

Summary of Responses to the Island Planning Strategy, Regulation 18 consultation (August & September 2021)

April 2022

This document provides a summary of the responses made on the draft Island Planning Strategy (IPS) consultation which concluded on 1st October 2021 following a 9 week public consultation. The responses are set out by each section of the plan and by individual plan policy.

Overall, 2,834 comments were made on the Plan from over 600 different respondents. The table below shows the total number of responses made on each section of the IPS. The chapter generating the largest proportion of responses was Section 7 Housing together with the proposed housing allocations.

Table 1 The number of responses to the Island Planning Strategy by chapter

Plan Chapter	Support	Object	General comments	Total	%
General Comments on the Whole Plan	5	25	14	44	2%
Sections 1-3	17	89	23	129	5%
Section 4 Environment	113	142	124	379	13%
Section 5 Community	63	101	61	225	8%
Section 6 Growth	29	189	28	246	9%
Section 7 Housing	149	685	105	939	33%
Section 8 Economy	39	91	56	186	6.5%
Section 9 Transport	41	71	42	154	5%
Section 10 Delivery Monitoring & Review	2	1	6	9	0.3%
Site allocations	38	468	16	522	18%
Appendices	0	0	1	1	0.03%
Total comments				2834	

It is important to note that this summary is not a formal document of the plan making process; however it provides the reader with a summary of the consultation responses received on each section of the draft Island Planning Strategy. Not every comment received is mentioned within this summary, but every comment made has been logged and reviewed in the formulation of the Regulation 19 submission version of the Island Planning Strategy.

When the Isle of Wight Council publishes the Regulation 19 submission version of the Island Planning Strategy it will also publish a formal Regulation 18 consultation statement that sets out how and where the plan has changed as a result of the comments made during the Regulation 18 public consultation. This will also be sent on to the Planning Inspectorate to form part of the public examination process.

General Comments on the Whole Plan

Total number of comments 44

Object	25	Support	5	General comment	14
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Key issues

- Support the new plan and its user friendly style
- Support the focus on the environment and affordable housing
- Support references to the South Marine Plan but link marine licence with the Marine Management Organisation and add reference to the South Inshore and offshore Marine Plan
- The island has a housing crisis particularly for more vulnerable people
- Support the changes made to the planning strategy
- Object to the Island Planning Strategy
- Some parts of the Plan area difficult to read and contradictory. Making the Plan digital makes it difficult to access. Check plan for typo and grammar errors. Poor key to maps. The plan is lengthy to dissuade people from commenting. Documents should be available at parish council offices and community centres. Consultation events should include a summary of the overall strategy and island implications and be better advertised. Few opportunities to debate the Plan in person. The plan is too long
- The strategy is not deliverable, is too short term in outlook, does not take account of Brexit or the wider impacts on green spaces and environment. Need for achievable and sustainable carbon targets
- Policies should not include loopholes to enable unsustainable development to take place
- Undertake a wider economic impact assessment on the Plan
- Should identify in the Plan the aspects the Council will deliver and more clearly define these
- Re-prioritise the Plan sections to 4. Transport 5. Economy 6. Housing 7. Growth 8. Community 9. Environment
- The Plan should seek to keep the island green
- There are no DtC matters with NFDC. Southampton City Council support further collaboration on relevant cross boundary issues
- Bus transport is neglected in the Plan and more reference is needed to site specific public transport improvements. Priority should be given to bus access in town centres and cultural areas and new development made bus friendly
- Add reference to empty and derelict buildings to the issues the island faces
- Developers should pay a bond to ensure highways and utilities can be connected
- The island should become an `Island Park`
- The charm and ecological beauty of the island is at risk of overdevelopment
- Need to create better jobs on the island
- The plan should focus on improving the lives of islanders rather than prioritising aspirational housing
- The plan does not consider deprivation / need for affordable housing in appropriate locations, beautiful landscape with areas of SSI, reliance on tourism and the finite amount of space, infrastructure and services available. The island roads are at capacity
- Add planning for young people as a key local plan theme

- The Plan should be used as an advisory document ahead of being formally adopted
- Add new policy on protecting amenity for future residents and neighbouring uses to align with national policy
- Freshwater definition including Totland and Colwell does not align with parish boundaries. Freshwater has a community led approach to planning and this is ignored
- The evidence base should include documents produced by Historic England to give context and significance of the sites
- The Plan is too focussed on housing. Plan should be updated to take account of changes due to the pandemic
- The housing is to meet national targets not to meet local needs and this should be clear
- Development should have a sharper urban rural divide to stop sprawl
- Agricultural land must be protected to increase self sufficiency
- Clarification is needed on why the number of permissions granted exceed the Government requirement and why given the climate emergency and the need to conserve and enhance the natural environment have some planning permissions been granted
- Changes of use applications should be required for permanent homes to be changed to holiday or second homes
- The Plan should recognise the downsides of being a visitor destination
- At least 30% of land and sea should be restored for nature and climate by 2030 with a clear target for recovery added
- Add Heritage Coast definition; SANGs, CIL; and ELS to the glossary
- Concern at use of the word `regeneration` it implies run down and deteriorating
- Recognition should be added to the constraints of settlements other than The Bay
- Replace reference in the Plan to Wootton with Wootton Bridge
- The background evidence to the plan is outdated and condensed and some policies do not have evidential context
- The Plan needs a clear ambitious approach, and this plan fails to meet the needs of the local population and business and produce a reduction in the use of resources and pollution
- The Plan should be bolder and more ambitious
- A comprehensive housing and business study is needed to help inform future business and employment opportunities and the number and types of housing
- The plan ignores neighbourhood plan policies

Section 1 Introduction

Total number of comments 7

Object 3

Support 1

General comment 3

Key issues

- Support the goals set out in the introduction
- The approach in the Island Planning Strategy to housing focusses on the number of new houses prescribed by government policy
- Add reference to the AONB, a nationally designated landscape covering half the island
- The Introduction covers the same issues as the Foreword but in a different order. The order should be as in the Foreword.
- The Isle of Wight has to deal with a unique set of circumstances special to an island which needs to be recognised by local, regional, and national government
- Amend para 1.3 to make the plan policies retrospective so that where work has not commenced on a site, the new island plan policies can be incorporated
- Amend para 1.11 adding a reference to an overarching Island Heritage and Cultural Plan which should be prepared. Add reference to the AONB and AONB Management Plan

Total number of comments 38

Object 21

Support 8

General comment 9

Key issues

- The issues have not been prioritised nor is it outlined how these will be tackled. Given the pandemic, resilience in cross Solent travel, food production and provision of jobs should be highest priority
- The plan should take account of changes which have taken place due to the pandemic - increased staycations and the impact of working from home. The pandemic may help achieve a better balance with working from home, subject to improved broadband connectivity.
- There is a lack of essential services to serve an increased population. No further development should be undertaken until current demand can be safely managed – dumping sewage into the sea and waterways is unacceptable.
- Proposals will worsen existing traffic problems, impacting on productivity and tourism. Rural Service Centres and the Sustainable Rural Settlements should expand to provide essential jobs and services
- The section does not acknowledge the failure of the spatial planning policy framework to significantly boost the supply of housing. There is no plan for growth or to address the recent low level of housing delivery
- The negatives of tourism are not recognised e.g. demand for health services, transport use and pollution.
- The low level of housing delivery in the last few years and very low levels of affordable housing, suggest a significant viability issue which the draft strategy does not address.
- The figure should be `Almost 2000 listed buildings` (HE)
- The Plan seeks to provide more homes without improving employment prospects, amenities, or affordability. There are no proposals to improve transport links or infrastructure. This is not sustainable. Too much focus on housing rather than the economy and increasing large homes which adds to the pressure
- The Plan does not promote a strategy to rebalance the population. Should retain younger Islanders, young families and attract skilled incomers with good employment opportunities. This will attract more of an ageing population
- The Plan has lost its central vision. The Island's economic strategy must be the core focus to address the island's economic underperformance
- The limit on space is mentioned in para 2.30 but sea level rises are special circumstances of the Island and is understated
- The Plan should protect the environment and landscape. Clarification is needed on how development such as in Freshwater that are within risk zones of SSSI sites and the SAC at Afton Marshes, impact on habitats?
- Add reference to reducing the use of energy, waste and other resources
- Clarify `aspirational housing` and new large housing estates and the enhancements required to environmental quality and high quality services

- Add reference to the economy section on the need for a thriving digital sector to provide work opportunities to younger people
- Support the contribution of holiday homes to the local economy
- Add reference to encouraging a unique economy and encourage world class businesses already on the island
- The plan should provide housing to reduce the outflow of working age people, with further allocations in East Cowes to help conserve heritage assets
- There is no vision for East Cowes or an explanation as to why it is a primary settlement and allocated a low share of housing growth
- Add reference to the contribution the retired population make to community building
- Amend environment section to actively encourage improvements and enhancements across the whole island not just the AONB. Add more references to the coast eg. 3.5 (box)
- Add to Section 2.2, Wootton Creek, Newtown and Kings Quay
- Add reference to a plan for growth to take account of inward migration from retirees and greater working flexibility
- Add reference to the Island's special biodiversity, with key species, such as: Red squirrels; bats; Dormice; Glanville Fritillary butterfly; Field Cow Wheat; Early Gentian and Wood Calamint
- Support paras 2.0, 2.3, 2.9, 2.10, 2.11-2.24, 2.37, 2.42, 2.46, 2.51, 2.54 and 2.55 and the proposed housing number as a maximum number
- Para 2.12 – European designated sites. Amend to 'internationally designated sites' or just 'designated sites'. If it is referring to the big Solent coastal sites then use Solent Marine Sites (with the SAC, SPA Ramsar)
- Amend para 2.18 to amend the contradiction with para 2.49
- Paras 2.25-38 add reference to market purchase to supply new social housing
- Paras 2.39-49 should reflect the negatives of tourism in increasing demand for health services, transport and pollution together with poor pay and seasonal work
- Amend para 2.29 to refer to increased staycations and impacts from working at home and the need to encourage more younger families to the island
- Amend para 2.30 as it does not recognise the plan is a pre NPPF document and does not provide a positive strategy to significantly increase the supply of housing in line with Government policy. This is not recognised in the supporting evidence. Add acknowledgement that the housing supply depends on commercial choices
- Object to para 2.32 as the Council is not positive about development
- Amend para 2.34 as it does not correctly reflect the brownfield land supply
- Amend para 2.35 as it underplays the need for greenfield land. Add the percentage of the island's land mass proposed as greenfield allocations and the percentage protected by the AONB and other protections.
- Add reference to para 2.37 on ringfencing the housing mix to meet island needs
- Object to para 2.41 as it is not supported with evidence
- Amend para 2.42 adding reference to the arts and creative industry as an important growth sector
- Clarify if para 2.50 is correct
- Add policy to plan to resolve the problems caused by second homes, Airbnb, holiday and short term lets to allow housing for local people

Total number of comments 84

Object	65	Support	8	General comment	11
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Key issues

- Support the Plan and the vision and objectives but add reference to supporting redevelopment and reuse of previously developed land and buildings
- Support paras 3.0 and 3.1
- Object as the Plan sets no clear vision, and it should be at the front of the Plan
- Para 3.5 – add a `Future generations` box. Ensure the biodiversity net gain of 10% is rigorously enforced along with other natural assets. Add reference to the Solent Freeport
- Object to para 3.8b which refers to designating areas outside the current settlement boundary and prioritising public sector land
- Object to para 3.19 which refers to Bembridge as a secondary settlement not a rural service centre
- Add to paras 3.14/5 a reference on promoting investment to provide local employment. Clarify the plan either to enable truly affordable housing or improving employment prospects.
- Para 3.18 – correct table showing 42 new homes at Arreton. Both sites have some planning permissions
- Para 3.15 – there is no clear plan for West Wight other than to build houses. There is nothing on the local economy or infrastructure. The local infrastructure for communications, water and drainage are all deficient yet not mentioned. The shared path has no local support. Add reference to the local economy or provision of infrastructure to support remote working
- Para 2.42 the wording should be amended to “As well as houses, it is also important to make sure we protect as many existing jobs as possible and also make it easy for new jobs to be created. IPS policies make sure that investment is directed into employment-generating sectors, land is secured and available for a range of businesses to maintain and increase the number of jobs. Our high streets continue to change, and IPS policies make sure that commercial property and businesses on our high streets can be as flexible as possible”.
- Figure 3.5 remove the inclusion of the “village green” to the west of the Harry Cheek Gardens development as area is a mineral reserves area. Add a future generations box. Cowes settlement diagram shows the whole of the Harrison site as housing conflicting with Policy E5.
- Fig 3.7 Newport Harbour. The Quay on the west side is a valuable public amenity
- Fig 3.9 East Cowes settlement diagram shows the whole of the Red Funnel marshalling area as housing conflicting with Policy E5
- Fig 3.10 Wootton. Development on the north side of Lushington Hill will adversely affect the main transport route. CPO powers should be used to ensure a sustainable road network giving safe routes to school. Area to the north of Wootton is not ancient woodland but was created from a Forestry Commission grant and should not be threatened by deforestation
- Retain Crossways field as agricultural land or public open space and Settlement Gap
- Page 19 add evidence of detailed site studies associated with the proposed SHLAA sites
- Amend the transport text box, page 20 to include reference to buses and the transport text box, page 30 to include reference to bus service improvements separate to those in Policy T1

- Increase focus on delivering housing with planning consent
- There is sufficient aspirational housing on the island the need is for affordable housing
- Amend the regeneration zones. Should be North Medina, comprising Cowes, E Cowes, Northwood and Whippingham, with Gurnard. Expand the Bay area to include the Newchurch area. The Bay should not be combined with Ventnor or the rural areas such as Chale Green. Rookley should not be combined with East Cowes. The three areas should be Medina Valley, Ryde and The Bay
- The prime focus should be on brownfield sites in Cowes, Newport, Ryde and Sandown.
- Support section and the reduction in housing numbers
- Support limited development in west Wight in urban areas, within the development boundary
- Support hard settlement boundaries, protection of the environment, promotion of employment opportunities and `in perpetuity` affordable housing
- Contradiction between improving the quality of life for residents and the level of housing development proposed
- More recognition should be given to Neighbourhood Plans
- Reassess sites close to ancient woodland. Including Parkhurst Forest; figure 3.5 – Cowes (including Gurnard and Northwood) settlement diagram; Ward's Copse by the southernmost housing allocation, south-west of Northwood, and Bottom Copse, directly south of Northwood Cemetery; Figure 3.10 – Wootton settlement diagram; The more southerly development area, abutting Lushington Copse to the west; Figure 3.12 – Ryde settlement diagram; to the east of Ryde. Remove areas or reduced away from the ancient woodlands.
- Newport Road, Northwood, is not within the area nor is the land to the south of No 403 Newport Road, Northwood. Cowes Medical Centre is not included as a Health Hub and there is no Place Road development shown.
- Support the recognition in the Plan for job creation including opportunities outside employment land and the high street
- Add definition of a `sustainable rural settlement`
- Revise Plan to take account of NPPF, July 2021
- Amend the `Environment` box to include reference to the historic landscape
- Shalfleet Parish Council support a site allocation in Wellow
- Include removal of barriers to inequality in key objectives and priorities
- Too much weight is given to themes arising from Covid. Central themes and future employment forecasts should include social care, health, admin and support services but place more emphasis on highly skilled jobs e.g. manufacturing, communications, IT, financial services, composites and renewables
- Amend statement that `60 per cent of the homes allocated are on brownfield land` as this is not the case in West Wight
- Support significant protection provided by the AONB, open space and dark skies in West Wight
- Add a primary residence policy to the Plan

Settlement Map

Total number of comments 2

Object 1

Support 0

General comment 1

Key issues

- Remove `supported` and add “To reinforce the other polices of the draft plan and the polices of the Freshwater Neighbourhood Plan we wish the development envelope to remain unchanged as a hard boundary”
- Para 5.19 mentions bridleways and these should be shown on the maps earlier in the strategy

Section 4 General comments

Total number of comments 20

Object	10	Support	5	General comment	5
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Key issues

- Support reordering of the Plan sections to show the environment first
- It is not clear that the planned level of development can be offset by tree planting to achieve net zero emissions by 2030. This section should have a key focus on climate change.
- More should be done to offset climate change and protect the island's Biosphere status
- Natural England support the methodology for assessing functionally linked land; Nutrient Position Statement; conclusion of no AEOI in relation to air quality and no further assessment is required
- Amend Page 1 section 4 line five to "The IWC's new carbon neutral target date for carbon neutrality the Island is 2040 (2030 for IWC and 2035 for the schools)" not 2050.
- Add reference to Solent Wader and Brent Goose Mitigation Guidance
- Welcome the reference to food production on the island
- Should commit to protecting more of the Island's natural assets and expanding the Area of Outstanding Natural Beauty (AONB)
- Support the protection of the natural environment and architectural heritage but the document gives insufficient attention to climate change impacts. Housing developments should not increase the risk of flooding and should be designed appropriately and not threaten the Biosphere status
- No space has been allocated to absorb CO2 and is this feasible given the finite nature of the island?

New Policies

- Add policy on supporting new viable uses for heritage assets that are deteriorating and re-use for the public and for housing, tourism or commercial use.
- Add policy on legally protected species
- Add policy on delivery of net gain
- Add policy on an eco system services to protect and improve natural capital and harness the role of nature based solutions
- More attention should be paid to the impact of climate change

Policy EV1

Total number of comments 41

Object	17	Support	10	General comment	14
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Key issues

- Support policy
- Amend to 'nine registered historic parks and gardens' as there are many more Local List and non-designated examples of parks, gardens and designed landscapes on the island
- Add a definition of what constitutes "substantial public benefits" which "would outweigh the substantial harm or total loss of significance."
- A full archaeological survey of the island is needed to identify SSSIs
- Amend policy by adding a requirement for development proposals to demonstrate how they have incorporated local historic themes and heritage
- A robust approach is needed in dealing with historic buildings falling into disrepair.
- Amend Policy EV1 to more closely follow NPPF paragraphs 194 to 208 to establish how development proposals of the Island's heritage assets (either designated or non-designated) and development which may impact their settings are considered. It should be indicated at the outset of the need for conservation and enhancement of heritage assets
- The wording that substantial harm to or loss of grade 2 listed buildings or registered parks or gardens will only be permitted in exceptional circumstances does not go far enough, nor does the wording "wholly exceptional circumstances in the case of scheduled monuments, scheduled wreck sites and Grade 1 and Grade 2* buildings and parks
- The objectives of both Historic England and English Heritage are aligned on the need to bring heritage to life and should be reflected in the Plan to align with national policy and guidance.
- Paragraph 4.14 'or the suitable re-use of heritage assets' add 'and reinstatement'
- Paragraph 4.20 'through discussions with owners ' add 'related charities and local community groups' and add 'reinstatement' to 'ensure the repair and maintenance of the asset'
- Add a presumption against harm to heritage assets, landscapes and conservation areas

Policy EV2 Ecological assets and opportunities for enhancement

Total number of comments 48

Object 18

Support 14

General comment 16

Key issues

- Support policy
- Amend para 4.26 adding mention of the migration of salmon up the Eastern Yar
- Para 4.26 - The requirement to demonstrate exceptional circumstances or overriding need should only apply to European Species.
- 4.26b Developments in Bembridge Harbour are inappropriate. Any mitigation by Nitrate credit schemes further “upstream” of the Eastern Yar should not be considered
- Amend para 4.26c – there is no alternative habitat for an ancient river. Add reference to the migration of salmon through the eastern Yar river to the gravel beds for spawning
- Amend para 4.27e – ecological network should not mean moving the problem from one area to another
- Amend para 4.32 – work with farmers to enhance catchment fields
- Designate as a SINC the area of land off Perone Way sloping down the Eastern Yar Valley with a Right of Way across the middle
- Amend para 4.29 – buffers are essential but judgements on width need to consider local topography, value of existing biodiversity and measures to attenuate and divert waste water drainage
- Amend para 4.30 to “...buffers should prioritise protection and enhancement of nature conservation assets including existing trees and hedgerows.”
- Para 3.30, bullet point 9 - bank sides and riverbeds should not be modified with piling, jetties or other structures and should be replaced with natural features. Their removal will not damage the historic environment
- Amend para 4.64 removing requirement for onsite SANGs of development >75 units. SANGs to be considered on case by case basis, as per Bird Aware strategy
- Add reference to joining up biodiversity areas and corridors
- Clarify what “suitable compensation strategy” can replace the environmental value of ancient woodland. There is no possible mitigation or compensation for the permanent destruction of unique biodiverse habitats
- Add clarification on the impact of climate change
- Add an explanation of the significance of Biosphere designation
- Add policy zones, designations and geographical areas that could act as 'receivers' for both offsite compensation and BNG where it cannot be delivered wholly within a project area
- Add reference to importance of agricultural areas on the island
- Delete ‘away from’
- Add a mechanism allowing developers to contribute to a local or regional initiative which could bring greater overall gains than minimal on-site improvements. With a greater emphasis on net gain, the Council should bring in a similar approach for off-site compensation when this is not achievable on site for local or national habitats and/or species

- Amend policy to: “Applications for development should include adequate and proportionate information to enable a proper assessment of ecological considerations by:
 - a) completing and submitting protected habitat and species surveys where required.
 - b) Submitting a biodiversity mitigation plan which sets out any avoidance, mitigation and any compensatory measures.
- c) Using Defra’s biodiversity metric calculator (where appropriate to the scale of development), to demonstrate how a minimum net gain of 10 per cent for biodiversity net gain will be achieved”. Is the 10% biodiversity net gain enforceable? Amend criteria c) to set a target greater than 10% for net gain. Amend policy and text to reflect the massive challenge of achieving a 10% biodiversity net gain, affecting development capacity and viability. Support 10% net gain. Amend policy to at least 20% biodiversity net gain
- Add a metric for urban/brownfield sites as such sites can have a very low level of biodiversity
- Clarify that ‘off-site’ compensatory measures can be secured by a contribution as it is not clear. If this is so, costs should be known, and viability of this approach tested for the allocations
- Add positive encouragement to intertidal restoration work
- Amend policy to clarify exemptions for domestic extensions, garages and ancillary buildings
- Protect habitats for red squirrels and sea eagles
- Add explanation for considering locally designated sites through planning decisions
- Update to DEFRA metric 3.0
- Add requirement to ensure developments do not impact nearby designations (both through construction and operation) and to reduce enforcement
- Add approach to onsite and offsite biodiversity net gain delivery
- Clarify if the Sustainability Appraisal uses priority habitat and ecological network information
- Add greater emphasis on Local Nature Recovery Strategy and Nature Recovery Network
- Add a commitment to producing an SPD on strategic nature recovery plan linking to human health improvements
- Amend policy to reflect paras 179 a) and b) in the NPPF requiring opportunities for biodiversity improvements in and around development
- Amend policy deleting the word ‘minimum’
- Add that the Island is home to a rich variety of important habitats and species, some of which are unique to the Island or are thriving due to the protection given to them by the Solent. Habitats for bats need to be protected
- Rigorously protect our natural assets including marine conservation zones
- Add a presumption against the loss of species rich environments or mature and veteran trees unless in exceptional circumstances

