

# Hearing Statement Matter 7: The delivery of a sufficient supply and mix of homes

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Examination in public

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#### Matter 7 – The delivery of a sufficient supply and mix of homes

This hearing statement represents the Isle of Wight Council's response to **Matter 7** of the Draft Island Planning Strategy (IPS) examination in public. Answers have been provided to each of the *questions* asked in document <u>ED4 'Inspectors Matters, issues and Questions</u>' published on 19 December 2024.

Where documents in the IPS examination library are referenced as part of the answer, the document reference and title are used, and a hyperlink provided to that document.

Where the National Planning Policy Framework (NPPF) is referenced, unless stated otherwise this refers to the December 2023 version of the NPPF that the IPS is being examined under.

Where the council's response suggests proposed modifications to the plan, these are in blue text and shaded accordingly.

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

Q7.1: 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?

#### **IWC** response

In the submission IPS the housing requirement for the plan period (2022-2037) in Policy H1 is 6,795 net additional dwellings. As set out in our answer to Question 2.4, the revised total housing requirement in the IPS on a wholly forward-looking basis would be at least 5,889 net additional dwellings over the revised plan period (2024-2037) at a rate of 453dpa (unchanged).

This requirement would be delivered from three sources of supply across the plan period, as set out below:

Source of housing supply	Submission IPS	Q2.4 update
Large sites with planning permission	2,596	2,146
IPS allocations	2,707	2,982
Windfall	1,500	1,300
Total	6,803	6,428
	(0.1% buffer)	(9% buffer)

To inform the table above, and provide context for other answers within this hearing statement, the council have prepared an updated and more site specific housing trajectory which is attached as Appendix 1 to this hearing statement and is recommended to replace existing Appendix 4 of the submitted IPS. The reduction in supply from 'large sites with planning permission' shown in the table above is largely a result of the passage of time and, for example, the expiry of the Medina Yard planning permission (P/00496/16- 535 units, previously projected to deliver 400 in the plan period and now none). The increase in supply from allocated sites, despite no increase in the number of allocated sites, is a result of some sites now projected to deliver more in the plan period, particularly the Pennyfeathers site (HA119), due to representations made at the Regulation 19 stage from the site promoter (IPSR34).

Given the content of Appendix 1 to this statement, the council consider that the housing requirement in the IPS will be delivered through the proposed sources of supply listed in Policy H1.

Q7.2: 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?

#### IWC response

At the time of publication, the housing trajectory in Appendix 4 of the IPS was soundly based and consistent with the most recent SHLAA and monitoring data

To ensure the examination and any adopted plan is based on the most up to date information, and to provide context for other answers within this hearing statement, the council have prepared an updated and more site specific housing trajectory which is attached as Appendix 1 to this statement – this incorporates factual updates from monitoring work (including data from 2023/24 and additional large sites that now benefit from planning permission) and also considers representations made at the Regulation 19 stage relating to some proposed allocations (for example IPSR34 relating to the Pennyfeathers allocation – HA119).

Q7.3: 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 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)).

#### IWC response

The council have prepared an updated and more site specific housing trajectory which is attached as Appendix 1 to this hearing statement and is recommended to replace existing Appendix 4 of the submitted IPS.

This trajectory is presented in a format that shows when the various sources of supply are expected to come forward in each individual year of the plan period, rather than grouping later years together. The council would note that the further into the plan period you go, the less certain the numbers can be for a wide range of factors, including some larger proposed allocations where the yield from such a site may vary from that included at the plan-making stage.

A number of large sites with planning permission and proposed allocations (all sites in excess of 100 units) are also now highlighted individually to demonstrate how and when these sites are currently projected to make a contribution to meeting the housing requirement in the plan.

The council would highlight that this updated indicative trajectory provides reasonable evidence that sufficient, deliverable housing land exists for the housing requirement in the IPS to be delivered on an annual basis across the plan period (including a small buffer of just under 10%).

