



Planning Inspectorate

Isle of Wight

Examination of the Island Planning Strategy

Inspectors' Matters, Issues and Questions (MIQs)

16 December 2024

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Introduction

This document sets out the following:

- The matters, issues and questions that will be the focus of the examination. (see Section 2).
- Summary guidance and deadlines for submitting written statements in response to the matters, issues and questions (see Section 1).
- A draft programme for the hearing sessions (see Section 3).
- A deadline of **5.00 pm on Monday 13 January 2025** to inform the Programme Officer if you wish to participate at one or more of the hearings.

Alongside this document, there is a separately published guidance note on the examination website [Examination Document ED5] which sets out further detail on the process and how to engage with the examination. If you are not familiar with a Local Plan examination process, the Planning Inspectorate has published a procedural guide¹, which is accessible via a link on the Examination website. There is also separate guidance from the Planning Inspectorate on taking part in a Local Plan Examination, including a series of short video clips, which is also available via the Examination overview webpage.

As part of this document there is a provisional hearings programme. The hearings will take place between 25 February and 20 March 2025. Any updates to this hearings programme will be published on the examination website.

¹ Last Updated 28 August 2024

If you made a representation on the proposed Submission version of the Island Planning Strategy (during July-August 2024) and wish to participate at the hearing session which is relevant to your representations, you should inform the Programme Officer by **13 January 2025**. If you do not respond by that time, it will be assumed that you do not wish to attend and for the Inspectors to rely on what you have provided in writing.

There are a number of representors who wish to be heard who are making similar submissions around the approach to Freshwater (whether it should be identified as a secondary settlement (as part of the 'West of Wight')) and the proposed sites for allocation. It may be helpful to the Examination if there is some coordination between the Parish Council, local representative groups, Councillors and individuals to present a collective or organised position at the hearing sessions, if possible.

Any queries about this document, and the Examination more generally, should be taken up with Louise St. John Howe, the Programme Officer.

David Spencer Andrew Steen

Examining Inspectors.

Section 1: Guidance and Deadlines for Further Statements in response to the Matters, Issues and Questions.

- i) Anyone who made representations on the Proposed Submission version of the Island Planning Strategy (July-August 2024) may submit a further written statement answering questions set out in Section 2 of this document. Other than for the Council, who must respond and provide statements to our questions, it is entirely optional for anyone else to provide a further written statement. If you do not provide a further statement, you may rely on your original representations submitted in July-August 2024.
- ii) You can only respond to the questions which directly relate to your previously submitted written representations on the Plan. Please clearly indicate in your statement(s) the question(s) you are answering.
- iii) Statements should not exceed 3,000 words per Matter. Further guidance on the format and content of written statements is set out in the separately published Guidance Note [Examination Document ED5]. The Planning Inspectorate has recently published guidance on the use of Artificial Intelligence (AI) [available at [www.gov.uk/guidance/use-of-artificial-intelligence-in-casework-evidence.](http://www.gov.uk/guidance/use-of-artificial-intelligence-in-casework-evidence)] The Examination may not consider statements that do not follow the advice on the use of AI.
- iv) Statements for Matters 1 to 6 should be submitted to the Programme Officer no later than 5pm on Wednesday 5 February 2025.
- v) Statements for Matters 7 to 9 should be submitted to the Programme Officer no later than 5pm on Wednesday 19 February 2025.
- vi) Late Statements will not be accepted. Please see the separately published guidance notes for further details.
- vii) The examination is that of the July 2024 Island Planning Strategy (IPS) as submitted by the Council [Document CD1]. Therefore, the current examination will not be considering the merits of potential sites for development that are not included in the Plan (often referred to as "omission sites").
- viii) Examination of consistency with national policy will relate to the December 2023 version of the National Planning Policy Framework (NPPF) and relevant sections of the Planning Practice Guidance (PPG). Where relevant, regard

will also be given to Written Ministerial Statements (WMS), which represent an expression of national policy and are a material consideration.

- ix) The Council on submitting the Plan has provided a number of statements of common ground, which those wishing to submit further statements may find helpful. In response to the representations from Natural England and Historic England, the Council has proposed a number of modifications to the Island Planning Strategy [see Document CD7]. We will take these into account, along with all the published evidence, all duly made representations submitted in July-August 2024 on the proposed Plan and any written statements to our matters, issues and questions. We will, however, only recommend main modifications to the Plan if we determine that they are necessary to make the Island Planning Strategy 'sound' or legally compliant.

Section 2: Matters, Issues and Questions

Matter 1: Legal Compliance and General Plan-making

Issue 1: Plan-making including Consultation.

- 1.1 Has preparation of the Island Planning Strategy (IPS) complied with the Local Development Scheme?
- 1.2 Is it clear which development plan policies would be superseded on adoption of the submitted Plan? [Regulation 8(5) of the 2012 Local Plan Regulations requires that superseded policies must be identified]. Are there any development plan policies that are intended to be 'saved' on adoption of the Island Planning Strategy?
- 1.3 How have issues of equality been addressed in the Local Plan? In what way does the Plan seek to ensure that due regard is had to the three aims² expressed in Section 149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?
- 1.4 Was consultation on the proposed submission version of the Island Planning Strategy during July and August 2024 carried out in accordance with the Statement of Community Involvement and the requirements of the 2012 Local Planning Regulations?
- 1.5 Was the consultation process on the proposed submission Plan compromised in any way by factors such as broken hyperlinks and incorrect forms? Have there been any fundamental deficiencies or technical problems during the consultation on the proposed Submission version of the IPS that have inhibited access to relevant materials and/or representations from being made in a timely manner, potentially resulting in procedural unfairness?

Issue 2: Duty to Co-operate

- 1.6 What mechanisms have been established between authorities on cross-boundary strategic matters? Do the signed statements of common ground with New Forest National Park Authority, Portsmouth and Southampton demonstrate effective and on-going joint working, as per NPPF paragraphs 26 and 27 and PPG paragraphs 61-009-20190315 to 61-017-20190315?

² At Section 149(1) of the Equality Act 2010 – (1) eliminate discrimination; (2) advance equality of opportunity; and (3) foster good relations.

- 1.7 Is it reasonable that any unmet housing needs on the Island are not proposed to be accommodated on those nearest parts of the mainland?
- 1.8 Is the Island sufficiently physically and functionally detached from the mainland such that it would not be a sustainable strategy for the Island to accommodate any unmet needs from those nearest parts of the mainland?
- 1.9 Should the examination be concerned about the absence of a Duty to Cooperate Statement of Common Ground with New Forest District Council? For example, on matters such as the environment and water quality of The Solent and transport connectivity to the Island?

