

**Island Planning Strategy (IPS): Revisiting the site allocations approach****1.0 Introduction**

- 1.1 This briefing paper focuses on the revised approach to the housing requirement and site allocations within the Island Planning Strategy (IPS). The submission version of the IPS contains a suite of policies focused on other key sectors such as the environment, economic development, the high street and health and wellbeing. The aim of all the policies within the IPS will be to help achieve the outcomes within the IWC Corporate Plan<sup>1</sup>.

**What the first Regulation 18 Draft Island Planning Strategy (2018) told us**

- 1.2 A first Draft IPS was published for consultation in December 2018 and included the designation of housing allocations to enable the Government's standard methodology housing number for the island to be met, including proposals for two new garden settlements. The response from local stakeholders and the community was overwhelming in opposition to the number of houses to be built, with a primary focus on the lack of capacity of the island to firstly deliver and then support this level of development. The impact on the character of the island and subsequent impact on the tourism industry were also raised as key concerns.
- 1.3 The evidence from our Authority Monitoring Reports (AMRs) had also highlighted some of the key issues raised, including low levels of housing completions against core strategy housing requirement and severe shortages in the delivery of affordable housing. This apparent failure in the market to provide affordable housing and indeed sufficient market housing suggested that further evidence was needed to investigate the reasons why this was emerging and what possible solutions might be.

**2.0 What the Isle of Wight Council has done since the first Draft IPS**

- 2.1 The Isle of Wight Council (IWC) decided to investigate the issues identified above and whether a different, more island-specific approach to address our housing issues was possible that would remain in line with national planning policy.
- 2.2 IWC commissioned a number of independent studies to investigate the key characteristics of the island housing market and how these related to identified issues of affordability, the ability to deliver at scale and restricted operators within the market.
- 2.3 The additional evidence gathered provides a clear steer that the island has a reduced ability to deliver homes given the restrictions in the housing market generated by the island location, which itself is unique across all Local Authorities in England. This reduced ability to deliver has intensified distinct affordability issues associated with the demographic, migration and tenure patterns of island residents.
- 2.4 Gathering and assessing this evidence has informed a revised approach to providing future housing on the island, which was re-evaluated further to take account of the impacts of the Covid-19 pandemic. This heightened the focus on wellbeing, the environment and sustainable development and how planning can help to facilitate changing life patterns, for example considerable increases in levels of home working and increased requirements for open space.
- 2.5 This overall process of recalibration resulted in the IWC identifying an alternative route for the second Regulation 18 Draft IPS to take, published for consultation in August & September 2021. That Draft IPS proposed a revised approach to the planning and delivery of housing that is markedly different to the approach within the first Draft IPS - whilst accepting the level of local housing need generated by the standard methodology, the 2021 Draft IPS considered a more locally focused

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<sup>1</sup> Isle of Wight Council Corporate Plan 2021 to 2025

housing requirement. This level of housing requirement offers a more sustainable and deliverable solution, one that is island focused and supplemented by a suite of policies supporting development where it has the best opportunity to succeed.

- 2.6 It is important to note that the IWC believes the right level of development is essential for the island to help with rebalancing the population demographic, increasing the working age population / wealth generators and addressing affordability issues and sees the IPS as the tool to make this happen. Securing sustainable development of an appropriate scale in appropriate locations within the housing market that exists on the island will have a positive impact on residents and visitors alike and assist local people who are currently unable to afford a home on the island.
- 2.7 The generation of an 'island realistic' housing requirement is set out within the accompanying evidence paper entitled 'Approach to Housing in the IPS' and is in line with paragraph 16 (b) of the National Planning Policy Framework (NPPF).
- 2.8 The outcome of this work is a housing number of 6,795 net additional dwellings over the 15-year plan period (2022-37), which averages **453 dwellings per year**. These numbers are reflective of both the evidence base on deliverability and the allocations approach outlined later in this paper and represents a positive, deliverable housing requirement in line with paragraphs 16 (b) and 35 (c) of the NPPF. To plan for a higher requirement would be undeliverable, as evidenced by the independent studies and subsequent work summarised above, and therefore contrary to the NPPF and unsound.
- 2.9 The housing number in the submission version of the IPS is a reduction of almost 30% from the 9,615 net additional dwellings that were planned for in the first Draft IPS in 2018 at an average of 641 per year. It also represents an approximate 36% reduction from the standard methodology number (March 2024) of 703 dwellings per year (which would equate to 10,545 across the 15-year plan period).
- 2.10 Whilst the annual number of 453 per year is higher than the 10-year delivery average on the island (380 per year 2013/14-2022/23), it is close to the 20-year (460 per year) average and the policies within the plan must work as a whole to help increase delivery. A more restrictive position on future sites coming forward (see bullet (v) of paragraph 5.16 below), must work in tandem with the plan allocating sufficient sites to ensure that the level of housing planned for helps to increase affordability by including a variety of locations and types of site.
- 2.11 Given both the time that had passed between the first draft IPS (2018) and the revised approach in the Draft IPS of 2021, and the change in quantum of housing to be planned for, the council felt it was appropriate to refresh the sustainability appraisal (SA) supporting the IPS. The update of the SA included an assessment of the spatial strategy and reasonable alternatives.
- 2.12 Six different spatial strategies were proposed in the draft IPS in 2018<sup>2</sup>. These options had been assessed in accordance with the framework of the SA undertaken in 2018, and it is worth noting that these 6 spatial options were assessed against a different (higher) level of development. Using the outcomes of the assessment work undertaken in 2018 and the new housing numbers, these spatial strategies were consolidated into four simplified spatial strategies which were further considered and assessed through an updated SA framework in 2021 (see table 2.1 below).

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<sup>2</sup> Appendix 6: *Island Planning Strategy Sustainability Appraisal Spatial Strategy Options of the IPS 2018 SA*

**Table 2.1: Spatial Strategies tested through the Sustainability Appraisal 2024**

Spatial Strategy Options considered as part of the SA work associated with the first version of the Draft IPS in <b>2018</b>	Spatial Strategy Options considered as part of the SA work associated with the second version of the Draft IPS in <b>2021 and submission version of the IPS in 2024</b>
1(a) Use existing settlement hierarchy (a) Increase density/site yield	1 Use existing settlement hierarchy (a) Increase density/site yield, focus on infill and brownfield, do not allow development beyond settlement boundaries (preferred option)
1(b) Use existing settlement hierarchy (b) extending settlement boundaries	
	2 Use existing settlement hierarchy and allow for growth outside but immediately adjacent to existing settlement boundaries (existing adopted plan approach)
2 Creating new communities	3 Creating new communities (new garden settlements)
3(a) Growth in locations not previously considered (a) New tier(s) in settlement hierarchy with settlement boundaries	4 Growth in existing settlements, outside of settlement boundaries and in locations not previously considered (effectively no spatial strategy)
3(b) Growth in locations not previously considered (b) New tier(s) in settlement hierarchy with allocated sites (no settlement boundary)	
3(c) Growth in locations not previously considered (c) New tier(s) in settlement hierarchy with settlement boundaries and allocated sites	