Whilst the trajectory shows that years three to eight of the plan period demonstrate a level of supply in excess of the IPS annual housing requirement, this is reflective of the large number of sites that already benefit from planning permission that could deliver in these years. The split of supply between permissions and allocations in years one to eight is almost 50/50 (1,941 homes and 1,832 homes respectively). The decision to submit an application / implement a permission is a commercial one based on a wide range of market conditions, and whilst these decisions are outside of the control of the council, they will impact when the sources of supply deliver homes.

Q7.4: Would at least 10% of the housing requirement be met on sites no larger than one hectare (NPPF paragraph 70)?

#### **IWC** response

Yes. Paragraph 7.12 of the IPS provides information on the proportion of the housing requirement that will be met on sites of less than one hectare and indicates that this would total over 30%, so comfortably in excess of the minimum 10% stated in national policy.

As set out in our answer to Question 2.4, if the plan period is updated to be only forward-looking the revised total housing requirement in the IPS would be 5,889 net additional dwellings over the revised plan period (2024-2037) at a rate of 453dpa (unchanged). 10% of this number would equate to 589 dwellings.

For completeness, updating paragraph 7.12 on the basis of the revised forward-looking plan period, total housing requirement and updated housing trajectory provides the following detail in terms of the three sources of housing supply for sites under 1 hectare:

**Allocations:** Of the proposed allocations within the IPS, eight are under one hectare with a combined yield of 176 dwellings (listed below).

Proposed allocation	Site size	Yield
HA002	0.83ha	10
HA018	0.14ha	25
HA055	0.64ha	24

HA077	0.73ha	20
HA084	0.37ha	50
HA116	0.27ha	25
HA117	0.28ha	10
HA118	0.24ha	12
	Total	176

**Permissions**: Nine large sites with planning permission are under one hectare with a combined yield of 129 dwellings.

**Windfall:** As set out in our answer to Question 7.5, it is also anticipated that the majority of windfall development will come from small sites of 9 dwellings or less, with a high proportion of those being sites delivering 0-4 units. Taking a conservative 75% of the windfall allowance of 100 dwellings per year in each of the 13 plan period years would equate to 975 dwellings.

Source of supply from sites less than one hectare	Total
IPS allocations	176
Large sites with planning permission	129
Windfall	975
Combined total	1,280
% of IPS housing requirement	22%

Given the evidence above, the council considers it can adequately demonstrate that at least 10% of the housing requirement within the IPS will be delivered on sites of less than one hectare and is therefore consistent with national policy.

Q7.5: 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?

#### IWC response

Yes the council consider that there is compelling evidence to justify the windfall allowance in the IPS and this is set out in paragraph 7.10 of the IPS and updated further in the table below. The table looks at historic completions from what would primarily constitute 'windfall' sites from an IPS perspective, i.e. small sites of less than 10 dwellings. Over the past eight monitoring years, the average annual number of completions from such sites is 158dpa, with a peak of 203 and a low point of 81 (these figures include an additional monitoring year to the numbers within paragraph 7.10 of the IPS).

By including 100dpa as the windfall allowance the IPS takes a conservative estimate of 63% of historic delivery on such sites. This recognises the less permissive policy approach in policy G2 with regard to settlement boundaries than appears in the Core Strategy, albeit many of these

small sites could still be delivered outside of settlement boundaries by aligning with IPS policies H4, H6, H7, H9 and H10.

Housing completions		Total	dpa							
on the Isle of Wight	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	Total	ари
Sites 5-9 units	28	45	24	11	75	38	42	65	328	47
Sites 0-4 units	107	101	116	70	128	86	66	106	780	111
Total from sites >10 units	135	146	140	81	203	124	108	171	1108	158

The figure of 100 is expected to be made up of existing small sites with planning permission, unanticipated delivery on sites of less than 10 dwellings plus any other policy compliant major development on an unallocated site that could come forward in the plan period, recognising that the housing requirement in the IPS is a 'floor' rather than a 'ceiling'. For the first of these components, Appendix 3 of <u>ED3A HLS Position Statement April 2024</u> identifies 226 units with permission on sites of 5-9 units that are expected to be completed in the next four years, at an average of 57 a year – in excess of the 47 dpa average from such sites over the previous eight years.