Policy EV3 Recreation Impact on the Solent European Sites

Total number of comments 11

Object 3

Support 3

General comment 5

Key issues

- Amend para 4.34 as during storms these birds come inland
- Amend para 4.35. Birds are affected by farming practice and it may not be appropriate to allow any development near designated sites. Bioenergy crops & Anaerobic Digestors are inappropriate agri-business for the islands rural landscape. The Island is a migratory route for many bird species
- Update Solent European sites with Solent Marine Sites
- Support the Position Statement on nitrogen neutral housing development which states "land on the Isle of Wight can be used to provide nitrogen credits for housing development on the mainland. The IWC, in its role as Local Planning Authority (LPA), is willing to engage with landowners and mainland local planning authorities over providing a monitoring role that cannot logistically be performed by mainland local planning authorities."
- Clarification why the policy only relates to housing when the issue is recreation and disturbance
- Add a presumption against any development damaging the Solent protected sites and exclude financial only mitigation

Policy EV4 Water Quality Impact on Solent European Sites (Nitrates)

Total number of comments 19

Object 7

Support 4

General comment 8

Key issues

- Support policy
- Para 4.29 - The buffer sizes should be 'a minimum of'
- Amend para 4.30 - add non-native invasive species should not be planted within the river buffer
- Para 4.33 – The Parkhurst Prison housing allocation includes headwaters for Gunville Stream and Parkhurst Stream which feeds into the Dodnor Creek RAMSAR site. Add to policy
- Para 4.39 - add reference to coastal Lichens and the shoreline areas being a useful tool in monitoring pollution of the Solent
- Para 4.40 – add the Solent international site will be affected by daily tidal movements
- Para 4.44 – mitigation and monitoring does not address overdevelopment
- Amend policy to “For all planning applications that involve a net increase of residential units or a net increase in guests at tourist accommodation (including tourist accommodation), it must be demonstrated that the development would not cause harm to the Solent European Sites as a result of drainage that would result in a net increase in nutrients”
- Identify the site allocations which do not drain to Sandown and the evidence to understand this issue
- Update Solent European sites with Solent Marine Sites
- Add to supporting text that a private package treatment solution (PTP) is unlikely to be acceptable to the Environment Agency in a sewerage area
- A policy should be added for storm/surface water removal to reduce the number of stormwater discharge events
- Clarify the work undertaken to protect nitrate neutrality and delivery rates
- Add that a key focus must be to secure the necessary improvements to waste water treatment works to address this issue in the long term
- Waste outfall from Sandown should not be excluded and exempt

Policy EV5 Trees, woodland and hedgerows

Total number of comments 20

Object 7 Support 6 General comment 7

Key issues

- Support policy
- The destruction of ancient woodland should not be allowed
- Replace `Appropriate species should be used at all times` not `wherever possible`
- Para 4.50 clarify that replacement should be with mature trees and hedges and made clear if it is monetary or environmental value
- Clarify the woodland uses which might be compatible with ancient woodland
- Development in areas close to woodland, and AONB should be discouraged. Further work needed on cumulative air pollution from industrial plant emissions.
- Amend supporting text to highlight that tree felling not determined by any planning permission may require a felling licence from the Forestry Commission.
- Amend policy to reflect that Government policy is to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless “there are wholly exceptional reasons, and a suitable compensation strategy exists”
- Support para 4.50
- Amend policy to acknowledge the wider benefits of trees and woodland
- Where it is deemed that there is going to be unavoidable residual damage or loss to ancient woodland, the measures taken to compensate for this must be of a scale and quality commensurate with loss of irreplaceable habitat. Where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost.
- Amend policy to set a target for tree canopy cover. A target of 30% for development sites is recommended
- Amend policy to prevent/prohibit the removal of trees and hedgerows which would be protected in a planning application process prior to submitting an application. Add a clause that prevents an application being made for a set length of time (e.g. 5 years) after any such clearance is made.
- Add to policy a presumption that all trees and hedges should be protected and only removed after mitigation has been agreed with the council
- The benefits of wildflower verges should be added to the policy
- Amend policy to state that any trees removed MUST be replaced with native appropriate species and MAINTAINED by developers
- Replacement with those of a commensurate value is a weak requirement. Commensurate value needs to be defined and the clause tightened.
- A 15m buffer is insufficient and is not explained in the supporting text. Clarify the reason for a 15m buffer and what should be included. A 50m buffer should be the minimum buffer maintained between a development and ancient woodland, including through the construction phase, unless it is clear how a smaller buffer would suffice. The preferred

approach is to create new habitat, including native woodland, around existing ancient woodland

- Amend policy to clarify that any farm or rural based development is conditional on replacement of all grubbed out hedges adjacent to public rights of way on the entire landholding of the applicant before new building work starts.
- Retaining trees should be presumed

Policy EV6 Protecting and providing green and open spaces

Total number of comments 23

Object 6

Support 12

General comment 5

Key issues

- Support policy
- Amend policy adding a criterion that development proposals which seek to support the management or improved accessibility of open spaces will be supported, providing other relevant policies are complied with
- Amend para 4.57 adding a reference to the origin of public parks, open and green spaces often in historic designed landscapes
- Add to the Glossary a definition of `designed landscapes` - “landscapes created to provide aesthetically pleasing settings for private houses, institutions and facilities’
- Add reference to the role of the council in managing parks, open and green spaces and gardens
- Replace `where relevant` and replace with developments over 25 units are required to undertake a play space audit
- Add reference to providing allotments in Bembridge
- Add reference to Natural England’s Accessible Natural Green Space Standard, and the Woodland Trust’s Woodland Access Standard. This recommends that:
 - That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.
 - That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people’s homes.
- Clarify if the standard for parks, gardens and open space been tested against the level of proposed development
- The effect of onsite SANGs for development of 75 dwellings has not been considered
- The 75 dwelling threshold is too high. It should be 20 dwellings
- Support references to the Local Nature Recovery Strategy
- Add enhancing green spaces with micro forests and ecosystem developments

Policy EV7 Local Green Spaces

Total number of comments 10

Object 2

Support 6

General comment 2

Key issues

- Support policy
- Add Brown's golf course as a Local Green Space
- Support Moorgreen Road allotments and adjoining reservoir as Local Green Space
- Add enhancing green spaces with micro forests and ecosystem developments

Policy EV8 Protecting high grade agricultural land

Total number of comments 9

Object 3

Support 1

General comment 5

Key issues

- Support policy
- Policy should include all agricultural land
- Policy should accommodate the uncertainties of ELMS
- Define `unnecessary`. High grade agricultural land should be protected from all development except food and farming
- Clarification is needed as to whether the policy undermines policies E2, E4, C10 and G2
- Agricultural land use should also be supported by an environmental enhancement approach

Policy EV9 Protecting our landscapes and seascapes

Total number of comments 20

Object 7 Support 6 General comment 7

Key issues

- The Island's historic landscape is amongst England's most varied and accessible. The Island depends on tourism. To protect this unique landscape an “Island park” designation is needed
- Support policy
- Seascape Character Assessments should be identified within the supporting text.
- Para 4.81 Add a hyperlink to the HEAP documents
- Para 4.82 – remove the reference to `in some cases`. Add reference to the emerging Local Nature Recovery Strategy
- Add reference to seascapes and seas around the island
- Add that further protection and enhancement of the water sources & catchment areas is required
- Isle of Wight’s local biodiversity action plan and local geodiversity action plan should be made available
- Add a policy on climate change, mitigation and resilience incorporating the aims of the IOW Climate and Environment Strategy
- Provide clarification on whether EV11 overrides EV9 when development is in the AONB
- Add references to the Heritage Coast and AONB
- Criteria a) – the Policy is too open-ended and wide ranging without clear parameters on what are considered to be ‘direct’ or ‘indirect’ impacts from development
- Criteria b) – Policy should identify ‘important vistas’ and ‘character’ to and from the land and sea. These should be identified on the proposal map. Otherwise, any area of the Island may be identified as ‘an important vista’.
- Criteria d) – Policy should include the ‘aims and objectives’ of West Wight and East Wight landscape character assessments.
- Criteria e) add to policy the aims and objectives of the Isle of Wight’s local biodiversity action plan and local geodiversity action plan; e: add reference to Historic Environment Actions Plans (HEAP) . Add reference to the emerging Local Nature Recovery Strategy
- Add reference to enhancing biodiversity

Policy EV10 Preserving settlement identity

Total number of comments 38

Object 21 Support 12 General comment 5

Key issues

- Support policy
- Add settlement gap i. between Ryde and Fishbourne ii. between Apse Heath and Lake iii. between Newport and Northwood iv) Shalfleet v) Calbourne vi) East Cowes vii) Wootton viii) Fairlee ix) other localised gaps
- Settlement gaps should not be changed once they are established
- Support the role of roadside gaps in development in separating settlements
- Object to change of settlement boundary in Freshwater, Totland and Bembridge
- Extend settlement gap to include site allocation HA005
- Amend gap between Brading, Sandown and Yaverland to remove land owned by Southern Water
- Amend settlement gap at Ryde to remove land to the north of Calthorpe Road, including the existing residential development along Woodland Close and the Puckpool Hill site to the north
- Exclude Folly Works from the settlement gap designation
- Ribbon development should apply the `exceptional development` test
- Add settlement gaps to Havenstreet and Ashley and Ryde to the south and west and Newport to the east
- Add settlement boundaries to Havenstreet and Ashley
- Exclude Industrial complexes from settlement gaps
- Exclude the sites at Freshwater from the settlement gap
- Object to the threats to the gap between St Helens and Brading

Policy EV11 Isle of Wight AONB

Total number of comments 22

Object	6	Support	5	General comment	11
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Key issues

- Support policy
- Extend the AONB to include the whole island
- Add reference in the supporting text to the Government's review of National Parks and AONB's and the subsequent report - The Glover Landscapes Review 2019.
- Add `The Council may consider strengthening policies regarding the IWAONB to include proactive measures in respect of landscape, nature, recreation and AONB boundary review and extension` to policy
- Extend the AONB in the Nettlestone and Seaview parish boundary
- Extend AONB boundary to include Newtown and the coast between Yarmouth and Thorness
- Add commitment to review AONB boundaries within 2 years
- Amend policy to add `Planning Permission will be refused for major development within the Isle of Wight AONB except in exceptional circumstances and where it can be demonstrated that they are in the public interest`
- Amend policy to remove requirement to fund remedial projects to compensate for the loss of features from farmers
- Amend para 4.95 to prevent further development where harm has already been caused by industrial activity
- All trees in the AONB should have TPOs attached to them
- Amend para 4.94 to state that the AONB Management Plan is statutorily produced by the AONB Partnership on behalf of the Isle of Wight Council. The Council then adopts the plan.
- Clarify that agricultural developments would not fall foul of this policy
- The focus in the policy should be on improvement only

Total number of comments 19

Object 5

Support 7

General comment 7

Key issues

- Support policy
- Dark skies should be actively promoted and extended to other parts of the island
- Connections should be made to the Local Transport Plan as some over illumination has occurred with LEDs
- Caravan and holiday parks, industrial areas, lorry parks and ferry transport need to take into account the Dark Skies policy
- The proposed area overlaps some urban fringes as well as some rural centres. These are places where people live or may be visiting during the hours of twilight / darkness and will require adequate street lighting for loading / unloading, walking / cycling as well as porch lighting for entering / exiting buildings. There should be provision in this policy which permits an appropriate level of lighting for these purposes within the Dark Skies zone
- Request additional words, 'and be downlit' are added in the last sentence in order to prevent unnecessary upward light spillage.
- Policy should take consider AONB and UNESCO Biosphere designations together with Dark Skies park
- Add 'improving current developments and enforcing requirements'

Policy EV13 Managing our water resources

Total number of comments 24

Object 12 Support 6 General comment 6

Key issues

- Criteria a-h do not accord with NPPF or PPG including restriction of 100 litres per person per day nor the requirement for 20% reduction in run off from greenfield rates. Amend policy in line with NPPF and PPG or add flexibility to enable the site and context to be taken into account
- Amend a) adding a caveat 'implementing measures to restrict predicted internal potable water consumption to 100 litres per person per day (this restriction should not apply for disabled persons who have a specific access need for bathing, changing etc) '
- Amend d) to say "ensuring no risk to the Island's aquifers"
- Clarify e) where it will be relevant to reduce run off rates to at least 20% below the greenfield run off rate
- Amend criteria e) and f) to include more on the type of subsoil and the effect on run-off
- Amend criteria g) to reflect that a flat rate new infrastructure charge is paid to Southern Water and that the developer is no longer required for making a connection to the nearest point of capacity
- Restrict new development until confirmation that no work is required to the sewer to accommodate new developments or the work has been carried out
- Replace "expect" with 'required to' and rainwater harvesting should be a requirement in new development
- Policy is supported by the Environment Agency.
- Bullet point 3 replace 'relevant' with 'possible'
- Need for a long term plan for loss of water from the mainland, saltwater ingress of groundwater and greater leakage control
- Define 'most sustainable options' and clarify how this will be delivered. Policy is not effective or justified
- Southern Water request changes to criteria g. Where sewers have limited capacity, site promoters need to work with Southern Water to ensure delivery of the network reinforcement aligns with occupation of the development. A condition may be required; h when planning site layout, taking into account the any existing water and/or sewerage infrastructure, to safeguard future access for maintenance and upsizing purposes
- Delete policy as it is already controlled by building regulations
- Consider new infrastructure to reduce the need to import water. Should the option of construction of an urban reservoir been explored?
- New dwellings should be the most water efficient homes possible
- Natural England support policy but strengthen wording to make clear that development must adhere to requirements for water use
- Replace 'should' with 'must'
- Exceeds the scope of national policy to set a requirement of 100 litres per person per day

- Add reference to the damage that run-off from roads and land does to the quality of river and sea water. This is not just a flood risk issue. Preventing run-off particularly in storm events should also sit within EV13
- Delete `where appropriate` and add a requirement for best practice only and for enforcement of requirements

Policy EV14 Managing flood risk in new development

Total number of comments 15

Object 5

Support 5

General comment 5

Key issues

- Support policy
- Amend para 4.8 which suggests flooding is a localised occurrence
- Policy should require on site sustainable drainage for all new development and meet the tests of the Strategic Flood Risk Assessment and Local Flood Risk Management Strategy
- Replace “expect” with “not permitted”
- Should consider Environment Agency previous comments on the aspiration for no residual risk and add a requirement for Strategic Flood Risk Assessment and Local Flood Risk Management Strategy.
- Managing flood risk should apply to all development not just major development
- Criteria d) should include tree planting to slow the flow of water and reduce surface water runoff
- Surface water should be separated from waste water
- New development should include roads not just housing and add alternatives to drainage pipes such as green areas, meadows and soakaways
- No building should be permitted on floodplains
- Flood warning and evacuation plans should include persons with reduced mobility or other access needs
- Add reference to on site drainage systems needing to take into account the predicted increase in intensity of rainfall
- All developments should have plans to deal with increased rainfall intensity and storms
- Better strategies are needed to address flooding

Policy EV15 Monkton Mead catchment area

Total number of comments 5			
Object	2	Support	0
		General comment	3

Key issues

- New developments that have an impact on flood risk within the catchment boundary maybe required to make a financial contribution towards flood risk alleviation projects. Clarification is needed on these contributions and how will they be applied
- Amend criteria e) - on site drainage systems need to take account of the predicted increase in intensity of rainfall
- Other areas should also be covered given the increased risk of high intensity rainfall and storms in a changing climate

Policy EV16 Managing our coast

Total number of comments 9

Object 2

Support 3

General comment 4

Key issues

- Support policy
- Properly protect our marine conservation zones
- Policy should actively encourage coastal defence schemes to incorporate space for biodiversity rather than just as mitigation or compensation to reach the net gain target
- Heritage coast should be mentioned here and its policy status
- Should there be further consideration relating to rolling back existing development and whether this is sustainable or appropriate?
- Substantial economic and social benefits is too vague. There should be a focus on no new developments in these areas

Policy EV17 Facilitating relocation from coastal change management areas (CCMAs)

Total number of comments 7

Object 3

Support 2

General comment 2

Key issues

- Support policy
- New location should be for the same use, similar to the one being replaced, remain close to the coastal community and not have significant adverse impacts
- Policy should rule out the placing of holiday parks and caravan parks inland within the AONB.
- Providing suitable accommodation (in consideration of any disability already identified or created by the enforced move) is essential and policy should reflect this
- Clarification is needed for how this will be delivered in areas where there may be significant adverse impacts
- No relocation should be accepted if the scale would create major damage to existing landscapes and ecosystems

Policy EV18 Improving resilience from coastal flooding and coastal risks

Total number of comments 11

Object 5

Support 2

General comment 4

Key issues

- Support policy
- Policy needs clarification. How would an applicant know which schemes might fall into this criterion?
- EV18 contributions toward coastal flood risk must be made clear so viability of sites can be assessed
- Policy should not allow surface water/storm water to enter a public sewer
- All development must ensure resilience from coastal flooding but must also avoid contributing to coastal flooding from carbon emissions
- Should it be “resilience to flooding” rather than “resilience from flooding”
- There should be specific recognition of increasing flood and storm risks due to climate change

Policy EV19 Managing ground instability in new development

Total number of comments 8

Object 1

Support 4

General comment 3

Key issues

- Policy EV19 needs expanding and used in conjunction with EV14(d)
- Support policy
- Paras 4.135, 4.136, 4.138. The area on the South ridge of the Downs in Arreton parish extending beyond that designated as Mineral Safeguarding has the potential and has already caused flood damage to roads and property. Any development under the ridge of the Downs in Arreton would pose potential risks from ground movement, floods and contamination of water resources.
- Add a reference to the Marine Plan
- There should be specific recognition of increasing flood and storm risks due to climate change

Section 5 General

Total number of comments		3			
Object	2	Support	0	General comment	1

Key issues

- There is insufficient infrastructure with poor roads and water, gas and electricity provision. Reliance on the mainland. The hospital is too small and access to health services and schools need improvement.
- Give more weight to local plans

Community Foreword

Total number of comments 13

Object 3

Support 5

General comment 5

Key issues

- Development in Brading should take account of reduced infrastructure available and wellbeing of the local community and full weight given to the neighbourhood plan
- A health study should be carried out on living in already congested areas to examine the effect on residents
- There is insufficient infrastructure for the quantity of development proposed, particularly health, schools and roads
- Support policies if the necessary education and medical facilities are provided
- Support the emphasis on building for future health and well being
- Island needs to be more resilient through low carbon energy, water supplies, drainage and energy costs

New Policy

- Add a primary residence policy to the plan

Policy C1 High quality design for new development

Total number of comments 35

Object 16 Support 12 General comment 7

Key issues

- Add reference to prevention of crime and disorder and require development to reduce opportunities for crime and disorder. Add to policy `Creating a safe environment depends on defensible space, natural surveillance, permeability, connectivity and lighting`
- Amend policy adding "the design and layout of the development shall incorporate the principles of Crime prevention Through Environmental Design."
- Amend policy allow access by sustainable transport modes including walking and cycling access as well as buses
- Add housing should be attractive and in keeping with the island style using local designs and include distinctive Island vernacular architecture. Emphasise celebrating the historic sense of place and pattern of design
- Add wording to policy and supporting text to `active design` and principles
- Add to supporting text `high quality design will demonstrate how green infrastructure, surface water attenuation, ecological gains, public access and recreational opportunity can be designed and delivered in the same place at the same time, reducing unnecessary sprawl, improving the efficiency of land use, and concentrating social and environmental performance`
- Protect quality of Ryde's historic buildings
- Add wording to encourage the use of renewable energy and local elements of design such as brickwork of different colours around windows and doorways. Do not allow gas heating in new build development
- Add to policy `Every effort must be made to support energy saving/developing methods: water, wind and solar. All development should enhance biodiversity in the area and work to improve it`
- Add to policy a requirement for garages and parking in new development to be large enough to accommodate cars
- Add to policy the need to provide adequate bin storage via a flat access route
- Add justification and evidence to support optional space standards
- Assess the adverse impacts of space standards on first time buyers including First Homes and potential impact on delivery rates
- Add requirement for very low environmental impact buildings and biodiversity gains
- Add wording to promote discrete off-road parking, hidden, underground and concealed with multi-habitational developments
- Add wording to criteria a) to refer to trees and hedgerows
- Amend policy wording adding 'well-designed' should be inserted into point a). In relation to point d) and e), shouldn't the policy reference space or amenity standards in SPDs or within the nationally described space standards? In point i) include 'within the AONB'
- Amend criteria c) which should add a need to enhance these features afforded the highest level of protection for their landscape or heritage value to accord with the NPPF. Amend

wording to `respect the character of the area, particularly in conservation areas and the AONB development proposals should look to conserve and enhance the scenic beauty of the landscape and value of heritage significance`. Amend criteria c) to include reference to key ways development must protect the character of the AONB and conservation areas, in terms of the use of natural and local materials respecting the vernacular and traditional architecture

- Amend criteria e) as there are many examples of great design of basements without outlook
- Amend criteria h) as given recent planning changes this seems a hard line to take
- Amend criteria k) to protect farmland and ensure consultation with farmers if enhancements are diverted near productive and active farmland
- Where developments cannot incorporate soft landscaping could they comply with the other criteria?
- Re-order policy criteria to reflect the National Design Guide. Add a reference to the National Model Design Guide and provide a framework for how these will be applied locally
- Add reference to environmental sustainability, the inclusion of renewable space and water heating, the planting of native and insect friendly landscaping and the inclusion of, for example bee/bat/barn owl habitation
- Creation of open space creates ongoing management and budget issues and ensuring larger family sized gardens is a better option
- Amend policy adding `universal design principles where appropriate early in the design of development`
- Add a requirement for properties have space to store waste bins for example, without infringing on the street scene. Recognition should be given to small, cramped sites can bring overcrowding issues and neighbourhood disputes
- Amend para 5.5 to read "...housing developments comprising of buildings which..."
- Add wording to paras 5.21-22 and 5.4 to extend the context to frame settlements in their parishes and emphasise `cultural capital`
- Amend para 5.18 as Access Statements` are required as part of the planning application process
- Amend para 5.19 - consider a review of unused and existing rights of way which could benefit the farming community by the public engaging with countryside through the ancient disused rights of way and this would help protect new rights of way in productive farmland

