

Island Planning Strategy: Regulation 22 Consultation Statement

1.0 Introduction

- 1.1 The purpose of this document is to set out how the council has consulted and engaged with communities and stakeholders to prepare the Island Planning Strategy 2022-2037. This fulfils the council's statutory duty in accordance with the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2012 (TCPR) and the council's Statement of Community Involvement (SCI).
- 1.2 This statement meets Regulation 22 (1)(c) (TCPR) and demonstrates the preparation of the Island Planning Strategy has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement, 2014 (SCI), (updated in 2023).
- 1.3 The SCI sets out how the council will involve local people and organisations in preparing the Island Planning Strategy (IPS). In consulting on the Island Planning Strategy, the council has followed the principles of the adopted SCI.
- 1.4 The IPS once adopted, will replace the Core Strategy 2012. It will set out a vision for the Island, how this will be delivered, and development managed on the island until 2037. The IPS will set out how much development should take place, where and what type.
- 1.5 This Consultation Statement will assist the IPS examination in determining whether the Island Plan complies with the requirements for public participation and government guidance. The report shows the consultation carried out has complied with Local Plan regulations.

2.0 Background

- 2.1 In preparing the IPS Regulation 19 version, the council has taken account of the two earlier Regulation 18 consultations. These were:
1. Draft Island Planning Strategy Development Plan Consultation, November 2018
 2. Draft Island Planning Strategy July 2021
- 2.2 The consultation in 2018 included a Sustainability Appraisal (SA) which assessed six development options. It explored key planning issues affecting the island through a collection of draft planning policies. Some 3800 people responded to this consultation.

- 2.3 The second Regulation 18 consultation was undertaken in July 2021 with an updated SA. This IPS consultation presented an island specific approach to housing provision based on a level of growth considered to be deliverable on the island. The approach did not dispute the level of housing need established by the standard methodology but acknowledged that it was simply unachievable as it cannot be delivered). The plan contained a full set of policies and a vision and objectives for planning policy on the island. 2800 people responded to the consultation.
- 2.4 Other related consultations also took place through a call for sites and updates to the brownfield land register (19 March 2021).
- 2.5 This Consultation Statement describes how the council has undertaken community participation and stakeholder involvement throughout the production of the IPS, sets out how this has shaped the Plan and the main issues raised.
- 2.6 The Council's draft Publication IPS, with its supporting documents was published in accordance with Regulation 19 for a six week consultation which ran from 8th July to 19th August 2024. The council consulted specific consultation and statutory bodies, local amenity and resident's groups, businesses and residents in accordance with the Statement of Community Involvement.

3.0 Structure of the document

- 3.1 This report summarises the outcomes of the two Regulation 18 and the Regulation 19 consultations. It is supported by the following documents:
- Regulation 18 consultation statement 1
 - Regulation 18 consultation statement 2
 - Summary of Regulation 18 (1) plan comments with council response
 - Summary of Regulation 18 (2) plan comments with council response
 - Summary of Representations on the Island Planning Strategy Regulation 19 consultation.

Regulation 18: Stage 1 - Draft Island Planning Strategy Development Plan consultation, November 2018

- 3.2 The Regulation 18 Consultation Summary Statement (1), June 2020 is a report on the consultation that was undertaken on the first draft Island Planning Strategy. The responses received and the response of the council is set out in the Summary of Responses to the Island Planning Strategy Consultation 1.
- 3.3 This consultation was the first step in local plan-making and sought the views of the community and other stakeholders on Strategic Options for meeting development needs as part of preparing the new Local Plan. It set out the

council's preferred new spatial strategy and draft planning policies were also presented for comment.

3.4 The consultation took place between 3rd December 2018 to 25 February 2019.

3.5 Six different spatial strategies were proposed. These were assessed in accordance with the 2018 SA framework.

1(a) Use existing settlement hierarchy (a) Increase density/site yield

1(b) Use existing settlement hierarchy (b) extending settlement boundaries.

2 Creating new communities

3(a) Growth in locations not previously considered (a) New tier(s) in settlement hierarchy with settlement boundaries.

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.

Who was consulted and how?

3.6 People and organisations on the public consultation database were consulted by letter or email informing them of the consultation arrangements and where documents could be viewed. Appendix 5 in the Summary of Consultation Responses 2020 sets out those consulted. An e-mail was sent to councillors and Planning Services informing them the consultation was taking place. A notice was placed in the Isle of Wight County Press.

3.7 The consultation information was set out on the council's website, including a link to the consultation document and the planning news page. Copies of the document were available to inspect at the Planning Reception and in local libraries.

3.8 Drop-in events took place at High Street Newport so residents could inspect the consultation documents and speak to officers about the consultation. Officers also attended a Town and Parish Council briefing session during the consultation period.

How many responses were received?