The council therefore believe that the windfall figure of 100 dwellings per annum is soundly based as it is uses up to date evidence and represents a justified and reasonable strategy for the plan period.

Q7.6: Overall, would the submitted plan provide for a robust five-year supply of deliverable housing land on plan adoption<sup>1</sup> (in 2025)?

#### **IWC** response

Yes, based on the updated housing trajectory, attached as Appendix 1 to this hearing statement, the council considers that the IPS, on adoption, would provide for a robust five-year supply of deliverable housing land. Should the plan be adopted in late 2025, then years 2 to 6 in the revised housing trajectory show a housing land supply sufficient to accommodate 3,121 dwellings against a five-year requirement of 2,718 dwellings (which includes a 20% buffer due to the council's Housing Delivery Test results).

Taking note of paragraph 78 of the NPPF (December 2024 version) and the requirement for the council to demonstrate six years supply (given the housing requirement in the IPS being less than 80% of the new standard method) from 1 July 2026, Appendix 1 to this statement demonstrates that the housing land supply position in 2026/27 would be in excess of six years (3,353 dwellings against a six year requirement of 2,718 dwellings).

Q7.7: 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

<sup>&</sup>lt;sup>1</sup> PPG paragraph 68-004-20240205

Policy G5 provide a justified and effective approach to incentivising delivery that would be consistent with national planning policy?

#### **IWC** response

Paragraph 6.33 of the IPS provides the context that there are a significant number of dwellings with planning permission on the island which are yet to be commenced (at the time of writing in January 2025 this figure was over 1,500 dwellings from 22 different large sites with planning permission). However as documents <u>HO16 Approach to Housing in the IPS May 2024</u> and <u>HO1 IWC assessment of supply – Three Dragons report</u> identify, this is not a situation that is unique to the island. What is unique is the island housing market, for all of the reasons explained in full in our housing evidence papers (HO16 – HO19).

As paragraph 6.33 notes, given the delivery focus of the plan (and relatively high 'conversion rates' against national averages) it is considered to be effective and justified to include a policy that strongly encourages the implementation of permissions once they are granted to help maintain this position. As set out in our Matter 2 hearing statement, simply 'turning on the supply tap' by allocating or permitting significantly more homes will not (and historically has not) result in more homes being delivered due to the particular (and probably unique) characteristics of the island housing market. Therefore continuing to ensure what is permitted gets built is absolutely essential.

Policy G5 is considered to be consistent with national policy – not least the overarching thread in paragraph 11 of the NPPF for the presumption in favour of sustainable development, but more specifically paragraph 75 which requires strategic policies to include a trajectory of the expected rate of housing delivery over the plan period. Policy G5 works in conjunction with the IPS trajectory (see Appendix 1 to this statement) to ensure the requirements of NPPF paragraph 75 are met. Paragraph 79 of the NPPF also requires local planning authorities to monitor progress of sites that have permission and paragraph 81 expects consideration to be given to the imposition of planning conditions to ensure timely delivery and investigation of the past performance on sites for major development with earlier planning permissions that were not built out. The criteria in Policy G5 are directed at relevant, proportionate and appropriate information being submitted by applicants to allow the council to closely monitor progress and help assessment against the Housing Delivery Test.

Q7.8: 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?

#### **IWC** response

The council consider that the final part of Policy H1 (on page 115 of the IPS document) is a justified and effective approach – if the council is unable to demonstrate a five year housing land supply, then it may be necessary to permit additional housing sites to enable a sufficient supply to be demonstrated. The council believe that it is effective and positively prepared to include in policy wording the parameters within which it would consider additional housing sites coming forward to address any deficiencies in land supply.