- 2.13 The streamlining of spatial strategy options from 6 to 4 was based upon national planning guidance. The NPPF states<sup>3</sup> that a sound plan is one that (amongst other things) is based upon an appropriate strategy, taking into account the reasonable alternatives. The NPPG<sup>4</sup> expands on what is meant by ‘reasonable alternatives’ when carrying out sustainability appraisal as “...the different realistic options considered by the plan-maker in developing the policies in the plan.” and of relevance here, “They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.” Of the 6 spatial strategy options tested in the previous SA, the 2 with variations, i.e. 1 (a & b) and 3 (a, b, and c) have both been simplified to a single spatial option for each. An additional option to cover the existing plan approach (no change) was also identified.
- 2.14 The 2021 spatial options have been assessed through the SA process accompanying the IPS and may further be considered alternatives to the preferred spatial strategy. See Section 4.5 and Appendix 2 of the Integrated Sustainability Appraisal (2024) for the full assessment of these spatial options.
- 2.15 The preferred spatial option *Use existing settlement hierarchy (a) Increase density/site yield, focus on infill and brownfield, do not allow development beyond settlement boundaries* was assessed by

<sup>3</sup> NPPF Paragraph 35 Examining Plans, 2021

<sup>4</sup> NPPG, Strategic environmental assessment and sustainability appraisal, 31 December 2020

the SA the best performing option. It was considered to support the local identity of individual settlements by reducing encroachment and settlement coalescence by restricting the majority of new development to within fixed boundaries leaving no room for challenges or interpretation, whilst accepting that smaller infill, windfall and exception site development may still occur outside of these fixed boundaries.

- 2.16 By focussing the majority of development within the existing settlement hierarchy<sup>5</sup> there were judged to be additional benefits to protecting the island's tranquillity, dark skies, AONB designation and sites important to biodiversity. The preferred spatial strategy was not found to have any direct negative impacts on any of the ISA objectives.
- 2.17 The following key principles have been identified from the SA work as a mechanism to apply the preferred spatial strategy when identifying potential allocation sites from the latest SHLAA outputs;
- Allocate sites within existing settlements (to include sites that would make a logical extension to the settlement with an adjustment to the settlement boundary to include such a site);
  - Take a proportionate approach that matches quantum of allocations/housing with settlement size;
  - Prioritise brownfield sites and allow infill where appropriate (i.e. supported by the other relevant policies of the plan) within settlement boundaries;
  - Taking a definitive approach to settlement boundaries, particularly with regards to development outside but immediately adjacent to a settlement boundary.

### 3.0 Guiding principles that address key issues raised from the first IPS consultation

- 3.1 A set of guiding principles were developed from the work carried out after the first IPS consultation to help steer the approach to the allocation of housing sites within the second Draft IPS and the submission version of the IPS. These principles will also help to deliver the vision for the island, as set out in the IWC Corporate Plan.
- a) Improve the delivery and affordability of new homes to best meet Island needs, in the most sustainable locations (reducing the reliance on private transport);
  - b) Prioritise the use of land within existing settlement boundaries, particularly where the land is brownfield and/or in public sector ownership;
  - c) Reflect the importance of a high quality built and natural environment and the associated positive impacts on wellbeing and contribution to UNESCO Biosphere Reserve status;
  - d) Create certainty through the adoption of a local plan over what is expected of development proposals and how places are likely to change as a result of the plan.

### 4.0 How sustainability has been taken into account

- 4.1 The set of guiding principles developed from the work carried out after the first Draft IPS consultation in 2018 help steer the approach to housing within the second Draft and submission versions of the IPS, i.e. *'Improve the delivery ... of new homes ... in the most sustainable locations'* defining this as amongst other things, *'reducing the reliance on private transport'*.
- 4.2 The ISA states that *"In order for the preferred spatial strategy to fulfil its purpose by facilitating the housing numbers required it is necessary to adjust existing settlement boundaries (the housing numbers required cannot be accommodated within existing settlement boundaries). ... This would*

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<sup>5</sup> As identified in adopted Core Strategy policy SP1 *Spatial Strategy* and revised Island Planning Strategy policy G2 *Priority locations for development and growth*.

*support and encourage any additional opportunities and indirect positive impacts, and to prevent any potential negative impacts with respect to congestion and air quality that this strategy could cause.”*

- 4.3 So in the context of identifying the most sustainable sites in the local plan, preferred locations are those that offer the possibility of reducing reliance on private transport by both proximity to existing services and transport links other than private vehicle. Recent decisions made by the Planning Inspectorate through the planning appeals process on the Island underline the robustness of the preferred approach to the location of new development (the preferred spatial strategy).
- 4.4 Appeal reference 21/00008/REF Outline for proposed dwelling was dismissed. The inspectors reasoning concluded that the nearest bus stop located 400m from site on a road that does not benefit from street lighting or a footpath – whilst this route may be satisfactory for able bodied persons, this would not be the case for those with low mobility or small children, buggies etc. or with shopping, bad weather or winter months. Consequently, the bus stop and nearby cycle routes would not reduce the need to travel by car to a significant degree. Whilst the proposal would not in itself generate a large number of traffic movements, the cumulative effect of allowing developments in locations such as this would be likely to increase the number of unsustainable journeys made. In addition, that the proposal would suburbanise the site and erode openness of the area, encroaching on the countryside setting and would not conserve or enhance AONB, harming its integrity<sup>4.5</sup> Appeal reference 21/00028/REF Proposed detached dwelling was also dismissed. In this case the inspector reasoned that the site lies some distance from the settlement of Brighstone which has some facilities, although future occupiers would be likely to travel beyond Brighstone to access services and facilities to support day-to-day living. Infrequent bus services and absence of street lighting and a continuous footpath to the nearest settlement would be likely to lead to future residents relying on the private car for the majority of trips. Consequently, the scheme would not represent a sustainable form of development. Again the inspector also commented on the site’s position, being open and largely undeveloped in character, the proposed dwelling would stand out as a harmful intrusion, to the detriment of the AONB. This would be exacerbated by additional hardstanding and domestic paraphernalia.
- 4.6 Appeal reference 22/00042/REF Removal of existing mobile home; Proposed dwelling with associated car parking and landscaping; alterations to reduce size of existing barn A was dismissed. One of the main issues was whether the site represents a suitable location for housing having particular regard to its accessibility to services and facilities. On the suitable location the inspector stated there was no evidence to suggest appeal scheme is meeting a specific local need for housing. The nearest village (Shalfleet) has a limited range of services and although a bus stop is in walkable distance and gives occupants a choice in mode of transport, it only runs every hour and consequently it is likely that to access shops and services found in larger settlements, future occupiers would prefer the convenience of a private car. This would not accord with the aim of existing core strategy policies (SP7 and DM17) which support proposals that increase travel choice and provide alternative means to travel to the car.
- 4.7 Appeal reference 22/3310130/REF Barn-style dwelling and associated works with car parking and landscaping; removal of existing mobile home; reduction in size of existing barn A. Again this was dismissed with one of the main issues being whether the site represents a suitable location for housing having particular regard to its accessibility to services and facilities. The inspector made a number of observations on the sustainability of settlements, including the range of services, accessibility to public transport and the provision of service (in this case bus regularity), stating, *“Whilst the bus would give some degree of choice in mode of transport, the limited facilities nearby means future occupiers would need to use the shops and services found in larger settlements for the majority of their day to day needs. Given the bus service is only hourly, it is likely that to access these future occupiers would prefer the convenience of the private car.”* The inspector concluded that that

the appeal site would not be a suitable site for new housing having particular regard to its accessibility to shops and services.

