major residential development to have a detailed timetable as part of the planning application or for there to be a condition imposed requiring an annual progress report in line with S114 of the LURA. Such reporting may be appropriate on key large scale developments but to require these from all residential schemes of 10 or more units is an unnecessary administrative burden for both the developer and council.

7.8 In the advent that a five-year supply of deliverable housing land could not be demonstrated, would the final part of Policy H1 provide a justified and effective approach? Is criterion 1 consistent with national planning policy in terms of otherwise seeking to significantly boost the supply of housing?

HBF welcomes the intent of the final section of H1 to bring forward additional sites where the Council fails to demonstrate there is a five year land supply. However, given that the Council recognise that they are not meeting housing needs in full HBF would suggest that should a site that meets criteria 2 to 5 in H1 should be permitted

regardless of their being a five year land supply. If the policy is retained then part 1 of this final paragraph is considered to be overly restrictive, especially given that that Council recognise that they are not meet needs and that the proposed requirement is a minimum.

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