The council do consider that a clarification is required to the policy wording to ensure that it is clear that these additional sites may be those that do not align with the spatial strategy of the plan (as set out in Policy G2). This clarification takes into account the fact that the housing requirement in the IPS is a floor not a ceiling, and additional sites that align with G2 (and are otherwise policy compliant) may come forward and be supported regardless of the housing land supply position. A further clarification is also suggested to supporting paragraph 7.17 to make it clear that this part of the policy would be applied in conjunction with the presumption in favour of sustainable development, as set out in paragraph 11 (d) of the NPPF (December 2024 version).

Criterion 1 is consistent with national planning policy in terms of helping to ensure a plan-led system that delivers sustainable development. The criterion provides a clear parameter to ensure that any development considered under this part of the policy must be commensurate to the shortfall in five-year supply. For example, if the identified shortfall is modest (25 or 50 dwellings), it is unlikely to be appropriate to release a site for 100 or 150 dwellings on land that would not otherwise be suitable for development, having regard to the spatial strategy in G2.

The adoption of a local plan will set the housing requirement that then informs both housing land supply calculations, and the Housing Delivery Test. As paragraph 69 of the NPPF notes, a sufficient supply is required. The council believe it is therefore justified to include a clear requirement for any such sites coming forward under this part of the policy to be relative to the deficiency in housing land supply, so as to ensure a continuation of plan-led, sustainable development.

#### Proposed modification (additional text underlined):

#### **Policy H1**

'Should it be demonstrated that the council does not have a five-year supply of land for housing against the requirements of Policy H1, additional housing sites that do not comply with the spatial strategy set out in Policy G2, may be supported where the following criteria are met:

#### Paragraph 7.17

In this situation the policy sets out the approach of the council to addressing that issue, which will be applied in conjunction with the presumption in favour of sustainable development that is set out at paragraph[h 11(d) of the NPPF.

### Issue 2: Whether the plan would deliver an appropriate mix of house tenures and types

Q7.9: Is the approach to affordable housing on the Island through the definition in Policy AFF1 and the site threshold (10 or more dwellings) and percentage (35%) in Policy H5 justified and effective having regard to specific circumstances and level of need for affordable housing identified for the Island? Have reasonable alternative approaches to Policy AFF1 and Policy H5 been appropriately considered through the Integrated Sustainability Appraisal?

#### IWC response

The approach to affordable housing on the Island is justified and effective. The definition set out in Policy AFF1 provides a graduated scale of discount linked to property size (number of bedrooms). Paragraph 3.16 and Table 2 in CD1 Island Planning Strategy submission version July 2024 sets out how the households being identified with the most urgent need translates into the different property sizes required to meet that need, forming the basis for a scaled approach.

Paragraph 3.20 is clear in the justification for affordable discounts deeper than the minimum in the NPPF, stating "Detailed work undertaken by the council in the Affordable Housing Assessment 2019 demonstrates that appropriate affordable rent levels for the Island are actually at higher levels of discount from market value and it is essential that this is reflected strategically in the plan so that affordable housing that is delivered is meeting the needs of Island residents."

The 35% affordable housing requirement was originally identified by the evidence base work carried out for the regulation 18 consultation version of the plan consulted on in 2018/19. The issue of local affordability was identified, evidenced by the council's monitoring reports (2015/16, 2016/17 and 2017/18), a housing needs assessment and a report<sup>2</sup> prepared by the Task and Finish group on Affordable Housing for the Policy and Scrutiny Committee for Regeneration, Housing, Planning and the Environment.

