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Your ref: Prince's Esplanade

Our ref: IOW Plan Aug 24

Island Planning strategy Regulation 19 Planning Service  
Seaclose Offices  
Fairlee Road  
Newport  
Isle of Wight  
PO30 2QS

Monday, 19 August 2024

Dear Sir or Madam

## ISLAND PLANNING STRATEGY – REGULATION 19 REPRESENTATIONS

On behalf of our client Southern Gas Networks (SGN), I have attached representations to the Island Planning Strategy (IPS) in respect of their landholding at Land off Prince's Esplanade, Prince's Esplanade, Cowes, Isle of Wight, PO31 8BT.

Carter Jonas has previously submitted representations on behalf of SGN during previous rounds of consultation in 2019 and 2021 and we have also made submissions to the Council's brownfield land register in 2021 also.

I have attached a red line plan for the site in question and I have also attached the necessary form in response to comments for Policy H2 in the IPS.

SGN manage a gas network that distributes natural and green gas to approximately 5.8 million homes and business across Scotland and the South of England. The attached site was previously used as a gas valve compound until October 2011. It currently features redundant equipment associated with its previous use.

The details of our representations are on the attached forms, but we consider that this brownfield site should be included as a housing site allocated as part of Policy H2 in the emerging IPS, to help meet housing delivery targets in the IPS.

If you have any queries on any points covered in this submission, please do not hesitate to contact me or my colleague Djellza Mujka to discuss further.

Yours faithfully

[Redacted signature]

**Alister Henderson**  
Partner

E: [Redacted email]  
T: [Redacted phone]

**Isle of Wight Council****Island Planning Strategy – Regulation 19 Submission version: COMMENTS FORM**

Your comments on the Plan will help us and the Inspector appointed to oversee the examination process, to identify any plan issues relating to soundness, legal compliance, and compliance with Duty to Cooperate and any changes that may be needed before adopting the Plan.

Please read the [guidance notes](#) carefully before completing this form.

Responses **MUST** be received **by midnight on Monday 19 August 2024** for your comments to be taken into account. Any representations received after this will not be forwarded to the inspector for the examination.

Your comments should relate to a specific policy, paragraph number or policy map. If there are parts of the plan which you believe are not sound, not legally compliant, or fail to meet the Duty to Cooperate, please tell us why, and what changes you think are necessary. Any evidence you have to support your proposed changes can be added as an attachment in addition to this form. You are able to submit a form for each policy or paragraph you wish to comment on.

**IMPORTANT:** Where you are attaching a separate letter setting out your representation, please make sure that you complete the questions on the form for each representation you wish to make and NOT just refer to an attached letter. This enables comments to be assessed and processed more quickly and does not hold up the Examination process.

**Any questions with an \* require an answer.**

**Contact details:**

Please complete your name and email address in the boxes below so that we can contact you if we require any additional information on any comments, you may have made, or you have shown interest in participating in a hearing session(s)

**Anonymous comments will not be accepted.**

**Name/Organisation: \***

Alister Henderson - Carter Jonas for SGN

**Email: \***

**Address and Postcode:**

Carter Jonas  
One Chapel Place  
London  
W1G 0BG

Telephone:

[Redacted]

**1) What type of respondent are you? \***

(Member of the public, statutory consultee (excluding Councillors and Parishes) Business (Landowner and Developers), Councillor, Parish Council, other Local Authorities, Resident Group.)

Planning consultant acting for landowner.

**2) What policy are you commenting on? \***

(Please complete a separate form for each policy you are commenting on)

Policy H2

**3) Does your comment relate to a specific paragraph(s)? If yes which paragraph does this relate to? \***

You are able to submit a separate form for each policy / paragraph you wish to comment on. If your answer to this question (no 3) is No please put NA in the text box below.