New Policy

- Add new policy promoting quality development and attractive quality bus provision with improved access to main corridors, less deviations off route with carriageway widths within new development a minimum of 6.5metres where appropriate and high quality bus stops

Policy C2 Improving Our Public Realm

Total number of comments 13

Object 4

Support 4

General comment 5

Key issues

- Support policy
- Amend wording to “clear and legible bus, pedestrian and cycle connections”
- More weight should be given to Neighbourhood plans and applicants directed to Town and Parish Councils before pre app discussions
- Applications should not proceed until reports from utilities companies are received
- Add a requirement in visually sensitive areas to provide visually appropriate screening of buildings / sites. Add pressure to sites remaining undeveloped for more than 2 years
- Add an emphasis on effective enforcement
- Add a requirement for streets to be tree lined and in the 2nd paragraph `well designed` for pedestrians and cyclists
- Add reference to trees and hedgerows for net gain and nature recovery
- New public realm should be encouraged in medium/large developments and include green space, footpaths, cycleways and seating areas
- Amend policy to `All proposals for major development must ensure that existing and new public realm is well integrated into the design, with street layouts and public spaces allowing for easy, clear and legible pedestrian and cycle connections, compliant with Local Transport Note 1/20, high quality public spaces and green infrastructure or access to it.
- Seek development proposals to enhance the public realm by improving landscaping, visual amenity and pedestrian and cycling connectivity
- More emphasis is needed on high quality private garden space
- For Rights of Way add BS 5709 (2018) which calls for Least Restrictive Access
- Standards for living space are too low with inadequate garden/recreation space, inadequate parking and do not promote new building materials
- Guidelines in heritage conservation areas are not adhered to and there is no commitment to seeking contributions for art. Design of public seating/shelters is poor and there is no policy for greening areas and planting trees
- A series of case studies should be developed of good practice and design to encourage good design
- Add requirement to include biodiverse green spaces in developments

Policy C3 Health and Wellbeing

Total number of comments 20

Object 9

Support 4

General comment 7

Key issues

- Support policy
- Object to a standards based approach. The PPS should be used to inform on site sports provision or secure off site contributions for new or improved provision
- Strengthen paras 5.27/28 to have the same status as preliminary ecological assessment
- Add requirement for Health Impact assessments
- Amend text to ensure open spaces and walking routes are safe, well-maintained and link to the surrounding area
- Amend criteria a) to explain community – is it the wider community or 25 or more houses
- Amend criteria c) to include `well designed`
- Policy will not overcome current shortfalls in infrastructure and services particularly in health and education nor cater for additional demand. Add space for public health
- Developer contributions should be used towards provision of doctor and dental services
- Add guidelines to assist applicants
- The policy threshold is not justified. Threshold should be reduced to 10 dwellings
- Amend policy to require larger gardens for all but the largest developments where larger open space is practical
- Add wording to reference the value of green infrastructure for health and well being
- A second hospital is required
- Add requirement for high quality design promoting new and innovative materials and design, meet guidelines for heritage conservation zones and seek contributions for art.
- Add reference to other environmental and transport criteria
- Insufficient care home capacity which needs addressing

Policy C4 Health Hub at St Mary's

Total number of comments 9

Object	1	Support	3	General comment	5
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Key issues

- Support policy
- Amend para 5.30 adding `where` to the start
- Add reference to KPS1 and KPS2
- Support the development of the extra care village and affordable housing for key workers
- Add supporting information to identify the deliverability assessment of this site against other SHLAA sites
- Clarify healthcare remains the same when the ageing population is putting a greater strain on services
- Residential development in this area should only be for key workers and for rent

Policy C5 Independent Living

Total number of comments 12

Object 8

Support 3

General comment 1

Key issues

- Support policy
- Add a locality hub in Bembridge
- Add plan allocations for this type of housing
- 20% should be a requirement and apply to medium sized developments
- Amend policy to a. Commit to providing a proportion of wheelchair-accessible dwellings (defined in Part M4(3)) as well as 'adaptable (Part M4(2)) b. Change 'expectation' to 'stipulation' c. Define the threshold of what constitutes a 'major' development d. Extend the requirement for accessible / adaptable dwellings to medium sites with a suitable threshold)
- Properties for the elderly should be built to a standard where access is easy, external and internal environment is appropriate, especially for residents with disabilities
- Add threshold to policy of 25 or more dwellings
- Policy wording provides no guidance or standards which can be assessed against the Policy requirements. Supportive text refers to Part M4(2) of the building regulations – recommend that Policy refers to Part M4
- Amend policy to address mobility scooters, their external storage and charging points
- Add to policy an annual target for the delivery of homes for older people and if not met in a year allow a presumption in favour of such development
- Add reference to shared living and supported care developments

Policy C6 Providing annexe accommodation

Total number of comments 7

Object 2

Support 5

General comment 0

Key issues

- Support policy
- Clarify wording in para 5.41 as it rules out garden buildings being used as annexes, but it is unclear why
- Amend policy to allow long term uses for annexes for private rental
- Add definition of `dependant relatives`
- Add reference to the Equalities Act
- Amend policy to allow an exception for rural workers and farm employees which can be crucial to support 24 hour operation with livestock and where an annex would be the most economical option

Policy C7 Delivering locality hubs

Total number of comments 6			
Object	2	Support	2
		General comment	2

Key issues

- Support policy
- Add definition of a `locality hub`
- Amend paras 5.43/5.44 to add the need to have early consultation with the Archaeology & Historic Environment Service as both locations are archaeologically sensitive
- Local hubs need to be built close to users and with public transport connections
- Add reference to shared living and supported care developments

Policy C8 Facilitating a blue light hub

Total number of comments 9

Object 0

Support 4

General comment 5

Key issues

- Support policy
- A control room for all emergency calls (Police, Fire, Ambulance, Coastguard and Lifeboat) should be located on the island
- Developer contributions should be sought for social and community infrastructure
- The policy is not required

Policy C9 Education Provision

Total number of comments 11

Object 5

Support 4

General comment 2

Key issues

- Amend para 5.46 `The community feels safe...` as the wording used does not read well
- Amend para 5.47 which describes the need for adequate educational infrastructure which does not go well with the push to cut primary school places by half
- The policy does not address a lack of education provision in Bembridge
- Support policy
- Amend the plan to add allocations for education provision to support growth
- Amend plan to keep rural schools open
- Amend policy to refer to `education sites`
- Add reference to require accessibility for pedestrians, cyclists and public transport
- Delete reference to `studio school` as this has closed
- Public transport constraints mean education provision for post 16 years is not served by centralisation and annex facilities are needed. Add to policy the intention to retain and extend local access to education directly and through the use of digital opportunities and hubs

Policy C10 Supporting renewable energy and low carbon technologies

Total number of comments 19

Object	11	Support	4	General comment	4
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Key issues

- Support policy
- Amend policy to “Proposals outside the settlement boundaries or site allocations must demonstrate that they have taken account of:
 - a) any unacceptable adverse impacts on the visual impact on the character of the area can be satisfactorily assimilated
 - b) the proposal has no unacceptable adverse impacts upon residential amenity and other sensitive neighbouring uses (including visitor accommodation, camping and caravan sites) that cannot be mitigated by virtue of noise, vibration, overshadowing, flicker, or other detrimental emissions, during construction, operation, and decommissioning; and,
 - c) the consistency of the proposal with nature conservation and heritage asset objectives”
- Add criteria i) to the policy requiring provision of electric charging for the Islands Bus Fleet and allocate a site for a commercial charging hub
- The level of housing proposed makes it impossible to achieve net zero emissions by 2030. Clarify if the amount of carbon offset provision been considered?
- The Council’s proposed zero carbon strategy should be incorporated into the Plan
- Add reference in the policy for new houses to minimise power consumption with an aim to be carbon neutral or contributors to the national grid
- Amend policy to be more precise, ensuring there are no unintended consequences on the amenity of neighbouring uses or the local economy
- Amend policy to provide adequate amenity protection for sensitive uses, including visitor accommodation, camping and caravan sites, against adverse impacts of low carbon development, particularly noise
- Add research into the tidal flow around the island to the supporting text
- Add to policy - All new and at least 60% of existing homes to meet net zero emissions; housing developers to include offsetting within planning permission applications; New housing developments to achieve net zero emissions by 2030; all new housing to use renewable and/or community heating and energy e.g. CHP, heat pumps, bio gas, solar, wind, tidal
- Add definition of `large scale`
- Amend bullet point 2 to `historic environment objectives`
- Amend para 5.65 final sentence to `nature conservation interests or the historic environment`
- Amend policy as a10% renewables target for new development is too low
- The AONB could sustain a limited number of wind turbines
- Amend policy wording to delete the compensation part of the AONB policy which is repeated for renewable energy proposals that harm the AONB
- The housing target will not allow net zero by 2030 to be met and would require very radical changes beyond what is set out in Policy C10. Planned development will increase CO2 emissions and to offset this would require 760 hectares of tree cover. No areas have been allocated for this and is it feasible
- Add references to support wind, tidal and solar technologies

Policy C11 Lowering carbon and energy consumption in new development

Total number of comments 20

Object	16	Support	1	General comment	3
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Key issues

- Support policy
- Amend policy to seek domestic and industrial buildings which generate the power they need to operate
- Object to policy as it does not go far enough. Amend policy and supporting text to reflect the goals of the Council's Climate and Environment Strategy which states that all new and at least 60% of existing homes to meet net zero emissions. The IOW Council has outlined 2030 as the deadline by which to achieve net zero
- Policy should require new housing proposals to be subject to the kind of carbon reduction targets that the government will eventually get round to suggesting e.g. generating a power surplus, ground source heat pumps, tidal power
- Amend policy "Unless it is unfeasible, proposals for non-residential development should exceed wherever possible the minimum required level of 'very good' standard for BREEAM or equivalent. Proposals for all major development should incorporate renewable energy systems to provide at least 10 per cent of the predicted energy requirements"
- Object to the 10% requirement for renewable energy as it is insufficient. Development should be required to be fitted with renewable future proof energy sources and conditions applied to ensure housing has cabling for EV Charging, and space and water heating should be fully renewable. Policy should force developers to significantly exceed the standards required nationally
- Add that the Island should aim for self-sufficiency in as many sectors as possible and developments which support this should be encouraged
- Object to 250 housing units being used as a figure where developments should seek district heating unless there is evidence to support this
- Amend policy to seek 40% renewable energy requirements which increases with further government targets. Seek 100% renewable energy requirements for space and water heating
- Replace `climate change` with climate emergency`
- Delete reference to BREEAM as it is due to be scrapped
- The 10% requirement for renewables is inconsistent with the council's stated aims in para 5.58 to achieve net zero by 2030
- Replace `where appropriate` with `utilise in every appropriate place decentralised ...`
- Add Solar water heating to the supporting text and install as standard in new properties
- Amend policy to require solar infrastructure in all non-affordable or social housing where appropriate/productive
- Amend para 5.70 the primary greenhouse gas is water vapour not carbon dioxide
- Amend criteria a) requiring developers to implement the highest possible standards of energy efficiency as it is unsound
- Clarify the level of performance required. Changes to the Building Regulations will require developers to deliver a 31% improvement rendering such an approach unnecessary

- District heating systems will add a significant cost burden that is not costed in the viability study. This should be considered on the basis of both the site-specific viability and the feasibility of providing such a system
- Housing must be built to the highest standards to reduce use of resources. The presumption should be onsite reduction and energy capture rather than any mitigation or offset

Policy C12 Utility Infrastructure

Total number of comments 14

Object 9

Support 1

General comment 4

Key issues

- Object to new houses being built without sufficient infrastructure. Services should be met within the development
- Healthcare and community infrastructure, electricity supply, water supply, sewerage and conservation of marine and river environments are all underfunded and insufficient to support proposed levels of development
- Object to removal of the Medina bridge from the plan
- Amend para 5.92 to ` In specific relation to water and wastewater infrastructure, the council will generally condition planning permission approvals that no development will occur until the applicant can demonstrate that a strategy is in place following discussion with Southern Water to provide connections to public utilities infrastructure and/or deliver the required infrastructure to support development. Where Southern Water has identified that network reinforcements are required, there will be a need to ensure that the occupation of development does not occur ahead of the delivery of such reinforcements`
- Amend paras 5.99 and 5.100 to make clear how the standard of supply can be maintained with the addition of thousands of new homes
- Support policy
- Amend policy to allow no new development until basic infrastructure is built to meet existing and future needs
- Policy should seek self-sufficiency in water, sewage plants, electricity and enable tidal energy
- Stronger enforcement is needed and for extra capacity to be built in beyond what is required
- Iterative infrastructure delivery is not sustainable. A desalination plant may be needed and a reduction of sewage discharges into the Solent

Policy C13 Maintaining key utility infrastructure

Total number of comments 11

Object 5

Support 2

General comment 4

Key issues

- Amend paras 5.96 -5.101 to reflect that the island's sewage system is not working and that new housing will worsen the position. Infrastructure within developments will not address this and will increase pollution in the Solent
- Amend policy to encourage farmers to install their own reservoirs for irrigation
- Add to policy a reference to the need to consider an Island reservoir having regard to climate change predictions and only 30% of the Island's water supply being provided by the mainland. A desalination plant could be considered
- Support policy
- Amend policy to read 1. Waste Water Treatment Works, Sandown 2. Water Supply Works, Sandown
- Development should not be permitted until the electricity, gas, water and sewage systems are upgraded
- 'Maintaining' must include not only functional utility infrastructure, but not to harm the local environment, including streams, rivers, coast, beaches, lakes, aquifers and natural water sources
- Should not gas provision in new development
- Add reference to reliance on the cross Solent utility pipelines and the implications on the Island's resilience when it comes to the provision of utilities
- Concern on the link between policy and Policy C14

Policy C14 Providing social and community infrastructure

Total number of comments 11

Object 4

Support 4

General comment 3

Key issues

- Support policy
- Amend para 5.105 adding `cultural facilities`
- The policy does not address the difficulties in getting a doctors or dentists appointment or deficiencies in infrastructure like the drainage, sewers, pavements, hospital, schooling, transport links. Inadequate attention is given to maintaining and improving social infrastructure
- Amend policy to comply with para 99 of the NPPF and better protect sports facilities from being lost to provide for alternative community facilities or use. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless (a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements
- Amend criteria a) to `the facility is no longer needed for its original purpose and is no longer viable for any other community use; b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- Amend criteria a in second subset from “the facility is no longer needed for its original purpose....” to “the facility is no longer needed by the community for its original purpose ...”
- The plan should include site allocations if there is an identified deficiency
- Clarification is needed on “development proposals will be expected to meet policy objectives” – presumably new community-led development (and not ‘all development’)
- Amend policy to allow alternative owners/uses to come forward

Policy C15 Community-led planning

Total number of comments 12

Object 4 Support 5 General comment 3

Key issues

- Support policy
- Add references to the Place Plans - Newport (Shaping Newport), Ryde (A Place Plan for Ryde), and Cowes and Northwood (The Cowes and Northwood Place Plan)
- Correct typo `unnecessarily`
- There is no requirement for major developments to demonstrate evidence of public consultation. It is unreasonable and impractical and could result in unnecessary delay and expenditure.
- Encouraging community engagement should be added to the supporting text of the policy.
- Add to paras 5.116-118 that to be given weight in the decision making process these plans must be properly prepared and consulted upon; they should not bypass the Neighbourhood Planning process and scrutiny of the planning policy process.
- Amend policy to `Where town and parish councils have undertaken place plans (including Neighbourhood Plans, Local Cycling and Walking Infrastructure Plans) and/ or master planning work that has been endorsed by the council, development proposals should demonstrate how they contribute to achieving the aims of the community-led plan`
- Clarify how this will be enforced in areas where town and parish councils oppose development
- Amend text to specify the public consultation required at a community level

Section 6 Growth General and Foreword

Total number of comments				5	
Object	2	Support	1	General comment	2

Key issues

- Support removal of the garden settlement from Wellow
- Brownfield sites only should be used for new housing including redevelopment of areas of poor housing and deteriorating unoccupied properties
- Growth should come from green initiatives
- Support policies
- Para 6.1-6.34 ring hollow when considering the amount of development and the need to move settlement boundaries to accommodate this. Local needs must be dealt with first

Policy G1 Our approach towards sustainable development and growth

Total number of comments 29

Object 14 Support 7 General comment 8

Key issues

- Support policy
- Support building the majority of homes on pdl
- Support development of pdl on the edge of settlements as it supports sustainable transport
- Delete the presumption in favour of development as permission will be granted in line with the NPPF
- The island is overcrowded and has insufficient infrastructure. No future development should be permitted if it fails to provide affordable housing, infrastructure and services.
- Allow development to be more evenly spread across the island not focused to the east. Should be some growth in the smaller villages to support growth in the larger settlements
- The plan is unsustainable. It is not possible to build 486dpa
- No guarantee the revised housing requirement will be accepted and development of pdl conflicts with the aim to intensify and expand industrial sites. The key priority sites are greenfield and employment and are risky and would increase East Cowes ferry traffic
- Delete last part of policy as it repeats NPPF para 11d)
- Amend text to “...new development will be of a high the highest possible design quality that contributes to a strong sense of place”
- Amend policy to remove reference to the delivery of an “island realistic housing requirement”
- Amend policy to `To facilitate travel on the Island, improvements to the existing road network, particularly in Newport are planned and a crossing over the River Medina is being investigated. The provision of cycling and walking infrastructure as set out in the current and future Local Cycling and Walking Infrastructure Plans will facilitate more journeys by sustainable modes of transport`
- Add to policy key words `low carbon` and `environmental development`
- Access to medical facilities is beyond planning control
- Housing to attract professional people should be focused on locations with jobs and services
- Build on brownfield not greenfield sites.
- Development should only be for local needs
- Robust enforcement of planning decisions is needed
- Place a moratorium on the previously allocated sites
- Add reference on the need to improve life chances for young people and future generations
- Prevent repeat applications for 9 units to avoid planning requirements

Policy G2 Priority locations for development and growth

Total number of comments 147

Object	129	Support	11	General comment	7
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Key issues

- Support policy and settlement boundaries
- Support designation of Seaview as a `Rural Service Centre` in para 3.19 but this conflicts with policy G2 where it is designated as a Sustainable Rural Settlement
- Support not allowing development outside or adjacent to settlement boundaries and the removal of previously allocated sites
- Support that most new development will be within the settlement boundaries
- Support paras 6.17 and 6.20
- Object to allowing growth in sustainable rural settlements with no defined settlement boundary
- Settlement boundaries should be permanent with no further development and should not be changed without regard to neighbourhood plans or exceptional circumstances. Object to extending settlement boundaries as it conflicts with Plan objectives and undermines their purpose. No further changes should be allowed to settlement boundaries
- Object to extending village boundaries to create new sites for development which is contrary to the Freshwater Neighbourhood plan and accommodates second homes when the need is for affordable housing
- Object to extension of Bembridge, Freshwater and Totland settlement boundaries
- Object to extending village boundaries to create new sites for development which is contrary to the Freshwater Neighbourhood plan and accommodates second homes when the need is for affordable housing
- Add priority for development within the settlement boundaries on brownfield sites
- Object to development outside a defined settlement boundary
- Clarify the delineation of settlement boundaries as there are inconsistencies
- Object to Bembridge, Wootton and Freshwater being designated as secondary settlements.
- Proposed development should only be located within the primary and secondary settlements
- Amend policy to give priority to using existing and potential brownfield sites
- Delete `sustainable rural settlements` from the plan and references to Wellow/Calbourne/Shalfleet which are unsuitable for further development
- Amend `revised settlement boundary` to `proposed`
- Add reference to Policy H9 as previously developed land should be a policy objective. Policy conflicts with Policy H9
- Object to most proposed development being on greenfield sites. These have ecological and agricultural value
- Allocating development in west Wight is inconsistent with protecting high quality environment and natural resources and the number is disproportionate given its facilities, infrastructure and amount of brownfield land. Settlements in west Wight should not be defined as towns. Proposals are on greenfield land affecting the landscape, biodiversity and tourism

- Object to insufficient planned growth at and around the rural service centres
- Amend policy to add Newport to its own level in the hierarchy and for a higher percentage of the island's growth
- Object to housing allocations at settlements with overburdened infrastructure by moving the settlement boundary
- Designate Shorwell and Ashley as sustainable rural settlements
- Object as the policy does not recognise that rural settlements can play a part in delivering sustainable development
- Object as the policy requirements are unjustified and may stifle development on non-allocated sites
- Object as hard settlement boundaries restrict growth meaning some settlements will have no growth over 15 years and this may impact on windfall development
- Significant developments proposed for Cowes/Northwood give no consideration to the additional impact on doctors, dentists, schools, traffic, parking, shops and social wellbeing (pubs, social halls, cafes etc)
- Object to para 6.16. Non allocated sites should not be considered, and the housing figure should be a target or ceiling not a minimum
- Object to changing of the settlement boundary for Ryde to include Westridge Farm which will create unacceptable urban sprawl and coalescence
- Para 6.17 - object to sustainable rural settlements not having a settlement boundary
- Amend para 6.18 final sentence to add a need should be proven for new dwellings
- Delete para 6.19 as there is no need for aspirational housing which is widely available.
- Clarify the conflict between Cowes and East Cowes being listed as Primary Settlements and Policy EV10
- Settlement boundaries should only be expanded in collaboration with local councils
- Policy does not create a clear growth pattern for the Plan period in relation to sustainable pdl sites outside the settlement boundary
- Extend Bembridge settlement boundary to include Bourne Leisure's Bembridge Coast Hotel
- There are few non allocated sites available within East Cowes boundary which are not employment sites
- Concentrate new development in the middle of the island, to preserve the coastline and ensure continuing tourism
- Amend reference to Cowes to include Northwood and Gurnard
- Exclude secondary settlements without the necessary infrastructure to support planned development

Policy G3 Developer contributions

Total number of comments 23

Object 16 Support 2 General comment 5

Key issues

- Support policy
- Support bullet point 6 (EA)
- Amend criteria 1) to “Affordable housing including but not limited to a mixture of buying, shared ownership, rentals, social housing and sheltered projects for families and individuals.”
- Amend criteria 2) to read “Highway infrastructure, including the provision of bus and other sustainable transport routes and facilities. Where relevant, contributions or provision shall relate to projects that have been identified through the council’s infrastructure delivery plan and detailed junction design work related to it.”
- Amend criteria 2) to `Transport infrastructure, including the provision of sustainable transport routes and facilities. Where relevant, contributions or provision shall relate to projects that have been identified through the council’s Infrastructure Delivery Plan and Local Cycling and Walking Infrastructure Plans`
- Amend policy as it does not recognise extra costs are passed to home buyers and can prevent housing delivery. Little evidence of delivery on affordable housing and Solent recreation mitigation payments which are already collected. If housing is outside a flood zone, seeking a contribution would not meet the relevant tests. Add that education/healthcare development are normally met through taxation
- Add that developer contributions should be spent in the immediate area of the development
- Clarify what is required for each allocation. A lack of clear structured contributions leads to uncertainty. A joined-up, holistic view should be taken on developer contributions for new infrastructure. The policy should include all the relevant financial contributions not added to SPD guidance
- Add to policy that if land values are inflated then the council will use compulsory purchase powers
- All the elements listed in G3 must be paid for up-front by the developer
- Financial contributions in lieu of affordable housing should be a last resort
- Amend para 6.22 replacing the 2nd sentence with `In order to meet the net zero targets set to achieve minimised emissions by 2030 on the Island, the following infrastructure should be expected from the developers of all new housing developments of 20 units or more.
 - i. All units should be insulated to the maximum standard to minimise heat loss and maximise ambient temperatures
 - ii. All energy infrastructure should be electrically powered, including minimal street lighting
 - iii. Solar panels on roofs and external, fireproofed smart battery storage areas should be incorporated into properties to assist in providing energy to the property. Therefore, the design of the development plan layout should maximise property exposure for sunlight to an appropriate section and size of roof space by predominant direction to the South, South East or South West.