Issue 3: Habitat Regulations Assessment

- 1.10 Is the Habitats Regulation Assessment (HRA) – May 2024 [Document EA1] robust in concluding, after carrying out an appropriate assessment including the consideration of mitigation, that the policies and proposals in the plan (alone or in combination with other plans/projects) would not have an adverse effect on the integrity of protected sites on or around the Island?
- 1.11 Having regard to the representations from Natural England and the subsequent Statement of Common Ground [Document GS24], in relation to the Briddlesford Copses Special Area of Conservation (SAC) and air quality, is it necessary to update the related findings in the HRA? Are the proposed modifications in Core Document 7 relating to the HRA, as set out in the Statement of Common Ground with Natural England, necessary for soundness?
- 1.12 The HRA identifies likely significant effects for Policy H2, Policies KPS1 and KPS2 and the proposed employment allocations at Policies EA1-EA6. Notwithstanding the broad identification of Policy H2 at the screening stage, the appropriate assessment goes on to deal with the individual sites including the allocated sites at Appendix 2 of the IPS and identifying/confirming, where necessary, site-specific mitigation. To enable a positive HRA conclusion, is it necessary for any site specific mitigatory requirements to be elevated from Appendix 3 of the IPS and embedded in the Plan within site specific policies for residential-led allocations (comparable to the approach for the employment allocations)?
- 1.13 Concern is raised regarding the impact of the Plan's development proposals at Freshwater on water quality at The Causeway and the Western Yar. There are various designations as part of the National Site Network (SACs and Special Protection Areas (SPAs)) and Ramsar designations around the West of Wight. Has the HRA process appropriately considered the likely significant effects arising from the proposals in the West of Wight and arrived at reasonable conclusions

regarding the effectiveness of mitigation, including for proposed development sites at Freshwater, as part of the appropriate assessment?

- 1.14 Table 5.4 of the HRA identifies that some of the proposed allocations in the Plan have a 'moderate' suitability to perform as offsite areas of land capable of helping to support the populations of qualifying bird species of the Solent and Southampton Water SPA and Ramsar site. Is it reasonable to conclude that any likely significant effects of allocating these parcels of functionally linked land can be mitigated in the terms set out at paragraphs 5.38-5.44 of the HRA and harm to the integrity of the protected site avoided?
- 1.15 The main mitigatory approach in the HRA for recreational pressure arising from proximate development to the Isle of Wight Downs SAC appears to be the provision of suitable, alternative natural green space. Would this be feasible and effective, including for smaller sites? Would there be a need for financial contributions to manage and monitor access on the SAC and would this need refining in both the HRA and the Plan in light of the Statement of Common Ground with Natural England at paragraph 4.9?
- 1.16 The HRA refers to one proposed allocation (Site HA096) and a proportion of the windfall allowance over the plan period having to connect into Waste Water Treatment capacity that discharges into the Solent. Is this correct, including the site reference to HA096 at paragraphs 5.108 and 5.109 of the HRA? If so, can it be concluded with confidence that the nutrient budget for these sources can be sufficiently accommodated / mitigated? Is this supported by the evidence in Nutrient Credit Analysis for the Plan [Document EN23]?
- 1.17 Is there any demonstrable capacity within available Nutrient Mitigation Supply and Demand Analysis to support further housing growth on the Island, at a level above the housing requirement set out in the submitted Plan?
- 1.18 The Policies Map has a designation for a Marine potential SPA (pSPA), linked to Policy EV2. Is this correct and if so, does or should the HRA appropriately reflect this potential addition to the National Sites Network?

Issue 4: Climate Change

(This issue deals with general legal requirements on Land Use Planning and Climate Change. Specific questions on Policy C11 (Net zero carbon and Lowering Energy Consumption) are set out separately at Matter 5.

- 1.19 Has the Council had regard to Section 19 of the 2004 Planning & Compulsory Purchase Act (As amended) requiring development plan documents to include policies designed to secure that the development and use of land in the local planning authority's area contribute to the

mitigation of, and adaptation to, climate change? Which are the policies and how will they be monitored for their effectiveness?

- 1.20 Is the plan's approach to flood risk, including the site selection process, consistent with national policy and suitably precautionary, including modelling for the long term, to take account of the effects of climate change? What should we make of the Environment Agency's representations on the Plan regarding the adequacy of the Level 2 Strategic Flood Risk Assessment site summaries from 2021?

Issue 5: Sustainability Appraisal (including Strategic Environmental Assessment)

(Please note separate questions regarding the site selection process are set out under Matter 6 for Housing Sites and Matter 8 for Employment).

- 1.21 Does the Integrated Sustainability Appraisal (ISA) July 2024 [Document EA2] adequately and reasonably assess the likely effects of the policies and proposals of the Plan against sustainability objectives?
- 1.22 Does the ISA test the preferred policy approach against reasonable alternatives, including options for the housing and employment requirements, the spatial strategy (how and where growth is distributed over the plan period) and the reasonable options for housing and employment site allocations?
- 1.23 Ultimately, does the ISA report demonstrate that the submitted plan is justified, in that would comprise an appropriate strategy³, having assessed reasonable alternatives?

Issue 6: Strategic and Local Policies

- 1.24 Plans must include, and explicitly identify, strategic policies to address the strategic priorities for the development and use of land in their area. Neighbourhood Plans will be required to be in general conformity with the strategic policies in the adopted Plan. Do the Policies identified in the Plan as being strategic meet the relevant criteria set out in national policy and guidance?
- 1.25 Having regard to NPPF paragraph 30 on non-strategic policies (and potential conflict between the content of the IPS and any future neighbourhood plans), would it be necessary for soundness to identify any other policies in the Plan as 'strategic'? For example, to ensure delivery, should Policies H2, KPS1 and KPS2 and the proposed employment allocations be identified as 'strategic'?

³ The test of soundness for 'justified' at NPPF paragraph 35(b).

Issue 7: Policies Map and Key Diagram

- 1.26 Would it be necessary on plan adoption to modify or update the submitted Policies Map [Document CD2] to reflect any factual updates or issues identified as part of the Regulation 19 consultation?
- 1.27 Is the Key Diagram at Figure 3.1 sufficiently clear and consistent with NPPF paragraph 23 in indicating broad locations for development?

Matter 2: Plan Period and Levels of Growth to Plan For

Issue 1: Plan Period

- 2.1 The IPS contains identifiable strategic policies. NPPF paragraph 22 expects strategic policies to look ahead over a minimum 15 year period from plan adoption⁴. The submitted plan covers the period 2022 to 2037. Would it be necessary for soundness (consistency with national planning policy) to extend the plan period so that relevant strategic policies look ahead to 2040?
- 2.2 If the Plan period was extended, would it be reasonable to extrapolate identified needs / requirements (from the available evidence base) in the submitted Plan or would it be necessary to commission additional evidence?
- 2.3 What would be the mitigating circumstances that could justify a 12-year post adoption plan period for strategic policies for the Isle of Wight as submitted? Would an early review mechanism be either a justified or effective approach in an Isle of Wight context?
- 2.4 Whilst the housing requirement is proposed to be lower (453 dwellings per annum (dpa)), the Plan does not identify a local housing need for the Island at variance to the standard method output, which in March 2024, was 703dpa⁵. The standard method for housing need is forward looking. Accordingly, would it be necessary for soundness to adjust the start of the plan period to 1st April 2024?

Issue 2: Whether the approach to establishing the housing need is soundly based.

- 2.5 Does the Local Housing Need Assessment 2022 [Document HO13] and the Housing Evidence Exceptional Circumstances Paper [Document HO15] justify why the standard method outputs are appropriate for establishing the housing need for the Island and as such should be considered a valid advisory starting point when establishing a housing requirement for the Island?
- 2.6 Having regard to NPPF paragraph 61, are there the exceptional circumstances for the Isle Of Wight, including the demographic characteristics of the Island, which would justify an alternative approach to the standard method, to determine the housing need over the plan period?

⁴ Anticipated to be November 2025 in the Local Development Scheme [June 2024]

⁵ We acknowledge that this approach is not considered sound by some representors, having regard to NPPF paragraph 61 and footnote 25. We explore this matter separately in Issue 2 (Questions 2.6, 2.7 & 2.8).

