

*To*

Matthew Giles  
Administration Officer – Local Plans

Via email to:  
[matthew.giles@planninginspectorate.gov.uk](mailto:matthew.giles@planninginspectorate.gov.uk)

*From*

**Ollie Boulter - Strategic Manager for  
Planning and Infrastructure Delivery**

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Our Ref: iw24/IPS

Date: 31<sup>st</sup> October 2024

Your Ref:

Dear Matt

### **Formal submission of The Island Planning Strategy**

Further to our recent correspondence and in line with Section 22 of The Town and Country Planning (Local Planning) (England) Regulations 2012, I am writing on behalf of the Isle of Wight Council to formally submit the draft **Island Planning Strategy Development Plan Document** and associated supporting documentation for independent examination under Section 24 of the aforementioned regulations.

As required by our Service Level Agreement (SLA) with PINS signed on 16 September 2024, we have provided electronic copies of all submission documents and would be happy to provide paper copies of any examination documents as requested by the appointed Inspector.

The council considers the **Island Planning Strategy (IPS)** to be legally compliant and sound. The council does not consider that any substantial concerns over legal compliance have been raised in the Regulation 19 process.

A range of issues have been raised over the legal compliance and soundness of the plan during the Regulation 19 period, and these are covered in both section 5 and Appendix 2 of this letter.

#### **1. Submission documents**

Appendix 1 to this letter provides a list of all of the submission documents that have been included in electronic form, with document references, and these will form the initial examination library.

## 2. Legal compliance / Duty to Co-operate

The council would draw attention to the following submitted documents that help to demonstrate legal compliance and that the council have fulfilled our Duty to Co-operate requirements:

- **GS21** Regulation 18 consultation 2018/19 compliance with SCI
- **GS22** Regulation 18 consultation 2021 compliance with SCI
- **CD8** Regulation 19 compliance with SCI
- **GS4** IPS Duty to Co-operate Statement
- **GS24** Statement of Common Ground – Natural England\*
- **GS25** Statement of Common Ground – Historic England\*
- **GS18** Statement of Common Ground – Marine Maritime Organisation (MMO)
- **GS17** Statement of Common Ground – Southampton City Council
- **GS16** Statement of Common Ground – Portsmouth City Council
- **GS15** Statement of Common Ground – New Forest National Park Authority

In particular, the Statements of Common Ground (SoCG) with government agencies Natural England, Historic England and the Marine Maritime Organisation demonstrate no unresolved objections from any of those government agencies. We are also in the final stages of completing SoCGs with the Environment Agency and New Forest District Council which will be submitted to the Inspector in the coming weeks.

Two of those SOCGs (marked \*) have been signed since the Regulation 19 period closed, and include suggested clarifications / amendments to text within the Island Planning Strategy (IPS) that are agreed by both parties.

For clarity, the council has **NOT** consulted on the suggested clarifications / amendments within these two SoCGs, however in line with the procedural guide we have collated these into a single document (**ref: CD7**) that has been submitted as part of our documentation so that the appointed Inspector can consider them as part of the minor / main modifications part of the examination process, should they so wish.

## 3. Programme Officer

On 15 October 2024, the council appointed **Louise St John Howe** as the programme officer for the examination. Contact details are as follows:

Louise St John Howe  
Programme Officer,  
PO Services  
PO Box 10965,  
Sudbury, Suffolk CO10 3BF  
Phone: 07789-486419  
Email: [louise@poservices.co.uk](mailto:louise@poservices.co.uk)

## 4. Examination web page

The Council has set up a dedicated examination web page and this can be viewed at [www.iow.gov.uk/planthewight](http://www.iow.gov.uk/planthewight) .

## 5. Main issues raised during Regulation 19 period of representation

The Regulation 19 period ran for 6 weeks between Monday 8<sup>th</sup> July 2024 and Monday 19<sup>th</sup> August 2024. A total of **727** separate comments were duly made and received.

The Council considers the main issues raised are those set out in the table attached as Appendix 2 to this letter. Within the table we have provided signposting to submission documents that we believe provide the necessary information / position on each of these issues.

The Council is of the view that the primary issue for consideration is the level of growth planned for in the draft IPS.

The current standard method housing need number for the Isle of Wight is 703 dwellings per annum (as of March 2024). The draft IPS proposes a housing requirement of 453 dwellings per annum due to the unique delivery constraints and housing market challenges faced on the Isle of Wight.

