

Home Builders Federation

Matter 5

Matter 5: Policies for creating sustainable, strong and healthy Communities

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

5.2 Whether the requirement in Policy C3 for a Health Impact Assessment is justified for all major developments?

The approach to development established by the IPS should ensure the plan itself supports development that secures positive health outcomes rather than for this to be considered on an application-by-application basis. The HBF would suggest that an HIA is only required on larger developments of over 100 units that have not been allocated through the IPS and as such will not have had their health impacts properly assessed as part of the preparation of the local plan.

5.6 Are the requirements in Policy C11 justified, effective and consistent with national policy, including in regard to the requirement for all homes to be net zero carbon? Having regard to the Written Ministerial Statement of 23 December 2023 are the requirements presented in an appropriate format? Is the viability appraisal realistic in regard to the requirement for new homes to meet this policy?

As set out in our representation HBF does not consider the approach set out in C11 to be justified or consistent with national policy.

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?

For Council. However, given the Council's concern regarding delivery rates it is surprising that the Council has chosen to place significant additional burdens on developers such as those set out in C11 without considering their impact on the delivery of new homes on the Island.

5.8 Is the principal evidence for Policy C11 contained in the Mission Zero Climate and Environment Strategy 2021-2040 [Document GS13] and IoW Zero Carbon Homes Analysis [Document CO15]?

For Council.

Mark Behrendt MRTPI

Planning Manager – Local Plans SE and E