- 2.7 Is it reasonable, as set out in Housing Exceptional Circumstances Paper [Document HO15], that alternative methodologies using exceptional circumstances could result in a standard method comparable or higher housing need figure for the Island, for example because of the scale of past under-delivery of housing?
- 2.8 The primary evidence before us advocating for exceptional circumstances, includes a September 2020 analysis paper, provided as part of the representations from Mr Bob Seely [IPSR52]. Would that evidence provide a reasonable basis for concluding that the submitted IPS would not be an appropriate strategy and that a lower level of housing need would be necessary for soundness?
- 2.9 Has plan preparation appropriately considered all reasonable options for establishing the housing need and appraised them accordingly as part of the Integrated Sustainability Appraisal?

Issue 3: Whether the proposed housing requirement is soundly based.

- 2.10 Is it demonstrated through the Integrated Sustainability Appraisal, and other evidence (for example Housing Evidence Paper C [Document HO18], that the proposed housing requirement of 453dpa (6,795 net additional dwellings over the plan period) would contribute to achievement of sustainable development on the Island? Would accepting the housing requirement of 453dpa as a realistically deliverable housing figure require accepting that there would be some associated negative impacts?
- 2.11 Having regard to the Employment Land Study 2022 [Document EC1] would the proposed housing requirement provide sufficient homes required to accommodate economically active households necessary to support the Plan's economic growth? Is there a risk that the proposed housing requirement could constrain or harm economic growth, including the potential from the Solent Freeport status, over the plan period?
- 2.12 The proposed housing requirement is based on an assessment of the capacity of the market to deliver on the Island based on recent and past trends⁶. As a methodology for establishing a housing requirement is that a reasonable and justified approach, consistent with national planning policy, including NPPF paragraph 67?
- 2.13 Are there any other factors that indicate the proposed lower housing requirement would be justified, for example the extent of available, suitable or achievable land supply on the Island or any environmental and/or infrastructure capacity constraints?

⁶ '...the relatively static nature of the island housing market and those operating within it' (paragraph 5.1, Housing Evidence Paper A [document HO16]).

- 2.14 Given the current development plan on the Isle of Wight predates the NPPF and the objective of significantly boosting the supply of housing, does looking back at past trends generate a housing requirement that would be compatible with being prepared positively, in terms of the balance of being aspirational but deliverable as per NPPF paragraph 16b)?
- 2.15 Would it be reasonable to conclude that because the 2012 Core Strategy for the Island did not allocate specific sites for the development and that Area Action Plans intended to perform that role did not materialise, rates of housing delivery on the Island have been suppressed over the last 10-12 years? Does this explain why in Table 2 of the Housing Evidence Paper A [Document HO16] average delivery rates have come down year-on-year in the last five years (is previous plan-led land supply drying up)? Is this also borne out in Table 3 of the same Paper A which shows delivery averages preceding the Core Strategy being materially higher than for the period since 2012?
- 2.16 Is the period of assessment informing the 453dpa housing requirement figure robust and justified? Are there reasonable alternatives to inform the housing requirement if a different period of past delivery were selected?
- 2.17 Part of the assessment of market capacity or demand to deliver on the Island includes an analysis of 'conversion' rates (the rate at which planning applications are implemented (or converted) into delivery on the ground (completions)). Is the assessment of conversion rates robust and is there a risk it could be skewed by any specific larger sites lapsing (for example, representations from the Home Builders Federation refer to the Pennyfeathers Site, Ryde (HA119))? Would it be reasonable to conclude that increasing supply, and subsequently granting planning permission, would not translate into boosting housing delivery on the Island?
- 2.18 If it was concluded that the housing requirement should be the standard method figure of 703dpa or an alternative capacity/market-led figure higher than the proposed 453dpa, what harm(s) would arise? Would the principal harm be the potential loss of plan-led decision making⁷? Have any other adverse consequences of a higher housing requirement been demonstrated through the Integrated Sustainability Appraisal?
- 2.19 In addition to the island-based housebuilders, have national housebuilders been active on the island during the assessment period from which the Council has based its 453dpa figure? Is there robust evidence to demonstrate that allocating sites on the Island to implement a higher housing requirement would not be an appropriate strategy because they would not be delivered? (for the various factors listed at paragraph 5.2 of

⁷ Inferred at paragraph 5.4 of the Exceptional Circumstances paper [Document HO15]

Housing Evidence Paper A – linking through to the 2019 University of Portsmouth study in Documents HO2 and HO3).

- 2.20 Primary barriers to housing delivery are principally set out and summarised in Housing Evidence Paper D [Document HO19]. Is there a realistic prospect that these barriers could be overcome or decreased during the plan period? Would setting a higher housing requirement incentivise action or investment to help address barriers (for example from the Council, Homes England or the development sector)?
- 2.21 Under the Council’s approach to the housing requirement, how can the market shape or affect housing delivery going forward to demonstrate higher levels of growth could be sustainably delivered, including, potentially, through future plan reviews? Would higher housing growth be dependent on external factors, for example, greater levels of public investment to support affordable housing delivery?
- 2.22 The submitted housing trajectory (at Appendix 4 of the IPS) includes two early years where annual housing delivery would significantly exceed 453dpa and then a mid-period (c.2027-2031) averaging at circa 570dpa. What accounts for the higher delivery in those years? Could it be sustained over the remainder plan period, particularly the latter periods, if suitable land was made available through a plan-led approach?
- 2.23 If the proposed housing requirement were to be found sound as a minimum figure, is the policy framework in the IPS sufficiently flexible to support further housing delivery on the Island beyond the windfall allowance already accounted for⁸?
- 2.24 Should the housing requirement at Policy H1 be expressed as a minimum figure (“at least”), consistent with paragraph 7.6 of the Plan?

Issue 4: Whether the Plan will support sustainable economic growth.

- 2.25 From the evidence in the Employment Land Study, Policy E1 would appear to allocate a quantum of land that appreciably exceed what might be required under the labour demand scenarios and significantly exceed the labour supply scenario when applying the constrained approach to the housing requirement. It also exceeds historic trends. Is the amount of employment land in Policy E1 justified, effective and positively prepared?
- 2.26 The Employment Land Study describes itself as “Freeport Off”, given it preceded the formal designation of Freeport Status in December 2022. Is there now developing certainty about what the Solent Freeport would mean for the Island? Would Policy E12 be an effective approach to the

⁸ Paragraph 9.6 of the Housing Evidence Paper A references potential to reduce the ‘gap’ between the standard method housing need figure and the housing requirement through windfall/exception sites.

Freeport designation or is there evidence to support an alternative approach, for example proactively allocating land? Is the whole Island within the Freeport designation and is it host to any of the 'tax sites' or 'customs sites' described at paragraph 8.120 of the IPS?

- 2.27 Is Strategic Policy E1 consistent with national planning policy at NPPF paragraphs 81-83 in terms of positively and proactively encouraging sustainable economic growth on the Island?
- 2.28 Including by reference to PPG paragraphs 2a-026-20190220 and 2a-027-20190220 does the analysis and assessment of employment land required over the plan period take sufficient account of local economic strategies, market demand, the current condition and employment land stock (including losses of employment space to other uses) and local market signals?
- 2.29 Is the submitted Plan consistent with the economic priorities for the Local Enterprise Partnership and the inclusion of the Island as part of the Solent Freeport initiative?
- 2.30 Does the plan provide sufficient flexibility to accommodate needs not anticipated in the Plan and to enable a rapid response to changes in economic circumstances in accordance with NPPF paragraph 86(d)?
- 2.31 Have any reasonable alternative employment land scenarios been considered through the Integrated Sustainability Assessment process?