3.9 The council received **3800** responses generating around **9,340** representations, including from bodies such as the Environment Agency, Southern Water and Natural England.

3.10 The main issues raised focussed on the level and location of housing development proposed in the Plan, the level of unmet need and the impacts on the island in meeting this level of development. Many respondents believed the housing level proposed was too high. A lack of infrastructure on the island was given as a reason why the level of development could not be met. Other responses either promoted a particular location for development or sought to avoid development in a particular location or site. A significant number of

responses objected to new garden settlements, particularly at Wellow. A number of comments considered more employment land was needed and should reflect where the growth in housing was proposed.

3.11 Other issues raised included: -

- Overcrowded roads, infrastructure and services, before further development is undertaken. New infrastructure needs to be provided before or alongside development.
- The need for affordable housing to meet the needs of residents rather than for more retirees and second home ownership.
- The number of empty and derelict buildings which could be developed rather than greenfield sites.
- A desire to build on brownfield sites first.
- The impact of the proposed level of development on the tourism industry, a key employment sector and the destruction of the rural nature of the island which visitors come to see.

How were these taken into account?

3.12 The level of housing proposed and its impacts on the island raised clear concerns. The council commissioned further evidence to help provide information on whether there was a realistic case to support lower housing numbers than those derived using the Government's Standard Methodology. This work was used to inform a new housing figure which was set out in the second Regulation 18 Island Planning Strategy.

3.13 All site allocations and plan policies were reviewed in light of the revised approach on housing numbers. The Council's response to the issues raised relating to the site allocations and plan policies are summarised in the Summary of the Public Consultation (1).

Regulation 18: Stage 2 - Draft Island Planning Strategy consultation July 2021

3.14 The consultation took place from Friday 30 July to 5pm Friday 1 October 2021. The Regulation 18 Consultation Summary Statement (2), July 2022 sets out the full details of the consultation undertaken. A summary of responses received, and the Council response is set out in the Summary of Responses to the Island Planning Strategy Regulation 18, Consultation 2.

3.15 Using assessment work on the six spatial strategies undertaken in 2018 and revised housing numbers, the spatial strategies were consolidated into four simplified options which were considered and assessed through an updated SA framework. The four options were: -

- 1 Use the existing settlement hierarchy - Increase density/site yield, focus on infill and brownfield, do not allow development beyond settlement boundaries (preferred option)

- 2 Use the existing settlement hierarchy and allow for growth outside but immediately adjacent to existing settlement boundaries (existing adopted plan approach)
 - 3 Creating new communities (new garden settlements)
 - 4 Growth in existing settlements, outside of settlement boundaries and in locations not previously considered (effectively no spatial strategy)
- 3.16 Updated information was collected from a `Call for sites` undertaken in June 2021. Also, a dedicated web page was set up to allow people to register their interest in self build and register on an ongoing basis. A `Call for sites` was undertaken for the Brownfield Sites Register between 15 February and 19 March 2021.

Who was consulted and how?

- 3.17 Those on the consultation database were contacted by email or letter to inform them of the consultation arrangements, where documents could be viewed and how to respond. A consultation webpage was created for the consultation and provided information on how to respond together with the consultation documents. Other publicity included a press release in the Isle of Wight County Press and social media messages on the council's Facebook page and Twitter. Comments could be made through the online consultation portal and were also accepted by email and letter.
- 3.18 In response to feedback from the previous Regulation 18 consultation an interactive online map was made available allowing people to see the sites and their status by settlement.
- 3.19 Paper copies of the consultation summary documents were available to view in libraries and at the reception areas of Seaclose Office and County Hall.
- 3.20 Briefings on the Plan were held for Town and Parish Councils throughout September. Drop in sessions were held at Newport High Street and Camp Hill Club during September for people to drop in and discuss the Plan.

How many responses were received?

- 3.21 **2,834** responses were received from over **600** respondents. The comments made covered the whole Plan, but the majority focussed on the overall housing number and individual housing site allocations. A summary of the issues raised, and a council response is available in the Summary of Public Consultation Responses document.

What were the main issues raised?

- 3.22 The key focus for responses centred around housing, growth and housing allocations at Freshwater and Bembridge. Many respondents considered housing need figures were exaggerated and that the island had exceptional circumstances to seek a reduced number. The lack of infrastructure capacity was most frequently referred to as a factor justifying restraining housing development. Other responses on housing growth sought to either promote a

particular location for housing development or to avoid development in an individual town or village. Other issues raised included: -

- i. the level of housing growth proposed in the Plan.
- ii. Objections to site allocations for housing
- iii. A lack of affordable housing for island residents and too much scope for retirees and second home ownership
- iv. The priority locations for growth
- v. The number of second and short term holiday lets on the island.
- vi. Impacts on the island from meeting the proposed level of development.
- vii. Need to develop empty and derelict buildings rather than greenfield sites.
- viii. Building on brownfield sites first
- ix. The impact of the proposed level of development on the tourism industry, a key employment sector and the destruction of the rural nature of the island which visitors come to see.

