IPSR40: NOW PLANNING with RAPLEYS, acting for landowners adjoining East Cowes to the east and south

**STATEMENT: MATTER 5** 

<u>Issue 1: Whether the approach to policies for the community is justified, effective</u> and consistent with national policy.

Q 5.7: Has the impact of Policy C11 on housing supply (the rate at which new homes come forward) been appropriately considered, particularly given the Council's position that issues of supply chains, access to a skilled workforce and market volatility, amongst other things, have influenced who builds on the island and recent delivery rates?

- Notwithstanding the admirable concern to speed up the achievement of net zero carbon on the island, there is no case for exceeding nationally applicable building regulations on these matters.
- 2. That is particularly so given the IPS approach to site allocations (mostly small, mostly infill and brownfield) and providing for just 53% of the island's housing need a need which is not refuted but is argued as "simply" unachievable together with the characteristics of the island's housebuilding sector. The C11 requirements would only add to costs in an already SME housebuilder dominated market costs which would be over and above those which typify the SME sector and explain the relative dominance on the mainland of the major housebuilders making it less likely that even the 53% of the housing need will be met. It is also inconsistent with the predominantly small sites the IPS allocates to suggest that the net zero carbon might be met "on average" across a site.
- 3. The aim instead of the IPS should be to do all that is in the Council's power to improve the performance (and commercial appeal) of the island's housing development sector and in doing so also to level the playing field as far as possible with the mainland's sector. Speeding ahead of building regulations which are in any case rising steadily over time to the net zero carbon challenge runs counter to those requirements. We again refer to the thoughtful advice of the actions the Council could beneficially take at Appendix A to HO1.