- 4.8 The above decisions support the principles of locating development in or as close to existing settlements so as to increase the potential to reduce journeys by vehicle, increase the potential to use more sustainable forms of travel and minimise the impact on the more rural areas of the Island. Further, there is an acknowledgement that not all settlements will offer the same opportunities in achieving these aims, with smaller settlements such as Brighstone and Shalfleet unlikely to contribute to sustainable development in the same way as larger settlements, thereby recognising the role a hierarchy of settlements can play in locating the most sustainable development. The approach taken by the spatial strategy enables this.

## **5.0 Revisiting the housing allocations for the new Draft IPS**

- 5.1 In order to plan for the island realistic housing requirement identified in the *'Approach to Housing in the IPS'* paper and paragraph 2.9 of this paper, IWC revisited the housing allocations from the first Draft IPS in 2018 using the preferred spatial strategy principles to deliver sustainable development (Section 2 of this paper) and the guiding principles derived from the consultation exercise (Section 3 of this paper).
- 5.2 Taking these principles the council has identified a number of criteria to help filter sites being considered as proposed allocations. The filters are in effect a set of five 'reasons for removal / not allocating'. The reasons for removal / not allocating seek to ensure the IPS is focused on planning for growth in the most sustainable locations with the fewest barriers to delivery by implementing the identified guiding principles (see Table 5.1 below).

Table 5.1: How the reasons for filtering of sites for allocation align with the principles guiding the preferred spatial strategy

		Guiding principles that address key issues raised from the first IPS consultation				ISA preferred spatial strategy key principles		
		Improve the delivery and affordability of new homes to best meet Island needs, in the most sustainable locations	Prioritise the use of land within existing settlement boundaries, particularly where the land is brownfield and/or in public sector ownership	Reflect the importance of a high quality built and natural environment and the associated positive impacts on wellbeing and contribution to UNESCO Biosphere Reserve status	Create certainty through the adoption of a local plan over what is expected of development proposals and how places are likely to change as a result of the plan	Allocate sites within existing settlements	Prioritise brownfield sites and allow infill where appropriate (i.e. supported by the other relevant policies of the plan) within settlement boundaries	Taking a definitive approach to settlement boundaries, particularly with regards to development outside but immediately adjacent to a settlement boundary
<b>R1</b>	Too small to allocate (under 10 units)	✓			✓		✓	✓
<b>R2</b>	Outside of any Primary, Secondary or Rural Service Centre boundary	✓	✓	✓	✓	✓	✓	✓
<b>R3</b>	Adjacent to a Rural Service Centre or at a Sustainable Rural Settlement so can be a Rural or First Homes exception site (policy H7)	✓	✓	✓	✓	✓	✓	✓
<b>R4</b>	Operational commercial site, reduced or no certainty of delivery	✓	✓		✓		✓	
<b>R5</b>	Adjacent greenfield site not forming a logical extension to the settlement boundary / less certainty of delivery / site specific issues	✓	✓	✓	✓	✓	✓	✓

- 5.3 The key SA principle ‘*Take a proportionate approach that matches quantum of allocations/housing with settlement size*’ doesn’t lend itself to a qualitative reasoning based filter. Instead its application has been through the quantum element to identifying allocations. IPS Appendix 5: *Indicative housing trajectory* includes details on the indicative housing trajectory of the development proposed within the plan that demonstrates there will be a spread of homes coming forward across the island throughout the plan period. There is a mix of size and location of the proposed allocations and existing permissions with the focus of growth on the primary settlements of Newport, Ryde and Cowes.
- 5.4 An important consideration raised through previous consultation is the capacity of existing infrastructure and the scale and location of proposed new development. The spatial strategy should ensure that proposed allocations will be located where there is existing infrastructure or the scope to accommodate the proposed growth through additional infrastructure capacity. The spatial strategy matches quantum to existing provision and identifies where gaps may exist over the lifetime of the plan.
- 5.5 The *Island Infrastructure Investment Plan Final Report* (Lichfields, May 2018) produced on behalf of the Solent Local Enterprise Partnership, provides an identification of the future infrastructure needs of the Isle of Wight across a range of “economic infrastructure” categories. This is in the context of the need to support sustainable economic growth on the Isle of Wight and having regard to national and local priorities. The report presents a detailed review of existing evidence and consultation with stakeholders to identify key issues for each of the main infrastructure categories included within the remit of the study and as such provides a baseline context of infrastructure need to support the IPS.
- 5.6 Against a backdrop of limited committed/funded infrastructure projects on the Island, a ‘long list’ of 45 infrastructure projects has been compiled from a range of sources including evidence base reports, the Council’s Regeneration Programme, the Island Infrastructure Task Force report, and through consultation with a range of stakeholders. The key focus of infrastructure projects identified through the Island Infrastructure Investment Plan (IIIP) is upon unlocking new public and private development sites for housing and employment uses. Potential infrastructure projects have been appraised on their ability to secure direct jobs, new homes, new employment space, new skills opportunities and private sector investment. The appraisal process has identified an overall prioritisation of potential projects. Table 5.2 lists all the projects identified as either having a High or Medium priority, the location of these projects and then where they sit within the settlement hierarchy of the proposed spatial strategy.
- 5.7 With all High priority infrastructure projects located in primary settlements and the majority of Medium priority infrastructure also located in primary settlements (with no High or Medium priority infrastructure projects identified as being required in either Rural service centres or Sustainable rural settlements, with the exception of island-wide projects) Table 5.2 clearly illustrates the point that implementing the spatial strategy (through the settlement hierarchy) would aid the delivery of future infrastructure needs. In addition, the preferred spatial strategy will be locating development to where existing capacity is most likely to exist, or new capacity is most likely to be delivered.
- 5.8 The Isle of Wight Infrastructure delivery plan (IDP) (Troy Planning + Design, 2018) seeks to address what infrastructure is required as a result of new growth on the Island, where, how and when it could be delivered using the standard method housing need figure of the time (641dpa) as a projected level of growth. Discussions, meetings and workshops have taken place with a variety of infrastructure providers, both within the Council and with external organisations, to develop an understanding of what infrastructure is needed. The process has enabled these infrastructure providers to think more

strategically in terms of future provision and the challenges brought about by significant growth in the long term, as well as providing information that forms the content of the IDP Addendum 2022.

