



Planning Inspectorate

Examination of the Island Planning Strategy

Inspectors: David Spencer BA(Hons) DipTP MRTPI

and Andrew Steen BA(Hons), DipTP, MRTPI

Programme Officer: Louise St John Howe

louise@poservices.co.uk

James Brewer
Planning Policy Manager
Isle of Wight Council
4 December 2024

Dear Mr Brewer

Examination of the Island Planning Strategy

We are mindful that it has been approximately 5 weeks since the Council submitted the Island Planning Strategy (IPS) for examination, and we wanted to provide reassurance that we are making progress in our assessment of the material that was submitted on 31 October 2024. We are also addressing in this letter some initial areas where we consider it would be helpful for the Council and for those with an interest in the examination of the IPS if we provided some early guidance.

Examination Website and Programme Officer

We would like to commend the Council on the structure and content of the examination website and to recommend it as a resource for those with an interest in the examination. The website will be updated as the examination progresses. We are also pleased that the Council has appointed Louise St John Howe as the independent Programme Officer. We wish to emphasise that Louise acts independently of the Council and works for the Examination, serving as the principal point of contact, including impartially liaising between the Council, representors and ourselves. If the Council or anyone who made representations on the IPS in July-August 2024 requires clarification on the Examination or wishes to raise a matter for our attention, please liaise with Louise.

Initial scope of main soundness issues for the Examination

As the Council's letter of 31 October 2024 accompanying the submission identifies (Examination Document CD4) there a number of matters that will form the core of the examination. From everything we have read so far, we would agree with the Council that the level of growth being planned for, in terms of the approach to housing need and the housing requirement for the Island (over a less than 15 year plan period from the anticipated point of plan adoption) will be the primary soundness issue for this Examination. We also raise now, that the examination will

be looking carefully at the following soundness matters (in no particular priority order):

- The policy framework of the Plan, informed by the accompanying Habitats Regulation Assessment, to mitigate potential impacts arising from the policies of the Plan on qualifying features of protected sites in relation to water nutrient levels, air quality and recreational pressure.
- Whether the Plan is positively prepared regarding economic growth and how that aligns with the proposed housing requirement.
- The proposed spatial strategy in terms where settlements are assigned in the hierarchy, how spatial strategy options have been tested through the Integrated Sustainability Appraisal process and whether it would be necessary for soundness to assign a more positive role to lower tiers of the settlement hierarchy to assist with housing delivery.
- The policy approach to affordable housing provision at Policies AFF1 and H5 in terms of consistency with national planning policy, viability and effectiveness.
- The proposed policy approach to net zero in Policy C11 (having regard to the Written Ministerial Statement of 23 December 2023, and the Council's evidence base on the effectiveness and viability of the proposed approach).
- The approach and geographical extent of the proposed Settlement Gaps (Policy EV10).
- The identification and selection of the proposed housing allocations, including the Key Priority Sites, their deliverability and developability as part of a robust housing trajectory. including whether there would be a deliverable supply of housing land in years 1 to 5¹.
- The proposed approach to deal with Gypsy and Traveller accommodation needs through a separate development plan document.
- Whether the cumulative cost of the requirements arising from the IPS policies would risk the delivery of the Plan in viability terms and whether the viability evidence is robust.

This list is not exhaustive, but intended to provide an early indication of some our key matters and issues we will need to question and explore at the hearings. As we set out below, the Council has constructively engaged further with Natural England and Historic England which has generated a number of possible modifications to the Plan through Statements of Common Ground (SoCGs). Where practicable, we would encourage the Council to consider whether any other SoCGs could be prepared between now and the start of the hearing sessions. Such a process may not lead to agreement or possible modifications, but it could usefully clarify why differences on Plan soundness may have arisen. A possible candidate SoCG would be the Environment Agency who have raised matters we will want to explore regarding site allocations and the sequential test.