N/A

**4) In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?\***

(a plan is legally compliant if it complies with the list in paragraph 3.1 [here](#) and the council have complied with the [Duty to Co-operate](#))

Yes

No

**5) Please give details to support your answer to question 4 \***

Yes, legally compliant

Yes, complies with Duty to cooperate

No, Failure to comply to Duty to cooperate

No, not legally compliant

**6) In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound? \***

There are four 'tests of soundness' set out in [paragraph 35 of the NPPF](#) – (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy

Yes – Positively prepared

Yes – Justified

Yes – Effective

Yes – Consistent with national policy

No

**7) If you answered no to question six is this because? \***

Not, Consistent with national policy

Not, Effective

Not, Justified

Not, Positively prepared

**8) What modifications do you think is needed to make the Island Planning Strategy legally compliant and/or sound? \***

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You can attach any files or documents with this submission. You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the inspector, based on the matters and issues he or she identifies for examination.**

We do not consider that the Plan is sound as a brownfield site we have previously suggested for housing delivery has not been included as a Site Allocated for Housing. Consequently, we do not consider the Plan in its current form to be Effective, Justified or Positively Prepared. The reasons for this are expanded upon below.

Policy G2 of the Plan explains that the focus for sustainable housing growth is within the settlement boundaries of the island's primary and secondary settlements. To support this submission, we have included a covering letter and a site plan which confirms the location of the deliverable brownfield site - the site in question is located off Prince's Esplanade, Cowes, PO31 8BT - which is located within a primary settlement boundary.

Policy H1 explains that the Housing Delivery Targets for the Plan period is 6,795 net additional dwellings (453 dwellings per year). It explains that this will be delivered using planning permissions on large sites (2,596 dwellings), sites allocated in Policy H2 (2,707 dwellings) and 1,500 windfall sites. It seems that relying on this significant number of windfall sites on an Island with finite land/brownfield land is extremely optimistic. The inclusion of the brownfield land at Prince's Esplanade would help to reduce the reliance on windfall sites during the Plan period.

Policy H9 supports new housing on previously developed land. It supports efficient use of brownfield land and references land within settlement boundaries as a priority. The site at Prince's Esplanade currently features redundant equipment associated with its previous use. It has an existing vehicular access from Prince's Esplanade and an area of hardstanding to the north of the site. The whole site is covered by a woodland TPO and some of the land owned by SGN is designated as a Site of Importance for Nature Conservation. However, this excludes the previously developed area (in the north shown on the attached plan). We consider that with sensitive habitat enhancement the redundant, previously developed brownfield element (shown on our attached plans) represents an opportunity to be redeveloped for residential purposes in alignment with the effective use of land principles outlined in the NPPF.

On the basis that the site is within the Cowes settlement boundary, is a previously developed site that is considered to be brownfield land, it can contribute towards the Council's housing need, aligns within the principles of the NPPF and does not feature any land use designation that could prevent the principle of development from being delivered on the site subject to satisfying other planning policies, we consider that the Plan should be amended to include this site as an allocated Housing Site.

**9) Do you have any comments on the policies map? \***

[\(click here to go to the Regulation 19 Island Planning Strategy Map\)](#)

Policies map should include suggested site as a Housing Allocation, as suggested above.

**10) Do you wish to request to appear at the hearing sessions that will take place? \***

Yes

No

**11) Please outline why you would like to attend? \***

If you have answered No to Question 10 please put NA in the text box below

N/A

## **How we use your information**

The Isle of Wight Council is committed to keeping your personal information safe and processing it in accordance with our obligations under the General Data Protection Regulation.

Your personal data will be securely held by the Isle of Wight Council for the purpose of assisting with the Island Planning Strategy process. To ensure an effective and fair examination, it is important that the inspector and all other participants in the examination process know who has commented on the plan. For the purposes of the examination, we will share your personal details and representation with the Inspector appointed and publish your name and representations as part of a report on our website.

The Isle of Wight Council is the data controller for the personal information you provide on this form. The council's Data Protection Officer can be contacted at [dpo@iow.gov.uk](mailto:dpo@iow.gov.uk). You can contact the council by phone on 01983 821000, or by writing to us at County Hall, High Street, Newport, IW PO30 1UD

For more information on the Isle of Wight Council's Privacy Statement, which explains how my information is used. Please visit the website: [www.iwc.gov.uk/privacy](http://www.iwc.gov.uk/privacy)

## **How to send to us.**

Email: [policy.consultation@iow.gov.uk](mailto:policy.consultation@iow.gov.uk)

Post: Planning policy, Seaclose offices, Fairlee Road, Newport, Isle of Wight, PO30 2QS

**Please ensure that you have answered all the questions in full.**

**The closing date for representations is by midnight on Monday 19 August 2024**