**Table 5.2: Matching infrastructure priority to proposed spatial strategy through settlement hierarchy**

Infrastructure Project	Overall Priority	Location	Settlement Hierarchy
East Cowes Regeneration Area – Highways Infrastructure works	High	East Cowes	Primary
HMP Camp Hill – Utilities network upgrades	High	Newport	Primary
East Cowes Regeneration Area – Flood risk prevention measures	High	East Cowes	Primary
HMP Camp Hill – Energy network upgrades required within the site	High	Newport	Primary
Stag Lane – land decontamination	High	Newport	Primary
Land to west of Westridge ('Pennyfeathers') road infrastructure improvements	Medium	Ryde	Primary
Land to south of Clayton Road – improvements to immediate surrounding local road network	Medium	Freshwater & Totland	Secondary
Land at Little Kitbridge – improvements to surrounding local road network	Medium	Newport	Primary
Land adjoining Lushington Hill & Hunters Way – improvements to Lushington Hill/Palmers Road junction	Medium	Wootton	Secondary
Land at Rosemary Vineyard & Sharon Orchard, Ashey Road – improvements to surrounding road network	Medium	Ryde	Primary
Land west of Sylvan Drive – Anticipated impact on wider road infrastructure of Newport	Medium	Newport	Primary
Newport Harbour and County Hall car parks – flood risk requires mitigation	Medium	Newport	Primary
Newport Harbour and County Hall car parks – dredging and harbour wall maintenance	Medium	Newport	Primary
Kingston Marine Park – Hoist dock to facilitate access to deep water	Medium	East Cowes	Primary
Ryde Esplanade Interchange improvements	Medium	Ryde	Primary
Environmentally sensitive dredging of key waterways and harbours	Medium	Cowes/East Cowes, Newport, Ryde	Primary
Industrial estate extension (Nicholson Rd) – transport and traffic access mitigation	Medium	Ryde	Primary
Industrial estate extension (Nicholson Rd) – utilities infrastructure	Medium	Ryde	Primary
Industrial estate extension (Nicholson Rd) – flood risk mitigation	Medium	Ryde	Primary
East of Pan Lane – off-site infrastructure required to connect to the nearest point of adequate capacity	Medium	Newport	Primary
Sandown industrial area – flood mitigation work required	Medium	Sandown	Primary
Radio broadband coverage	Medium	Island-wide	Primary
Integrated Transport Network	Medium	Island-wide	Primary
Satellite broadband coverage for rural areas	Medium	Island-wide	Primary
Provision of dedicated Higher Education facility	Medium	Newport	Primary

- 5.9 The infrastructure delivery plan includes details of the infrastructure identified by the Council and other service providers as being needed to support the delivery of the IPS. It explains the approach the Council has taken to identifying this infrastructure, how it will be delivered, and an assessment of the potential risks associated with doing so. As the IPS housing requirement is lower than the identified housing need, further analysis is provided in the IDP addendum that considers the implications of the lower housing requirement on different elements of infrastructure provision in the context of the IPS policies being written to allow further development over and above the 453dpa to come forward if it represents sustainable development and aligns with the policies of the plan as a whole.
- 5.10 In addition to housing sites, the IPS also allocates sites for health care and employment, to support the planned housing growth. Appendix 2 of this paper summarises the evidence base in terms of need and location for these non-residential allocations. All the sites have been assessed through the SHLAA criteria to identify any significant factors that might constrain or otherwise inhibit the sites being developed.

### **Site selection**

- 5.11 All of the previously allocated sites in the first Draft IPS of 2018, and those promoted to the IWC as part of both Draft IPS consultations, have firstly been considered in a basic site classification exercise that solely assessed the size/likely yield, the location in, out or adjacent to settlements and the type of site in relation to the brownfield or greenfield status. Regardless of location, sites that were too small to allocate (yield of under 10 units) were removed or not taken forward (reason **R1**) - a total of 26 sites with a combined predicted yield of 145 dwellings from the 2018 Draft IPS) and these may instead form part of the identified (and conservative) windfall allowance in the IPS of 100dpa, subject to location. In the 5 years from 18/19 – 22/23, completions on sites between 0 and 9 dwellings totalled 656 dwellings, or 131 per annum. In line with paragraph 70 of the NPPF, these sites do provide a realistic source of supply. However as the IPS is planning for a lower housing requirement, there is a necessity to ensure that the planned growth provides as much affordable housing as possible. Sites of less than 10 units would not deliver any affordable housing, therefore any that do come forward will fall into 'windfall' rather than allocated supply.

### **How flood risk has been considered in the local plan allocations**

- 5.12 The Island is in an unusual position whereby the majority of the authority area is at low risk of flooding (Flood Zone 1). However, being an island has influenced the evolution of the primary settlements, with all of these either on the coast or estuary. As these settlements have grown, the risk of flooding has increased over time as a result of climate change.
- 5.13 While it is possible to select new sites on the edges of these settlements with a lower risk of flooding, the most sustainable option of redeveloping previously developed sites, often in the settlement centre, may well be subject to increasing risk of flooding over time. In order to make best use of such sites, minimising the demand on settlement extension into rural areas and avoid town centre locations becoming derelict with associated negative social and economic impacts such as vacancy can bring, regeneration of brownfield sites is likely to be an increasing reality for the Island's otherwise most sustainable locations in the primary settlements. National guidance on the application of the Sequential Test recognises that some areas at lower flood risk may not be suitable for development for various reasons and therefore out of consideration. The guiding principles and preferred spatial strategy key principles set out in Table 5.1 are the start point for the consideration of the Sequential Test for the proposed allocation sites.

5.14 Flood risk has been a consideration in the selection of sites to be allocated. There have been 3 separate but linked processes that have included consideration of flood risk, being the site allocation process, the sustainability appraisal, and the strategic flood risk assessment. A summary of how flood risk has informed each of these processes is set out below.

Plan-making process	Activity	Consideration of Flood Risk
Site allocations	SHLAA Update	Applied a sequential risk-based approach that considered nature (greenfield v brownfield) and location (settlement hierarchy) against the flood risk hierarchy (most preferred FZ1 to least FZ3) to discount sites not appropriate (e.g. greenfield sites predominantly in FZ 2 & 3 etc).
	Shortlisting sites for consideration as plan allocations	Sequential approach taken to site selection, only sites in public ownership, brownfield and in primary settlements would be considered if there is any element of flood risk that couldn't be excluded from developable area.
Sustainability Appraisal	Site Appraisal	Individual assessment of each site against criteria in the SA framework to identify potential issues and areas for improvement.
	SA proposed allocated sites assessment workshop	Follow-up workshop between plan-making and SA teams – identified areas to improve the SA performance of sites, increasing potential to pass exceptions test.
Strategic Flood Risk Assessment	Level 1 SFRA (Sequential Test)	Application of the Sequential Test resulted in sites identified as being wholly or partially within a zone of flood risk being discounted. The exception to this rule was where the sites were brownfield, where this was the case the sites were identified for consideration under the SFRA Level 2 assessment.
	Level 2 SFRA (Exceptions Test)	Provides recommendations for safe development of sites shortlisted for development that are subject to flood risk, but due to their nature (brownfield) have come through the Sequential Test and due to their location (primary settlements) and wider sustainability benefits to the community (land in public ownership offering the greatest returns in terms of planning and community gains) pass the Exceptions Test.

5.15 With the revised approach to housing delivery and the update to housing allocations, 3 of the 28 proposed allocated sites with an element of residential use have been identified as being affected to some extent by Flood Zones 2 and 3. While all three of these are located in the primary settlements of Cowes (1 site) and Newport (2 sites), two are brownfield and one is greenfield.

5.16 HA033 Land west of Sylvan Drive is a greenfield site within the settlement boundary of Newport that has a small area (10%) in Flood Zones 2 and 3 where an unnamed watercourse flows along the northern boundary of the site from west to east. All the development proposed for this site is to be

located in Flood Zone 1 and while the allocation site boundary could have been drawn so as to exclude the areas at risk of flooding this would have then lost the opportunity to include provision for an enhanced river corridor buffer and the associated ecological and wider biodiversity benefits such improvements and protection that would bring. This would also deliver the opportunities for watercourse improvements that the council has been working in partnership with the Newport Rivers and Island Rivers Groups on and set out in policy EV2 *Ecological assets and opportunities for enhancement*.

