

## **Home Builders Federation (HBF) Response to Matters, Issues and Questions (MIQs) for the Bristol Local Plan- Matter 18: Housing Trajectory and Housing Land Supply**

HBF is the principal representative body of the housebuilding industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

We have not commented on every policy on those of interest to our members.

We have not repeated our Regulation 19 concerns which remain outstanding but have referred them where we feel this is helpful. This response should therefore be read in tandem with our Regulation 19 comments.

### **Matter 18: Housing Trajectory and Housing Land Supply**

**Issue 18.1: Whether the plan will provide for a sufficient housing land supply to deliver the planned scale of housing growth over the plan period and whether a deliverable five-year supply of housing will be available on adoption.**

*Paragraph 68a of the NPPF states that planning policies should identify a supply of specific, deliverable sites for years one to five of the plan period. Paragraph 68b requires the identification of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan.*

**Q18.1: What is the most up to date 5-year housing land requirement and supply position?**

HBF would wish to see and comment on the Council's current position in relation to Housing Land supply.

As set out in more detail in our Regulation 19 response, HBF do not believe that the Plan as the housing requirement for the Bristol Local Plan is sufficient.

**Q18.2: Would the Council be able to demonstrate a 5-year supply of deliverable housing land on adoption of the Plan? Are assumptions on deliverability appropriate, justified and consistent with national policy? In responding, could the Council ensure the most up-to-date trajectory of the supply is provided.**

As set out in more detail in our Regulation 19 response, HBF do not believe that the Plan as the housing requirement for the Bristol Local Plan is sufficient.

HBF would wish to comment on the revised Housing Trajectory once it has been provided. We note the revised trajectory is insufficient as although it provides more site information it does not include a year by year break down of housing delivery on

a site by site this basis. This is essential for the effective monitoring of housing land supply.

**Q18.3: Does the Plan identify a supply of development sites, or broad locations for growth, for years 6-10 and, where possible, years 11-16 of the Plan, from the point of adoption?**

As set out in more detail in our Regulation 19 response, HBF do not believe that the Plan as the housing requirement for the Bristol Local Plan is sufficient. As such the Plan does not identify enough sites to establish a large enough supply of development sites, or broad locations for growth, for years 6-10 and, where possible, years 11-16 of the Plan, from the point of adoption.

***Issue 18.2: Whether the Plan identifies specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan.***

**Q18.4: Is the Plan consistent with paragraph 68b in terms of the identification of a supply of development sites, or broad locations for growth, for years 6-10 and, where possible, years 11-16 of the Plan, from the point of adoption?**

As set out in more detail in our Regulation 19 response, HBF do not believe that the Plan as the housing requirement for the Bristol Local Plan is sufficient. As such the Plan does not identify enough sites to establish a large enough supply of development sites, or broad locations for growth, for years 6-10 and, where possible, years 11-16 of the Plan, from the point of adoption.

HBF's concerns about housing supply more generally are set out elsewhere in our MIQ and Reg 19 responses, which are not repeated here.

***Word Count 688 (including wording of the questions)***