- iv. Heat pumps for individual houses or multiple pumps centralised for small units of flats should be installed to provide heating. Infrastructure from all units should be in place to be able to transmit excess energy from all units to a community central hub for backup storage within the development and smart technology to then transfer excess from this to the national grid when necessary. Such central hubs could also be constructed with an additional row of solar panels for its own energy source
- Amend 6.26 to read “the completion of a biodiversity metric to be submitted ...”
- Add new housing should have a high proportion reserved for residents and all housing should be built to the highest environmental standards
- Developments below 10 dwellings should provide the development requirements
- The affordable housing levy should not apply to single unit self-build projects

Policy G4 Managing viability

Total number of comments 12

Object 10

Support 0

General comment 2

Key issues

- Policy is worded to imply that the policy requirements are not achievable
- Add an improved, more productive working practice is needed
- Object to the calculations used for land values as developers have too much influence
- Object to implication that the policies in the plan can be watered down to ensure viability
- Add evidence to show under delivery is partly caused by unrealistic land values and how this links to constraints to development
- Object as securing public subsidy is not a judgement that can be made through the planning process
- Add viability reviews and single-phase issues as recommended by RICS Guide Assessing Financial Viability under the planning framework 2019
- Viability could be used to avoid key requirements, and this should be avoided
- Clarification is needed on who administers this if the council is the landowner
- Concern there are no changes to policy

Policy G5 Ensuring planning permissions are delivered

Total number of comments 30

Object	18	Support	8	General comment	4
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Key issues

- Support policy. Should be extended to all sites
- Object to policy no longer considering the track record of applicant to ensure planning permissions are delivered
- Add where no building work commences for a long time period following approval, it should be followed up. Add a requirement for a penalty payment when land stands dormant
- Amend policy to `pool` smaller sites to give sustainable transport contributions
- Add a strict timeframe for development to be built and limit time and reasons for extensions
- Amend para 6.35 - landowners should be discouraged from holding onto land not in farming or agricultural use and monitor and review re-wilding land every 10 years
- Amend para 6.37 - The condition should be clarified to state that housing should be delivered and ready for occupation at the end of a 3 year period.
- Clarify in para 6.39 the evidence that will be used when monitoring an applicants or agents track record
- Amend para 6.39 add landowners to the list of those whose track record might be considered
- Amend para 6.42 – add that major development proposals should be subject to meaningful pre-application public consultation
- Add the threat of CPO may be subject to legal challenge. Clarification is needed as the enforcement is weak and therefore the policy ineffective
- Add enforcement action is needed on dilapidated, abandoned sites which affect tourism and present a hazard
- Add there should be pro-active engagement to ensure delivery
- Add to policy a fuller reflection of the reasons why development can legitimately lapse
- Delete policy. Criteria d) and e) do not acknowledge that a major development can be for education facilities or health facilities. It is onerous and unjustified for major applications to be accompanied by a masterplan or evidence of public consultation. There is no requirement for major development to demonstrate public consultation and is not feasible.
- Conditions requiring the whole development to be completed are likely to be difficult to enforce. Conditions requiring the completion of the whole of a development should therefore not normally be imposed
- The additional requirements on sites with an expired permission within this policy are onerous and inconsistent with the NPPF
- The policy onus is on developers to speed up the process when a significant issue has been the lack of s106 agreements, and the length of time taken to determine planning applications
- The current wording does not consider a site's complex background, viability issues, changes in market conditions or the transfer of land to new owners / developers seeking to implement an alternative proposal from that previously permitted
- Object to the restriction of future planning permissions where previous planning permissions have recently expired or are due to expire

- There is no evidence that a Local Housing Company will take positive action
- The policy is not required as the council already has powers to revoke planning consent

Section 7 General Housing and Foreword Comments

Total number of comments 38

Object 20 Support 1 General comment 17

Key issues

- There is a lack of transparency on how many new homes are occupied by local people. There should be targets to ensure local need is met and that the residents' needs are prioritised over those wishing to retire/move to the island or for second homes. Proof of island residency/connection should be required to purchase/rent new island houses. Building second homes with no one living in with workers not being able to rent it forces the workforce to live off the Island. Increasing the retired population is unsustainable. Second homes add nothing to the community, streets of dead unused houses to be visited for a couple of weeks every so often. Affordable housing is being sold as second homes not towards meeting the housing needs of islanders. All housing developments should include 75% allocation to buyers with local links
- The plan should make clear the distribution of new housing stock on brownfield and greenfield through colour coding and separately aggregated statistics
- Infrastructure issues are not being addressed and give no consideration to the existing population
- Poor quality build housing is shoe-horned in to achieve the greatest density, with micro small private outside space, which is detrimental to mental health wellbeing
- Only one largescale development should be permitted in an area and must be completed and signed off before further large scale development commences. The main obstacle to the provision of new housing is the number of sites with planning permission which are left undeveloped.
- Infrastructure should be developed first. Reduce the number of dwellings provided over the Plan period until services are provided
- Brading lacks homes for first time buyers, and affordable rental accommodation, and any such development proposals within the settlement boundary, would be welcomed.
- Support approach removing sites from the plan which are away from settlements and in garden villages
- The plan should weigh up evidence for housing need, demand and constraints and come to a flexible housing target which is subject to regular review and distinguishes between different types of housing requirements
- Support references to 'improving our health and wellbeing' but no linkages are made to infrastructure around health services and the lack of GP and dental services on the Island
- More attention is required on predicted sea level changes and areas susceptible to flooding due to climate change
- On larger sites developers will build the profitable bits and the rest will take 15 years to develop. The smaller sites which are no longer in the plan are those that could be built out quickly by local companies
- The plan is trying to create homes where there are no jobs and this does not help achieve net zero carbon emissions

- To bring forward viable development, greenfield sites should be maximised to meet growing island needs
- Meet needs using empty property plus alternative accommodation, using storage containers, or modular buildings and surplus council parking space. Add a focus on long term rented housing for local people through Housing Associations using modular construction
- High density should be considered including properties with between 3 and 6 storeys
- Development contributions provided through section 106 agreements should be used in the local area, their use transparent, and local councils consulted in negotiations
- New development encourages in migration rather than meeting local needs
- Housing standards to reduce use of resources needs dramatic improvement. An ambitious island approach is needed building on Biosphere status, AONB and SSSIs
- The major driver should be meeting local housing needs for the working population, local families, and older residents.
- Development at Blanchards will be for mainland retirees putting pressure on medical facilities
- The key priority sites are greenfield and employment and are risky and would increase East Cowes ferry traffic

Evidence papers

Total number of comments 42

Object 0

Support 42

General comment 0

Key issues

- Support Evidence paper B paragraphs 4.3, 4.6 and 4.8iv
- Support Evidence paper B paragraphs 3.1a-c
- Support Evidence paper B paragraphs 2.9 and 2.10

Exceptional Circumstances

Total number of comments 203

Object 189 Support 3 General comment 11

Key issues

- The case should be made for exceptional circumstances.
 - To protect the unique island features
 - Setting a target that is unattainable would result in the Island Plan failing the housing delivery test with a resulting free for all for developers instead of planned growth
 - To enable issues to be effectively addressed at the earliest possible opportunity
 - Due to loopholes through `exception sites`; inaccurate housing needs surveys, dubious shortfalls in 5 year housing land supply, random percentages of affordable housing numbers; that the methodology and data in section 7 does not stand up to close scrutiny and provides little protection against speculative housing development and little assurance the rural character and heritage of the island will be protected
 - As the island is unique and the only one in England with a large population. It is not like other parts of the UK. As an Island we must have the best case to argue for exceptional circumstances
 - As there is a need to develop a bespoke approach to meet island needs. House prices are below the average for the south east attracting incomers from the mainland which feeds the demand for new housing, but does not align with local needs
 - To stem unsustainable growth which is not matched by economic growth
 - Challenge the government-set standard assessment of housing need to better protect the undeveloped landscape; protect green spaces and prioritise the development of brownfield sites; and ensure that affordable and social housing is situated in existing towns - near shops, schools, and transport amenities
 - The local population is reducing so there is no need for more housing. All new housing will be for those moving to the island and for second homes. The island should not be treated in the same way as the mainland.
 - The economy is heavily dependent on tourism and agriculture and to preserve this the attractive countryside, wildlife and outdoor sports and activities need protection
 - To protect house prices for islanders
 - To recognise the landscape as a UNESCO biosphere
 - As many protected landscapes are wetland areas around the river basins
 - Sea level rises are predicted and with finite areas of retreat on the island is an understated special circumstance
 - To prioritise long standing island residents, in existing communities built in an island style not second home owners and retirees
 - Which can be demonstrated through an Island housing needs assessment alongside the Council's study on the Island's availability of building materials and delivery constraints
 - Which are justified because of the lack of infrastructure, public services, or investment to support the proposed housing targets

- Should be considered to assist in concentrating development on pdl and to conserve the island's landscape
 - Current housing targets are unachievable and should not be included in the plan
 - The strategy should be redesigned to reflect local need not national targets. In Freshwater it does not have the jobs or infrastructure to support the number of proposed houses
 - The Government number of houses is unrealistic and undesirable for the Island. The Island may have unique circumstances with regard to its demography and housing market allowing a lower target than 486dpa if the Island's housing need is explored
 - The annual target is based on an average of past delivery rates over a 20 year period, as set out in the Housing Evidence Papers A-D, but due to the inclusion of 3 very high years (2006/7, 2007/8 and 2008/9) where housing delivery nearly doubled, the average is heavily skewed. The last 10 years, for example, have seen housing completions closer to 350 dpa, which is more representative of the long term need. The annual housing need estimate takes no account of the contribution which vacant homes could make towards meeting local need. The reduction in the housing target does not go far enough. 486dpa is based on a statistical analysis of averages of delivery during each fifteen-year period between 2000 and 2020 and then taking an average of those averages. It is a rough and ready target far exceeding the current level of delivery of dwellings. Should seek an annual target of 300
 - The housing delivery figure remains below the government target for the Island of 668 dpa. The Island Plan has to have clear reasons to promote a housing figure 179 per annum less than the government target. Given this will lead to failure of the local plan at examination, exceptional circumstances should be argued
 - Would enable the Island to deliver affordable and sustainable housing for Islanders, protect the rural environment and reduce speculative and inappropriate housing development
 - The push to reduce carbon emissions conflicts with building homes where there are few employment options and little supporting infrastructure including schools, medical services and good travel links
 - The island is a special case because of its geography, remoteness, cost and timing of the ferry journey
- Amend para 2.4. "Given these geographical special circumstances of the Island we recommend that the IWC investigates the NPPF option of seeking 'exceptional circumstances within the current draft Island Plan consultation framework"
 - There should be island park status or the AONB expanded
 - The annual requirement is too high as it is based on projections which include a significant proportion of migration from the mainland. There is no evidence to support providing for internal migration
 - The IOW should be preserved as a special place
 - Any building on greenfield sites should only be allowed in exceptional circumstances and in small numbers
 - Provide the required services - water supply, sewage treatment, drainage, medical, transport, schooling etc before development and ensure realistic employment opportunities close by
 - The low target puts the island at risk of failing the housing delivery test leading to a loss of planning control, and fuel speculative development in greenfield locations

- The number and nature of housing on the island should be specific to the Isle of Wight and not decided by a national housing algorithm
- Need to protect the rural character of the island and make use of unused registered brownfield sites
- Oppose applying for exceptional circumstances as there is no evidence to support a reduction in the housing number. Ignoring need will decrease the supply of homes, increasing costs and decrease affordability. It is unclear how `exceptional circumstances` will be justified. Setting a ceiling will not solve the island's housing crisis. The lack of allocations since the Core Strategy has led to a lack of investor appetite. There is a lack of evidence that under delivery is nothing to do with the ongoing lack of allocations. It is not explained how restricting supply will impact on houses prices and affordability. There has been no regular testing of the market and engagement with developers off the island to attract further interest. The removal of 75 sites from the plan is not consistent with arguing for exceptional circumstances as these would boost supply. A buffer of 25% in Appendix 5 is insufficient

Policy H1 Planning for housing delivery

Total number of comments 188

Object	138	Support	30	General comment	20
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Key issues

- Support the reduction in the housing numbers
- Support paragraph 7.9
- Support criteria c) but amend to promote increased density and alternative unit mixes
- The plan is not sound, positively prepared, effective, justified or consistent with national policy. Amend Plan to provide 668 homes per year to meet Government housing targets
- Object to 486dpa because
 - the island population is decreasing
 - the number does not reflect local need
 - the method used to calculate the Plan housing target is not statistically correct, not robust, does not take account of housing need. and is based on an average of past delivery rates over 20 years. Past data is insufficient evidence to support delivery of 486dpa. 7,290 homes is higher than average delivery on the island from the last 20 years and places an undeliverable, unrealistic and unsustainable demand on the island
 - setting an unachievable target risks failing the housing delivery test, a loss of planning control and fuelling of speculative development
 - windfall rates will decline over the Plan period,
 - it is not aspirational as it reflects previous delivery rates and is unsustainable
 - there is no upper limit on the number of new homes the Plan would allow to be built
 - of impacts on water quality
 - increased strain on schools and doctors, the overloaded drainage system and roads and insufficient jobs. The island should be an area of natural beauty or an island park. Need to protect undeveloped landscape to be attractive for tourism and support the economy. Build fewer homes to protect the UNESCO site and dark skies.
 - more infrastructure is needed to support 20,000 more people which should be built alongside development. Lack of sufficient evidence on infrastructure requirements
 - house building is prioritised over protecting the quality of the environment and should be reduced
 - the proposed strategy is not effective forward planning having a negative housing delivery strategy
 - Amend plan to provide between 300 and 350 homes per year/no more than 300 homes per year/around 400 homes per year/around 350 homes per year with 50 for social housing and 150 for those with an island connection/increase to deliver economic growth/take account of proven construction capability on the island
- The housing figure should be a target or ceiling not a minimum
- A housing needs assessment should be prepared and a survey of future business and employment opportunities
- Add evidence to demonstrate deliverability assumptions are realistic
- Evidence does not recognise the failure of the spatial plan to significantly boost housing supply

- The plan understates the amount of development to be undertaken
- Add housing requirements for designated neighbourhood areas to meet NPPF requirements
- Assess other options including building on brownfield sites; undelivered approvals; empty buildings; the regeneration of Sandown, Newport and struggling town centres; and only building to meet local needs in the next 5 - 15 years
- Cap windfall development to prevent infrastructural and environmental pressure
- Use brownfield sites and vacant properties first, avoiding use of greenfield sites. Where greenfield is used provide mitigation e.g. hedgerows and trees
- Housing should meet local needs, prioritise young people and be built in an island style.
- Clarify
 - delivery of development for sustainable growth. Many site allocations are unachievable – e.g. Camp Hill and Newport Harbour
 - the low numbers of homes planned for in years 11-15
 - how higher development costs could be addressed
 - why sites close to smaller settlements with good public transport are not considered and why additional benefits e.g. provision of a shop are ignored
 - why Housing Needs Surveys are given disproportionate weight when they are inaccurate
 - the effect of hard settlement boundaries on availability of windfall sites
 - why sites submitted are not included in the Plan and if constraints could be overcome
 - why the policy reduces the housing requirement when the Viability Study does not consider the development costs on the Island to be higher than the mainland and concludes most development typologies are viable. The profit margins on First Homes and the cost of electric vehicle charging on improving the electricity network should be revisited in the viability study

- Provide certainty and choice of development sites
- Amend text as there is sufficient aspirational housing
- Add a requirement to build 10% of all homes on small sites.
- Add a reference to the constraints on developers and provide flexibility in the policy
- There are unrealistic assumptions made on delivery of large sites. Add further large sites to the end of the plan period to deliver higher completions.
- Add that greenfield sites can provide a greater housing mix and affordable housing
- Amend the requirement for 5% self-build plots as it is impractical for site safety and management and the implementation of planning conditions
- Rural Service centres have only one allocation and narrowing the scope of development to a narrower range of sites is not realistic or achievable
- Policy should align with broader social economic and well-being objectives, not just house building
- Disagree there is a perceived low return on housing investment on the island. Smaller builders fill the gap of larger housebuilders. There is no evidence that houses cannot be bought or sold at the full housing requirement rate
- Disagree with the barriers identified to development
- If the housing requirement can be justified, agreements with neighbouring authorities relating to unmet needs will be needed. What discussions have taken place with neighbouring authorities under the Duty to Cooperate
- Amend para 7.6 to include an incentive for to bring additional sites forward

- Ryde and Newport are over-developed, and housing should be more spread out across the island
- Provide evidence to identify how the housing stock is allocated between permanent residents/second homes/holiday lets/empty properties

New Policy

- Add policy to reduce the number of second homes/holiday lets/Air BnB which will increase housing stock, reduce greenfield development and pressure on infrastructure and services. Include a requirement for a change of use to be applied for houses not in permanent occupation

Policy H2 Sites allocated for housing

Total number of comments 112

Object	94	Support	10	General comment	8
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Key issues

- Support the removal of site allocations outside rural settlement boundaries
- Support policy reference to affordable housing contributions
- Support provision of infrastructure alongside development and the proximity of sites to services, facilities and public transport
- Concern on the cumulative impact of housing allocations in Freshwater and Godshill on tourism; local employment opportunities; infrastructure and services; in attracting more retirees, second and holiday homes; and that 255 homes is unsustainable, contrary to the Neighbourhood Plan and takes no account of AONB or Heritage Coast designations. The figure does not reflect local need and there is a contradiction between the allocations and improving the quality of life. Development should focus on small brownfield sites for young people and providing sheltered accommodation
- Add an approximate nutrient budget for allocations, identify allocations resulting in increased phosphorous in the Medina catchment and set mitigation options. Assess in more detail impacts to Solent Maritime SAC resulting from increased recreation pressure (NE)
- Object to urban sprawl and impacts on the UNESCO World Heritage status to provide housing for those moving to the island
- Amend policy to take account of Ventnor and its potential for small higher density housing. Seek to limit holiday and second homes in the town. Separate Ventnor from the `Bay area` classification
- Only develop brownfield sites
- No further development of greenfield sites in Newport Regeneration Area until brownfield sites and those with existing permissions have been used. Development of greenfield sites contradicts paras 4.1 and 4.4 and does not take account of outstanding planning permissions
- Add to policy that smaller sites should be pooled to give sustainable transport contributions
- Amend policy to add `proof of need` for applications in rural areas
- Object to the disproportionate distribution of sites in West Wight compared to Sandown as it ignores available infrastructure. Focus regeneration in Newport and restore hotel sites in Ryde, Sandown, Shanklin and Ventnor. Ryde should contribute more than the proposed 27% of housing in the plan as it is a primary settlement.
- Add more small and medium sized sites across the island
- Many allocated sites are not viable
- Policy seeks to control development when there is no 5 year housing land supply
- Clarify
 - the revision of settlement boundaries and reclassification of settlements
 - why some sites have site specific requirements in Appendix 2 and others do not (EA)
 - whether SANGs will be provided via contributions and whether SANG provision for sites over 75 units are considered in site capacity

- why small villages have been classed as `sustainable rural villages` as many are not considered sustainable locations
 - the role of smaller sites. Build smaller energy saving developments
 - how it can be demonstrated that there is a lack of appropriate land for development
- Add `services` to the statement on infrastructure
 - Amend para 7.22 to make clear if there are shortfalls in housing delivery early in the plan, applications will not be approved just to meet the target
 - Concern that more development increases flood risk
 - Support the provision of the flood risk information but
 - the Site Summary Tables do not provide a clear and robust assessment of flood risk. The documents should identify the estimated type, depth, velocity, duration, and speed of onset of flooding to inform on mitigation measures
 - the key, critical, development requirements identified in the Site Summary Tables are carried through into the Plan so that they form part of the Plan documentation. This will provide clarity on the actions the Council and developers need to take and a clear level of risk for each site and how it can be managed
 - The proportion of the sites at risk in Flood Zones is only estimated to include up to 70 years of climate change. For the purposes of flood risk management planning this should be a 100 year minimum development lifetime. It is not sufficient to refer to the Site Summary Tables without considering and acting upon the conclusions within, and in any case they in some cases do not go far enough in assessing the risk of flooding in sufficient detail to demonstrate deliverability in terms of compliance with the NPPF
 - Object to sites removed from the plan being encouraged for first homes or rural exception sites
 - Setting thresholds and density targets delays bringing sites forward
 - The level of development at Northwood is excessive and unsustainable, will affect its village identity and exceeds current stretched services
 - Object to reliance on a small number of large developments with questionable deliverability
 - The policy and supporting evidence do not consider the increase in house prices, reduction in rental housing stock, post pandemic living trends, the Solent Freeport, the amount of buffer sites needed, the delivery record of developers, the deliverability of sites in Newport, the positive actions of the local housing company and the environmental policies impact on site layout and housing capacities
 - The number of site allocations should be increased to deliver the standard methodology
 - Add evidence to
 - justify site selection and why some previous allocations are excluded
 - to demonstrate that sites are deliverable
 - show that lowering affordable housing values will not be detrimental to values and prevent the release of land. Clarification is needed on whether viability testing is taken into account and if this will improve delivery of affordable housing
 - the sequential test has been used in the selection of site allocations
- Sites allocated should not affect deep water frontages in Cowes and East Cowes
 - Object to the impacts of development at Ryde to the Brading boundary