In terms of evidence, we will largely proceed on the basis of what has been provided on plan submission. Given the significance of housing numbers and supply, we note

¹ As measured from the date of Plan adoption as per Planning Practice Guidance paragraph 68-004-20240205

that the last housing land supply assessment on the Examination website is dated April 2021 (Examination Document HO10). We would be grateful to understand from the Council whether there has been a further update as part of annual monitoring processes and whether there is a likelihood of an update as of 1 April 2024? Given the increasing significance of establishing a robust housing trajectory and deliverable supply as part of plan-making this is an area we will explore as part of the hearings. This will include whether there is compelling evidence for any windfall allowance and the role of Neighbourhood Plans to consider opportunities for small and medium sized sites.

Timeframe for Further Statements and Hearings

It is our intention to shortly set out our Matters, Issues and Questions (the main themes and areas we want to explore through the Examination) in approximately 2 weeks' time, upon which further written statements will be invited. We recognise this will coincide with the Christmas/New Year break and so we are looking to set deadlines for statements towards the end of January / into early February. At the same time, we will be setting out accompanying guidance notes for the Council and others in terms of how to respond to our questions.

Upon receipt of the statements, we are looking to hold hearings in late February and into March 2025 (sitting no later than 20 March). We would request that the Council arrange for a suitable venue for sitting Tuesday 24 February to Thursday 26 February, Tuesday 4 March to Friday 7 March, and Tuesday 18 March to Thursday 20 March. The venue will need to be DDA compliant and with the ability to record the hearings for either live-streaming or post event viewing. We will not be accommodating 'blended' events with some participants in the room and others joining via a screen. Those who wish to be heard should attend in person. If these dates are not feasible for the Council, please let the Programme Officer know as soon as possible, so alternative arrangements can be made.

National Planning Policy

A number of submissions on the IPS refer to the direction of travel (particularly on housing numbers) following the Written Ministerial Statement (WMS) of 30 July 2024 ('Building the Homes we Need') and the proposed revisions to National Planning Policy Framework (NPPF) which have been the subject of consultation (July-September 2024). The IPS was submitted for examination on 31 October 2024 and accepted by the Planning Inspectorate. As things currently stand, the IPS will be examined for consistency with national planning policy against the December 2023 NPPF and associated Planning Practice Guidance and, where relevant, WMSs. When a new NPPF is published, we will take a view as to whether to invite the Council, and possibly others, to comment on whether there are any implications for the submitted IPS, bearing in mind that previous updates to the NPPF have normally contained transitional arrangements to ensure the timely progress of development plans that are well-advanced.

Potential Modifications

We also wish to emphasise early in the process that it is our role to examine the submitted Plan as published under Regulation 19. This is the version of the Plan that was consulted on in July-August 2024, which the Council will have considered to comprise a sound Plan. We note that the Council has subsequently engaged with Natural England and Historic England (as statutory consultees) and produced a number of proposed modifications (brought together in Examination Document CD7). We will take these into account, and where necessary discuss them at the relevant hearing sessions. Nonetheless, it is our role to only recommend those main modifications that would be necessary for soundness or legal compliance. Any other changes to the IPS would be a matter for the Council and normally presented as 'additional modifications' (sometimes also known as 'minor modifications').

Sites not in the submitted Island Planning Strategy

As a starting point, it is not necessary for us to examine the detail of potential sites that have not been proposed for allocation in the submitted IPS. If we determine after the hearings that (a) the housing need/housing requirement requires modifying and/or (b) the spatial strategy and site selection process requires revisiting, it would be a matter for the Council to consider the possible options. It is not our role to direct the Council to specifically allocate an additional site or sites. Consequently, at the forthcoming hearings, we will not be discussing the detail of sites that are not in the Plan (sometimes referred to as 'omission sites').

Next Steps

We trust this letter is of assistance to the Council and others with an interest in the examination. We look forward to hearing from the Council that the proposed dates for hearings can be accommodated and for an update regarding whether there is a more recent assessment of housing land availability than April 2021 (HO10).

Yours sincerely

David Spencer Andrew Steen

Examining Inspectors.