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CHARTERED TOWN PLANNERS

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Mr D Spencer and Mr A Steen
C/O Ms L St John Howe
Programme Officer
PO Services
PO Box 10965
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Our ref: 3376

05 February 2025

Dear Sirs,

Examination of the Island Planning Strategy 2022-2037

Matter Statement on behalf of Smallbrook Developments Limited

Reference: IPSR34

On behalf of our client, Smallbrook Developments Limited, please find enclosed our matter statements for the forthcoming Island Plan examination. For efficiency purposes we have focused on these statements on key points raised in the questions but will be present at the examination to discuss and respond to any points raised in the discussion on the matters to which we have been invited.

Matter 2 – Plan period and amount of employment land needed and other development needs

At this stage we do not wish to expand on the comments we made at the Regulation 19 stage but will be present at the Hearing session to add to the debate if, and when required.

Matter 8 – Economic growth

At this stage we have no further comments to add other than those made in our Regulation 19 consultation response, although to note the Pennyfeather's Site, Ryde will provide an element of employment uses on the Brading Road frontage and any comments will be in relation to that element of the proposed development.

Matter 2 – Amount of housing development needed on the Island

At this stage we have no further comments to add other than those made in our Regulation 19 consultation response.

We note question 2.17 references the Pennyfeathers Site, Ryde (HA119). In that regard we will be present to explain the planning history of the site and as discussed in this statement can provide further details in regard to its delivery to help that discussion if required.



Matter 3: Spatial Strategy

At this stage we have no further comments to add other than those made in our Regulation 19 consultation response but we will be present at the hearing sessions to add to the debate and discussion and respond to any point in regard to site HA119, Pennyfeathers, Ryde.

Matter 6 Approach to site selection

We will be attending session 6 with a specific focus on the allocation of site HA119, Pennyfeathers.

In regard to question 6.6, we are pleased to see that the Pennyfeathers site is included within the settlement boundary for Ryde. This provides clarity for the allocation and any future development within the site. It makes logical sense to include the Pennyfeathers site within the settlement boundary as within the plan period significant mixed use development will occur on the site and for the site to remain in the countryside would add a layer of complexity that is not required. We support the plan in this approach.

Matter 6 – Proposed housing allocations – Cowers and East Coves, Ryde and Freshwater

Question 6.25 Whether the capacity of housing allocation HA119, Pennyfeathers, is justified?

On behalf of our client, we are preparing a hybrid planning application for the Pennyfeathers site. The team has been working on the application for over a year and have carried out a suite of extensive surveys and assessments, including all necessary ecology studies.

We are working to a programme which will see a hybrid application, accompanied by an Environmental Impact Assessment and Shadow HRA submitted to the Isle of Wight Council for their consideration this Spring. We are in the final stages of the preparation of the application and can confirm that it will demonstrate that the site can accommodate the following development:

- 900 dwellings,
- A supermarket,
- Hotel and / or flexible commercial space,
- Commercial space for a range of employment uses,
- A community centre.

The submission of the application includes an estimated programme for delivery. At this point in time, it is anticipated that the 900 homes will be delivered 12 years from commencement. It is our view that if the application is determined this year the scheme should deliver close to the 900 dwellings proposed within the plan period. This is helped by the hybrid element of the application, which seeks detailed approval for 85 dwellings. This will enable the first 85 dwellings to be brought forward quickly once full planning permission is granted.

Question 6.26 There is indication that SANGs may not be necessary for housing allocation HA119, Pennyfeathers. Is this requirement in the site-specific requirements for SANGs justified?

As confirmed in our response to the Regulation 19 Consultation, Natural England has confirmed there is no requirement for SANGs on this site as such the site-specific requirement for a SANG is not justified and this policy should be drafted accordingly.

Further, a Habitats Regulation Assessment has been drafted for the Pennyfeather's development and this confirms that the site will not have any adverse impacts either alone or in combination on the integrity of the qualifying bird species populations of the Solent and Southampton Water SPA/ Ramsar



site and the Solent and Dorset Coast SPA due to the distance of the site from these features and therefore a SANG is not required.

Matter 4 – Policies for the Environment

Question 4.2

As set out in our response to the regulation 19 consultation, it is our view that policies should not be overly restrictive and onerous on development to meet requirements, particularly where these are set out at the National level and then enhanced at the local level.

For instance, we have already heard from Rachel Reeves (on 29 January 2025) in her speech ‘How the UK will kickstart Growth’) about the need to reduce environmental requirements in order to get Britain building, where she confirmed:

“Last week we confirmed our priorities for the Planning and infrastructure Bill to rapidly streamline the process for determining applications to for determining applications to make the consultation process far less burdensome and to fundamentally reform our approach to environmental regulation. The problem in our economy, the lack of bold reform that we have seen over decades can be summed up by a £100 million bat tunnel built for HS2 the type of decision that has made delivering major infrastructure in our country far too expensive and far too slow. So we are reducing the environmental requirements placed on development when they pay into the nature restoration fund that we have created so they can focus on getting things build, and stop worrying about bats and newts.”