The Council has submitted a wide range of evidence to support this position and we would draw attention in particular to the following documents:

- **HO16** IPS Housing Evidence Paper A: Approach to Housing in the IPS
- **HO17** IPS Housing Evidence Paper B: Revisiting allocations approach
- **HO18** IPS Housing Evidence Paper C: Implications of not meeting the standard method
- **HO19** IPS Housing Evidence Paper D: Barriers to delivery
- **HO15** IPS Housing Evidence Paper – Exceptional Circumstances
- **HO1** IWC assessment of supply – Three Dragons report
- **HO2** University of Portsmouth Phase 1 report Housing delivery on the Isle of Wight
- **HO3** University of Portsmouth Phase 2 report Housing delivery on the Isle of Wight
- **HO4** Impact of physical separation from the UK mainland on IOW public service delivery

For clarity, the draft IPS is **NOT** pursuing a case for exceptional circumstances, rather the Council is accepting the standard method with its evidence base justifying a lower housing requirement in the IPS which shows the extent to which housing need can be delivered over the plan period. The Council is of the view that this approach aligns with paragraph 67 of the NPPF (December 2023).

## 6. Possible hearing days / dates

Following liaison with our experienced Programme Officer, the Council considers that given the main issues raised, the number of comments received and the number of people requesting to appear that a total of **10** hearing days may be required, over a three week period.

The Council would be able to facilitate the hearings anytime from January 2025 onwards.

## **7. Number of participants at hearings**

During the Regulation 19 period of representation, a total of **50** different respondents expressed a wish to appear at the examination hearings.

## **8. Other information**

As part of the aforementioned Regulation 19 period of representation, a number of unduly made comments (seven in total) were received that did not identify a specific part of the plan and/or did not state whether the plan was considered to be sound, legally compliant or meet the Duty to Co-operate. Whilst these comments are not included on the main Regulation 19 comments database (ref: **CD9**), we have included copies of these comments in the submission package so that the appointed Inspector can review should they consider necessary.

## **9. Purchase order number**

As required by the SLA, a Purchase Order number for PINS to use on any invoicing is being processed and we will send this on as soon as it has been generated by our finance team (and it will come directly to PINS from finance as well).

We trust everything is in order and look forward to hearing from you at your earliest convenience with regards to the appointment of an Inspector for the examination.

Should you have any questions regarding the submission of the Island Planning Strategy, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to be 'James Brewer', with a long horizontal line extending to the right.

**James Brewer**  
**Planning Policy Manager**

## Appendix 1 - Island Planning Strategy Submission documents

### Core submission documents

- CD1 Island Planning Strategy submission version July 2024
- CD2 Island Planning Strategy Policies Map
- CD3 Local Development Scheme
- CD4 IPS submission covering letter
- CD5 IPS Regulation 22 Consultation statement
- CD6 Summary of responses to Regulation 19 consultation
- CD7 Document setting out proposed modifications from SoCGs
- CD8 Regulation 19 period of representation statement of compliance with SCI
- CD9 Regulation 19 representations database
- CD10 Representor list with representor numbers

### Environmental assessments

- EA1 IPS Habitat Regulations Assessment HRA May 2024
- EA2 IPS Integrated Sustainability Appraisal ISA July 2024
- EA3 Strategic Flood Risk Assessment SFRA 2010
- EA4 Strategic Flood Risk Assessment SFRA 2010 Appendices A-X
- EA5 IPS Level 1 SFRA Sept 2019
- EA6 IPS Level 1 SFRA Sept 2019 Appendices A to E
- EA7 IPS Level 2 SFRA Sites Summary Report Aug 2021
- EA8 IPS Level 2 SFRA Methodology update May 2024
- EA9 IPS Level 2 SFRA Sites mapping update July 2024

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### General supporting evidence

- GS1 IOW Core Strategy 2012
- GS2 IOW Corporate Plan 2021-25
- GS3 IOW Regeneration Strategy
- GS4 IPS Duty to Co-operate Statement July 2024
- GS5 IPS Explainer document Corporate Policy context
- GS6 IPS Infrastructure Delivery Plan IDP 2018
- GS7 IPS Infrastructure Delivery Plan Addendum 2022
- GS8 IPS Infrastructure Delivery Plan Addendum 2024
- GS9 IPS Infrastructure Delivery Plan Schedule update 2024
- GS10 IPS Regulation 19 allocations map booklet
- GS11 IPS Viability Assessment July 2021
- GS12 IPS Viability Assessment Update report July 2022
- GS13 Mission Zero Climate and Environment Strategy 2021-2040
- GS14 IOW Planning Enforcement Strategy
- GS15 Statement of Common Ground IWC New Forest National Park Authority July 2024