- Plan is positive towards publicly owned sites without considering the location of jobs and seeks to promote undeliverable or economically blighted areas whilst constraining previously identified SHLAA sites
- Greater consistency is needed between information shown in settlement tables as some include sites with permission and others do not
- Consider sites for extra care development
- The densities proposed are too low
- Policy does not take account of SANGs/Nitrates/Biodiversity net gain within allocations
- Road safety issues should be considered by developments

Policy H3 Housing development general requirements

Total number of comments 37

Object 24 Support 6 General comment 7

Key issues

- Support policy
- Add criteria to:
 - ensure new buildings are carbon neutral and where possible generating their own using solar & wind energy. The aim should be net zero carbon. New builds should be capable of generating a power surplus to feed into the grid and equipped with sustainable heating
 - ensure new buildings and developments retain rainwater within their boundaries and re-use where possible using soakaways and minimising non-porous surfaces
 - encourage higher densities where it doesn't compromise the nature of villages
 - preserve hedgerows wherever possible and include new hedgerows to development
 - require development to assess how much carbon is released per acre and apply a carbon capture calculation to each greenfield development and how that loss will be replaced on site
 - require that greenfield sites are close to existing shops, doctors, schools, work place, regular bus service and /or within walking distance
 - require brownfield site development to be carbon capture positive
 - ensure all development incorporates measures to tackle climate change
 - state that "Consideration of the significance of designated and non-designated heritage assets and their settings should be undertaken to inform the siting, scale and design of development and opportunities taken to enhance and better reveal the significance of them"
 - ensure a sequential approach is taken on individual sites to ensure that risk is not increased either on site or to others downstream
 - provide cycling infrastructure
 - build in areas for children in development
- Amend criteria d) to read "proportionate contributions to improvements to off-site junctions identified in Tables 9.1 and 9.2, if required as well as contributions to improved services where required"
- Clarify criteria c)
- Amend criteria e) and f) to ensure access to sites is suitable for all users, including mobility aids and adapted cycles
- Support criteria h)
- Increase density of development to reduce use of greenfield sites
- Add clarification on children's services facilities
- Amend numbering of the criteria in policy
- Add reference to health and wellbeing and its importance and to support for future generations
- Affordable housing requirement should apply to all developments and go to local families

- Amend para 7.39 to take a robust approach and guarantee all documentation is valid and meets legal requirements. Delete “where relevant”
- Add clarification on the tables relating to 3d). Amend criteria to where it is large sites a contribution to sustainable travel options will be needed
- Rural footpaths should reflect the location and not be of urban design
- Affordable housing in rural areas should reflect village character
- Housing in rural areas should only take place where there is a viable village shop
- Amend wording to “proportionate contributions to off-site transport infrastructure (T1 and T2)”
- Driveways should be permeable
- Add reference to Policy C3 and the IDP
- Increase the biodiversity target following studies prior to development
- Add habitat creation should occur during development not left until the end

Policy H4 Infill opportunities outside settlement boundaries

Total number of comments 11

Object 2

Support 5

General comment 4

Key issues

- Support policy
- Amend policy to only allow single plot affordable dwellings and re-use of redundant buildings outside settlement boundaries
- A three dwellings limit is arbitrary
- Add reference to not developing greenfield sites
- Support infill in Bembridge included in the 2012 plan
- There is a conflict between H4 “a small gap in a row of houses, or an otherwise built-up frontage “and para 7.44 which states “Infill sites are a small gap in an otherwise built-up frontage “with no reference to ‘a row of houses’ i.e., not necessarily ‘built-up frontage’
- Add a definition of `a small gap`
- Add that new homes should be in keeping with the style and quality of neighbouring properties
- Clarify that development should only be on garden land not agricultural land, where the gap between existing dwellings is less than 150m, reflects the scale, design and spacing of existing dwellings

Policy H5 Delivering affordable housing

Total number of comments 145

Object	125	Support	8	General comment	12
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Key issues

- Support policy
- Affordable homes should only be let or sold to island people in perpetuity. There should be a ban on second home ownership
- Small units for older island people are needed to free up larger housing units
- Add more emphasis on social housing
- Support provision made to retain younger people on the island. Provide small units
- Object to policy as it seeks to constrain and provide a hurdle to housing delivery. It is not a plan enable truly affordable housing
- Object to target of 35% affordable housing. Amend to 40% or 50%
- The only type of housing that is needed on the island is affordable rented properties
- Some developments should only provide affordable housing
- Support affordable housing contributions for sites of 1-9 dwellings in the AONB
- Object to financial contributions for developments up to 9 dwellings. The figure should be 3 dwellings
- Support 35% target. Increase discount to 40% for local and key workers. Increase to 70% in secondary and rural settlement areas, 75% on public land and 100% in sustainable rural areas. Support tenure mix for affordable housing.
- 35% not 25% should be available for first home buyers and only resold to island residents. A 30% reduction in cost of starter homes is insufficient
- A 20% discount is unaffordable to local people
- Seek improvements to short term lets rather than new building
- The Government's housing target is closer to the housing need on the Island and only limited affordable housing has been built even with a presumption in favour of development. Reducing the housing number will push up land values
- Add an example of an `exceptional circumstance`
- Recognition is needed that most affordable housing is out of reach for young people and those on low wages
- Need to provide live/work units, rental and social housing for key workers and other employees
- Affordable housing should be built on brownfield land. Brownfield development is unlikely due to clean up costs
- Land should be compulsory purchased to provide affordable housing. The council should buy existing long term empty buildings and set up a housing company to build affordable housing
- Amend plan to define `affordability` and base affordable housing criteria on local salaries. Mortgage or rent should cost no more than 30% of average Island gross household income (~£635 per month)
- Ban extensions to affordable and first homes to keep them affordable
- Add accessible/adaptable dwellings to the definition of affordable housing

- Houses provided in Wootton Bridge should meet the needs identified in the Housing Needs Survey
- Clarify if a 30 or 40% discount applies when IWC isn't providing the discount directly.
- The policy approach must be viability led and recognise constraints inhibiting delivery. Using 'must' prevents delivery of alternative affordable housing products. Add more flexibility
- Amend policy to make affordable housing and local needs the cornerstone of the Planning Strategy. Only provide affordable housing for island residents, in locations they are needed
- Planning permissions should be restricted to 1 or 2 bed semi-detached houses for local people to afford
- Address the issue of second homes and discourage holiday lets. Set a percentage of housing stock that can be used for holiday lets
- Affordable housing should not be for retirees from the mainland
- Increase density in Cowes, East Cowes, Sandown and Newport
- Amend para 7.53 as it provides a loophole to provide allocated numbers of affordable housing. Remove any exceptions in policy and text
- Permit holiday rentals to be open all year to provide cheap rental property out of season
- Add social housing prioritising initially, Islanders most in need, then key workers
- Undertake a full housing needs survey on the island
- 40% discount rate for rental and properties for sale is achievable but may lead to existing sites being unviable or have slow delivery. Requires testing against other policy requirements in a plan wide viability assessment. Add evidence that the increase in first homes discount is viable
- Bembridge does want affordable homes for young families but not large homes for holiday homes or AirBnB
- Affordable housing in Bembridge would not be affordable and should be built elsewhere on unused sites, brownfield and sites needing improvement
- Add reference to new build or conversions for co-ownership or mutual housing trust affordable housing and community led housing
- Provide affordable housing at Camp Hill and East Cowes Factory site for first time buyers
- Add reference to modular based construction to provide affordable quick provision
- Clarify why contributions cannot be collected for affordable housing on developments of 9 units or less outside the AONB
- Provide information on how much ex key worker housing is recycled for key workers
- Only rental housing is needed in rural locations
- No exceptions should be permitted in the AONB
- Provide further evidence to help understand the decline in affordable housing provision and the effect on affordability in settlement with no development and whether the market will want shared ownership first homes
- A shortage of housing for seasonal workers is not addressed
- Policy should address the issue of developers applying for 8/9 units to avoid affordable housing provision

Policy H6 Housing in the countryside

Total number of comments 14

Object 6

Support 6

General comment 2

Key issues

- Support policy
- Independent accommodation is often needed to support farming enterprises
- Add to policy `exceptional quality designed properties`
- Amend para 7.57 as NPPF no longer requires temporary dwellings to demonstrate essential need
- Should retain agricultural restrictions which protect property
- Strict enforcement is required
- Amend to criteria b) the need to protect traditional or vernacular architecture
- Amend criteria c) to stipulate that the structure should be capable of conversion with only minor external modification. Conversions should be limited to buildings over 50 years old, be substantially constructed of brick or stone and require few external modifications to their materials or openings
- Concern that criteria d) gives a vague definition of `heritage asset` and the wording should be strengthened to “secure the optimal use of a heritage asset, or secure the future of a heritage asset, but only in cases where the development is entirely heritage asset, and where the development is entirely sympathetic to the asset itself, its surroundings and complies with the asset itself, its surroundings and its benefits outweigh any costs of the development.”
- Amend criteria d) to require appropriate recording or other mitigation
- Add to para 7.61 that in the case of conversion of buildings which are heritage assets, appropriate recording may be required
- Add to para 7.69 that compliance with other relevant policies of the plan will need to be demonstrated
- Amend policy to avoid preventing an existing occupant of a rural dwelling from having major adaptation / reconstruction work undertaken to fulfil a health, care or access need
- Amend policy to add reference to the viability and feasibility requirements of policy G4 and amend to state ‘...the Council will support proposals that provide 35% affordable housing, or an alternative provision as demonstrated and supported by a suitable viability appraisal and in accordance with Policy G4
- Extend policy to cover small developments for local needs and affordability

Policy H7 Rural and First Homes exception sites

Total number of comments 26

Object 13 Support 8 General comment 5

Key issues

- Support policy and support rural affordable housing in-perpetuity
- No market homes should be built on rural exception sites. Rural exception schemes should be 100% rental with no open market housing and reflect local design. Town and parish councils should set criteria for who is local and this should be added to the policy
- Amend para 7.65 to ensure housing sites on council land is 100% affordable in perpetuity and preferably social housing
- Amend para 7.68 – 20 dwellings is too high for small villages. It should only be 5 dwellings in Calbourne. The number of dwellings should be proportionate to the size of the settlement. Make clear that 20 dwellings would not be appropriate in the AONB as it is `major development`
- Amend para 7.71 as first homes and open market homes should not be sold to non-residents or become second homes
- The policy could be mis-used to develop on greenfield sites in rural areas outside settlement boundaries. These areas can be important for the character and identity of a settlement. Any sites should be sustainable
- Amend policy limit to not more than 20 dwellings. Define `local need` as within the parish. First home exception sites should only be in rural areas with a local need in the parish and limited to 20 dwellings
- Windfall on greenfield sites should only be permitted where there is a local need within the parish or returning to the parish
- Policy should be strictly enforced
- Development should be exceptional in character, providing a one-off unique benefit with only one scheme in each area
- There is no evidence that exception sites would be viable or meet the target for new affordable homes. Removing greenfield sites from the plan makes delivery of affordable housing even less likely as they need to be properly planned for
- Delivering First Homes on exception sites is a risky approach reliant on small unallocated sites coming forward
- Amend policy so it does not prevent an existing occupant of a rural dwelling from having any major adaptation / reconstruction work undertaken to fulfil a health, care or access need
- Clarification is needed whether First Homes exception sites means the Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2019

Policy H8 Ensuring the right mix of housing

Total number of comments 15

Object 11 Support 2 General comment 2

Key issues

- Support “the policy approach should avoid the risk of creating “imbalanced communities and unviable developments”
- Add criteria recognising the objective of Policy H9 to deliver new housing on previously developed land
- Clarify why developments can’t be all affordable
- Add that half of all new properties should be sold to island residents
- Add a stronger emphasis on renting property
- Para 7.74 - add a definition of affordable one bed properties to exclude HMOs but includes properties for professionals and young people
- Amend para 7.76 to add provision for some Part M4(3) (fully wheelchair accessible) homes
- The mix is not targeted at young island families but holiday/second homes
- Object to the target of 1 bed private flats and 4 bed properties being as low as 5%
- Add evidence to justify housing mix should be based on an identifiable housing need for Island residents in that specific area
- Policy should be strictly enforced
- The percentages included in the policy are only a snapshot in time and will change over the plan period. Add flexibility to respond to local market demand and ensure viability.
- Add to supporting text to support the creation and maintenance of a register of the various types of accessible rented accommodation on the Island
- Amend policy to reflect that some sites would not be able to deliver larger sized units eg. Medina Yard.
- Object to using the register as the determinant of the mix for affordable rent when it excludes residents who are not accepted on the register
- The mix set out in the policy does not take into account that the plan does not deliver enough homes to meet growth
- Object to the proposed mix for private development for 1 bed (5%) and 3 bed (40%) units as it is unviable in flatted developments and contradicts policy H9
- Amend policy to set larger regeneration sites an alternative housing mix or increase flexibility
- Setting a prescribed housing mix is unsound. Delete the final paragraph and table specifying the mix of homes
- Add such developments should be subject of local links in perpetuity

Policy H9 New housing on previously developed land

Total number of comments 15

Object 5

Support 7

General comment 3

Key issues

- Support policy
- No recognition is given to the impact of the policy on the land available for employment
- Add that house building on pdl should be sustainable
- Amend para 7.7 – if a brownfield site is unavailable within a certain time constraint, this should not be a reason to allow building on greenfield sites just to meet housing targets
- Amend para 7.79 - adequate for the Island identified housing need for Island residents has been identified
- Clarification is needed what happens if up-to-date housing needs surveys are not available and the means of identifying locally identified housing need
- Policy should be strictly enforced
- The council should re-develop brownfield sites into development ready sites and approach Government on the viability of this approach
- Clarification is needed on the definition of previously developed land and brownfield sites as currently it could include any commercial buildings
- This should be applied to derelict hotel buildings and disused holiday camps and other large empty properties
- Add proposals should make the most efficient use of sites in their urban context and the policy should recognise that significant weight should be awarded for housing development on previously developed land
- Add criteria that brownfield development should be focussed on local linked housing rather than open market housing

Policy H10 Self and custom build

Total number of comments 13

Object 6

Support 4

General comment 3

Key issues

- Self build should be located on individual plots not larger housing sites as encouraging amateur builders is less efficient and would not speed up housing delivery
- Support policy
- Add to policy that development must include features to combat climate change
- Object to the 25 dwellings threshold
- Delivery of self build plots on housing developments can lead to issues of access to the site and site management. Some flexibility is therefore needed in how custom and self-build plots are provided and this should be added to the policy
- Self build plots should be restricted to those who have lived on the island for at least 15 years and not be for those wanting second or holiday homes
- Object as the policy does not ensure the same quality standards are met for self-build on major sites. The policy is too onerous for a small number of units
- Add exemption to policy for strategic sites allocated under policy H2
- Policy is not justified or consistent with national policy
- Policy merely changes the form of delivery and other approaches should be considered to support self builders including use of council owned land
- Self build registers rarely provide an accurate assessment of the demand for self-build homes
- Amend policy to provide a mechanism allowing unsold plots to revert to the developer if they remain unsold after a 6 month marketing period
- Support policy where it meets high environmental standards and a local link priority

Policy H11 Planning for Gypsy, traveller and travelling showpeople provision

Total number of comments		5				
Object	3		Support	0	General comment	2

Key issues

- Sites should be allocated in the plan
- Para 7.96 – in final sentence replace heritage assets with the historic environment
- Add reference to recognition that people in the gypsy and traveller communities may have access needs

Policy KPS1 Key priority site 1: HA39 Camp Hill

Total number of comments 61

Object 41 Support 11 General comment 9

Key issues

- Support policy and allocation and the preparation of a masterplan
- High rise development should be considered instead
- The development would have adverse environmental impacts on green spaces and will destroy the diverse habitat and wildlife haven. Huge impacts on hospital, schools, local infrastructure, sewage and drainage. There are insufficient jobs, gridlock and pollution at St Mary's junction and serious impacts on the adjoining forest, trees and unique habitat on the fields
- Concern on public transport connectivity and would like to see this come forward through the masterplanning. A better understanding of the build out rate of the development would be helpful
- Add to policy the highway improvements required to ensure the development has minimal impacts on the highway network
- Good site for affordable housing and should not be for second/holiday homes or high cost rental
- Object to the proximity to the Parkhurst Forest.
- Reduce housing by 30% and add a visitor centre and country park. A new primary school and village centre should be included. All houses should have a minimum of 2 spaces
- The map should be adjusted to exclude the Camphill estate which is private housing
- The development is too large and will have traffic implications. The houses should only be sold to island residents
- The development will do nothing to protect the environment or put money into tourism, entertainment or employment or to improve the island's infrastructure
- The unique beauty of the island should be preserved
- Flooding on and near the site is an issue as water floods down from the field
- Need parking for all the cars on Camp Road
- Development will lead to a loss of dark skies
- The development is distant from amenities and the highway network and should contribute to the highway schemes in Policy T1
- Amend policy and text to take account of Forestry England's Principles for Development Sites Adjacent to the Nation's Public Forests and to enable sustainable management of the area
- New development should be located only on the brownfield land not the surrounding green fields
- Object to the impact on the wildlife in the forest and impact on protected species
- The sewers have no further capacity
- Add an ecological buffer of 50m around Parkhurst Forest to take account of the sensitivities of site specific locations. The buffer area must be wide enough to protect the existing and future ecological features and absorb additional recreational pressure. The preferred approach is to create new habitat, including native woodland, around existing ancient

woodland and linking to nearby woodland sites. This will help reverse the historic fragmentation of this important habitat. The consequent increase in ecological connectivity between areas of ancient woodland will enable the creation of resilient landscapes and help to mitigate climate change

- The fields around Camp Hill prison should be replanted with trees and given back to the Forestry Commission or designated a natural park.
- Object to the number of dwellings and question delivery by the local authority
- It is premature to allocate the site for housing as it is not certain it will be available. It risks coalescence with Northwood
- Two hectares of employment land is insufficient
- Object to use of greenfield part of site. Only build on the old prison site and carpark use for affordable and rental homes for local people
- Rare species depend on this habitat
- It is unclear how access will be achieved and considerable congestion is likely along Forest Road and Standen Avenue
- Insufficient local services and facilities. There is regular traffic congestion
- is also renowned for its rare lepidoptera assemblage, populations of dormice, red squirrels, as well as supporting 16 species of bats for both foraging and nursery roosts. The Forest also shows evidence of remnants of ancient wood pasture. Parkhurst Forest also includes a SSSI
- Clarification is needed on provision of buffers and SANGs and where it will be to comply with Biodiversity Net Gain requirements
- Change references from Forestry Commission to Forestry England
- Support the creation of a Statement of Common Ground with Forestry England to ensure liaison between the Local Authority and future developers, potentially in partnership with Natural England to ensure the protection of the Parkhurst Forest SSSI
- Residential properties should be aligned to have their gardens facing away from ancient woodland, not backing onto it
- The hydrology of the site should also be considered as to avoid it impacting on the ancient woodland. This includes the use of Sustainable Urban Drainage (SUDs), which should not be sited within any buffer zones
- District heating system should use wood fired district heating using woodchip or pellets alongside Forest Road energy from waste. Should use locally-sourced timber
- Object to housing site allocation
- there is a question mark over the evidence that shows it is a viable and deliverable scheme? Is at least 1,200 homes the right quantum? Is 35% affordable housing viable? Is there enough demand for the quantum of employment use proposed? What assumptions have been made in relation to demolition costs, site remediation and abnormal costs? Delivery of all the requirements is 'a big ask' without subsidy. Further work is required to ensure that the scheme is deliverable. The MoJ are committed to working in partnership with the council and stakeholders
- Services must be provided upfront
- A 15m landscape buffer is insufficient. A minimum 50m buffer should be maintained between the development and ancient woodland, including construction. A larger buffer may be needed for significant engineering operations or after uses that generate significant disturbance
- Reliance on this site is a high risk as it is still a prison and the farmland has not yet been released by the current owner. It is not a prime location for housing. A higher level of allocations is needed to achieve delivery targets

- Biodiversity in the fields surrounding Parkhurst Forest is not being recognised
- Rooke Street is not suitable for more traffic or pedestrians
- Site provides an opportunity to deliver sustainable development connected by walking, cycling and public transport and active travel. Density should be high to maximise viability of public transport with open space retained
- The Camp Hill social club/community centre should be retained and modernised and the existing memorial preserved
- Recognise potential for impact to Parkhurst Forest SSSI and features it supports. Impacts include loss of supporting habitat for bats and significant visitor pressure on the ancient woodland. Use of significant landscape buffers and engagement with Forestry England are recommended
- Development of land identified as part of the Island's ecological network could lead to fragmentation and the loss of potential restoration sites and therefore should be avoided. Developer contributions will be required to ensure that effective long-term mitigation and management can be delivered. A high level of on-site green infrastructure is required to minimise recreational impacts
- The loss of the fields will have a detrimental impact on the presence of informal play areas for children and young people
- Concern on the impact of residents in the area around the site during and after development

Policy KPS2 Key priority site 2: HA44 Newport Harbour

Total number of comments 15

Object 8

Support 6

General comment 1

Key issues

- Support policy
- Too many dwellings are planned on the site and delivery by the local authority is questionable
- Development restricts further employment opportunities. It is questionable if marine uses are realistic and whether there is demand for offices
- The flood risk to the site has not been adequately considered so the policy is unsound. Previous concerns on this site still stand
- The site allocation is not evidence based and relies on future studies not yet complete. No information is given on the flood characteristics likely to be experienced across the site. It is therefore not possible to conclude that the mitigation measures shown are deliverable or appropriate. Little information is available regarding potential flood characteristics at the site over the lifetime of the development (i.e. depth, velocity, duration, onset etc.) beyond the fact that there appears to be a significant risk of inundation both at present day and increasingly over the coming century. Further work is needed before the site can be allocated and it does not comply with the NPPF
- Object to progression of a masterplan despite concern on the lack of recognition given to the significant and complex flood risk issues on the site
- Add cross references to policies KPS1 and C4 to maximise benefit to Newport and the island
- A guarantee is needed that 35% affordable housing will be built and services for the development must be provided upfront
- Will add further pressure to traffic congestion, hospital and healthcare services
- Clarification is needed on employment opportunities for new residents
- There is a high level of risk depending on a small number of large schemes with questionable delivery. A higher level of allocation is needed to achieve the delivery targets in the trajectory
- Clarification is needed on the viability testing undertaken for this site as it is a key site
- Development is distant from the highway network and should contribute to the highway schemes in Policy T1
- Amend duplicate numbering of the criteria in policy