It is not that nature does not have a place. It does but the requirements should be sensible and in line with Government policy.

For instance, where there is ancient woodland the Government’s policy is a buffer of 15m is required as a minimum. The Guidance states:

“where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone”

As such 15m buffer should be the starting point for the plan, leaving the development control process to determine if the buffer needs to be extended due to individual onsite aspects. Placing a blanket buffer of 50m on Ancient Woodland effectively sterilises a further 35m of land that could be used for development without harm or impact on the Ancient Woodland and critical without appropriate assessment.

Equally, requirements in the supporting text in regard to SANGs and River Corridor buffers are not helpful and should be clear where this is guidance or a requirement and that these factors should be determined on the merits of each case.

ENV2 requires development proposals to achieve at least a 10% net gain. This element of the policy is not necessary as this requirement is set out in legislation, which includes specific exemption not detailed in the policy. To avoid conflict and confusion this reference should be amended. For efficiency we do not repeat this point in regard to question 4.5 but will comment along these lines at the Hearings).

The Planning Strategy needs to ensure it removes inappropriate barriers to growth to ensure the delivery of the housing growth required to meet local needs as an absolute priority.



When the Government announced the consultation on the NPPF, they confirmed the country is in the “*the most acute housing crisis in living memory*”. Whilst the Island Planning Strategy is not being examined under the revised NPPF 2024, it is imperative that it provides flexibility to enable the right form of development to be brought forward, and to ensure the allocated sites can be delivered in accordance with the trajectory. Placing significant burdens on development will only further stifle growth and the economy. These policies and text should be modified to ensure flexibility in the development process.

Question 4.13

The question highlights our concern with this policy. It takes a very strict approach to the impact from development on all landscapes and seascapes. What must be clearly accepted and understood is that there will be an impact, likely considered adverse, from any development on a landscape in which it sits and given the nature of the Island, potentially on the seascape. But this can not be the overriding criteria for considering whether a development proposal is acceptable or not.

Flexibility in the policy wording is required to ensure this policy does not stifle and restrict development and ensure a consistent approach with National Policy. As noted above, the imperative from Government is to significantly boost the supply of land from housing to help to address the housing crisis and therefore the focus of policies such as this must be on ensure delivery, particular of allocated sites in the plan is not unduly restricted, especially where change is already accepted.

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

Question 4.21

There is no need and justification for this policy to secure enhancements on the requirements of Building Regulations. Potable water consumption should be left to Building Regulations requirements as this can be amended as appropriate, whereas amending the Island Planning Strategy is a significant piece of work.

As noted above, policies in the plan should focus on the delivery of the development needed and should not place onerous burdens on schemes to deliver above and beyond nationally set requirements as this could create viability and deliverability issues.

Question 4.24

We have serious concerns in regard to EV15 a) and b). Both parts are ambiguous, and we are concerned they will not be feasible to implement on sites that are not capable of including infiltration due to existing ground conditions. Within these policies, flexibility is key to ensure allocated sites within the plan can deliver the development required.

Matter 7 – Housing Land Supply / delivery

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



At this stage we have no further comments to add other than those made in our Regulation 19 consultation response. We will be present at the hearing sessions to add to the debate and discussion in regard to the delivery of HA119 Pennyfeathers, Ryde.

Matter 7 – Housing policies including affordable housing

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

At this stage we have no detailed comments to add other than those made in our Regulation 19 consultation response, but to note that affordable housing is a critical issue and is a key component in terms of the viability of any scheme on the Island and therefore the policy should ensure there is adequate flexibility to respond appropriately to circumstance of the site and particularly case.

Question 7.7

Policy G5 is overly onerous and restrictive and should be deleted in order to enable the delivery of development throughout the plan period.

Refusing to consider applications that cannot provide this information is certainly not going to help in terms of delivery. There is a need to ensure delivery, but equally preventing applications coming forward will not in any way help with this approach. The requirements stipulated are only likely to delay planning applications come forward, which will ultimately delay or jeopardise the delivery of these projects.

Matter 5 – Policies for the community

Question 5.4

Policy C5 should be consistent with Policy H8. Increasing the proportion of dwellings to meet M4(2) of Building Regulations is not justified or effective and will place an additional burden on development and increase costs and space requirements.

Question 5.6 and 5.7

It is our view that Building Regulations propose the appropriate and most flexible approach to achieving net zero carbon and lowering energy consumption. This policy is not required. It is appropriate to rely on Building Regulations to ensure these targets are met.

Additional requirements, over and above that required by National Policy / building regulations will add further costs and restriction to building and growth on the Island.

Matter 9 – Transport, Infrastructure and monitoring

At this stage we have no further comments to add other than those made in our Regulation 19 consultation response but we will be present at the hearing sessions to add to the debate and discussion and respond to any particular points in regard to site HA119, Pennyfeathers, Ryde.



We look forward to attending the hearing sessions in the forthcoming weeks, but if you have any further queries in the meantime, please do not hesitate to contact us.

Yours faithfully,

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