## Appendix 1 - Island Planning Strategy Submission documents

- GS16 Statement of Common Ground IWC Portsmouth City Council July 2024
- GS17 Statement of Common Ground IWC Southampton City Council July 2024
- GS18 Statement of Common Ground IWC Marine Management Organisation July 2024
- GS19 Summary of Reg 18 (1) plan comments with council responses
- GS20 Summary of Reg 18 (2) plan comments with council responses
- GS21 Regulation 18 consultation 2018/19 compliance with SCI
- GS22 Regulation 18 consultation 2021 compliance with SCI
- GS23 Regulation 18 (2021) consultation statement
- GS24 Statement of Common Ground IWC Natural England October 2024
- GS25 Statement of Common Ground IWC Historic England October 2024

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## Environment section

- EN1 IOW AONB Management Plan
- EN2 Air Quality Update
- EN3 East Wight Landscape Character Assessment
- EN4 Good Practice Guidance for Green Infrastructure and Biodiversity
- EN5 Green Infrastructure Standards for England Summary
- EN6 Historic Landscape Characterisation Final Report 2008 Vol 1
- EN7 Historic Landscape Characterisation Report Volume 2 maps and figures
- EN8 Integrated Water Management Study 2018
- EN9 IOW Local Geodiversity Action Plan
- EN10 IOW Playing Pitch Strategy Sept 2020
- EN11 IOW Settlement Coalescence Study report
- EN12 IPS Evidence paper Local Green Spaces June 2022
- EN13 IPS explainer document Coastal policies
- EN14 IPS explainer document Environment policies
- EN15 Isle of Wight Biodiversity Action Plan
- EN16 Isle of Wight Historic Environment Record Access and charging policy 2021
- EN17 Isle of Wight Shoreline Management Plan
- EN18 IWC Open Space Assessment 2020
- EN19 IWC Position Statement Nitrates
- EN20 Landscape Review (The Glover Report)
- EN21 Local Flood Risk Management Strategy
- EN22 NFU Fertile Ground
- EN23 Nutrient Credit Analysis for the IPS May 2024
- EN24 Ryde Surface Water Management Plan

## Appendix 1 - Island Planning Strategy Submission documents

- EN25 Seascape assessment for the South inshore and offshore Marine plans 2014
  - EN26 Solent Recreation Mitigation Strategy
  - EN27 Solent Waders and Brent Goose Strategy
  - EN28 South Marine Plan 2018
  - EN29 West Wight Coastal Flood and Erosion Risk Management Strategy
  - EN30 West Wight Landscape Character Assessment
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### Community section

- CO1 Bembridge Neighbourhood Development Plan
  - CO2 Brading Neighbourhood Development Plan 2015
  - CO3 Brighthorne Neighbourhood Development Plan
  - CO4 Building for a Healthy Life
  - CO5 Chale Village Design Statement 2013
  - CO6 Cowes and Northwood Place Plan
  - CO7 Design principles for Extra Care Housing
  - CO8 Fishbourne Parish SPD
  - CO9 Freshwater Neighbourhood Development Plan 2018
  - CO10 Godshill Parish SPD
  - CO11 Guidelines for Recycling and Refuse Storage SPD
  - CO12 Gurnard Neighbourhood Development Plan 2017
  - CO13 IOW Health and Wellbeing Strategy 2022
  - CO14 IOW Local Care Plan
  - CO15 IOW Zero carbon homes analysis
  - CO16 IPS evidence paper – Second Homes May 2024
  - CO17 IPS Explainer Document Community policies
  - CO18 Isle of Wight Independent Living Strategy 2023-2038
  - CO19 Nettlestone and Seaview parish plan SPD
  - CO20 Niton and Whitwell parish plan SPD
  - CO21 SuDS SPD May 2024
  - CO22 Yarmouth and Thorley community plan SPD
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### Growth section

- GR1 Childrens Services Financial Contributions SPD
  - GR2 Health Contributions SPD May 2024
  - GR3 IPS evidence paper - Rural Sustainability Matrix April 2022
  - GR4 IPS Explainer Document – Growth and housing policies
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### Housing section