- 5.17 When considering the area of each site, the extent of the area predicted to be at risk of flooding and the estimated development footprint of the proposed yield of each site (taking into account likely densities), it is possible by taking a sequential approach to the development of the sites for 2 of them to locate the proposed built development wholly within Flood Zone 1, with safe access and egress. The table below provides a summary of this analysis.

Site reference	Area of site covered by Flood Zone m2/as a % of site total			Indicative yield	Area of development assessment	Access/egress	EV14 Policy compliant*
	FZ 1	FZ 2	FZ 3				
HA018 Green Gate Industrial Estate, Thetis Road, Cowes	42%	58%	51%	25	Site area 0.15ha, 40% of site developable, likely development flatted 4/5 storey 1&2 bed units on FZ1 footprint, 5 units per floor, avg unit size 55sqm (nationally prescribed space stds min are 50sqm for 1b and 61sqm for 2b) = 275sqm x 1.4 for circulation = 385sqm footprint. 600sqm of site available in FZ1	Main access to the site will be via Thetis Road, located off the B3320. This road is unaffected by fluvial or tidal flooding and remains dry during all surface water events. Travelling north-east, the B3320 is at high surface water risk however remains dry to west up to the 1 in 100-year event	Yes
HA033 Land west of Sylvan Drive	90%	10%	9%	225	10.2ha site, 90% of which is FZ1 (9.2ha). Likely development of a housing mix as per policy H8 at 25-30dph – density calculated (225/9.2) is 24dph which excludes all FZ2/3 land which can be used as green river buffer	The majority of the site is located within Flood Zone 1 and there is limited fluvial flood risk around the site. It is likely to be accessed from Sylvan Drive. Within the vicinity of the site, this road remains dry up to the 1 in 1,000-year surface water event. Travelling east, towards	Yes

						<p>Newport, Sylvan Road is at high risk of surface water flooding from the 1 in 30-year event upwards with depths of up to 0.9m. Travelling west, the surrounding roads are also impacted from the 1 in 30-year event upwards with 1 in 30-year depths of up 0.15-0.6m.</p>	
HA44 Newport Harbour	26%	74%	66%	250	<p>2.56ha site, Flatted development likely 4/5/6+ storeys in a number of different buildings across the site (see p40 &amp; 43 of NH masterplan), mixture of 1 &amp; 2 bed units, avg unit size 55sqm. Only utilising the 26% of site in FZ1 would see a density in excess of 400dpa. Likely requirement to utilise some areas of FZ2 (no resi at ground floor) to achieve high density scheme of 200+dph typical of city centre urban flatted development E.g. FZ2 Sea St Car Park site approx. 1500sqm footprint, 20 units per floor 1100sqm x 1.4 circulation = 1510sqm – 5 storey building less GF as non resi = 80 unit yield (32% of proposed devt). FZ1 Riverside Centre site approx. 2,400sqm footprint, 6 storeys, 30 units per floor 1650sqm x 1.4 circulation 2310sqm 180 units (72% of allocation)</p>	<p>To the north, Fairlee Road is impacted by a surface water flow path from the 1 in 30-year event upwards. Depths here are up to 0.6m during the 1 in 30-year event and up to 0.9m during the 1 in 1,000-year event. To the south of the A3020 most roads are impacted during the 1 in 1,000-year event. Hunny Hill is likely to be impacted from the 1 in 30-year upwards within the vicinity of the channel.</p>	Yes*

\*This is conditional upon the recommendations from the Newport Harbour FRA (September 2021) being met through detailed Flood Risk Assessments associated with any application to develop any part of the site, specifically:

1. Only less vulnerable uses being located at ground floor level;
2. Finished first floor levels being set above the 1 in 200-year predicted tide levels for the year 2115 and should include a freeboard (to be agreed with the LLFA and Environment Agency);
3. Submission of a surface water management plan detailing the proposed means of managing surface water onsite, in line with industry standards, national guidance, and the LLFA requirements;
4. An identified site manager registered to receive all relevant flood warning and alerts with contingencies to cover absences and personnel changes;
5. A detailed evacuation plan should be produced for any buildings located within flood risk areas, detailing how safe access and egress to the buildings will be maintained, approved by the LLFA, EA and relevant emergency services bodies;
6. Undertake detailed site investigations to identify, manage and mitigate high groundwater areas within the site.

5.18 The proposed allocation at Newport Harbour is the only site where there is potential for flood risk to development, having applied a sequential approach to developing the site. Having applied the Sequential Test at various stages of site selection and a sequential approach, this allocation has to be considered under the (flood risk) Exception Test, as set out in [paragraph 160 of the National Planning Policy Framework](#). The Exceptions Test is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. The 2 parts to the Test require proposed development to show that it will provide wider [sustainability benefits to the community that outweigh flood risk](#), and that it will be [safe for its lifetime](#), without increasing flood risk elsewhere and where possible reduce flood risk overall, and these are set out below.

### **The wider sustainability benefits of Newport Harbour**

- 5.19 The proposed mixed use allocation site of Newport Harbour is centrally located in the county town of the authority area. As such it provides unique opportunities in terms of being able to access and being accessible, at the centre of the Island's road, foot, and cycle path network. Located on the Medina Estuary also provides the possibility of water based access for both recreation and transport (there is an active aggregate wharf on the opposite bank of the estuary).
- 5.20 This is the only brownfield site in Newport that is wholly in the ownership of the council and capable of delivering major development. As the site is part of the council's regeneration strategy it is very likely that it will provide the wider sustainability benefits to pass the first part of the Exception Test. Regeneration of the site is intended to increase connectivity to the existing town centre, attract visitors, and ensure the future of the harbour by providing for maintenance and investment in harbour facilities. The new proposals are mostly on the eastern side of the estuary, keeping the Medina itself available for boats and leaving more commercial functions on the west, including the existing marine and boating activity. The redevelopment aims to keep and reuse buildings where possible, to help conserve and enhance the historic and marine heritage of Newport Quay.
- 5.21 The council, in its role as the harbour authority for Newport Harbour has proceeded with a revision order to the harbour. The harbour infrastructure requires significant investment to maintain the area as a working harbour and the harbour revision order is necessary to be able to unlock investment potential (such as through areas of land to be disposed and enabling longer leases) to help pay for infrastructure improvements.