Issue 5: Other Development Needs

(The soundness of Policy H11 is addressed separately under Matter 7).

- 2.32 Having regard to NPPF paragraph 63, Planning Policy for Traveller Sites (*the PPTS*) and the Council's Gypsy and Travellers Paper [Document HO7], is it justified that the accommodation needs for Gypsies and Travellers in terms of site allocations are dealt with in a separate Development Plan Document (DPD) and not as part of the Island Planning Strategy?
- 2.33 What assurances can be provided that the Gypsy and Travellers Site Allocations DPD would be progressed as per the milestones in the Local Development Scheme? Are steps being taken to commission an updated Gypsy and Travellers Accommodation Assessment and a call for sites?
- 2.34 Is there evidence of other specific development needs that should be addressed by the Plan, for example net additional retail floorspace and those different groups in the community with particular housing needs (older persons, self-build etc)?

Matter 3: Spatial Strategy

Issue 1: Whether the Spatial Strategy is sound.

- 3.1 Is the proposed spatial strategy for the Island in Policies G1 and G2, including the settlement hierarchy, soundly based on a proportionate and up to date evidence base, including, amongst other things, the Rural Sustainability Matrix Review 2022 [Document GR3]?
- 3.2 As set out above, the proposed housing requirement would be approximately a third lower than the standard method derived housing need figure. The submitted housing trajectory shows delivery rates in the latter part of plan period reducing significantly. Is plan making for the IPS justified in not pursuing larger sites, including possibly new settlements, as part of a spatial strategy to assist housing delivery in the medium to long term on the Island? How does this square with Housing Evidence Paper D [Document HO19] and its barrier to delivery #7 regarding lack of large sites attractive to national volume housebuilders, providing a “pipeline” for sustained delivery?
- 3.3 The Housing Evidence Paper B [Document HO17] (notably at paragraph 5.32) sets out the rationale for not pursuing additional bigger edge of settlement sites and scaling back from the approach initially presented at earlier stages of plan-making, is this justified?
- 3.4 Are there any reasonable alternative spatial strategies for the Island? If so, have these been appropriately considered as part of the Integrated Sustainability Assessment process?
- 3.5 Is it clear in the Plan, through a combination of Policy G2, the key diagram, Policy H1, Policy E1, the indicative housing trajectory at Appendix 4, and paragraphs 3.44-3.49 how much growth is being planned for over the plan period and how this would be broadly distributed? Will Policy G2 be effective in ensuring the right amount of growth occurs in the right places?
- 3.6 Would it be necessary for soundness and as part of an appropriate strategy to elevate Newport as a distinct, top tier settlement to accommodate a commensurate proportion of the Island’s growth over the plan period? Does Newport have sufficiently distinct sustainability credentials to justify a different spatial role to Cowes, East Cowes, The Bay and Ryde?
- 3.7 Is the identification of Freshwater as part of a composite secondary settlement for ‘West of Wight’ (along with Totland) justified, having regard

to its level of services and employment, connectivity to higher order settlements on the Island and environmental setting?

- 3.8 Policy H1 sets out a housing requirement for the six designated neighbourhood areas on the island. Is the approach set out in Policy H1 justified, positively prepared and consistent with NPPF paragraph 67? Is a consequence of the approach that there would be no further housing allocations made through neighbourhood plans in those designated areas where the IPS is not allocating sites?
- 3.9 Does Policy G2 (in combination with other policies of the IPS) provide a sound approach for promoting sustainable development in rural areas, including enabling rural service centres and sustainable rural settlements to grow and thrive, consistent with NPPF paragraphs 82 and 83?
- 3.10 Is the Plan justified, through Policy G2, in not positively allocating sites for housing in either Rural Service Centres or Sustainable Rural Settlements?
- 3.11 Would the approach in Policy G2 for development outside of the settlement boundaries of Rural Service Centres and at Rural Service Centres be effective in facilitating sustainable housing growth including appropriate types of housing for the local community? Is it clear what is meant by "meet a specific local need"?
- 3.12 Is the distribution of proposed employment in Policy E1 justified (the focus on the north and north-east of the Island) and will it be effective in supporting the Island's economic objectives over the plan period? Is the Plan releasing the right type and amount of land for the employment needs (Class E office, B2 and B8) identified?
- 3.13 Is the distribution of employment land allocations in Policy E1 consistent with the Spatial Strategy for growth in Policy G2 and otherwise aligned with housing growth to support sustainable patterns of growth?
- 3.14 Would it be necessary for plan soundness to identify additional employment land at Freshwater given the proposed scale of housing allocation at the settlement? The proposed approach in Policy E1 would be to support the intensification and expansion of existing employment uses at Golden Hill and Afton Road in Freshwater. Would this be an appropriate strategy to generate additional jobs alongside the scale of new homes proposed?
- 3.15 Does the UNESCO Biosphere Reserve status have any bearing on spatial strategy options and/or the Island's overall capacity to accommodate development?

Matter 4: Policies for the Environment

Issue 1: Whether the approach to environmental protection is justified, effective and consistent with national policy.

- 4.1 Various modifications to Policy EV1 and accompanying paragraphs in Section 4 of the IPS, are presented in Core Document 7, in light of the statement of common ground with Historic England. Are these proposed changes, covering matters such as heritage led regeneration, non-designated heritage assets and heritage at risk necessary for soundness?
- 4.2 Whether the requirements of policy are justified and effective in terms of their effect on deliverability of development (e.g. effect of woodland buffer on housing allocation HA025), and consistent with national policy, in particular:
 - 10% net gain in biodiversity in Policy EV2 (suggestion from Wildlife Trust should increase to 20%);
 - River corridor buffers at §4.29;
 - Minimum SANG size at §4.42;
 - 50m buffer to ancient woodland in Policy EV5;
 - Creating 30ha of new woodland for every 1ha of ancient woodland lost in §4.60
- 4.3 Whether Policy EV2 in relation to ecologically sensitive locations will be effective? Is it clear what comprises international, national and local nature conservation designations and the national site network and what does the term "most sensitive locations" mean in the context of this policy?
- 4.4 Is the reference to "overriding public interest" in relation to the hierarchy of 'most sensitive locations' justified within Policy EV2?
- 4.5 Is Policy EV2 relating to biodiversity net gain justified in not taking into account the exemptions provided in the Biodiversity Gain Requirements (Exemptions) Regulations 2024? Is the policy consistent with the background text that implies the metric calculator is only required for "all qualifying development"?
- 4.6 Is the background text consistent with national policy, in particular in relation to plans and projects (or development) and likely significant effect (no adverse effect) in §4.21?
- 4.7 Will the requirements of Policy EV4 be effective over the plan period taking account of potential discharges from the Wastewater Treatment Works (WwTW) to the SPA and in terms of enabling flexibility should the situation change?