How have these been considered?

- 3.23 The consultation comments have been considered along with ongoing updating and development of the evidence base to inform the Regulation 19 stage of the plan. The additional evidence collected and updated included: -

Brownfield Capacity Study
Employment Land Study Update
IOW Housing Needs Assessment
Strategic Housing Land Availability Assessment update
Infrastructure Delivery Plan addendum
Local Greenspace Background Paper
Nutrient credit analysis
Rural Sustainability Matrix
Short term holiday let accommodation supporting paper
Viability Update

Regulation 19 Island Planning Strategy

- 3.24 The Regulation 19 version of the Plan contains new policies on Climate Change, Affordable Housing, Infrastructure, Net Zero Carbon and Lowering Energy Consumption in New Development, Short Term Holiday Let Accommodation and Solent Freeport.

Who was consulted and how?

- 3.25 2,087 emails and 205 letters were sent out to those on the Consultation database. Two separate officer drop in sessions were held during July and August to assist members of the public with the process. A presentation was made to the Planning Agents and Architects Forum on 19th July. The Plan and the supporting documents were available on the Council website and could be viewed in paper format in libraries and at the reception areas of Seaclose Office and County Hall. All town and parish councils were sent a paper copy of the

Plan. Other publicity included a press release in the Isle of Wight County Press and social media messages on the council's Facebook page and Twitter. Representations could be made through the online consultation portal and were also accepted by email and letter. The Statutory Notice that appeared in the County Press is attached as Appendix 1.

How many responses were received?

- 3.26 **731** responses were received from **108** respondents. A summary of the issues raised is available in the separate Summary of Representations on the Island Planning Strategy Regulation 19 consultation (**document reference: CD6**)..

What were the main issues raised?

- 3.27 Many responses to the Plan sought a reduction in housing numbers through `exceptional circumstances`. The council does not support this approach because the level of housing proposed in the Plan is considered to be a realistic housing requirement which can be delivered on the island but is less than the Government's standard method. The plan argues that housing at a higher level will simply not be delivered due to specific island factors.

- 3.28 Some of the other issues raised include: -

- Housing requirement in the plan is too high (and the council should be pursuing a case for exceptional circumstances)
- Housing requirement in the plan is too low and far short of the nationally prescribed methodology. The council should take account of the proposed changes to the NPPF, the Written Ministerial Statement from the Deputy Prime Minister and the new standard method number.
- The Regulation 19 information was not clearly linked on all IWC website consultation pages and therefore was not easily accessible for the entire 6 week period.
- The Regulation 19 questionnaire included a question that had the answer options changed during the 6 week period.
- The Plan period is unsound and should be extended to 2042.
- The settlement boundary for Freshwater should not be changed
- The `in perpetuity` requirement in H5 is not consistent with the current or draft NPPF or PPG and will present challenges.
- Lack of small site allocations hampers delivery in the Rural Service Centres limiting the ability of small builders.
- Lack of certainty on delivery of KPS1. Is the land surplus to requirements of the Ministry of Justice?
- The Policy C11 `net-zero` requirement goes beyond building regulations and possible Future Homes Standard, cannot be justified and is conflict with written ministerial statement.

4.0 Conclusion

- 4.1 The council has consulted widely using a range of methods during the preparation of the Island Planning Strategy. The comments from both Regulation 18 consultations have had a tangible impact on the direction of the Plan. The community supported a strategy focussed on the existing towns to protect the individuality of settlements and to support sustainable development. Strategic and detailed policies have been developed to address the key issues respondents felt strongly about such as tackling climate change, protecting the environment, affordable housing and delivering infrastructure. It is considered that the Regulation 19 Plan has taken account of views from the earlier consultations undertaken and up to date evidence. The representations from the Regulation 19 consultation will feed into the forthcoming examination process.

Regulation 19 Statutory Notice

Planning and Compulsory Purchase Act 2004 The Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 19)

Under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 the Isle of Wight Council has prepared a Pre-Submission Island Planning Strategy Development Plan Document and accompanying documents for formal public representations.

The representations period will run for 6 weeks from **Monday 8 July 2024 until midnight on Monday 19 August 2024**. Views are sought on the Plan's soundness for an Examination in Public which will take account of whether the Local Plan policies are: • Legally Compliant • Sound • Meet the Duty to Cooperate.

Further information about the consultation and guidance notes on making representations can be found at [Island Planning Strategy \(iow.gov.uk\)](https://www.iow.gov.uk) Paper copies of the Pre submission Island Planning Strategy will be available to view in County Hall and Seaclose Office receptions and all libraries during office hours.