- 5.22 The IPS allocation works in parallel with the revision order by allocating the area for mixed use development so that it can benefit from the revision order in a way that the site previously could not (e.g. historically there was a maximum 3 year lease term meaning no significant investment was likely and no ability to fund necessary infrastructure improvements). By regenerating the wider harbour area, it safeguards the retention of this important facility on the island. On balance, in conjunction with the fact the allocation is sustainably located and accessible by means other than the private car, is brownfield land in public sector ownership, has the ability to deliver much needed affordable housing and employment opportunities for Newport, which include some of the most deprived wards on the island, and contribute to the preservation of the harbour itself through infrastructure improvements funded through regeneration proposals, whilst there may be sequentially preferable sites on the island for development in flood risk terms, none offer the range of sustainable benefits likely to be achieved through the sites regeneration, or have as negative an impact should the site remain undeveloped.
- 5.23 The site has been assessed through the Sustainability Appraisal (SA) of the IPS. The site performed well (in comparison to other proposed site allocations). The SA objectives where the site was assessed as having a positive impact were all locational in nature, being *Landscape* (including noise), *Land use, soils and agriculture*, and *Material Assets*. The location of the site is assessed as being positive due to not having impacts on sensitive receptors important to the wider rural areas of the Island (such as the AONB and Dark Skies proposed designation re. *Landscape*). The location also results in a positive sustainability objective score by not taking or sterilising through proximity, areas important to agriculture, mineral deposits or protected for geological importance (*Land use, soils and agriculture*). The location also scores positively by being located within a primary settlement and the transport infrastructure that provides (*Material Assets*).
- 5.24 The only negative performance against SA objectives were for *Cultural Heritage* and *Biodiversity*. For *Cultural Heritage*, where the observation upon which the judgement made was, “*There are a number of Grade II listed buildings within the vicinity of the southern section of the site.*” given the high number and distribution of protected historic assets in Newport, it’s highly unlikely that a brownfield site within the settlement area would become available that wasn’t in close proximity to such an asset. Furthermore, the listed status of the quay wall will benefit from being within the site area by way of any required renovation/maintenance and future protection with enhanced interpretation and awareness.
- 5.25 For the *Biodiversity* SA objective the observation for the negative score was “*The Solent and Dorset Coast SPA runs immediately adjacent to the western boundary of the Site. Slightly further north there are SSSI, SAC Ramsar and SPA sites.*” Again the extent of this designation is such that all of the primary settlements on the Island are affected and the council worked with Natural England (NE) in defining the designation boundary (which is adjacent to the north of the site) and understanding the activities likely to generate impacts (e.g. certain types of fishing and dredging activity where the protected bird species food sources might be disturbed). Regeneration of Newport Harbour is unlikely to generate significant impacts and while any redevelopment of the site will need to be done with an awareness of the environmental designations, specific requirements will be addressed in the relevant EIA. Based upon the engagement with NE to date the council cannot identify any nature conservation constraints that would prohibit redevelopment of the site. Given the extent of hard surfacing and numerous existing drainage outputs to the Medina there are significant opportunities for environmental improvement of the site and surrounding area.

### **Demonstrating Newport Harbour will be safe for its lifetime**

- 5.26 The second part of the Exceptions Test requires the proposed allocation to be able to demonstrate that it will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce

flood risk overall. In considering allocating Newport Harbour through the local plan process the council has undertaken a level 2 Strategic Flood Risk Assessment. Both this and a more detailed Flood Risk Assessment carried out for the whole allocation area have provided the evidence needed to be able to conclude that Newport Harbour can provide safe development, does pass both parts of the Exceptions Test and therefore can be allocated.

- 5.27 In line with guiding principles (a) and (b), sites that are outside any Primary, Secondary or Rural Service Centre settlement boundaries were removed (reason **R2**) or not proposed for allocation to ensure that planned growth is directed to the most sustainable locations. 100% of the allocated dwellings within the Draft IPS are now concentrated at the Primary and Secondary settlements. 92% are located in Primary settlements and 8% within Secondary settlements (with Wootton and Bembridge being classified as Secondary settlements due to population size and available services/facilities).
- 5.28 In line with paragraphs 77 and 78 of the NPPF, sites that were adjacent to the smaller Rural Service Centres or at the Sustainable Rural Settlements have been removed (reason **R3**) or not been proposed for allocation. Some of these sites could still come forward under either the Rural & First Homes Exception Sites policy (H7) and deliver locally needed housing, or where relevant the Housing on Previously Developed Land policy (H9) and provide development on brownfield land. Allocating these in the plan, with the majority being between 10 and 30 units, would reduce the amount of much needed affordable housing that would be delivered in these rural areas, as only 35% of the dwellings would have to be provided as affordable in line with affordable housing policy H5.
- 5.29 Sites that are existing commercial operations with lower levels of certainty of delivery have also been removed (reason **R4**) or not been proposed for allocation. A Housing on Previously Developed Land policy (H9) will provide support in principle for existing brownfield sites such as these to come forward should existing commercial operations cease or development represent a viable and appropriate option for the site, and these would also contribute to the windfall allowance within the IPS.
- 5.30 Finally, a number of predominantly greenfield sites adjacent to settlement boundaries have been removed or not been proposed for allocation where they would not represent the most appropriate and sustainable extensions to the settlement boundary or where there are site specific issues that reduce the certainty of delivery (reason **R5**) or the site is no longer being promoted for housing.
- 5.31 It is important to note that some of the sites removed from the first Regulation 18 Draft IPS in 2018/19, could still come forward for development under the Rural / First Homes exception sites policy or new brownfield sites policy. Of the new sites suggested to IWC during and since the last IPS consultations that have not been taken forward as allocations, some could also still come forward under the aforementioned policies. This position aligns with the housing requirement of 453 dwellings per annum within the submission version of the IPS not being a target to aim for or a ceiling in line with the NPPF. Windfall dwellings delivered through policies H7 and H9 would be in addition to the planned growth on allocated and permitted sites and may result in the windfall allowance of 100dpa within the IPS being exceeded.
- 5.32 The major spatial strategy changes from the first Draft IPS in 2018 to the 2021 Draft and submission versions of the IPS can therefore be summarised as:
- i. the removal of the two proposed garden settlement areas of search and associated housing numbers attributable to these developments;  
**WHY? - there is no certainty of delivery within the plan period contrary to paragraph 72 (d) of the NPPF due to the substantial levels of work required to justify the viability, location and any**

**delivery mechanisms of such settlements and associated long lead in times highlighted by paragraph 59 of Planning Practice Guidance;**

- ii. the removal or non-allocation of sites outside of settlement boundaries;  
**WHY? – with a lower, island realistic housing requirement allocated sites will be within extended settlement boundaries to deliver development in the most sustainable locations. This may also assist in maintaining realistic land values to ensure viable, policy compliant schemes can be delivered;**
  - iii. settlement boundaries adjusted to include all allocated sites;  
**WHY? - setting clear settlement boundaries to include land allocated for development helps provide the community certainty for the future on how places will be shaped (see also bullet v relating to sites adjacent no longer being supported in principle);**
  - iv. the removal or non-allocation of some greenfield sites adjacent to settlements that do not represent the most sustainable extensions to settlement boundaries or where site specific issues reduce the certainty of delivery;  
**WHY? - a deliverable and realistic island housing number requires some greenfield sites. However, those that do not form the most sustainable extensions to settlement boundaries or have site specific issues that reduce certainty should not form part of the planned growth**
  - v. the removal of support in principle for sites outside, but adjacent to the settlement boundaries set within this plan, should they come forward for development;  
**WHY? - Prioritising the delivery of sites in the most sustainable locations through the use of settlement boundaries and allocations helps create certainty over where development will take place**
  - vi. a stricter policy approach to ensure that planning permissions granted are built out to timescales set out as part of application information  
**WHY? - the level of housing within this plan meets an island realistic housing requirement therefore delivering the sites that have been allocated forms an essential part of the process**
- 5.33 A balance has been taken to ensure that the deliverable housing requirement is planned for across a variety of locations and types of site – this helps to increase affordability and access to a range of housing to meet all requirements and needs within the restricted housing market on the island. In line with paragraph 67 of the NPPF, the IPS also sets out the proposed housing requirement within any designated neighbourhood areas on the Island.
- 5.34 Alongside the submission version of the IPS and this paper, the IWC has published further evidence base papers related to both the implications of not planning for the standard method and also the delivery barriers that exist within the island housing market and whether they can be overcome or partly addressed through the implementation of the policies in a local plan.