The starting point was the adopted core strategy policy DM4 and it's requirement for proposals to provide 35% of the development as on-site affordable housing, based on developments of 15+ units in Key Regeneration Areas and 10+ units elsewhere. Consideration was given as to whether that is a viable policy position to take forward in the local plan review process (which began in 2016). The council have added the deeper discounts through AFF1, and the viability appraisal demonstrates that this represents a viable policy position for the affordable housing provision to be set at 35% when set against all of the other policies of the plan.

The latest Monitoring Report (2022/23) and emerging figures underline an increasingly worsening situation in terms of delivery of affordable homes (69 units of affordable/social rent in 2022/23 and 48 units in 2023/24) against identified need, "The 2022 HNA indicates that to meet the affordable housing need, an annual figure of 489 dwellings should be provided although the assessment does highlight a number of issues that need to be remembered in interpreting the housing needs analysis. The figure is higher than the previously identified target of 222 units (this is shown in Graph 5). It is still clear that the provision of new affordable housing is an important issue for the council." (Isle of Wight Council Monitoring Report 2022 – 2023).

Balancing the increasing need for affordable housing on the island with making sure that policy H5 is viable is critical. The council have sought to balance requiring as much of a contribution from development proposals towards affordable housing, with the viability of development, aware that 35% of something rather than 40% (or any other %) of nothing is a betterment. Anything over 35% would risk the suite of policies being unviable, while paragraph 7.63 of the supporting text to

Homes For Island Families report was prepared by the Task and Finish group on Affordable Housing for the Policy and Scrutiny Committee for Regeneration, Housing, Planning and the Environment.

<sup>&</sup>lt;sup>2</sup> Delivering Affordable

policy H5 does provide a mechanism (through an open book viability assessment) for a proposal where delivering the 35% on-site is not possible.

This conforms to paragraph 63 of the NPPF where it states "Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; ..."

GS12 IPS Viability Assessment Update report July 2022 states "Based on the assumptions set out in this report and the financial appraisals appended, we recommend that the Draft Island Planning Strategy is viable on the basis of 35% affordable housing in line with draft IPS policies AFF1 and H5." (paragraph ES 25).

EA2 IPS Integrated Sustainability Appraisal ISA July 2024 provides the following commentary on the assessment of AFF1 "As part of the evidence base looking into the island housing market and the barriers to delivery that exist (UoP & Three Dragons reports), work was undertaken to appraise why levels of affordable housing delivery had been so low since 2015 and what some of the implications of this were on the island housing register. Public and stakeholder consultation responses during Regulation 18 periods also highlighted the severe lack of truly affordable housing for many island residents. The purpose of this new strategic policy is to set an island definition for affordable housing with regards to discounts from market value. The policy is necessary due to evidence supporting the IPS (2019 Affordability Assessment & 2022 update) that demonstrates 'policy compliant' affordable housing in line with the generic NPPF definition (up to 80% of market value) that has been secured in previous years does not meet island needs, where income and house prices suggest deeper discounts are required." (para. 8.4.5). Followed by the determination on consideration of alternatives in paragraph 8.4.6 "The alternative is to not set an 'island definition' and continue to fail to meet the needs of island residents." Thus the approach is justified in terms of an appropriate strategy, taking into account the reasonable alternatives.

While consideration of alternatives to the plan in its entirety, via potential scenarios (e.g. 'no plan', 'business as usual' i.e., continuing with the existing Core Strategy, moving forwards with Draft IPS or a new/ revised plan), have been assessed, as has different spatial options and alternative sites, alternatives for every policy were not tested as this would lead to arbitrary assessments on alternatives that were either not realistic (e.g. no affordable housing provision) or so marginal (e.g. 40% or 30%) that it would likely lead to a disproportionate effort in determining marginal differences. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The supporting evidence, in this case viability (GS12), provides sufficient reassurance that there are no reasonable alternatives to the 35% proposed in policy H5.

Q7.10: Will the Plan be effective through Policy H8 in delivering a housing mix that reflects the evidence in the Local Housing Needs Assessment [Document HO13]?