Section 8 General

Total number of comments 5

Object 1

Support 1

General comment 3

Key issues

- Support the employment policies but question if they will generate sufficient employment to support the increase in dwellings
- Recognition must be given to the changing economy needs of the Island and former industries which are either being modernised or obsolete on the Island due to global economic and former industrial pressures
- Policies should be flexible in future protection, relocation and change in employment uses and development; allowing opportunities for the Island's economy to adapt and to plan ahead for the future business opportunities and demands of tomorrow and to respond to local situations

New allocations

- The farm buildings at East Afton Farm should be allocated for employment and mixed uses purposes
- East Cowes waterfront should be a new employment allocation

Policy E1 Supporting and Growing our Economy

Total number of comments 41

Object 25 Support 4 General comment 12

Key issues

- Support policy
- Economy and Employment should be the first section in the Plan
- Amend policy to
 - add references to the need to support agriculture
 - refer to Solent Freeport
 - refer to small businesses
 - add references to developing local Skills and Innovation centres
 - add a job creation target
 - add reference to local employment or infrastructure to support remote working
 - allow commercial buildings of more than one storey
 - make reference to manufacturing on the island a significant employer
- Add employment allocations to the Plan
 - Allocate employment land in west wight. Fort Victoria is a potential location for B1 units and the River Yar Boatyard has potential as does farm diversification. Golden Hill has further potential. Land in Afton Road is largely used already and is in a flood area
 - Add employment sites close to the Bay, Pan, Camphill, Ventnor or Freshwater
 - Land at Horsebridge Hill should be allocated for employment with housing as enabling development
 - Allocate redundant sites including hotels, petrol stations, car showrooms and farm buildings should be allocated for employment not housing as a first option
 - Allocate the Ice Rink in Ryde
 - Medina Yard
 - Add more employment allocations to give greater choice
 - Allocate sites to support the Freeport and Solent Gateway
- There is no proper assessment of the need for employment land. There is insufficient employment provision in the Plan overall particularly in west wight and the rural area. Too much employment is focussed on Newport. Sufficient housing must be allocated to ensure delivery of employment development. The plan overemphasises publicly owned employment allocations
- The policy does not address the barriers to economic growth, such as inadequate infrastructure, education, services or housing, or a poor quality environment. No reference is made to the economy of the island and how to grow it or achieve it.
- Clarify the industrial employment sites in Cowes
- Amend policy to `... commercial uses that may be located within them and ensuring any new development outside these areas has no detrimental impact on them:...'`
- More encouragement is needed for eco businesses
- Deep water frontages should be retained for employment not housing

- Browns Golf course should be left for the community
- Plan should seek adjacent employment and housing to reduce travel need
- Housing sites of more than 25 units should include employment space
- Amend para 8.1 first sentence as the IOW is not growing as an island
- Amend para 8.4 to read “The Council will insist on the provision of the infrastructure required to deliver development”
- Para 8.7 add `will also need to demonstrate compliance with other plan policies`

Policy E2 Sustainable Economic Development

Total number of comments 5

Object 1

Support 2

General comment 2

Key issues

- Support policy
- Amend criteria c) to “result in the re use of previously developed land and/or building for economic purposes suitable for and reflective of the location, building and land type, and relationship with surrounding landscape and built environment, in particular when the location is within the AONB”
- Amend policy to reflect that Pedestrian, cycle and vehicular access / facilities to these sites must be suitable for all users, including those with mobility aids and adapted cycles
- Amend policy. resistance to the loss of ‘employment’ land due to ‘water access’ is unduly proscriptive and may prevent alternative viable uses of site to be considered (especially sites which do not utilise existing access to water currently or in the recent past).
- Amend supporting text. Flexibility should be exercised in the marketing evidence recognising those constraining factors which might hinder an applicant’s ability to offer alternative employment opportunities.

Policy EA1 Employment allocation land to the east of Pan Lane

Total number of comments 3

Object 0 Support 0 General comment 3

Key issues

- Add that bus service improvements would need to be funded by the developer
- Add a reference to the flood risk at this site. A FRIS will be needed together with avoidance of flood risk areas and flood plain compensation provided. Add that this allocation could provide betterment for downstream communities
- Add a buffer zone policy within this allocation to ensure access to the river is maintained and ensuring the integrity of the river banks

Policy EA2 Employment allocation at Nicholson Road, Ryde

Total number of comments 3

Object 1 Support 0 General comment 2

Key issues

- Add developer contributions for the diversion of the service 2 bus between Newport and Ryde as such a diversion would not be commercially viable
- Development would cause increased water runoff into Monkton Meads Brook unless water capture features are provided. This development should be replaced by one at west Ryde
- Correct para 8.15 - the Council has not secured outline planning permission of 19/00922/out as stated in the document - it only has resolution to grant

Policy EA3 Employment allocation at Somerton Farm, Cowes

Total number of comments 7

Object 1 Support 4 General comment 2

Key issues

- Amend policy and text to include information in the Cowes and Northwood Place Plan
- Amend site boundary to wrap around the scrapyards as the sloping area suitable for housing and allows least visual impact and opportunities to limit and manage impacts from HGVs

- Support retention of existing trees and hedgerows. Add requirement that where removal of trees is unavoidable a proposed tree replacement ratio reflecting the Woodland Trusts guidance is expected
- Add additional criteria “j) have no detrimental impact BAE System’s Cowes site to the west.”
- Add reference to appropriate archaeological investigation/mitigation also being required

Policy EA4 Employment allocation at Kingston, East Cowes

Total number of comments				3	
Object	1	Support	0	General comment	2

Key issues

- Site is not a new allocation and the reasons for non-implementation have not been addressed.

Policy EA5 Employment allocation at Lowtherville, Ventnor

Total number of comments				4	
Object	0	Support	2	General comment	2

Key issues

- Support allocation
- Support para 8.34 to retain where possible existing trees and hedgerows or provide mitigation where this is not possible, but this should be reflected in policy EA3
- Removed trees should be replaced

Policy EA6 Employment allocation at Sandown Airport, Sandown

Total number of comments				8	
Object	3	Support	1	General comment	4

Key issues

- Amend policy to require appropriate archaeological investigation/mitigation
- Site should be listed as suitable for F1c use to encourage heritage centre or museum uses
- Question deliverability because of access issues due to the site being too small. The site should be expanded to address this

- The option of creating a Sandown Airport Station should be left open
- Site is not suitable for B2 or B8 uses but may be suitable for office use and should not be detrimental to the recreational use of the airport or the adjacent caravan and camping site

Policy E3 Upskilling the Island

Total number of comments 9

Object 4

Support 2

General comment 3

Key issues

- Support policy
- Further supporting information is needed to provide the rationale for the threshold of 25 dwellings
- Clarify policy to make clear whether the employment and skills plan is required during the assessment of an application or whether it can be conditioned to a permission. This should be post submission to allow for changes in the construction phase.
- Object to policy as it is a brake on development; is not a planning matter; and is not possible under planning powers. A condition would be needed but would the condition meet the required tests?
- Amend the supporting text to explain how this will be monitored

Policy E4 Supporting the Rural Economy

Total number of comments 14

Object 6 Support 4 General comment 4

Key issues

- Support policy
- Amend policy to
 - encourage sustainable economic development in west wight
 - resist loss of agricultural land to housing, commercial use or tourism
 - ensure that farming remains the principle use of the land
- Amend para 8.55
 - consider allowing conversion for diversification to include holiday lets as part of tourism growth
 - add conversion must be sensitive and building recording prior to conversion will often be required as a planning condition
- Amend para 8.59 as it contradicts para 8.55 where you are only allowing stone barn conversions for rural and agricultural workers
- Para 8.61. The plan discriminates against barns and modern structures which do not add to the rural or historic character and could lead to very few barns qualifying for re-use
- Amend criteria b) to clarify the built form of the farm should remain as farming use
- Amend criteria c) as it gives licence to aggressive expansion and industrialisation of rural areas and not all rural areas are suitable
- Amend criteria d) converting historic buildings can cost more than new builds. It is hard to imagine any conversion coming within the bracket of "affordable/low cost"
- Amend criteria e) to clarify whether this allows buildings to be constructed for any economic purpose including tourism if next to a village or employment site
- Amend criteria f) to
 - Add any features of architectural or historic interest are conserved or preserved by record
 - make clear that such conversions will be subject to, in perpetuity, an agricultural workers restriction.
 - Delete criteria as it is covered by Policy H6
- Clarify text to make it clear if Policy E11 overrides economic development if it is considered to harm the AONB
- Add text prioritising employment and industrial proposals rather than residential conversions unless restricted to holiday accommodation
- Amend the supporting text to quantify and distinguish as not all rural economic projects (which use farm land) are diversification projects.
- Supporting text should reflect probable demand for more farm building following the Government new agricultural policies. Diversification should allow for uses which are good for the rural economy and lifestyle but not necessarily on strict landscape issues

Policy E5 Maintaining Employment Sites with Water Access

Total number of comments 8

Object 3

Support 2

General comment 3

Key issues

- Amend policy to
 - maintain and protect the public's right of access to the water given the Island's reliance now and in the future on tourism
 - be flexible, considering future operations where development part retains employment opportunities and encourages alternative or more appropriate types of business which meets future needs or facilities for the Island (rather than those industries of the past)
 - recognise the allocated site, HA019 Medina Yard Cowes. Clarity is needed on how policies E5 and H2 would interact
 - take consideration of any financial costs which may be required to maintain 'water access' to the river which can be prohibitive of future development
 - address the current position of stopping all businesses uses changing where they have water access, even when the business is no longer needed in that location, or doesn't need a water access
- Correct typo in para 8.75 to read Marine Management Organisation and amend to read 'The historic environment (including palaeoenvironmental deposits) in the Medina Valley is significant and vulnerable to change, and development proposals should also take this into account'
- Add references to the Cowes and Northwood Place Plan. It is threatened by splitting the East and West medina regeneration zones and should be replaced by north medina
- Yarmouth Harbour area including Hayles Boatyard and the land/water south of the road could be improved for business purposes and is an opportunity for the West Wight
- Clarify 'net loss of employment use'. Is it floor space, number of employees, or number of businesses on site? Clarification is also needed on 'access point' – is this an existing or future access point? Does this include public or provide access?

Policy E6 Future Proofing Digital Infrastructure

Total number of comments 12

Object 6

Support 4

General comment 2

Key issues

- Support policy
- Amend policy to
 - delay more development until infrastructure shortcomings in paras 5.96-5.103 are addressed
 - exclude self builds and extensions from these requirements
 - ensure that any infrastructure placed within the public realm (e) is designed so as not to cause a barrier to pedestrians with mobility or other access needs
 - prevent a change of use from retail to residential
- The broadband policy needs to be widened beyond new development to support a strong reliable rural broadband
- A strong and reliable rural broadband is a key asset in the growth of the rural sector and its associated businesses
- Object to policy on broadband only covering new development and a strong reliable broadband is key for the growth of the rural sector
- Developments of all sizes should deliver town centre wifi hotspots and other community digital access measures including in rural areas

Policy E7 Supporting and Improving Town Centres

Total number of comments 13

Object 9 Support 4 General comment 0

Key issues

- Support policy
- Amend policy to
 - allow for flexibility of spaces for commercial use
 - add requirements for retail provision required along with a given number of new houses. A local shop is needed for large developments
 - justify the restrictions in changing former retail shop fronts given recent planning changes
 - require new developments or improvements to town centre premises to be designed to improve access or otherwise be able to make reasonable adjustments as required under the Equality Act 2010. Appropriate design regulation and guidance (such as: Part M (volume 2) and BS 8300 (2018), as well as ‘Inclusive Mobility’ and ‘Manual for Streets’) should be applied when planning, designing or reconfiguring public realm areas. Add the provision of toilet facilities and resting places (including seating) throughout town and village centres)
 - include a presumption in favour for change of use to a different Use Class to attract people back into the town centre. This should be supplemented by the granting of permission for residential accommodation over, and removal/reduction of car parking charges within town centres
- Amend supporting text to clarify car parking provision in the centre of Newport. Object to the loss of car parking
- Amend para 8.92 by
 - adding regeneration proposals in the core of Newport should consider the impact on below ground archaeology and the Archaeology & Historic Environment Service should be consulted at the earliest opportunity
 - removing the example given
- Add supporting evidence to underpin the extent of town centre boundaries and the primary shopping areas
- Clarify what is meant by “encourage and facilitate linked trips to the nearest town centre”
- How have the loss of traditional shop fronts been considered?
- Add clarification on the relationship between IOWC and Island Roads
- Brading high street should be protected

Policy E8 Supporting the Evening Economy

Total number of comments 3					
Object	2	Support	1	General comment	0

Key issues

- Support policy
- Clarify how the conflict between the evening economy and use of spaces over retail units for residential can be resolved
- Add explicit encouragement to the opportunities for developing and promoting accessible tourism

Policy E9 Supporting High Quality Tourism

Total number of comments 33

Object 21

Support 4

General comment 8

Key issues

- Support policy
- Add criteria to policy to establish viability of tourist accommodation by requiring:
 - Proof of marketing for sale at a reasonable market price (for a minimum of 12 months)
 - Evidence of attempts to save or reposition the business
 - Evidence of business performance when set against local and regional benchmarks, such as the levels of occupancy relevant to South East average
 - Evidence of professional and competent management
 - Amend criteria d) to `contribute to maintaining an overall mix of tourism accommodation across the Island that offers a range of styles; and`
 - Amend criteria e) to distinguish between an attraction which may encourage all-year tourism, and accommodation which in itself would not attract tourists
- Amend policy
 - Add clarification on what exceptional circumstances might include
 - Add criteria to the policy to protect the character of Sandown
 - Add a requirement for tourist related proposals to develop green and new niche tourism products
 - Add a requirement to prevent change of use from employment to residential
 - Deleting criteria c) and d)
 - Add proposals `should demonstrate how they: Promote and facilitate active travel and create no net gain in private car trips`
 - Actively encourage accessibility by promoting adaptations of existing tourism facilities and diverse forms of new developments of this type and encourage wheelchair accessible accommodation and access to the beach as other coastal areas
 - Add a presumption in favour for change of use to a different Use Class to attract people back into the town centre and allow for residential accommodation
 - Add the need to capitalise on the interest of the Island's natural and heritage endowments to attract a higher spending, less seasonal visitor market
 - Clarify if new tourist accommodation in sustainable locations (such as settlement boundaries, town centres, or within close proximity of established tourist attractions) would be supported
- Object to "Within the core tourist accommodation areas, as shown on the policies map, the council will resist the loss of tourist accommodation" as it is weak
- Object to encouragement of tourism which puts unsustainable pressure on housing and healthcare provision
- Re-use derelict hotel sites

- The Plan should distinguish between purpose built accommodation and tourism in unrestricted residential accommodation. Tourism should not exacerbate the housing shortfall
- Add reference to the need to co-ordinate between planning strategy and Visit Isle of Wight in the promotion of local homes friendly tourism
- Support reuse of existing tourism sites rather than new ones
- It is not possible to enforce a 52 week holiday use and a dated 2/3 month off season closure policy for each tourism accommodation development is needed
- Limit the number of properties taken out of residential use and used as second homes or short term holiday lets
- Exclude motorcycling from the definition of tourism
- Object to protection of core tourist areas as it protects poor quality buildings. Supporting evidence is required to support this position
- Supporting text should reflect the negatives associated with tourism
- Clarify if tourism overrides AONB policy
- Legal Agreements could also restrict the sale of properties to prevent them being sold as second homes, or as holiday accommodation
- Tourist accommodation should be rigorously protected by policy

New Policy

- Restrict Air BnB and add a policy to require planning permission when the whole of a dwelling becomes a tourism/short let property

Policy E10 The Bay Tourism Opportunity Area

Total number of comments 10

Object 4

Support 4

General comment 2

Key issues

- Support policy
- Add a reference to Brown's Golf Course
- Add to policy that any development should consider the impact on below ground archaeology and that the Archaeology & Historic Environment Service should be consulted at the earliest opportunity
- Amend para 8.105 to make reference to the importance of the early 20th century design influences in the area of Sandham Gardens, Isle of Wight Zoo and Dinosaur Isle. This should be incorporated into aspirations to improve the gardens and open spaces in the area and also applies to other key public open spaces in The Bay
- Former hotels should be quickly restored for visitor accommodation
- Support recognition in policy of development taking account of current and future flood risk. It will have to be demonstrated that any development is safe
- More council intervention is needed using an Local Development Order for Sandown
- Rename the section as the Sandown Bay Tourism Opportunity Area
- East Cowes should be designated an area for tourism opportunity area

Policy E11 Ryde Tourism Opportunity Area

Total number of comments 7

Object 3

Support 2

General comment 2

Key issues

- Support policy
- Amend the named zones to reflect the Place Plan and reference the Place Plan rather than the Chamber of Commerce Plan
- The Royal York Hotel should be used for visitor accommodation
- Amend policy to ensure that any development is appropriate in terms of flood risk
- Add to policy the need for a clear design strategy approach as a masterplan to inform planning applications adding a requirement to respect and add a reference to the late 19th century and early 20th century character of the local built and designed landscape environment of Ryde
- Designate East Cowes as a tourism opportunity area
- Add reference to encouraging opportunities to develop and promote accessible tourism
- The designation should have site allocations

Section 9 Transport General

Total number of comments		14
Object	3	Support 3
		General comment 8

Key issues

- Add to policy that weight must be given to the traffic flows arising from development from across the island
- Support sustainable transport and electric charging
- Legal agreements should include new public footpaths and cycle tracks. Maintenance of public rights of way should be defined in planning applications. Historic rights of way should not be diverted
- Improvements are needed to public transport in rural areas
- Replace `A better connected island` with `a better safer and connected island`
- Add to policy that developments should include a safety risk assessment for pedestrians and cyclists
- The island roads are insufficient to cope with current and future traffic
- Support new cycle tracks but needs to be a more comprehensive strategy to replace cars on the roads
- Add reference to preparing a Supplementary Planning Document to set out local urban and rural design standards
- Add policy to ensure protection and enhancement of Rights of Way and National Trails
- New roads should be made wider than the legal minimum

Transport Foreword

Total number of comments 4

Object 0

Support 4

General comment 0

Key issues

- Support the policies, key objectives and roles outlined
- Support the need to promote and develop sustainable transport and that a key policy performance indicator for enhancing cross Solent travel will be the number of applications that improve (or are permitted) cross Solent terminal per year
- Support links to the Local Transport Plan
- Add a sentence recognising the island's transport estate as the single biggest continuous land ownership we have, and a massively significant proportion of the land surface
- Add reference to a need to maintain and improve cross-Solent travel (including connectivity with mainland services), provide affordable parking in town centres in order to encourage their use, and facilitate sustainable travel by (among other things) providing electric charging points and ensuring that all parts of the Island have access to public bus services

Policy T1 A better connected island

Total number of comments 42

Object	26	Support	8	General comment	8
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Key issues

- Support policy
- The bus transport is over provided, expensive and operated by one company
- Amend policy to take account of the role the bus can play to meet climate change and air quality objectives. Include requirements to
 - i. Ensure a Prioritised network that assists modal share in favour of the bus including bus priority in appropriate locations
 - ii. include bus priority measures at the junctions highlighted within the policy
 - iii. Enable an excellent infrastructure and as well as good interchanges between transport modes on the Island
 - iv. Ensure that buses serve new developments as set out in the appropriate policies elsewhere in the document
 - v. Include a requirement for the need for travel plan for the whole site to make necessary contributions in order to implement sustainable transport initiatives, including minimising car usage and increasing the use of public transport, walking and cycling
- Section 9 is car orientated and lacks vision. There are only 4 shared path schemes, no reference is made to bus services or the schemes listed in the Cycling and Walking Infrastructure Plan 2020-2030
- Support para 9.5 and seeking to enhance high quality connections through all modes including ferries and “The Council has a duty to promote sustainable transport”
- Amend para 9.7 adding a source for the list of infrastructure schemes and a reference to Local Cycling and Walking Infrastructure Plans. Add references to the LCWIP to T1 and para 9.8. Add other schemes listed in the Council’s LCWIP and bus services to planned infrastructure improvements
- Amend wording in para 9.15 to: Because of the history, the ongoing instability and the core purpose of The National Trust, who own the majority of the most vulnerable land over which the Military Road passes, it is considered appropriate to investigate this issue once again to be able to provide a clear direction. A feasibility study for Military Road is needed to resolve the issue to comply with NPPF para 104. Concern on the possible closure of Military Road and seek commitment to resolving the issues on alternatives
- Amend para 9.18 to read “improve the efficient use of remaining vehicles”
- Amend para 9.21 The creation of new roads connecting urban and rural areas seems unnecessary. The second sentence should read “The maintenance and improvement of existing sustainable routes between urban and rural areas...”
- Amend table 9.1 removing focus on increasing traffic capacity and refocus on bus prioritisation, walking and cycling schemes and alternatives to mass car-ownership, such as building in car clubs into new developments. Delete unfeasible junctions set out in 9.1
- Delete Table 9.2