## Appendix 1 - Island Planning Strategy Submission documents

- HO1 IWC assessment of supply 2020 Three Dragons report
- HO2 UoP Phase 1 report Housing Delivery on the Isle of Wight October 2019
- HO3 UoP Phase 2 report Housing Delivery on the Isle of Wight November 2019
- HO4 Impact of physical separation from the UK mainland on IOW public service delivery
- HO5 2022 SHLAA Report and Appendices
- HO6 Affordable Housing Contributions SPD 2017
- HO7 Approach to GTTS in the IPS May 2024
- HO8 Housing Affordability SPD September 2023
- HO9 Housing Market Insight Report 2024
- HO10 IOW 5YR Housing Land Supply Position Statement 1 April 2021
- HO11 IOW Affordable Housing Assessment 2019
- HO12 IOW Housing Needs Assessment 2018
- HO13 IOW Housing Needs Assessment 2022
- HO14 IOW Housing Strategy 2020-2025
- HO15 IPS Housing evidence Paper Exceptional Circumstances May 2024
- HO16 IPS Housing evidence Paper A – approach to Housing in the IPS May 2024
- HO17 IPS Housing evidence Paper B –Revisiting the IPS allocations approach May 2024
- HO18 IPS Housing evidence Paper C – Implications of not Meeting the Standard Method May 2024
- HO19 IPS Housing evidence Paper D – Barriers to Delivery May 2024
- HO20 IOW Gypsy and Traveller, Travelling Showpeople and Houseboat Dweller Accommodation Assessment
- HO21 Newport Harbour masterplan SPD Flood Risk Assessment 2021

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## Economy section

- EC1 IOW Employment Land Study Final report Jan 2022
- EC2 IOW Retail Study Update Combined Report and Appendices
- EC3 IPS Evidence paper – short term let holiday accommodation May 2024
- EC4 IPS Explainer Document Economy policies
- EC5 Island Investment Plan
- EC6 Newport & Ryde Commercial Frontages Design Guide SPD
- EC7 Ryde Place Plan
- EC8 SLEP Island Infrastructure Investment Plan Final report
- EC9 Solent 2050 An Economic Strategy for the Solent
- EC10 Solent Marine Sites Annual Survey Report 2023
- EC11 Solent Waterfront sites Strategy
- EC12 Vision to increase economic and social wellbeing 2030



## Appendix 1 - Island Planning Strategy Submission documents

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### Transport section

- TR1 Bay Area LCWIP Final report
- TR2 Brading Bembridge St Helens LCWIP
- TR3 Cowes Northwood Gurnard LCWIP
- TR4 East Cowes and Whippingham LCWIP
- TR5 EV Chargepoint Infrastructure Strategy
- TR6 Guidelines for Parking Provision as part of new development SPD
- TR7 Island Planning Strategy Explainer Document – Transport
- TR8 Island Transport Plan, 2011-2038
- TR9 Newport and Ryde LCWIP SPD June 2023
- TR10 Rights of Way Improvement Plan 2018-2028
- TR11 SRTM modelling IOW local plan
- TR12 Junction feasibility study Junction 6 Queens Road West Street
- TR13 Junction feasibility study Junction 7 Argyll Street West Street
- TR14 Junction feasibility study Junction 8 Binstead Road Pelhurst Road
- TR15 Junction feasibility study Junction 9 Quarr Hill Newnham Road
- TR16 Junction feasibility study Junction 10 Marlborough Road Great Preston Road
- TR17 Junction feasibility study Junction 11 High Street Victoria Avenue
- TR18 Junction feasibility study Junction 12 Newport Road Industrial Way roundabout
- TR19 Junction feasibility study Junction 13 Newport Road Sandown Road
- TR20 Junction feasibility study Junction 14 Lake Hill The Fairway Part A
- TR21 Junction feasibility study Junction 14 Lake Hill The Fairway Part B
- TR22 Junction feasibility study Junction 14 Lake Hill The Fairway Part C
- TR23 Junction feasibility study Junction 14 Lake Hill The Fairway Part D
- TR24 Junction feasibility study Junction 14 Lake Hill The Fairway Part E
- TR25 Junction feasibility study Junction 15 Morton Common Perowne Way
- TR26 Junction feasibility study Junction 2 Newport Part A
- TR27 Junction feasibility study Junction 2 Newport Part B