- 4.8 Whether Policy EV6 is consistent with national policy, particularly §103 of the Framework in terms of protecting open space?
- 4.9 Whether Policy EV7 is justified taking account of the contents of Policy EV6? How have the Local Green Spaces as shown on the Policies Map been identified and has the process of assessing options for Local Green Spaces been consistent with the criteria at NPPF paragraph 106? Is this demonstrated by the evidence in the June 2022 Paper [Document EN12]?
- 4.10 Whether identifying the whole of the land identified as open space/local green space at Fort Victoria is justified or whether a smaller area as shown on the Green Spaces – Table and maps of the Freshwater Neighbourhood Plan should be identified?
- 4.11 Is the definition of very special circumstances at §4.74 justified? Comment EV7.4 from Isle of Wight Council Public Health suggests another circumstance, being replacement with an improved green space.
- 4.12 Is Policy EV8 justified in terms of its consistency with the allocation of land at Camp Road, Freshwater (HA005)?
- 4.13 Is criterion a of Policy EV9 consistent with national policy in being so strict in ensuring new development avoid both direct and indirect adverse effects or cumulative impacts upon the integrity of landscapes and seascapes? Could the phrase “ensure new development” be removed as it repeats the introduction to the criteria?
- 4.14 Is reference to the historic landscape characterisation justified in criterion d of Policy EV9 given it is not referred to in the supporting text (§4.83)?
- 4.15 §191b of the Framework suggests that tranquil areas could be identified. Tranquillity is mentioned a number of times in the background text, suggesting it is important, but tranquil areas aren’t identified in policies. Should tranquil areas be identified and protected consistent with national policy?
- 4.16 Is Policy EV10 effective and justified in addition to Policy EV9, particularly in terms of restricting development within the gaps identified on the policies map, especially the larger, more substantial gaps – e.g. between Newport and Cowes and those around Ryde? Is the approach to the settlement gaps supported by the evidence in the Settlement Coalescence Study 2018 [Examination Document EN11]?
- 4.17 Is Policy EV10 effective in terms of its relationship with sites intending to be allocated (e.g. HA005, HA006, HA040)?
- 4.18 Is Policy EV10 effective in defining a settlement boundary for Freshwater that may differ from that within the Neighbourhood Plan?

4.19 Is reference to “overriding public interest” in Policy EV11 consistent with national policy? Is this confused with the concept set out in the Habitats Regulations?

Issue 2: Whether the approach to flooding and managing the coast is justified, effective and consistent with national policy.

4.20 The Level 1 Strategic Flood Risk Assessment was prepared in 2010, with an update in 2018, and the Sites Summary Report relating to a number of sites prepared in 2021 with update in 2024. Reference has been made to flooding at Monktonmead and Springvale in 2023 and 2024. Taking these into account, are policies relating to flooding supported by up to date evidence and justified?

4.21 Whether the requirement in Policy EV13 to restrict predicted internal potable water consumption to 100 litres per person per day, below the optional requirement at Approved Document G of the Building Regulations, is justified (see Planning Practice Guidance at Paragraph: 014 Reference ID: 56-014-20150327)?

4.22 Whether the requirement in Policy EV13 to ensure no net increase in surface water run-off and reduce run-off rates on greenfield sites to below the greenfield run-off rates by at least 20% is justified? How does this section of the policy relate to Policy EV14 on managing flood risk in new development; will the policies be effective?

4.23 Policy EV14 requires all development proposals to undergo the sequential test but §4.109 states that this does not apply to allocated sites. Is this consistent and, therefore, effective?

4.24 Is the reference in Policy EV15b effective in terms of whether it relates to new or existing development?

4.25 Whether inclusion of Fort Victoria Pier and adjacent shingle beach within the Coastal Change Management Area under Policy EV16 is justified by the evidence?

4.26 Whether reference to AONB rather than National Landscape is consistent with the rest of the plan and national policy (in particular at Policy EV17d)?

4.27 Is reference to determining developer contributions on a case-by-case basis in Policy EV18 effective and justified in terms of providing sufficient certainty to developers as to what will be required?

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

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

- 5.1 Is the requirement in Policy C1c and f to only respect the character of the area, particularly in historic places and the National Landscape, consistent with national policy that also refers to enhancing such that the criteria would begin “respect or enhance ...”?
- 5.2 Whether the requirement in Policy C3 for a Health Impact Assessment is justified for all major developments?
- 5.3 Whether the requirements of Policy C4 are justified taking account of the comments from the Isle of Wight NHS Trust and Isle of Wight Council Public Health?
- 5.4 Whether the requirement in Policy C5 for 20% of dwellings within major residential developments to meet part M4(2) of the Building Regulations is justified and effective, taking into account the requirement in Policy H8 for 10% of new private housing to be built in line with the accessible and adaptable standard for homes set out in part M4(3) of the Building Regulations?
- 5.5 Are the provisions of Policy C6 justified and effective in providing additional accommodation that may only be required for a relatively short period?
- 5.6 Are the requirements in Policy C11 justified, effective and consistent with national policy, including in regard to the requirement for all homes to be net zero carbon? Having regard to the Written Ministerial Statement of 23 December 2023 are the requirements presented in an appropriate format⁹? Is the viability appraisal realistic in regard to the requirement for new homes to meet this policy?
- 5.7 Has the impact of Policy C11 on housing supply (the rate at which new homes come forward) been appropriately considered, particularly given the Council’s position that issues of supply chains, access to a skilled workforce and market volatility, amongst other things, have influenced who builds on the Island and recent delivery rates?

⁹ The WMS says the additional requirement should be expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specific version of the Standard Assessment Procedure (SAP), as opposed to an energy use target as expressed in Policy C11.

- 5.8 Is the principal evidence for Policy C11 contained in the Mission Zero Climate and Environment Strategy 2021-2040 [Document GS13] and IoW Zero Carbon Homes Analysis [Document CO15]?
- 5.9 Would Policy C12 provide an effective approach to securing infrastructure necessary to support sustainable growth? Are these contributions justified through the viability appraisal and would they affect deliverability of development and the effectiveness of the plan? How does this policy relate to Policy G3 regarding developer contributions?
- 5.10 Is there a reasonable prospect that infrastructure deficits and requirements can be addressed through a combination of the funding programmes of infrastructure providers, other delivery organisations and through the use of developer contributions and Community Infrastructure Levy?
- 5.11 Is the approach in Policy C14 insofar as it relates to the loss of existing community facilities effective and consistent with national policy, including paragraph 103 of the Framework?
- 5.12 Is Policy C15 consistent with national policy, particularly with regard to paragraph 105 of the Framework in relation to Local Green Space?
- 5.13 Is the effective level of policy making relating to restricting second home and short term holiday let ownership of new build properties at Neighbourhood Plan level? How does this relate to Policy E9?
- 5.14 Various modifications to Policies C1, C3 and C10, are presented in Core Document 7, in light of the statement of common ground with Historic England. Are these proposed changes necessary for soundness?

Matter 6: Allocating Sites for Housing, including the Key Priority Sites

Issue 1: General approach to the selection of housing sites allocated in the Plan.