- Amend policy adding road junctions at Branstone Cross and Sandown Airport on the list of key infrastructure improvements
- Amend policy adding a full cycle network, reinstatement of the Undercliffe highway, local schemes in rural areas, highway measures to reduce bus travel times and delays and in locations with large bus movements bus priority measures such as bus lanes and signal priority
- Amend policy adding reference to the need for a fixed link to the mainland
- Update as St George's Way has recently been completed
- Amend policy. The justification for each scheme should be revisited in the light of current transport trends. Give priority to non-motorised users' needs at every stage in development planning and road design.
- Add reference on delivering accessibility, ongoing changes in travel behaviour and Government guidance in Gear Change -A bold vision for cycling and walking
- Large housing allocations should promote good road connections to ease public transport provision, distribute traffic and provide resilience to the network
- Clarification is needed on what is meant by 'help create high quality places' and the role played by transport
- Support shared paths and new cycleways and new sustainable transport routes for cyclists, pedestrians and horses.
- Object to unsegregated 'shared' routes unless the total number of users is very low and proven to not cause a hazard to vulnerable users. Object to shared paths and creating conflict between the two types of user
- Support cycle track (including West Wight Greenway) and the development of the multi-use route between the West Wight and Newport. Replace shared path route between West Wight and Newport with an upgrade of the existing route between Thorley through Newchurch round the back of Ningwood and Shalfleet. upgrade cycle path surfaces from Sandown to Newport, Wootton to Fairlee
- Object to the Newport West Wight shared path
- Add pedestrian, cycle and vehicular access / facilities must be suitable for all users, including those using mobility aids and adapted cycles
- Add improvements to cycle/road junctions outlined in the East Cowes Town Plan
- A solution to the floating bridge is needed as it has an economic, and environmental cost
- Add to the list of infrastructure improvements the road junction between the A3056 Newport Road and Scotcells Brook Lane leading to Sandown Airport
- Improvements are needed to road and public transport links to Bembridge
- Add the junction of Newport Road/ Nodes Road in Northwood, the junction of Three Gates Road and Place Road, the road junction at Smallbrook Lane/Great Preston Road, improvements to the junction between Station Road, High Street and Church Road in Wootton Bridge and improvements to Somerton roundabout to the list of key road junctions. Improvements for pedestrians, cyclists and vehicles is needed at Pallance Road and Four Cross junctions (Cockleton Lane/ Pallance Road/ Nodes Road/Place Road). A footpath is needed along the length of Wyatts Lane to Pallance Road and also along the western side of Place Road from Cockleton Lane towards the Range
- Add the provision of a Park and Ride Scheme on Fairlee Road, Newport
- Amend policy to make it clear that the list of schemes are just a selection e.g. 'schemes include...'
- Policy T1 should list, plan and cost all junction and highway improvements required over the strategy period to meet the Strategy
- Upgrading the capacity of interconnectors should be resolved before development takes place

- “Better connected island” should include cross-Solent transport, and also accessibility demands
- Reduce overlap between policies T1 and T2
- Remove references to Strategic Road Network as the island does not have any
- Clarify the strategic objective of improving the junctions listed
- Clarify if the SRTM Modelling Report (2018) still valid evidence underpinning the Plan post pandemic?
- Giving priority for the allocation of planning obligations towards junction improvements recognises that new developments generate significant trips which conflicts with sustainable development. The focus on road junction improvements encourages use of motor vehicles
- Support objective of supporting proposals which reduce the impact on air quality and climate change
- Support the planned ‘Greenway’
- Support the priority given to cycling
- Support good highway structure to any new developments
- Support initiatives to reduce traffic volumes
- To avoid an unsustainable road system in Ryde should not allow development east of Monkton Mead Brook
- Add reference to a Medina Bridge
- Add reference to road safety issues
- Amend the transport text box on page 20 to include reference to buses and the transport text box on page 30 to include reference to bus service improvements linked to Policy T1
- Policy fails to address the lack of connectivity between the railway and hovercraft terminal

New Policy

- Add new policy to seek a partnership with a commercial operator to purchase all the old railway tracks and provide electric trams for links between the major communities

Policy T2 Supporting sustainable transport

Total number of comments 26

Object 13

Support 8

General comment 5

Key issues

- Amend policy to support the IOW Restoring Your Railway bid
- Support criteria c)
- Add criteria f) enable access to local bus services
- Add reference to i. developer contributions ii. car clubs iii. Local Cycling and Walking Infrastructure Plan (LCWIP)
- Policy does not support commuting by cycling. Shared paths do not work and are dangerous
- Public transport should be available in each parish and the policy reflect local schemes developed with parish councils
- Support policy
- Support para 9.20
- Para 9.21 - add need to consider sustainable densities
- Amend para 9.22 adding that proposals should demonstrate ease of trips to get to school safely by walking or cycling and for other trips for shopping or leisure
- What supporting evidence has been used to understand the implications of this policy on the allocations proposed?
- Support sustainable transport schemes but need to add reducing traffic flow into Newport, residents parking schemes and improvements to footpaths and bridleways
- New junctions should allow for cycle usage
- There should be a stronger requirement for developers to demonstrate how the specific location is accessible to the point where car use is less attractive. Some rural locations may be more suitable for development than edge of settlements. There needs to be more explicit guidance on providing walking and cycling accessibility
- Prioritise electric vehicles and car shares
- Add Access Fund outcomes to the supporting text
- Cars, buses and lorries are causing air pollution and alternatives should be considered
- There should be no fixed crossing to the mainland
- Support more cycle paths across the island, including at Brading and a route to Sandown avoiding Brading High Street
- Providing sustainable transport access may reduce development density and viability and there is no evidence to help understand the implications of this policy on the proposed allocations

Policy T3 Cross-Solent transport

Total number of comments 19

Object 8

Support 4

General comment 7

Key issues

- A study should be undertaken to investigate a fixed link study and its viability
- More ferry routes and frequency of service is needed
- Support policy
- Add good access to the passenger ferry terminals by public transport
- Re-word policy to be less negative and supportive of the ferry links growth and efficiency
- Support criteria a) and b)
- Co-ordinate bus and train services with the ferries
- Add policy criteria for development proposals to consider the impact on archaeology and for early consultation with the Archaeology & Historic Environment Service particularly where new terminals are proposed
- Add to policy the need to improve facilities including car (including blue badge) and cycle parking, pedestrian routes to stations, drop-off points, bus / taxi facilities, waiting / seating / shelters and information points / provision
- Other solutions should be investigated to solving the chain ferry connection between East and West Cowes and for accessing the Hovercraft terminal to Ryde Esplanade Station

Policy T4 Supporting our railway network

Total number of comments 17

Object 7

Support 6

General comment 4

Key issues

- Amend policy to support the IOW Restoring Your Railway bid
- Amend policy to read “retaining current and former railway routes for future sustainable transport purposes where this would allow for the future extension of the line or support the development of other related transport improvements, including a potential rapid bus scheme”
- Support a proposal for a rail link or light tram from Sandown to Newport and Shanklin to Ventnor
- Support policy
- Amend policy to add `improvements to ferry services and the service extended to Ryde Pier Head`
- Add text to support rural bus services, car sharing and innovative transport solutions
- Amend policy to add a reference to i. the ambition to reopen the Newport to Ryde railway and extend the Island Line to Ventnor ii. the expansion of the steam railway for tourism
- Amend criteria h) to give a commitment to a review of all former routes, and enforcement of any unauthorised development
- Amend policy to improve facilities around and at stations and other interchanges
- Add reference to creating more rail halts
- Add clarification on what retain former railway routes means if they are not brought back into use
- Add reference on the opportunity of creating a Sandown Airport Station

Policy T5 Electric vehicle charging points

Total number of comments 23

Object 6

Support 8

General comment 9

Key issues

- The policy approach does not take into account the rapid changes in technology which may make the approach redundant
- Amend supporting text to add text on hydrogen and battery power
- Support policy and should encourage in rural areas
- Public charging points should be added to each parish
- Support policy
- Add a definition of “active or passive parking spaces”
- Amend policy to read “Proposals for major development should ensure an adequate provision of charging infrastructure in new active or passive parking spaces”
- Emphasis should be added on generating our own power to supply these points
- Add to policy to seek electric charge points close to all ferry terminals
- Amend policy to require developers to provide parking with a charging point for electric vehicles
- Amend para 9.33 – charging points should be installed on carriageway (on build-outs) rather than footways
- Support para 9.40
- Amend policy and text to support retrofitting EV charging points outside domestic properties
- Policy provides no standards on the number of EV charging points
- Amend policy to require all new dwellings provide as a minimum, adequate cabling to facilitate easy erection of (1 2 bed) an EV charge point (3+bed) 2 x EV charge points
- Amend policy to provide for electric vehicle ‘car club’ hubs in n new developments and provision of space for battery storage units in new builds
- Amend policy to locate EV charging points to enable disabled people to access them and that the feeder pillars and cables do not cause a hazard for users of the public realm
- Strengthen policy to require all new housing to have access to electric vehicle charging points

Policy T6 Parking provision in new development

Total number of comments 9

Object 8 Support 0 General comment 1

Key issues

- Amend policy to address concern that the policy perpetuates low density, car dependant estates in unsustainable locations.
- Amend policy to take account of town centre properties with good public transport access which could have garden space rather than car parking
- Provision of additional car parking spaces, traffic and lack of updated long term modelling and lack of strategic infrastructure leads to questions whether net zero can be achieved by 2030
- The SPD should be explicit that parking and new development should not hold up the flow of public transport and highlight where payments may be triggered for public transport contributions and link to travel planning
- For larger properties 3 or 4 spaces is more realistic as garages are not used for parking
- Ensure policy seeks on site car parking for all new development because of safety issues
- Policy should future proof transport strategy to promote transport, not storage of private cars in public space
- Provision of Blue Badge spaces in appropriate locations will remain essential as will parking for visitors
- Add text to provide more safe parking / storage provision suitable for adapted and non-standard cycles and larger mobility devices
- Parking policy should be revised to take account of multi occupancy households and most households have 2 cars at least. More parking provision on new developments

Section 10 Delivery, Monitoring and Review

Total number of comments 9

Object 1

Support 2

General comment 6

Key issues

- Support section
- Include Town and Parish Councils in this review process
- Include monitoring of biodiversity net gain: total number and type of credits created, number of developments achieving net gain and size of sites, record of on and off site contributions.
- Set delivery targets for nature recovery/improvement as a result of the plan
- Protect safeguards for most versatile agricultural land (Grade 1,2 and 3a)
- Set standards for how ecological benefits will be measured and enforced
- Increase use of enforcement powers and use compulsory purchase where needed
- Undertake regular reviews of the Plan

Site Allocations

Total number of comments 522

Object	468	Support	38	General comment	16
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HA001

- No reference is made to real local need

HA002

- Object
- Object to allocation because:
 - It erodes the rural nature of the community
 - The site boundary should exclude the car park and school field which are maintained by the Parish Council and used for sports
 - Will lead to a decline in birds and protected species
 - Increase traffic beyond the existing infrastructure. Camp Road/Queens Road junction is already dangerous and will be exacerbated by further development
 - Already struggling health services
 - Para 6.21. The increase in large homes has added to the stretched drain and sewage problems and has had a notable increase in traffic and congestion from increased the number of cars along the main road into Alum and the Needles Park. Further development will increase the number of cars.
 - Bicycles are encouraged but there are no pavements along New Road Alum Bay and no cycle tracks anywhere in Totland.
 - The infrastructure cannot cope with the present overdevelopment of large homes and the proposal of additional housing will accelerate the problems.
 - Problems of flooding on New Road Alum Bay, Church Hill and The Broadway and Middleton Roads.
 - Risk to protected wildlife and birds and animals.
 - Lack of health facilities and local facilities and additional people will overburden existing services.
 - The site should be used for a community garden and as a learning hub
 - Should not develop greenfield sites
 - Development will increase CO2 emissions and no land has been set aside for tree planting to help offset this
 - Impact on SSSIs, and SAC at Afton Marshes
 - coast and countryside are unique island features and to continue developing green spaces will detrimentally affect the tourist industry and damage the infrastructure
 - building large, detached houses will be used for second homes

HA003

- Object to allocation because:
 - It erodes the rural nature of the community
 - Will lead to a decline in birds and protected species
 - Oppose the settlement boundary changes
 - Increase traffic beyond the existing infrastructure. Camp Road/Queens Road junction is already dangerous and will be exacerbated by further development
 - Already struggling health services
 - The land identified to the rear of Lanes End is private property. The identified parcel of land covers a car park, access driveways, drying area and open amenity space which is owned and maintained by the current 24 properties on Lanes End which surround the site. Residents are deeply disturbed that their private property has been identified as a site for development.
 - The land to the rear of the allocated site is an area of significant natural interest. The open space at the back of the car park borders an area known locally as 'One Horse Field', which contains a myriad of flora and fauna species specific to the area, including rare species. The area at the rear of the car park, is a haven for wildlife and includes numerous nesting sites for birds, badgers, foxes, snakes, lizards, amongst others. The rare species found in One Horse Field could also be found in the open space at the rear of the car park, given its proximity
 - The Wight We Want survey identified protection of the natural environment in the West Wight as a main priority. Development of the identified area contradicts this, given that this is an undeveloped greenfield site. Should not destroy untouched natural habitats in favour of housing developments, particularly in an area bordered by the AONB and protected coastline.
 - There is no appropriate access to the land. Lanes End is a narrow, quiet cul-de-sac with no capacity for increased traffic flow. Current access to the site is via two private driveways. These access driveways are maintained by the current residents. Current access rights also include specific access for the properties bordering the shared driveways, who hold rights of way over the land to access their properties. The current access driveways are narrow and unsuitable for large vehicles
 - 'One Horse Field' is a protected site, left to the community of Totland Bay by the estate of Lionel Osman, to be used and kept as an open space to be enjoyed by, and protected for, the community
 - There is no evidence of the need to develop additional greenfield housing sites in the West Wight area. Current information would suggest that the population of West Wight, including Totland, is declining.
 - There is no justification of the need for additional housing stock for local people and it is not clear where will the facilities exist for families and local people to access. Use the 'brownfield' sites and unused old buildings in the parish before greenfield sites
 - The new houses will be occupied by second homeowners, or those moving to the island. There are already significant numbers of second homes in the Lanes End area with approximately 1 in 5 properties used as a second / holiday home. There is no strategy to deal with this issue
 - Development of the site would cause significant local parking issues. Loss of the car park which is owned, and utilised by the 24 surrounding properties, would see the total loss of well-used parking provision.

- Local facilities and infrastructure do not have the capacity to support additional housing e.g. healthcare facilities, bus services, congested roads
- Protect greenfield sites
- Development would increase CO2 emissions and no land is set aside for tree planting to offset this
- Impact on SSSIs, and SAC at Afton Marshes
- The loss of green spaces will be detrimental to the tourist industry and damage infrastructure

HA005

- Object to criteria b and c. SANGs may not be possible and open space should suffice
- Object to allocation because:
 - It does not preserve the environment
 - Is an important green lung
 - Site is a wildlife habitat and part of a corridor and the proposals will continue the decline in species. Will drive away red squirrels and badgers
 - Presence of rare breeding reptiles/rare bats
 - Site provides an important function in separating nearby settlements
 - The gap on Camp Road is an important separator between Pound Green and Easton and its removal would lead to merging of these areas – contrary to the Coalescence Study
 - Loss of settlement identity
 - Development would undermine the rural character of these settlements
 - Together with development of other sites at Freshwater it does not reflect sustainable development as there are inadequate services (including health services), infrastructure and jobs
 - There is no protection for existing biodiversity nor has an independent environmental impact study been undertaken
 - of the proposed number of houses and the impact on the Biosphere designation
 - Contrary to the Freshwater Neighbourhood Plan
 - There is no identified local need
 - Concern on flooding and sewerage disposal. There are yearly flooding problems at the junction of Camp Road and Victoria Road which will be further aggravated
 - There is not the demand for the resulting housing – unaffordable for residents, but used for holiday homes and by retirees
 - Redefines the settlement boundary
 - Camp Road/Queens Road junction is already dangerous and will be exacerbated by further development. No assessment has been made of the road infrastructure around the site. Problems with access, poor quality footpaths, on street parking, poor bus services and safety
 - It is a greenfield site and brownfield land should be developed first
 - There has been minimal investment in water, gas, electricity sewage and surface water facilities
 - The site is grade 2 agricultural land
 - Potential impact on a strategic tourist asset. Will contribute to the destruction of a heritage asset
 - The proposed development will be clearly visible from the Downs and the Tennyson Monument view is irreplaceable and should be protected

- It is unclear how the allocation will help achieve carbon zero targets. Development will contribute to CO2 emissions
 - Impact on the dark skies
 - Full archaeological and ecological surveys must be undertaken.
 - The density of development is not consistent with a rural area
 - Impact on tourism
 - The allocation is not supported by an assessment of the infrastructure needs of this part of the island
 - Impact on SSSIs, and SAC at Afton Marshes
 - The site should be converted to woodland
 - Damages the quality of life changing the charm and character of the villages
 - Erosion of the unique qualities of the Isle of Wight and West Wight
 - The only reason these fields are being considered is that they are for sale
 - Site is close to the Yar estuary and will feed sewage into already inadequate pipes. Threatens the Solent and Southampton Water SPA
 - Dependence on water and energy supplies from the mainland
- Support site allocation to stop the village stagnating and to boost the local economy and create new opportunities
 - Support 90 dwellings yield but this should be flexible
 - Confirmation that the site can meet policy criteria and that phasing delivery and infrastructure is acceptable.
 - The site area shown could be enlarged
 - The allocation as part of a total 255 dwellings in Freshwater is not sustainable
 - Infrastructure improvements should be achieved before development commences

HA006

- Object to criteria b and c requiring access improvements. Amend capacity of site to 70-90 dwellings. SANGs may not be feasible
- Support flexible site capacity and the infrastructure and site requirements can be achieved. The meadow will be considered in the design approach/ecology/biodiversity and open space requirements
- Support the boundary change to stop the area stagnating and to boost the local economy by attracting new people and providing affordable housing for local people. Infrastructure will adapt and new opportunities provided
- Reinforcement of the local sewerage network would be required. Southern Water would work with developers and a criterion should be added to read `Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider`
- Object to allocation because:
 - 255 dwellings is not sustainable development in an area which already has inadequate services
 - There is no protection for existing biodiversity nor an independent environmental impact survey
 - It contravenes Biosphere Reserve designation
 - It will lead to a major loss of habitat and settlement identity

- It is contrary to the Freshwater Neighbourhood Plan
- Concern on flooding and sewerage disposal issues
- it redefines the settlement boundary, including agricultural fields and other green space
- Of the need to keep island as wild and natural to support biodiversity, species and habitats and contribute towards combating global warming
- Moving the settlement boundary expands onto greenfield sites which are important wildlife corridors. Rare breeding reptiles
- Will create few extra jobs and the existing infrastructure is fully stretched
- Will lead to more holiday homes, second homes and cater for retirees
- No need for housing beyond local needs
- Will erode the rural nature of the community and continue the decline in birds and protected species
- Will increase traffic. Camp Road/Queens Road junction is already dangerous and will be exacerbated. No assessment has been made on the narrow road infrastructure around the site to accommodate the scale of development
- No consideration of services. Existing pressure on health services. Infrastructure improvements should come first before development
- Object to changing the settlement boundary.
- Unclear how it will maintain and enhance the Island's biosphere status', and carbon zero targets when outlining plans to build on greenfield sites
- There are more suitable sites and development will increase CO2 emissions
- Impact on tourism with negative impacts on the landscape, biodiversity and through negative cultural and visual impact on the landscape. Impact on SSSI's and SAC
- Should prioritise brownfield sites and protect greenfield sites
- Erodes the gap between settlements
- Close to the Yar estuary which will feed sewage into already inadequate pipes
- Damages the quality of life changing the charm and character of the villages and erodes unique Isle of Wight and West Wight qualities
- In the risk assessment zone for the Afton Marshes SAC which feeds into the Solent and Southampton Water Special Protection Area
- The site is considered only because it is for sale
- Impact on phosphates and nitrates; dark skies; protected sites; attracting young people to the island
- already dependent on water and energy from the mainland

HA008

- The site is not available
- Object to allocation because:
 - There is no vehicle access to the site and the lane is jointly privately owned. Cope Lane is too narrow for passing traffic or construction vehicles, with on street parking so the traffic can only flow one way and is in poor condition. Camp Road/Queens Road junction is already dangerous and will be exacerbated by further development. No traffic assessment of the road impacts around the site. The road system at Pixley Hill is dangerous and the speed of the traffic is notorious; entrance to Kings Manor Road is overgrown and ownership is unclear

- First time and affordable housing which is needed would not be built in this location. Focus should be on 1 and 2 bed units
 - No identified local need and is likely to result in more holiday homes, second homes and retirees
 - It reduces the special qualities of the island and impacts on the AONB
 - Loss of wildlife habitat and wildlife
 - Impact on local services, lack of infrastructure and potential run off/flooding. Serious lack of health services. There is no consideration of the infrastructure needs of the area. The island is dependent on water and energy from the mainland
 - Increase in light and noise pollution
 - Is detrimental to views, the SSSI and Conservation Area and there are archaeological considerations. The land has been designated as a Saxon remains site
 - Site is greenfield and brownfield sites should be prioritised
 - 255 houses in Freshwater Is not sustainable development
 - No independent environmental impact survey on biodiversity has been carried out
 - redefines the settlement boundary to include agricultural fields and green spaces
 - There are few additional jobs in the area
 - The arboretum in All Saints Churchyard and the Western Yar itself make Church Field part of a special wild environment enjoyed by villagers and visitors and its loss would reduce quality of life in a wide area
 - Proposal will lead to a continuing decline in birds and protected species
 - Does not reflect the Freshwater Neighbourhood Plan
 - Need to keep site as wild and natural as possible to contribute towards offsetting global warming
 - Erodes part of a “sensitive gap” between Freshwater Totland and Easton
 - Site is close to the Yar estuary and will feed sewage into already inadequate pipes
 - The development will contribute to CO2 emissions
 - Impact on tourism through negative cultural and visual impact on the landscape
 - Site is used by migratory birds to feed
 - Damages the quality of life for local people changing the charm and character of the villages
 - Adverse impacts for walkers on Freshwater way and the Robert Hooke Trail
 - Within the risk assessment zone for the Afton Marshes SAC which feeds into the Solent and Southampton Water special protection area
 - The site is only considered because it is for sale
 - Impact on phosphates and nitrates; dark skies; protected sites; attracting young people to the island
- Support allocation and the boundary change will prevent stagnation. Attracting more people will boost the economy and provide affordable homes. Infrastructure will adapt to new needs
 - Church Field should be recognised as a community asset and part of the Freshwater Causeway panorama of natural beauty
 - It is unclear how the development will maintain and enhance the Island’s biosphere status’, and achieve carbon zero targets
 - Little detail on who the houses are for and the traffic impacts
 - Add definition of ‘extremely high quality’

HA018

- Object due to flooding issues. 40% of the site is in flood zone 1. The primary source of flooding is from the River Medina. The Guidance for site design and making development safe section of the Summary Table doesn't seem to reflect the nature of the risk and focuses on the management of fluvial and surface water flooding. Safe access and egress should be demonstrated in the 0.5% plus climate change event and not the 1% event as suggested
- The Summary Table does not provide an estimate of the predicted design tide level using current sea level rise allowances, and so does not estimate the likely depths, velocity, frequency and duration of flooding. Appropriate mitigation measures, and the deliverability of such measures cannot therefore be identified on the basis of the current information. It is not therefore clear if the site can be developed safely in the context of flood risk

HA019

- Support allocation and requirements

HA020

- Support allocation with amendments
 - Add contributions for bus service enhancements to be agreed in partnership with bus operators
 - Condition walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be provided close to the site funded by the developer
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
- Add correction as the site is in Northwood not Cowes
- Object greenfield sites being allocated until other sites have been delivered off Newport Road, Harry Cheek Gardens and Wyatts Lane
- Amend site criteria to include "Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider"

