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10th February 2025

Louise St John Howe
Programme Officer
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Our ref: IPS-1.0

Dear Louise,

Re: Island Planning Strategy Hearings, Matter 7

In relation to Matter 7 of the Isle of Wight Local Plan examination, Housing Policies, I wish to make the following submissions regarding the Regulation 19 version of the Island Planning Strategy, dated July 2024.

H1: Planning for housing delivery

This policy does not cross-reference policy H6, but cross-references other similar policies.

Proposed solution: cross-reference policy H6 in policy H1 via the insertion of an additional criteria.

H4: Infill opportunities outside settlement boundaries

I have identified the following problems with the current text of policy H4:

1. This policy begins “Housing outside the settlement boundaries will only be supported where it would be infilling a small gap...” This contradicts the part of policy H6 which states that housing which is not infill development can be supported in certain circumstances:

“Single new homes in the countryside outside of the settlement boundaries that are not infill development (policy H4) will only be supported where they meet at least one of the following criteria:”

Proposed solution: change the first line of policy H4 so that it begins “Housing outside the settlement boundaries which does not meet any of the criteria in policy H6 will only be supported...”

2. The September 2022 draft of the Island Planning Strategy included the following text for policy H4 criteria a):

“they would meet a specific local need that has been identified;”

In the July 2024 Regulation 19 draft, this text had changed to:

“a ‘specific local need that has been identified’ is being contributed to (see glossary for definition);”

A policy which needs to refer to a glossary is insufficiently clear in its own right.

This glossary entry states: “A local community need within the parish in which the application land is sited that has been identified by a local housing needs assessment and/or surveys.”

I do not think this additional restriction is sound or justified. For example, a rural worker may farm on one side of the parish boundary and have the opportunity to be housed on the other side. The local housing needs assessment may be very out of date; for example, a Parish Council may not have updated its housing needs survey for more than a decade.

I also believe the definition of ‘local community need’ could potentially be incompatible with the Equality Act 2010, if it excludes housing opportunities for people on the basis that they are not ‘local’ or members of the ‘community’. The ‘Equality Impact Assessment: Draft Island Planning Strategy’ dated March 2024 only considers this risk in terms of Gypsy, Traveller and Travelling Showpeople provision, but there are other migrants to the Isle of Wight of course.

Proposed solution: change policy H4 criteria a) to: “they would meet a specific need that has been identified;”

3. Paragraph 7.54 states “Such gaps should not include agricultural land and it is expected that a small gap will sit between the curtilage of existing buildings to either side.” This would rule out many suitable sites for rural infill dwellings, where a small portion of an agricultural site can be used to house people in a development which meets all the criteria of policy H4. Also, the wording “small gap” is undefined and may cause scarce infill land to be wasted.

Proposed solution: delete the third sentence in paragraph 7.54.

H6: New homes in the countryside outside of the settlement boundaries

I have identified the following problems with the current text of policy H6:

1. This policy states that ‘Single new homes’ will be supported, but contains no justification as to why two or more homes would not be supported if the relevant criteria from the National Planning Policy Framework were met. For example, a farming family may require a pair of tied cottages, rather than one new home.

Proposed solution: delete the word ‘Single’ from the first paragraph of policy H6.

2. Compared to the five criteria of paragraph 84 of the National Planning Policy Framework (December 2024), policy H6 has four criteria, omitting criteria d), that the development would involve the subdivision of an existing residential building. Together with additional words added such as ‘proven’, ‘structurally sound’ and ‘appropriate for this use’, which are unnecessary, policy H6 does not build on the NPPF paragraph 84 provisions; it subtracts from them.

If the proposed use meets the essential requirements of the NPPF paragraph 84, then it is unreasonable to expect an applicant for planning permission to 'prove' this beyond all reasonable doubt.

If a re-usable building needs some structural work in order to convert it into a rural dwelling in accordance with the NPPF criteria, that is not a sound reason for the Island Planning Strategy to reject the proposal. And by definition, a building which is not a dwelling cannot be 'appropriate' for use as a dwelling before it is converted, and so all proposals would fail this criteria. Design quality of any residential conversion is covered by the proposed policy C1, and so there is no need to put additional road-blocks in the way of delivering much-needed rural housing.

Proposed solution: delete the word 'proven' from criteria a), delete the words 'structurally sound' from criteria b), delete the words 'appropriate for this use' from criteria c), reinstate criteria d) from NPPF paragraph 84 and move criteria d) to e).

3. Supporting text paragraph 7.67 states that the housing should be "for a full-time worker" which excludes semi-retired farmers, their dependents and rural workers with caring responsibilities. It would be impractical and unnecessary to take planning enforcement action against residents whose circumstances have changed since the dwelling was built.

Proposed solution: delete the words 'full-time' from the first sentence of paragraph 7.67.

4. Paragraph 7.67 continues "The unit and the rural employment activity should have been established for at least three years and be financially sound, with a clear prospect of remaining so." This policy would prevent start-up businesses which rely on rural worker accommodation, and is contradicted later in the paragraph where it is stated: "If a new dwelling is essential to support a new farming activity that has not been established for at least three years, for the first three years it should be provided by a temporary dwelling unless exceptional circumstances can be demonstrated."

Proposed solution: replace the second sentence in paragraph 7.67 with "The rural employment activity should have a clear prospect of being financially sound in the foreseeable future."

5. Paragraph 7.68 states "The replacement dwelling should not be materially larger than the existing dwelling." This is unsound, as there may be a justification for a larger dwelling which meets the criteria in NPPF paragraph 84. Some of the agricultural tied dwellings built in the last century are basic bungalows which do not make efficient use of the plots that they are built on.

Proposed solution: delete the third sentence of paragraph 7.68.

6. Paragraph 7.72 states "Information on the current structural condition of the building and the method of conversion to the new use will be required to assess whether it is of substantial construction, structurally sound and capable of conversion without the need for substantial extension, alteration or reconstruction." As in criteria b) of the main text of policy H6, this paragraph sets an unreasonably high bar for residential conversions. It is not possible to convert a redundant rural building into a dwelling without alteration.

Also, this requirement is not made at the planning stage for any other type of conversion, as it is a matter for Building Regulations approval.

To require this information from applicants for planning permission would involve additional up-front expenditure on structural surveying which would not be recouped should planning permission be denied. It is not clear that planning officers have been trained to interpret structural engineering reports, which would be an additional responsibility and workload for them.

Finally, condition and structural details are not relevant to whether a building is proposed for extension. Any significant extension should be obvious from a comparison of the existing and proposed plans for the building.

Proposed solution: change the second sentence of paragraph 7.72 to read "Information on the current condition of the building will be required to assess whether it is capable of conversion without the need for substantial reconstruction."

Best wishes,

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