- 6.1 Does the 2022 Strategic Housing Land Availability Assessment [Document HO5], together with the Integrated Sustainability Assessment and the Housing Evidence Paper B [Document HO17], demonstrate that all reasonable options for potential housing allocation sites have been identified and systematically considered and that unreasonable options have been discounted at the appropriate stage?
- 6.2 Appendix 1 to the Housing Evidence Paper B [Document HO15] provides an overview of the scaling back of sites from earlier drafts of the Plan. Is the approach justified? The table at Appendix 1 identifies that the Council considers a notable number of the removed sites could be suitable for development through submitted Policies H7 or H9. Would that be an effective approach?
- 6.3 Is it justified and consistent with national planning policy, in applying the sequential test on flood risk, that sites with a lower risk of flooding at the edges of settlements are not taken forward /discounted and that previously developed sites in primary settlements (Cowes and Newport) affected by high flood risk pass the sequential test and are subject to the exceptions test?
- 6.4 Policy H2 'Sites Allocated for Housing' refers to sites in Appendices 1 and 2 of the IPS which comprise both large sites with planning permission and "allocated sites". Would it be necessary for soundness (effectiveness) to have allocation policies in the Plan for the housing sites in Appendix 3, similar to the approach adopted for the proposed employment allocations (Policies EA1-6) and key priority sites (KPS1 and KPS2)?
- 6.5 Appendix 3 includes site specific requirements for sites that have planning permission. Is that a justified and effective approach given sites with detailed planning permission are capable of implementation and have already been adjudged to comprise sustainable development?
- 6.6 Are the large sites with planning permission listed in Appendix 1 encompassed within the proposed settlement boundaries on the Policies Map where it is logical to do so?
- 6.7 The Plan splits sites into those that have specific requirements at Appendix 3 and then Policy H3 sets out housing development general requirements to apply to all sites. How has plan-making determined those sites that warranted inclusion in Appendix 3? In terms of plan effectiveness would there be any internal tension or conflict between

Appendix 3 and Policy H3? Is Policy H3 necessary or does it largely overlap with other policies of the Plan?

Issue 2: Whether the policy approach for the proposed Key Priority Sites is soundly based? (Policies KPS1 and KPS2)

- 6.8 Is the site at the Former Camp Hill prison (HA39), identified as Key Priority Site 1 (KPS1), likely to come forward for development within the plan period? Is there a clear timeframe or agreed process for site disposal from the Ministry of Justice?
- 6.9 The site capacity is identified at least 750 homes together with other on-site requirements listed in the proposed Policy KPS1. Is that site capacity justified having regard to environmental factors (for example proximity of the Parkhurst Forest SSSI) and infrastructure capacity (local roads, sewerage etc)?
- 6.10 What contribution would the Camp Hill site make to the housing trajectory in Appendix 4? When is it anticipated to start delivering, at what rate and is that reasonable?
- 6.11 The IPS recognises (paragraph 7.31) that there are other proposed allocations (and sites with planning permission) within the vicinity of the KPS1 site at Camp Hill. The submitted approach is to prepare a Supplementary Planning Document to address these sites (that would also include the St Mary's Hospital site) to establish a degree of coordination (for example infrastructure planning). Would this be an effective approach?
- 6.12 Would it be necessary for soundness to insert additional content into Policies KPS1 and KPS2 regarding heritage as set out in Core Document 7, following the Statement of Common Ground with Historic England?
- 6.13 Is land at Newport Harbour (HA44) justifiably identified as a Key Priority Site (KPS2)? Is the site developable within the plan period?
- 6.14 The Newport Harbour site, at approximately 2.5 hectares, is allocated for a mix of uses, including at least 250 homes (35% affordable), serviced employment land, retail, community floorspace and public realm. Is that feasible on the site and compatible with objectives to make efficient use of land (including appropriate densities) and achieve well-designed places?
- 6.15 Supporting text to the KPS2 Policy refers to the emerging Newport Harbour masterplan and the Policy refers to a masterplan. Are they one and the same? Are criteria (j) to (o) justified in terms of what the masterplan should address? Should development proposals on KPS2 "have regard to" the Masterplan rather than be developed in "accordance with it"?

6.16 Is the allocation of the Newport Harbour site consistent with national planning policy regarding flood risk in terms of the relationship of the site to the functional fluvial and tidal floodplain of this part of the River Medina and any floodwater storage capacity that the site may perform in its current condition? Does the evidence exist, in the Strategic Flood Risk Assessment Level 2 (2021) and/or the Newport Harbour Masterplan SPD Flood Risk Assessment 2021 [Document HO21] to satisfy the sequential test, and then the exceptions test including that the development on the site can be made safe for its lifetime and not increase flood risk elsewhere?

Issue 3: Whether the proposed housing allocations through Policy H2 are soundly based.

- 6.17 Is the proposed allocation and site specific requirements of site HA005, at Camp Road, Freshwater, justified and effective having particular regard to the setting of heritage asset (Farringford House – grade I listed), National Landscape and Tennyson Heritage Coast, whether it comprises grade 2 agricultural land or would adversely affect biodiversity and relationship to the settlement gap between Freshwater and Totland? Whether there is adequate access and services to support any development? Given the constraints of this site, is it viable and deliverable?
- 6.18 Are the proposed modifications in Core Document 7 for the site specific requirements for Site HA006 Heathfield Campsite, regarding setting of the Scheduled Monument, necessary for soundness?
- 6.19 Whether the development of site HA18, Green Gate Industrial Estate, East Cowes, would be viable and deliverable taking account of the risk of flooding in this location?
- 6.20 Whether the capacity of housing allocation HA020, former Somerton Reservoir, Cowes, is justified taking account of the neighbouring woodland designated as a Site of Importance for Nature Conservation?
- 6.21 Whether the capacity of housing allocation HA022, Somerton Farm, Cowes, is justified having particular regard to landscape buffers, effect on neighbouring occupiers (e.g. BAE) and the capacity suggested in planning application reference 22/01720/OUT?
- 6.22 The 50m buffer zone from adjoining ancient woodland referred to in Policy EV5 appears to mean most or all of housing allocation HA025, land rear of 84 Wyatts Lane, Northwood, would be undeliverable. On that basis, is allocation of this site justified and effective?

- 6.23 Whether the capacity and extent of housing allocation HA036, land at Noke Common, Newport, is justified taking account of the neighbouring woodland designated as a Site of Importance for Nature Conservation?
- 6.24 The table of allocations refers to generic policy requirements on housing allocation HA046, land at Crossways, East Cowes, when there are specific policy requirements set out in appendix 3. To be fully effective, should this be corrected (subject also to the above question relating to the layout of housing allocation policies)?
- 6.25 Whether the capacity of housing allocation HA119, Pennyfeathers, is justified? The list of allocated sites provides an indicative yield of 290 with the site-specific requirements referring to at least 800. Comments suggest a planning application for up to 900 may be submitted, with an assumption of at least 875 being possible within the plan period.
- 6.26 There is indication that SANGs may not be necessary for housing allocation HA119, Pennyfeathers. Is the requirement in the site-specific requirements for SANGs justified?
- 6.27 Whether the capacity of housing allocation HA120, land at Red Funnel, Cowes, is justified taking account of comments from Red Funnel that housing capacity should be 30 and commercial space should be restricted to class E and 520m² and taking account of flood risk (within Tidal Flood Zones 2 and 3 on Proposals Map)?
- 6.28 Whether housing allocation H121, land rear of Harry Cheek Gardens, Northwood, is deliverable with particular reference to highways access and reference to proposals not preventing adjacent sites from coming forward?
- 6.29 Whether the site-specific requirements at appendix 3 adequately deal with archaeology (see comments of the Isle of Wight Archaeology and Historic Environment Service – in particular in relation to HA002, HA005, HA022, HA025, HA033, HA064, HA065, HA0120 and 16 Medina Yard, Cowes)? Would the proposed modifications in Core Document 7, suggesting additional text on archaeology, be necessary for soundness?

Matter 7: The Delivery of a Sufficient Supply and Mix of Homes

Issue 1: The robustness of the Housing Trajectory and whether there would be a deliverable supply on plan adoption and developable supply thereafter to meet the housing requirement.