**Main issues raised in the Regulation 19 representations on the Island Planning Strategy**

Issue	Legal compliance or soundness	IWC comment /evidence base signposting to examination library
<p>Housing requirement in the plan is too high and the council should be pursuing a case for exceptional circumstances</p>	<p>Soundness</p>	<p><b>HO16 - HO19</b> <u>IPS Housing Evidence Papers A to D</u> and <b>HO15</b> <u>IPS Housing Evidence Paper – Exceptional Circumstances</u> set out the approach to the housing requirement in the IPS. For clarity, the IWC is <b>NOT</b> pursuing a case for exceptional circumstances.</p>
<p>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.</p>	<p>Soundness</p>	<p><b>HO16 - HO19</b> <u>IPS Housing Evidence Papers A to D</u> set out the approach to calculating the housing requirement in the IPS. Further evidence documents <b>HO1, HO2, HO3 &amp; HO4</b> provide justification for this approach. For clarity, the IWC is accepting the standard method housing need for the island, however as permitted by the NPPF, is planning for a lower housing requirement due to clear and obvious delivery constraints that are unique to the island.</p>
<p>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.</p>	<p>Legal compliance</p>	<p>See <u>Regulation 20 consultation statement</u> and <u>Regulation 20 compliance with SCI document</u>. All Regulation 19 documentation was available to view and download on the council website for the entire 6 week period.</p>

<p>The Regulation 19 questionnaire included a question that had the answer options changed during the 6 week period.</p>	<p>Legal compliance</p>	<p>The Regulation 19 comments forms (online and downloadable version) available from Monday 8 July 2024 included all of the questions that required answering. There was an error relating to a hyperlink and line of supporting text beneath Q4 however this did not affect the validity of submissions made.</p>
<p>The Plan period is unsound and should be extended to 2042.</p>	<p>Soundness</p>	<p>The IPS plan period runs for 15 years from 2022 to 2037 reflecting the period from which a Regulation 19 submission version of the plan was prepared. An adjustment of plan period from 2024-2039 could be made if necessary (to reflect submission date), with associated revisions to housing trajectories. However future plan review work will supersede this (see below).</p> <p>The IPS commits to plan review triggers (Section 10) related to housing delivery given the lower housing requirement being proposed.</p> <p>The IWC is also aware that proposed transitional arrangements set out in the recent NPPF consultation would require the IWC to commence work on a new local plan immediately following adoption of the IPS, given the difference in the proposed standard method housing number (1,104dpa) and that within the IPS (453dpa) being in excess of 200 homes.</p> <p><b><i>As such, adoption of the IPS would represent a positive, plan-led step forwards ahead of a new local plan being prepared under the forthcoming new plan-making system.</i></b></p>

<p>The settlement boundary for Freshwater should not be changed</p>	<p>Soundness</p>	<p>Settlement boundaries have been adjusted to include proposed allocations and this approach is justified and evidenced in the <b>EA2</b> Integrated Sustainability Appraisal (ISA), <b>HO17</b> and fully aligns with the spatial strategy for growth set out in policy G2.</p>
<p>The `in perpetuity` requirement in H5 is not consistent with the current or draft NPPF or PPG and will present challenges.</p>	<p>Soundness</p>	<p>Securing affordable housing in perpetuity reflects the current policy position taken by IWC and is essential to address one of the key challenges faced by the island.</p>
<p>Lack of small site allocations hampers delivery in the Rural Service Centres limiting the ability of small builders.</p>	<p>Soundness</p>	<p>All proposed allocations are 10 units or more to drive the delivery of much needed affordable housing from allocated sites.</p> <p>In principle policy support for development within all settlement boundaries (G2) and on all brownfield land (H9) is provided by the IPS allowing small sites to come forward across the island.</p> <p>A range of other policies also provide positive opportunities for small sites to come forward (H4, H6, H7). The windfall allowance of 100dpa demonstrates that small sites will be expected to play a vital role in helping to achieve the housing requirement within the IPS.</p>
<p>Lack of certainty on delivery of KPS1. Is the land surplus to requirements of the Ministry of Justice?</p>	<p>Soundness</p>	<p>The MoJ responded in the Regulation 19 period supporting the proposed mixed use allocation at the former Camp Hill prison site and a Statement of Common Ground will be prepared between IWC &amp; MoJ. Given the accepted challenges around the future of surplus MoJ estate, the site is not expected to deliver any housing until the back end of the plan period. Any early plan review will therefore be able to consider any change in circumstances as a result of further MoJ estate reviews.</p>

<p>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.</p>	<p>Soundness</p>	<p>Policy C11 is informed by a detailed, island specific piece of research, funded by the LGA that demonstrated how net zero housing could be delivered on the island and what thresholds should be used (<b>Ref: CO15</b>) . The financial impact of C11 has also been covered within the viability report update (<b>Ref: GS12</b>). Ongoing conversations with the construction sector are demonstrating that the KPIs and thresholds within C11 can be met.</p>
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