#### **IWC** response

Yes, Policy H8 is considered effective in delivering the housing mix reflecting evidence in HO13. Table 5 in HO13 sets out a suggested mix of housing by size and tenure for market and affordable housing by size. This is reflected in Policy H8 except for an adjustment for market housing by reducing 2 bed houses by 5% and increasing 4+ bed houses by 5%. This reflects a continuing demand for family housing on the island from the larger proportions of people aged between 25 and 34 in the larger settlements of Newport and Ryde (HO13).

Policy H8 provides some flexibility in case of local or market changes by identifying the use of parish housing needs surveys or alternatively any evidence that justifies a different approach in schemes for 10 or more dwellings. Therefore, adjustments to the housing mix can be considered where this is clearly evidenced but clear guidance is set in policy to outline what is expected in development proposals.

Q7.11: Will the Plan be effective in meeting the needs of older persons, consistent with NPPF paragraph 63 and PPG paragraph 63-001-20190626? Has consideration been given to specifically allocating sites for older persons housing/accommodation in Policy H2 to meet needs identified in the Local Housing Needs Assessment?

#### **IWC** response

NPPF paragraph 63 seeks plans to recognise the size type and tenure of housing for different groups in the community including older people (including those who require retirement housing, housing-with-care and care homes).

PPG paragraph 63-001-20190626 identifies a critical need to provide housing for older people given the increasing proportion of older people in the population. It seeks the provision of a choice of accommodation to suit changing needs to help independent living for longer and an understanding of how the ageing population affects housing needs.

Consideration of the housing needs for older people is supported by evidence included in section 10 of the <u>IOW Housing Needs Assessment 2022</u> (HO13). This identifies that there is projected to be a 29% increase in the population aged 65 or over between 2023 and 2038 on the island which will partially offset population falls in most other age groups, with the Island seeing a net increase in the population of 10,014 over the period. This trend will lead to different types of older person accommodation being needed.

Paragraph 10.12 (HO13) identifies that the level of demand of older persons housing needs can be addressed through mainstream housing (allowing for both lifetime homes and the scope for adaptations); and a residual need for specialist forms of housing for older people. Drawing this information together there is a need to increase the supply of M4(2) accessible and adaptable dwellings and M4(3) wheelchair user dwellings. In seeking M4(2) compliant homes, such homes can be considered "homes for life" and would be suitable for any occupant, regardless of whether or not they have a health problem or disability at the time of initial occupation.

The Plan proposes to meet the varying needs for older persons accommodation in different ways including:

- Policy C4: Health hub at St Mary's Hospital including an extra care village
- Policy C5 Facilitating Independent Living to support the delivery of a range of accommodation types and tenures to enable people to live as independently as possible. This includes development proposals which contribute to the delivery of the Island's Independent Living Strategy; buildings that can be adapted over time; major residential development will be required to provide at least 20 per cent of the total dwellings for private market sale built to meet Part M4(2) of the Building Regulations to ensure suitability for older people or those with mobility problem
- <u>Policy C6</u>: Providing annexe accommodation to an existing dwelling to help families provide independence and support that relatives need.

The approach the Plan takes seeks to provide suitable housing in different ways recognising that many housing needs can be met through mainstream housing taking into account other policies in the Plan, reflecting the guidance set out in NPPF para 63 and PPG paragraph 63-001-20190626.

Issue 3: Whether Policy H11 provides a sound approach to meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople.

Q7.12: Are the criteria for assessing 'windfall' proposals for gypsy and traveller accommodation at a)-g) in Policy H11 justified, consistent with national policy and positively prepared?