HA022

- Support allocation with amendments
 - Contribution to appropriate bus service enhancements to be agreed in partnership with bus operators
 - Condition walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be provided close to the site funded by the developer
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher

- Object to development of farmland with stunning views across the Medina Valley. Area contains foxes, badgers and rabbits, is used by birds of prey and bats. Site contains large oak trees providing habitat for red squirrels and woodpeckers
- Impact on infrastructure increasing strain on health and education facilities and add to traffic, waste and pollution
- Contributes to coalescence of Northwood, Cowes and Gurnard
- Object to criteria b) and re word `improved road network to allow ease of movement to and through the site`
- Delete SANG from criteria d) as there is insufficient space
- Delete `and along with the watercourse corridor` in criteria e)
- Correction needed as the site is in Northwood not Cowes
- Clarification is needed on the increase in site capacity to 130 units
- Delete criteria f)
- Delete `The site has an area of mineral safeguarding to the west and investigation should be undertaken to establish whether the minerals can be utilised within the development or extracted as appropriate`
- Amend site boundary to include the area to the southern boundary
- Object to Somerton Farm being identified as part of any settlement gap between Newport and Cowes
- Site should be used for small or medium scale employment
- Amend criteria e) to include a minimum 50m buffer with ancient woodland including through construction unless it can be demonstrated a smaller buffer would suffice. A larger buffer may be required in some circumstances
- Add a requirement "The proposed development should also ensure have no detrimental impact on BAE System's Cowes site to the west."
- Amend site criteria to include "Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider"

HA025

- Amend site capacity to 25-35 dwellings
- Note the woodland is in the landowner's ownership
- The track between the two sites is maintained by the landowner but is not a requirement
- Object to a large area for development outside the settlement boundary. It will have a detrimental effect on access to Wyatts Lane and neighbouring properties
- Object to development of greenfield site before developments off Newport Road, Harry Cheek Gardens and Wyatts lane have been delivered
- Amend site criteria to include "Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider"

HA031

- Object to development of a greenfield site
- There is no demand from island residents and building more houses will increase in-migration and a greater pressure on infrastructure

- Support allocation with amendments
 - Contribution to appropriate bus service enhancements to be agreed in partnership with bus operators
 - Condition walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be provided close to the site funded by the developer
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
- Support allocation and level of housing proposed but significant highway infrastructure improvements are needed to address the increase in traffic

HA032

- Amend site capacity to 150+
- Amend policy wording to reflect that SANG will be explored as will upgrading nearby facilities, improved pedestrian and cycle connectivity and community facilities
- Support allocation with amendments
 - Contribution to appropriate bus service enhancements to be agreed in partnership with bus operators
 - Condition walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be provided close to the site funded by the developer
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
 - Amend site boundary to include all land available in this ownership
- Confirm that policy criteria are achievable on this development
- Object to the allocation as it is close to the SINC and ancient woodland and would impact on wildlife and fauna
- A 15m buffer is insufficient to protect Dodnor Creek and the adjoining ancient woodland
- Amend criteria to include a minimum 50m buffer with ancient woodland including through construction unless it can be demonstrated a smaller buffer would suffice. A larger buffer may be required in some circumstances
- Object due to excessive density and that it is unlikely that mitigation could ensure the retention of biodiversity let alone achieve a 10 per cent net gain
- The council should undertake the evidence studies and use this to allocate sites
- Object due to the increased impact on Horsebridge Hill (including from Noke Common and Hogan Road), Parkhurst Road, and Forest Road. Congestion around Coppins Bridge will worsen unless major changes are made
- Reduce the site capacity and redraw site boundaries to protect important green sites from development

HA033

- Support allocation with amendments
 - Condition for walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be provided close to the site funded by the developer
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
 - Improvements to bus service 39 funded by the developer to improve sustainable travel access to the site
- Object to development of a greenfield site. The site is rich in biodiversity and provides food resources for wild birds and bats. It is used as an educational site and is used by the primary school for nature walks
- Conflicts with policies EV5 and EV6
- Clarification is needed on whether the site includes or excludes the current Flood Zones 2 and 3 on the northern boundary of the site, the requirement for the Exception Test and scope of the Flood Risk Assessment.
- Amend text to make clear that development should avoid Flood Zones 2 and 3 and take account of flood extent due to climate change

HA035

- Support summary table reference to avoidance of flood risk areas and further hydraulic modelling but add consideration to the impact of climate change on predicted flood extents which could constrain the site further. As site has been removed from Appendix 2 it is unclear where these requirements will be set out
- Add a watercourse crossing could be constructed on the site which will require a Flood Risk Activity Permit from the Environment Agency and will only be permitted for clear span structures which are of the minimum possible width required for essential access purposes, and only where it can be demonstrated that they will not have an adverse impact upon flood risk or the watercourse itself (and associated biodiversity interest)

HA036

- Site availability is confirmed
- Support the allocation with amendments
 - Contribution to appropriate bus service enhancements to be agreed in partnership with bus operators
 - Condition for walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be provided close to the site funded by the developer
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher

- Object to allocation as it is close to the SINC and to ancient woodland and would impact on wildlife and fauna
- unlikely that mitigation could ensure the retention of biodiversity let alone achieve a 10 per cent net gain. Increase buffer from 15m to 45m plus
- Object due to the increased impact on Horsebridge Hill (including from Noke Common and Hogan Road), Parkhurst Road, and Forest Road. Congestion around Coppins Bridge will worsen unless major changes are made
- Reduce the site capacity and redraw site boundaries to protect important green sites from development
- A masterplan is needed as the site has strong environmental quality as it is close to an SSSI and ancient woodland and synergy is needed between the two

HA037

- Support allocation
- It is unlikely that mitigation could ensure retention of biodiversity let alone achieve a 10 per cent net gain. Increase the buffer from 15m.
- Object due to the increased impact on Horsebridge Hill (including from Noke Common and Hogan Road), Parkhurst Road, and Forest Road. Congestion around Coppins Bridge will worsen unless major changes are made
- Reduce the site capacity and redraw site boundaries to protect important green sites from development
- Object to site. It is unclear where vehicle and pedestrian access will be located. Concern over site levels and impacts on existing property
- The site could be accessed from Podnor Lane end and used for hospital use

HA038

- Support site with amendments
 - Contribution to appropriate bus service enhancements to be agreed in partnership with bus operators;
 - Condition for walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be provided close to the site funded by the developer;
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
- Object to site
- Initial phase has disturbed feeding area of buzzards
- Removes green areas used by wildlife
- Unsuitable site due to proximity to Parkhurst Forest and surrounding parkland
- Object to site as no suitable road access and significant highway improvements are needed in the area
- Part of the site floods during winter months but building will reduce natural drainage and make the problem worse

HA039

- Object to development of greenfield parts of the site and the concentration in one area close to the SSSI and ancient woodland. Should use brownfield part of the site only including car parks and other similar areas
- Site capacity is far too many and little regard has been had to topography and the characteristics of the area eg. steeply sloping areas to the north of the prison
- Employment is needed
- Object to increased pressure on surrounding residential roads and St Mary's junction. Focus traffic movements on Clissold Road not Standen Avenue which is too narrow and congested with parking. Object to the increased impact on Horsebridge Hill (including from Noke Common and Hogan Road), Parkhurst Road, and Forest Road. Congestion around Coppins Bridge will worsen unless major changes are made
- Remove the area of land bounded by Clissold Road, Old Oak View, Albany Prison and the prison stores is included in the land allocated to housing. The area once contained a reservoir and now has many mature and semi mature trees forming a wildlife habitat. This area should be removed from the site and protection safeguards put in place
- Add evidence to demonstrate the site capacity and how development would affect heritage assets in a proportionate heritage impact assessment. If this demonstrates harm this should be justified in line with national policy
- The final sentence of the policy does not meet national policy and should be rewritten to give great weight to the conservation of the significance of heritage assets and that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification
- Site boundaries for Newport Harbour masterplan and the proposed policy do not match
- Clarification is needed on if Newport Harbour masterplan has been approved by the council and should be listed in the evidence base
- unlikely that mitigation could ensure the retention of biodiversity let alone achieve a 10 per cent net gain. Increase buffer from 15m. Increase buffer to 45m
- Reduce the site capacity and redraw site boundaries to protect important green sites from development
- Object to the lack of detail which means it is difficult to assess the impact on the community and the environment
- Concern on the impact of development on the drainage of surrounding properties

HA040

- Object to removal of site from the plan and require clarification on the reasons for removing the site as it was previously deemed an acceptable housing site
- The site forms a logical extension to the settlement boundary with a close relationship with the built form of Newport

HA044

- Object to the plans for office space which should be re-assessed in light of needs from 2022-2040

- High risk to the economic viability of the site and the island plan depends on the site. Given this there is insufficient growth in the area
- Correct para 3.16 which refers to 332 affordable homes, yet Medina Yard does not provide any on-site provision. A financial contribution of £3m would only buy 12 houses so there is a shortfall of affordable homes. It is unclear where these will be located
- Support allocation but reduce capacity to 200 dwellings. Development should retain the vibrant historic look of the area
- Site is a level 2 flood risk area and development needs future proofing

HA046

- Support site with amendments
 - Condition for walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be provided close to the site funded by the developer;
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
- Object to development of a greenfield site and agricultural land
- The site is important open space and used by migrating geese and other birds and mammals
- The proposed density is too high and would contribute to coalescence with Whippingham
- Object as the school is at capacity and there is no secondary school
- There is pressure on health services and other infrastructure
- Increased pressure on the roads
- Houses would overlook the school with potential to lose our `forest` school

HA053

- Amend criteria to include a minimum 50m buffer with the ancient woodland including through construction unless it can be demonstrated a smaller buffer would suffice. A larger buffer may be required in some circumstances
- The landscape and ecological buffers and SANGs, open and recreation space could be located to the west to act as a buffer to the woodland

HA058

- Object to removal of site from the plan as it was previously assessed as suitable and can be delivered as confirmed in the 2018 SHLAA
- Allocating the site would increase flexibility, improve affordability and help address under delivery, providing sustainable growth
- Puckpool Hill should be added back into the plan and its deletion contradicts the approach on HA060 and HA062 where the settlement boundary is redrawn to include them in the settlement boundary and the bulk of development is in the later years of the plan

HA059

- Object to the removal of the site from the plan given the significant housing shortfall highlighted in the last Housing Delivery Test and the previously acceptability of the site
- The site is in a sustainable location and can be developed with regard to landscape constraints, without altering how Ryde interacts with surrounding undeveloped areas

HA060

- Support site with amendments
 - Contribution to appropriate bus service enhancements to be agreed in partnership with bus operators
 - Condition walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be provided close to the site funded by the developer
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
- Object to the approval of the planning application in advance of the Plan being finalised

HA061

- Object to deletion of the site from the plan. It is deliverable and achievable and can deliver at least 45 dwellings, contribute to plan objectives and significantly boost housing supply

HA064

- Support site
- Should not be executive homes for retirees or second homes increasing pressure on infrastructure and not meeting local or affordable housing needs
- Unsustainable due to hazardous road conditions in the High Street for cars and pedestrians which will be made worse with increased traffic; additional flooding problems; inadequate medical facilities at St Helens; and insufficient infrastructure to support new development. Access will be onto busy single track road with no pavements. No reference to improving the transport infrastructure. The roads are in disrepair. Developer contributions towards highway infrastructure would be required due to a lack of pavement on Mill Road and High Street and single lane traffic in High Street with poor sight lines
- Object as site is outside the current settlement boundary and object to this being revised; development undermines the Neighbourhood plan; the site is grazed has extensive hedgerows and trees providing habitat for much wildlife; provides a wildlife corridor with ancient woodland and Brading Marshes; development will adversely affect quality of life for current residents and place considerable stress on facilities and services. Biodiversity must be conserved
- Good quality services should be in place before any development. Increased pressure on classroom sizes. There are frequent power cuts and housing development will not improve the situation. The internet is already extremely poor
- Will spoil the unique character and village feel

- Add reference to site requirements on a) Transport infrastructure & improvement b) Road improvement, including pavements & footpaths c) Drainage, water, sewerage d) Mitigation of existing flooding e) Gas, electricity supplies f) Renewable energy requirements g) Mitigation of Co2 h) Educational facility i) Medical facilities j) Green spaces k) Affordable housing l) Planning consultation and enforcement
- Impact on tourism
- Limited local employment and facilities leading to commuting by car as limited public transport
- Contrary to guiding principles for location of development (para 3.8)
- There should be no development considered until after Southern Water has increased their capacity to stop outspills in Bembridge
- There are no detailed evidence studies on transport, landscape capacity impact, TPOs, local needs housing assessment for Bembridge
- Development is inconsistent with other plan policies
- Major flooding on Steyne Road, Hillway and Mill Road due to inadequate drainage. The existing drainage and sewage infrastructure is unable to cope and is over capacity. The site has flooded in the last 6 months. The site does not meet Policy EV4a as it is not safe from flooding and will increase the risk elsewhere.
- Concern on the proximity to the Grade one listed Bembridge Windmill. Takes away the open aspect of the fields nearby
- Too many homes proposed on the site. Island population is declining so little justification for 195 dwellings in Bembridge. Level of development should be commensurate with the distinctive character of the village and absorbable
- Will take away the greenspace valued by residents and visitors. The land should be used to benefit people in the village – a park for children and dog walking or tree planting to reduce flooding
- Will worsen the existing parking problems
- Will result in light pollution
- Is not a community led project
- Vital to retain the rural character of the village. Ancient oaks, unique rural boundary and vista contributes to wellbeing
- Will increase carbon emissions
- Other areas of the island have not taken their fair share of the housing requirement
- Use brownfield sites elsewhere
- not within reasonable walking distance of the village centre where most facilities are located
- the top south west portion of the site is a mineral safeguarding area
- Limited bus services which are often full
- The site will not deliver the affordable housing requirement
- Design should reflect the existing character of the village development
- Does not align with protecting the natural environment
- There should be a requirement to support the rural economy and one of the sites could be for a small development of industrial units and the other a solar farm
- The council should set out a masterplan with an illustrative layout and the highway and other works and provisions required and set up a company to buy land and develop local needs housing

HA065

- Support site
- Should not be executive homes for retirees or second homes increasing pressure on infrastructure and not meeting local or affordable housing needs
- Unsustainable due to hazardous road conditions in the High Street for cars and pedestrians which will be made worse with increased traffic; additional flooding problems; inadequate medical facilities at St Helens; and insufficient infrastructure to support new development. Access will be onto busy single track road with no pavements. No reference to improving the transport infrastructure. The roads are in disrepair. Developer contributions towards highway infrastructure would be required due to a lack of pavement on Mill Road and High Street and single lane traffic in High Street with poor sight lines
- Object as site is outside the current settlement boundary and it is not clear why this is being revised; development undermines the Neighbourhood plan; the site is grazed has extensive hedgerows and trees providing habitat for much wildlife; provides a wildlife corridor with ancient woodland and Brading Marshes; development will adversely affect quality of life for current residents and place considerable stress on facilities and services. Biodiversity must be conserved
- Good quality services should be in place before any development. Increased pressure on classroom sizes. There are frequent power cuts and housing development will not improve the situation. The internet is already extremely poor
- Will spoil the unique character and village feel
- Add reference to site requirements on a) Transport infrastructure & improvement b) Road improvement, including pavements & footpaths c) Drainage, water, sewerage d) Mitigation of existing flooding e) Gas, electricity supplies f) Renewable energy requirements g) Mitigation of Co2 h) Educational facility i) Medical facilities j) Green spaces k) Affordable housing l) Planning consultation and enforcement
- Good quality services should be in place before any development
- Major flooding on Steyne Road, Hillway and Mill Road due to inadequate drainage. The existing drainage and sewage infrastructure is unable to cope and is over capacity. The site has flooded in the last 6 months. The site does not meet Policy EV4a as it is not safe from flooding and will increase the risk elsewhere. There should be no development considered until after Southern Water has increased their capacity to stop out spills in Bembridge
- Impact on tourism
- Limited local employment and facilities leading to commuting by car as limited public transport
- Contrary to guiding principles for location of development (para 3.8)
- There are no detailed evidence studies on transport, landscape capacity impact, local needs housing assessment for Bembridge
- Development is inconsistent with other plan policies
- Concern on the proximity to the Grade one listed Bembridge Windmill. Takes away the open aspect of the fields nearby
- Too many homes proposed on the site. The land should be used to benefit people in the village – a park for children and dog walking
- Will take away the greenspace valued by residents and visitors
- Will worsen the existing parking problems
- Will result in light pollution
- Island population is declining so little justification for 195 dwellings in Bembridge

- Is not a community led project
- Ancient oaks, unique rural boundary and vista contributes to wellbeing
- Vital to retain the rural character of the village
- Will increase carbon emissions
- Other areas of the island have not taken their fair share of the housing requirement
- Use brownfield sites elsewhere
- Level of development should be commensurate with the distinctive character of the village and absorbable
- not within reasonable walking distance of the village centre where most facilities are located
- account must be taken of the TPOs
- the top south west portion of the site is located in a mineral safeguarding area
- Limited bus services which are often full
- The site will not deliver the affordable housing requirement
- Design should reflect the existing character of the village development
- The existing drainage and sewage infrastructure is unable to cope and is over capacity
- Does not align with protecting the natural environment
- There should be a requirement to support the rural economy and one of the sites could be for a small development of industrial units and the other a solar farm
- Should not be executive homes
- The council should set out an illustrative layout, with the highway and other works and provisions that would be required and set up a company to buy land and develop local needs housing

HA073

- Support removal of site from the plan. It would not have met island needs, was outside the settlement boundary and is on a greenfield site separating Seaview from Nettleston
- Object to removal of site from the plan as it is unjustified and is not for suitability, viability, accessibility or deliverability reasons. It remains in the latest SHLEAA and monitoring evidence and is within the settlement. Small and medium sites are supported by Government and is consistent with the NPPF, other plan policies and would bring significant benefits including biodiversity net gain and management of the green infrastructure on-site
- do not agree with the principle of access to the proposed sites using the single vehicle width, unadopted, gravel access road to the Ansell's Farm, Seagrove Close, Seagrove Farm Road, and the adopted single car width residential road Seagrove Manor Road

HA079

- Add requirement that the building line of the new development is kept back from the northern extent of the site, to avoid harm to the setting of St John's

HA080

- Support allocation but add a requirement for a full sized football pitch (preferably with a 4g artificial surface) with changing rooms and a clubhouse to provide a home for Sandown Football Club

HA081

- Object to site. There are no exceptional circumstances to justify harm being caused to this Grade II listed building which has been allowed to deteriorate, resulting in its closure as a youth and senior citizens facility
- Should be restored and used for the above and as a service hub and heritage centre

HA084

- Add to policy the need to provide adequate car parking
- Housing is likely to be for visitors or second homes rather than those who need them
- The area at the base of the cliffs could provide small business units with parking at the front of the site

HA096

- Object as it is not sustainable development, contradicts other aspects of the plan and adds to already strained infrastructure on the island

HA101

- Object to there being no housing site allocations in Wellow. The site can deliver 18 dwellings (50% affordable), is free of constraints, can deliver the plan objectives and significantly boost housing supply

HA102

- Strong objection to proposed housing in Niton as it is a greenfield site and there is a lack of infrastructure especially road access

HA103

- Strong objection to proposed housing in Niton as it is a greenfield site and there is a lack of infrastructure especially road

HA106

- Object to removal of the site from the plan due to it not being located in or adjoining a settlement boundary
- The site is deliverable and is sustainable due to good public transport links and provide benefits to the local community which has not been considered in the allocation process
- The site may still be subject to development proposals. Increased housing numbers will impact on the hospital and the impact on infrastructure modifications proposed is not clear
- The site will increase run off and increase sewage issues. Run-off issues will worsen with expected climate change.

HA110

- Support site
- Support site with improvements to infrastructure

HA113

- The site has planning permission so is not a new allocation
- MAP 3.9 The entire Red Funnel marshalling yard in East Cowes is scheduled for housing. This is not as per the planning permission granted. It would also negate the deep water berths presently available and expected to be retained under policy E5 a&b , and also T3 a&b – efficient use of the ferry terminal ,and, mitigating the traffic impact [on East Cowes.]

HA114

- 255 dwellings do not represent sustainable development in a settlement with inadequate services
- Support boundary change to prevent stagnation, to boost the local economy and provide affordable housing for local people. Infrastructure will adapt to meet need and provide new opportunities
- Object to allocation because:
 - There is no protection for existing biodiversity nor any independent environmental impact survey and contravenes the Biosphere Reserve designation.
 - contrary to the Freshwater Neighbourhood Plan
 - Flooding and sewage disposal are already overloaded. Development has potential to increase flooding in the area. Site is close to the Yar estuary and will feed sewage into inadequate pipes
 - The redefining of the settlement boundary includes agricultural fields and green spaces
 - There is no need for the type of housing which will result. It will not lead to affordable housing for local people but more holiday homes, second homes and retirees. No identified local need
 - Few extra jobs will be created and the existing infrastructure and local services are overstretched. Development should not be permitted ahead of infrastructure improvements. Already dependent on water and energy from the mainland
 - no assessment has been made of the infrastructure needs of this part of the island nor the narrow road infrastructure around the site to accommodate the scale of development
 - shifting the settlement boundary to include greenfield sites expanding the village to greenfield sites which hare important wildlife corridors. Rare breeding reptiles
 - contrary to the Freshwater Neighbourhood Plan
 - should not build on greenfield sites and prioritise brownfield development
 - need to keep the island as wild and natural as possible to support biodiversity, species, habitats and contribute to reducing global warming
 - loss of habitats, wildlife and settlement identity. Impact on SSSI's and SAC

- It is not clear how it will maintain and enhance the Island's biosphere status', and carbon zero targets when outlining plans to build on greenfield sites
- There are more suitable sites to develop
- Development will increase CO2 emissions but have not identified land for tree planting to offset this
- Impact on tourism through the negative cultural and visual impact on the landscape
- Redefining settlement boundaries erodes gaps between settlements
- Damages the quality of life for local people changing the charm and character of the villages and erodes the unique qualities of the island
- within the risk assessment zone for the Afton Marshes SAC which feeds into the Solent and Southampton Water special protection area
- The site is only considered as it is available for sale
- Impact on phosphates and nitrates; dark skies; tourism; protected sites; attracting young people to the island

HA115

- Support allocation

Appendix 4

- Add policy EV11