**Appendix 1 List of sites removed from the 2018 & 2021 Regulation 18 Draft IPS**Reasons site removed:

<b>R1</b>	Too small to allocate (under 10 units)
<b>R2</b>	Outside of any Primary, Secondary or Rural Service Centre boundary
<b>R3</b>	In or adjacent to a Rural Service Centre or at a Sustainable Rural Settlements so can be a Rural or First Homes exception site
<b>R4</b>	Operational commercial site, reduced or no certainty of delivery
<b>R5</b>	Adjacent greenfield site not forming a logical extension to the settlement boundary / less certainty of delivery / site specific issues

IPS policies that may be applicable to removed sites:

*Policy H7: Rural & First Homes Exception Sites*

*Policy H9: Housing on Previously developed Land*

Table of sites removed:

<b>Site reference</b>	<b>Site address</b>	<b>Reason for removal</b>	<b>H7 applicable?</b>	<b>H9 applicable?</b>
HA001	Land off Alum Bay, New Road	R1		
HA003	Land to the rear of Lanes End	R5		Y
HA004	Land to the South of Clayton Road	R5		
HA007	School Ground, Regina Field and land NW of Regina Road, Copse Lane	R5		
HA008	Church Field, Copse Lane	R5		
HA009	The Apple Farm, Newport Road	R1, R2		
HA010	Land at Main Road, Wellow	R2	Y	
HA011	Manor Farm (West Field)	R2	Y	
HA012	Buildings at Lee Farm	R2	Y	Y
HA013	Land fronting Thorley Street	R2	Y	
HA014	Land at Warlands, Shalfleet	R2	Y	
HA015	Land at Elm Lane	R2	Y	
HA016	Merlins Farm, Elm Lane	R2	Y	Y
HA017	Land at Moor Lane	R1, R3	Y	
HA021	Land at Baring Road	R1		
HA023	Parklands Centre, Park Road	R1		Y
HA024	Land to west of Newport Road	R1		
HA027	Luton Farm (East of Wyatts Lane)	R5		
HA029	117 Medina Avenue	R4		Y
HA030	Test Centre site, 23 Medina Avenue	R1		Y
HA034	Land off Gunville Road (east)	R2		
HA035	Land off Gunville Road (west)	R5		
HA040	Land at and adjacent to New Fairlee Farm	R5		
HA041	Barton School site, Green Street	R4		Y
HA042	Land east of St Georges Way and south of Asda, Newport	R1, R2		
HA043	Land at Landscape Lane	R5		
HA045	Land at Fairlee Road, Hillside	R4		Y
HA047	Merstone Valley Nurseries	R2	Y	Y
HA048	Highwood Nursery, Main Road	R3	Y	
HA049	Land to east of and at Rookley Green	R3	Y	
HA050	Land between The Spinney and The Linhay	R1		
HA052	Reynards Cattery, Palmers Road	R1		

HA053	Land adjoining Lushington Hill & Hunters Way, Wootton	R5		
HA054	Land to the rear of 34 High Street, Oakfield	R5		
HA056	6-8 George Street	R4		Y
HA057	St Thomas Street Car Park, Ryde	R4		Y
HA058	Land adjoining Puckpool Hill (The Archery Field)	R2		
HA059	Land to the west of Upton Road	R5		
HA061	Land at Binstead	R5		
HA062	Land off Quarry Road	R5		
HA063	Land at Puckpool Hill	R2		
HA066	Land near Brading Roman Villa / Land off Morton Road	R3	Y	
HA067	Land north of Quay Lane	R3	Y	
HA068	Wrax Farm, New Road	R3	Y	
HA069	The Builders Yard, Yarbridge	R1		Y
HA070	Coppid Hall Farm, Main Road	R2	Y	Y
HA071	Car sales area on the east side of Main Road Havenstreet	R1, R2	Y	Y
HA072	Former Flamingo Park, Oakhill Road	R2	Y	Y
HA073	Land at Seagrove Farm Road	R2		
HA074	Land west of Eddington Road	R2	Y	
HA075	Gibb Well Field, off Seaview Lane	R2	Y	
HA076	Guildford Park Caravan Site & Fakenham Farm	R3, R4	Y	Y
HA082	Chester Lodge Hotel, 7 Beachfield Road	R1		Y
HA083	Land adjacent Perowne Way	R5		
HA085	The Bayhouse Hotel, 8 Chine Avenue	R5		Y
HA086	Holme Farm, Church Road	R1, R2		Y
HA087	Land opposite Holme Farm	R1, R2		
HA088	Shanklin Esplanade Car Park	R4		Y
HA089	Fairfield Lodge, Priory Road	R1, R4		Y
HA090	Depot site at Lowtherville Road	R5		Y
HA091	Ventnor Youth Club, Victoria Street	R4		Y
HA092	Land off Chestnut Drive / Willow Close	R5		
HA093	Land to the east of Ventnor Road	R2	Y	
HA094	Land at 31 Ventnor Road	R1, R2	Y	
HA095	Land at Moor Farm	R5	Y	
HA097	Land at Deacons Nursery	R5	Y	
HA098	Land at Lower Branstone Farm	R2	Y	
HA099	Land at Tithe Barn Farm	R1, R2	Y	
HA100	Popes Farm, High Street	R2, R3	Y	
HA101	Westmeanth, Land at White Dymes, Main Road	R2, R3	Y	
HA102	Land off Chatfield (east), Niton	R3	Y	
HA103	Land off Chatfield Road	R3	Y	
HA104	Land at eastern end of Allotment Road	R1	Y	
HA105	Land rear of High Street	R2, R3	Y	
HA106	Land east of Alverstone Road	R2	Y	
HA107	Castle works and former bacon factory, Castle Road	R5		Y
HA108	Former Worsley Inn, High Street	R1		Y
HA109	Land at St Johns Road	R3	Y	

## Appendix 2 Summary evidence for health care and employment allocations

### Healthcare Allocations

C4 Health Hub at St Marys Hospital

C7 Delivering Locality Hubs

1. The Bay
2. A central locality hub

Based upon information provided by the NHS<sup>6</sup> there are 3 Primary Care Networks (PCNs) on the island:

1. Central & West,
2. South, and,
3. North & East.

The Clinical Commissioning Group (CCG) are in the process of reviewing the estate demands within these three PCNs. The increases in workforce being recruited through to 2023/24, along with the population projections from ONS and information collected during the Strategic Health Asset Planning and Evaluation (SHAPE) review, are being used to help inform the level of additional and/or expanded facilities that are required within each PCN on the island.