#### **IWC** response

No suitable sites have come forward to meet accommodation needs for gypsies, travellers and travelling showpeople, no planning applications have been submitted and the existing GTTS population on the island is settled and tolerated (and is effectively the 'identified need), therefore the council has taken a positive but robust policy approach towards new provision and this is set out in <a href="HOT Approach to GTTS">HOT Approach to GTTS in the IPS May 2024</a>. A separate development plan on Planning for Gypsy, Traveller and Travelling Showpeople will immediately follow the conclusion of the Island Planning Strategy examination. This is set out in <a href="CD3 Local Development Scheme">CD3 Local Development Scheme</a>.

In the interim, Policy H11 has been included in the Island Planning Strategy to guide any proposals should they come forward. The policy is criteria based and Policy H11 has been guided by paragraph 11 of Planning Policy for Travellers Sites which states:

"Criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community."

Paragraph 13 of Planning Policy for Travellers Sites HO7 sets out guidance for policy criteria for sites for the travelling community and Policy H11 is consistent with these.

## Appendix 1: Updated housing trajectory (to replace Appendix 4 of the submitted version of the IPS)

Source of supply	Year 1 24/25	Year 2 25/26	Year 3 26/27	Year 4 27/28	Year 5 28/29	Year 6 29/30	Year 7 30/31	Year 8 31/32	Year 9 32/33	Year 10 33/34	Year 11 34/35	Year 12 35/36	Year 13 36/37	Total
Large sites with permission	146	276	375	309	207	267	218	143	93	70	42	0	0	2146
Allocated sites	9	25	127	258	397	380	315	321	255	225	240	255	175	2982
Windfall	100	100	100	100	100	100	100	100	100	100	100	100	100	1300
Total supply	255	401	602	667	704	747	633	564	448	395	382	355	275	6428
Projected supply from large sites with	permissi	on (over :	100 dwell	ings)										
20/01061/FUL (472) West Acre Park	0	30	50	50	50	50	50	50	50	50	42	0	0	472
23/01538/FUL (202) Acorn Farm	0	60	60	60	22	0	0	0	0	0	0	0	0	202
22/00629/OUT(113) & 22/00631/FUL (36) Broadwood lane	0	0	0	18	18	30	30	30	23	0	0	0	0	149
P/01218/16, 22/01369/ARM (140) Rosemary Vineyard	0	0	0	20	20	20	20	20	20	20	0	0	0	140
P/00573/15, P/01127/16, 21/00699/ARM, 21/00031/ARM (128) Harcourt Sands	0	0	25	25	25	25	28	0	0	0	0	0	0	128
22/00733/FUL (107) Scotland Farm	31	35	35	0	0	0	0	0	0	0	0	0	0	107
Projected supply from proposed alloc	ations (ov	ver 100 dv	wellings) \	within the	plan per	iod								
HA119 Pennyfeathers (800)	0	0	0	0	0	80	80	80	80	80	100	100	100	700
KPS1/HA039 Former HMP site (750)	0	0	0	0	0	0	0	0	60	60	60	75	75	330
KPS2/HA044 Newport Harbour (250)	0	0	0	0	0	0	0	50	50	50	50	50	0	250
HA031 Land adj Carisbrooke College (175)	0	0	0	0	20	20	20	20	20	15	30	30	0	175
HA022 Somerton Farm (160)	0	0	0	30	35	35	30	30	0	0	0	0	0	160
HA020 Somerton Resevoir (146)	0	0	0	35	35	35	35	6	0	0	0	0	0	146

HA064 Land north of Mill Road (130)	0	0	40	40	40	10	0	0	0	0	0	0	0	130
HA033 Land west of Sylvan Drive (125)	0	0	10	10	25	25	25	30	0	0	0	0	0	125
HA046 Land at Crossways (125)	0	0	0	0	25	25	25	25	25	0	0	0	0	125
HA036 Land at Noke Common (100)	0	0	0	0	25	25	25	25	0	0	0	0	0	100
HA110 Land at Moreys (100)	0	0	0	0	0	20	20	20	20	20	0	0	0	100
HA005 Camp Road (100)	0	0	0	0	25	25	25	25	0	0	0	0	0	100