- 7.1 Will the housing requirement in the Plan at 6,795 dwellings be delivered through the proposed sources of supply listed in Policy H1 over the plan period?
- 7.2 Is the proposed housing trajectory at Appendix 4 soundly based and consistent with Strategic Housing Land Availability Assessment evidence and latest annual monitoring on housing land supply? Are any factual updates required to the trajectory?
- 7.3 The trajectory at Appendix 4 is a relatively high-level table, with years 6-10 and 11-15 amalgamated so there is no individual year profile. Would it be necessary for soundness to present the trajectory as a either a graph or a gantt chart showing what the annual housing requirement is (whether that is a consistent average or, if required, a stepped requirement), and in a format that will show when the various sources of supply will come forward each year over the plan period? Would it be possible in the trajectory to specifically show when any particularly large or critical sites to overall delivery would contribute to the meeting the housing requirement? (for example: Medina Yard (535 homes), Key Priority Sites 1 and 2; Land at Horsebridge Hill (200 homes); Westridge Farm, Ryde (475 homes); Pennyfeathers, Ryde (800 homes)).
- 7.4 Would at least 10% of the housing requirement be met on sites no larger than one hectare (NPPF paragraph 70)?
- 7.5 Is there compelling evidence to make an allowance for windfall housing in the plan period as per NPPF paragraph 72? Is the windfall figure of 100 dwellings per annum soundly based? Is the 100 figure an amalgam of existing small sites with planning permission and additional unanticipated delivery on small sites of less than 10 dwellings?
- 7.6 Overall, would the submitted plan provide for a robust five-year supply of deliverable housing land on plan adoption¹⁰ (in 2025)?
- 7.7 The Plan advocates that part of the Island's housing delivery issues arise from the rate at which planning permissions are implemented. Is this a serious issue for the Island and would Policy G5 provide a justified and

¹⁰ PPG paragraph 68-004-20240205

effective approach to incentivising delivery that would be consistent with national planning policy?

- 7.8 In the advent that a five-year supply of deliverable housing land could not be demonstrated, would the final part of Policy H1 provide a justified and effective approach? Is criterion 1 consistent with national planning policy in terms of otherwise seeking to significantly boost the supply of housing?

Issue 2: Whether the Plan would deliver an appropriate mix of house tenures and types.

- 7.9 Is the approach to affordable housing on the Island through the definition in Policy AFF1 and the site threshold (10 or more dwellings) and percentage (35%) in Policy H5 justified and effective having regard to specific circumstances and level of need for affordable housing identified for the Island? Have reasonable alternative approaches to Policy AFF1 and Policy H5 been appropriately considered through the Integrated Sustainability Appraisal?
- 7.10 Will the Plan be effective through Policy H8 in delivering a housing mix that reflects the evidence in the Local Housing Needs Assessment [Document HO13]?
- 7.11 Will the Plan be effective in meeting the needs of older persons, consistent with NPPF paragraph 63 and PPG paragraph 63-001-20190626? Has consideration been given to specifically allocating sites for older persons housing/accommodation in Policy H2 to meet needs identified in the Local Housing Needs Assessment?

Issue 3: Whether Policy H11 provides a sound approach to meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople.

- 7.12 Are the criteria for assessing 'windfall' proposals for gypsy and traveller accommodation at a)-g) in Policy H11 justified, consistent with national policy and positively prepared?

Matter 8: Economic Growth

Issue 1: Whether the proposed employment allocations are sound.

- 8.1 Are the employment allocations identified at Policies EA1-EA6 soundly based? Has there been an appropriate approach to site selection in identifying the 6 proposed sites for allocation? Do the proposed employment allocations align with the evidence base in the Employment Land Study 2022 [Document EC1], in particular Lowtherville, Ventnor (EA5) which is recommended to be released as an employment allocation?
- 8.2 Some of the proposed key priority sites and housing sites (Newport Harbour, Medina Yard, Land to the East of Gunville, and Red Funnel (East Cowes)) include a requirement for employment land and/or floorspace. Should these sites be regarded as "mixed-use" sites that are as important to helping meet the Island's employment needs as they are to helping meet the housing requirement? Or are they providing a helpful buffer or headroom of employment land in addition to the proposed core employment allocations? Should they be identified in Policy E1?
- 8.3 Is the proposed allocation at EA3, Somerton Farm, Cowes justified and would its development raise legitimate issues (comparable to the 'agent of change' principle at NPPF paragraph 193) in terms of potentially impacting existing operations at the nearby BAE Cowes radar testing facility?
- 8.4 Is the proposed allocation at EA6: Land at Sandown Airport justified and effective in terms of being a sustainable location for employment floorspace and being capable of being safely and suitably accessed from the highway network?

Issue 2: Whether the plan would provide a sound basis for supporting a diverse economy on the Island.

- 8.5 Is the overall strategy in Policy E2 for achieving sustainable economic development justified, effective and consistent with national planning policy? Would parts d) and e) of the policy apply to any site in employment use on the Island or those sites in Policy E1 as identified on the Policies Map? Are these criteria justified, including the threshold of 0.1 hectare and to apply protection to any site that provides water access for employment uses?
- 8.6 Is Policy E3 on upskilling development justified and viable? Would it be effective?

- 8.7 Is Policy E6 on future-proofing digital infrastructure justified and consistent with national planning policy? Is it feasible and are there any viability implications in exceeding Building Regulations on digital connectivity?
- 8.8 Would it be necessary for soundness to insert additional content into Policies E4, E7 and E11 regarding heritage as set out in Core Document 7, following the Statement of Common Ground with Historic England?

Issue 3: Whether the plan's overall approach to the rural economy is sound.

- 8.9 Is Policy E4 justified and consistent with national planning policy (including NPPF paragraphs 88 and 89) in supporting a prosperous rural economy on the Island?
- 8.10 Is criterion c) of Policy E4 justified in supporting the 'intensification/ expansion of existing rural industrial estates or employment sites'? Criteria d)-f) in the policy have a qualification regarding impact/harm to the rural character, would similar be necessary for criterion c) for soundness?
- 8.11 Is the final part of the Policy E4 resisting the use of best quality agricultural land justified and consistent with national planning policy (NPPF paragraph 180a)? Would 'best quality' be synonymous with 'best and most versatile agricultural land' as per the definition at Annex 2 of the NPPF?

Issue 4: Centres and Retail.

- 8.12 Table 8.2 of the IPS sets out a hierarchy of centres. Is the hierarchy justified? Would it be necessary for soundness to include the hierarchy within plan policy¹¹?
- 8.13 Are the impact thresholds in Policy E7 locally justified, having regard to the NPPF's (paragraph 94) default threshold of 2,500 square metres?
- 8.14 Are the extent of the town centre boundaries, and the primary shopping area in Newport, as defined on the Policies Map, justified and consistent with national planning policy, as part of a positive strategy for the future of town centres in line with NPPF Paragraph 90(b)?

¹¹ NPPF Paragraph 90a)

Issue 5: Tourism (Policies E8 and E9)

- 8.15 Tourism is clearly an integral part of the Island's economy. Does Policy E8 strike an appropriate balance between supporting sustainable growth in the sector and (in combination with other policies in the Plan) protecting the specific qualities that attract visitors to the Island?
- 8.16 Are the core tourist accommodation areas in Policy E8 justified as prime locations to support this sector of the Island's economy? Is the Policy approach to resisting the loss of tourist accommodation in core areas justified and consistent with national planning policy?
- 8.17 Is the approach to short term let holiday accommodation in Policy E9 justified and consistent with national planning policy, including the proposed focus on the core tourist accommodation areas? Having regard to the Council's Evidence Paper [Document EC3] what is the intended outcome or objective of the Policy and will it be effective in achieving this?