However, as this review work is only just beginning and the council will be publishing the plan well in advance of any outputs from the CCG, the IPS needs to reference this ongoing work and ensure it has a sufficiently flexible policy approach to be able to take account of the implications and requirements from a spatial planning perspective. In the first instance this will take the form of identifying space to accommodate the increasing demand in services for each PCN, but could also provide evidence to enable the planning obligations SPD to be revised/refreshed if the output of the CCG work determines we should be collecting a contribution or seeking land in a particular area from a particular allocation to help deliver any new facilities.

The council adopted the [Health Contributions SPD](#) on 9 May 2024. The SPD outlines how the Hampshire and Isle of Wight Integrated Care Board (ICB) decide what improvements to health infrastructure may be needed in particular areas of the Island. The SPD will use up-to-date information to calculate whether contributions are required, and then identifies how the amount of money a developer may have to pay towards these improvements is worked out and also what size of new development may have to pay.

With the development of the IPS being so far ahead of the PCN review it's difficult to plan with certainty for future demands. Given that the CCG use ONS population projections to inform their estate planning, and these also feed the SM, their estate planning is effectively looking at the high end of projected growth for the Island (IPS plus unmet need). With the IPS making provision for below the SM to start with (but allowing more than the 479 if deliverable) health facilities will be planned and delivered by the CCG to serve a higher level of growth than may be met by the plan, certainly in its first iteration. What's important is that the plan ensures the growth required within each of the PCNs is accommodated through allocations, contributions and ensuring no future conflict in uses through permission of non-related development prior to the new or expanded health facilities being delivered.

The council has identified the following allocations as the first step in meeting a known, but as yet unquantified future demand for health facilities. The approach taken has sought to match the areas likely to see the most significant increases in demand (the primary settlements within the spatial strategy) with the areas of health care provision to ensure there is potential cover across all 3 primary care networks in order to be able to take account of the PCN review.

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<sup>6</sup> Isle of Wight Estates Update, 19<sup>th</sup> November 2021, Hampshire, Southampton and Isle of Wight Clinical Commissioning Group

Allocation EA2 provides an element of flexibility as it is a greenfield site where any facility can be scaled up or down according to needs established at the time and if it isn't needed for health it could be used for employment instead.

### Island Planning Strategy health-based allocations

Primary Care Network	Practices	Spatial Strategy*	Allocation Provision
North East Locality	Tower House Surgery The Esplanade Surgery Argyll House Surgery East Cowes Medical Centre St Helen's Surgery Medina Healthcare	Primary settlement Ryde/Medina Valley	EA2** Employment allocation at Nicholson Road, Ryde
South Isle of Wight Locality	Beech Grove Surgery Grove House Surgery Shanklin Medical Centre Sandown Health Centre South Wight Medical Practice Ventnor Medical Centre	Primary settlement The Bay	C7 Bay locality hub, The Heights/Barracks community hub, Sandown
Central and West Health Alliance	Newport Health Centre (previously the now-merged Carisbrooke and Dower House practices) Cowes Medical Centre Wight Primary Partnership Ltd (previously Brookside Health Centre and Yarmouth Surgery)	Primary settlement Medina Valley	C4 Health hub at St Mary's Hospital  C7 central locality hub, Pyle Street, Newport

\*As set out in IPS Policy G2 *Priority locations for development and growth*

\*\* Nicholson Road site includes the potential for a healthcare facility as part of the mixed use development.

### Employment Allocations

E1 Supporting and growing our economy

EA1 Employment allocation land to the east of Pan Lane  
EA2 Employment allocation at Nicholson Road, Ryde  
EA3 Employment allocation at Somerton Farm, Cowes  
EA4 Employment allocation at Kingston, East Cowes  
EA5 Employment allocation at Lowtherville, Ventnor  
EA6 Employment allocation at Sandown Airport, Sandown

The Isle of Wight Employment Land Study 2022 Update provides evidence to inform local planning and development policy, particularly regarding the provision of employment land and floorspace. The following points summarise the main findings with regards to future employment land requirements.

- Demand is relatively well distributed across the island, albeit with more demand in the Medina Valley and Ryde.
- Most demand for office space is in the Medina Valley and Ryde
- For reasons of accessibility, it is recommended to concentrate future industrial development in the north and north-east of the Island.
- Bringing together supply and demand, there is a nominal oversupply of 6.85 ha of industrial land and a nominal undersupply of 0.36 ha of office land. This is nominal as typologies have been assigned to land based on its most likely/appropriate use.
- However, given that there is an aggregate oversupply of employment land and flexibility in this supply, there is enough to meet all needs without allocating further sites to those identified in the draft Local Plan.

On the basis of the final bullet point above the following table sets out the employment land allocations in the IPS and the IcenI employment plan study recommendations.

#### Island Planning Strategy employment allocations

IPS policy reference	Proposed site	Spatial strategy*		IcenI recommendation**
EA1 Employment allocation	land to the east of Pan Lane	Newport	Medina Valley	<b>Retain Allocation</b> – Despite its difficulties it is the only allocation in Newport and may be required to serve the sub area
EA2 Employment allocation	Nicholson Road	Ryde	Ryde	<b>Retain Allocation.</b> Phased development is recommended as per the outline application submitted for the site.
EA3 Employment allocation	Somerton Farm	Cowes	Medina Valley	<b>Review Boundary</b> – To provide maximum flexibility the site should be merged the draft housing allocation HA022 and should become a mixed-use allocation. 14.5 ha mixed-use allocation with 25% allocated for employment use (Class E).
EA4 Employment allocation	Kingston	East Cowes	Medina Valley	<b>Retain Allocation.</b> This is the only allocation with marine access and should be encouraged for marine use particularly on the west of the site.
EA5 Employment allocation	Lowtherville	Ventnor	Ventnor	<b>Release Allocation</b> - The site does not provide a reliable source of additional employment land. Intensification of the site could be supported under policy E1 or left to the market.
EA6 Employment allocation	Sandown Airport	Sandown	The Bay	<b>Retain Allocation</b> - The site is the most realistic source of additional employment land in a single location (i.e. not infill) within the Bay Area.

\*As set out in IPS Policy G2 *Priority locations for development and growth*

\*\* *Isle of Wight Employment Land Study 2022 Update*, IcenI Projects Ltd, January 2022.

The site at Somerton Farm is identified as requiring a boundary review in the Icení study given the location directly adjacent to draft housing allocation HA022. Ongoing pre-application discussions have seen employment uses located to the south of the proposed housing area, rather than to the north as this would act as a buffer to the scrapyard and other employment land lying on the southern boundary of HA022. As a result, the wording of both the site specific requirements for HA022 in Appendix 3 of the submission version of the IPS and allocation EA3 have been amended to reflect the findings of both the Icení report and ongoing pre-application discussions to ensure the best and most appropriate use of land.

The site at Lowtherville, Ventnor is identified as having some scope for intensification of employment uses though allocation was not essential. It was noted that the site was fully occupied demonstrating demand for this type of site in this location. As the only available employment site in the Ventnor and wider south of the Island area, the allocation is retained, but will be reviewed periodically to determine demand and delivery.

The employment land study also supported the approach taken in IPS Economy policy E1 *Supporting and growing our economy* for retaining some sites with potential for intensification and/or expansion of employment uses at the following:

- Cowes Industrial Estate, Three Gates Road
- College Close Industrial Estate, Sandown
- Afton Road Freshwater
- Golden Hill industrial estate