Matter 9: Transport, Infrastructure, Viability, Monitoring and Review

Issue 1: Transport matters

- 9.1 Is the plan effective in locating development in areas accessible by travel other than the private car, such as bus and train?
- 9.2 Whether the plan is effective in providing sufficient accessibility to and around West Wight, including Freshwater, taking account of planned development?
- 9.3 Whether the plan is effective in providing sufficient opportunities for additional cycle paths, shown on Figure 3.1 – Key Diagram?
- 9.4 Has the Healthy Streets concept been taken into account in the plan, as referred to by Isle of Wight Council Public Health, and is the plan effective as a result?
- 9.5 Whether enabling access to local bus services in Policy T1e is effective, or whether it should seek to encourage additional bus services?
- 9.6 Is the reference at Policies T1g and C1 to '20 minute neighbourhood' design principles reflected in the policies and proposals of the plan such that it is effective?
- 9.7 Policy T2 and Tables 9.1 and 9.2 relate to transport improvements. Is that a comprehensive list and are any listed in Table 9.2 that should be in Table 9.1? Does the policy appropriately deal with Military Road?

- 9.8 Would Policy T2 provide an effective approach to securing transport infrastructure necessary to support sustainable growth? Are these contributions justified through the viability appraisal and would they affect deliverability of development, affecting the effectiveness of the plan? How does this policy relate to Policy G3 regarding developer contributions?

Issue 2: Infrastructure Delivery to support the Plan's proposals.

- 9.9 Strategic Policy INF1 sets out an overarching approach to ensuring growth would be supported by appropriate levels of infrastructure. The policy references technological infrastructure and sewage capacity as areas of particular focus. With reference to the Infrastructure Delivery Plan [Documents GS6-9], is the Plan based on a sound assessment of existing infrastructure capacity and future infrastructure requirements to ensure the plan's growth would be sustainable?
- 9.10 Various infrastructure projects are identified in the 2024 Update of the Schedule [Document GS9]. For a small number of projects costs remain to be determined and for other projects delivery responsibility and timeframes are to be confirmed. Infrastructure planning is complex, and the responsibility of a various organisations, but do any of current 'unknowns' in the schedule (cost, delivery and timeframe) create significant issues for the delivery of the Plan and the achievement of sustainable development on the Island?
- 9.11 Having regard to the proposed levels and distribution of growth on the Island in the Plan, are there any key infrastructure inter-dependencies that could have bearing on the housing and employment trajectories? (in short are there any critical infrastructure investments, which if delayed, could impact the forecast housing and employment delivery?)
- 9.12 Are the site size thresholds in Policy G3 (Developer Contributions) for education and healthcare contributions¹² justified? Are there known healthcare and education capacity issues and does that apply across the whole island? Would it be necessary for soundness for the Plan to contain further content around how these contributions would be calculated or is sufficient guidance contained in the 2024 Health Contributions Supplementary Planning Document (SPD) [Document GR2] and the 2014 Children's Services SPD [Document GR1]?

Issue 3: Plan-wide Viability.

- 9.13 Does the Viability Study of the Plan, updated in 2022, [Examination Document GS12], make reasonable assumptions, based on adequate, proportionate and up to date evidence, about the cost of meeting all of

¹² Also set out in Policy H3

the policy requirements set out in the Plan along with any other relevant national standards? In particular, the cumulative cost of implementing Policy C11 (net zero carbon), Policies AFF1/H5 (affordable housing), Policy H8 (optional technical standards for accessible housing), Policy EV13 (water consumption standards), Habitats mitigation and costs for biodiversity net gain.

- 9.14 Has the Local Plan Viability Study examined appropriate typologies of development that reflect the types of schemes that are likely to deliver the growth identified in the Plan? Have reasonable assumptions been made on the sales values that can be achieved on the Island and the existing use values, together with a reasonable premium necessary to incentivise the release of sites?
- 9.15 Given the focus of the Plan to deliver on previously developed land (brownfield sites) does the plan-wide viability evidence demonstrate that this source of land supply can viably deliver 35% affordable housing? Is the benchmark land value for brownfield land on the Isle of Wight in the Local Plan Viability Study reasonably robust?
- 9.16 Does the viability evidence support the requirements at Policy AFF1 and Policy H5 for older persons housing to provide affordable housing? Does the viability evidence enable a distinction to be made between older persons accommodation within either the C3 or C2 land use in terms of requiring affordable housing or accommodation?
- 9.17 Is it necessary for soundness (justified and effective) for Policy H5 to be modified to exempt older persons housing proposals from providing affordable housing on viability grounds?
- 9.18 Overall, taking account of the evidence in the Local Plan Viability Study, would the requirements of the policies of the Plan put the viability of its implementation at serious risk?
- 9.19 Given national planning policy states that up-to-date policies are assumed to be viable, is Policy GS4 necessary? If it is, would the Policy be effective? Would there be any prioritisation of criteria (a) to (f) or would the Council look to implement these options equally, notwithstanding the critical need for affordable housing on the Island?

Issue 4: Monitoring and Review

- 9.20 Does the Plan contain an adequate framework for monitoring the implementation of the policies?
- 9.21 Is paragraph 10.7 of the Island Planning Strategy an effective approach to plan review in terms of setting out 3 key housing delivery indicators that could trigger an immediate review of the relevant policies?

9.22 Are there circumstances for the Isle of Wight to indicate that a review of the IPS within a specific period of time would be necessary for soundness? Or would that be instigated in any event by recent changes to national planning policy¹³ without requiring additional content in the Plan?

¹³ For example, paragraph 236 of the December 2024 NPPF.

Section 3: Provisional Hearings Programme

[Please note, this hearings programme is subject to change. It provides a provisional outline in terms of the order in which the Matters would be discussed. Further changes to the programme will occur once numbers of participants have been established. Updates to the Programme will be uploaded on the examination website and those participating will be notified.]

Week One

Tuesday 25 February 2025

AM: Matter 1 – Legal, procedural and other general matters

PM: Matter 2 – Plan Period and Amount of Employment Development Needed on the Island

Wednesday 26 February 2025

AM Matter 2 – Housing Need and Housing Requirement

*** Please note this session is likely to be a longer morning sitting; possibly starting at 9.30am and working through to 1.30pm ***

Thursday 27 February 2025

AM Matter 3: Spatial Strategy

PM: Matter 6: Approach to Site Selection and the Key Priority Sites

Friday 28 February 2025

AM Matter 6 – Proposed Housing Allocations - Newport

Week Two

Tuesday 4 March 2025

AM Matter 6 Proposed Housing Allocations – Ryde, Cowes & East Cowes

PM Matter 6 Proposed Housing Allocations – Freshwater

Wednesday 5 March 2025

AM – Matter 4 Policies for the Environment

PM – Matter 4 Continuation

Thursday 6 March 2025

AM – Matter 5 Policies for the Community

PM – Reserve if required

Week 3

Tuesday 18 March 2025

AM Matter 7 Housing Land Supply / delivery

PM Matter 7: Housing Policies – including Affordable Housing

Wednesday 19 March 2025

AM - Matter 8 Economic Growth

PM Matter 9 Transport, Infrastructure, Viability and Monitoring

Thursday 20 March 2025

Reserve If Required