

Community Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 16:31:39

Name/Organisation

Nora Galley BA MA MPhil MRTPI FRSA, Director, Now Planning Ltd

Email Address

[REDACTED]

1. What type of respondent are you?

Business, Landowners and Developers

2. What Community policy you are commenting on

C11 - Net Zero Carbon and Lowering Energy Consumption in New Development Utility Infrastructure Requirements for New Development

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

The requirements are too onerous for small builders who probably do not have the tools even to assess compliance - especially given that small builders typify the island and in a context in which housing supply target is well below the evidenced need because, says the IPS, past delivery rates have been lower than need since 2012 because of island specific factors. The Aspinall Verdi Viability Appraisal (July 2022) already raises red flags on the risks that these higher than Bldg Regs requirements may not be affordable. The policy could still be ambitious - and refer to the most up-to-date national standards for energy efficiency and embodied carbon.

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

Yes

5. Please give details to support your answer to question 4

- **Yes - legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **not effective**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

See the comments above. The policy should refer to standards that are achievable on the island - while being compliant with national regulations, with more demanding specifications welcomed.

9. Do you have any comments on the policies map?

No

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

To set out why and how ambitious net zero and embodied carbon standards can be achieved while not discouraging sustainably located development on an island which unavoidable has a more demanding delivery environment.

Economy Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 18:17:34

Name/Organisation

Nora Galley BA MA MPhil MRTPI FRSA, director, Now Planning Ltd

Email Address

[REDACTED]

1. What type of respondent are you?

Business, Landowners and Developers

2. What Economy policy you are commenting on

E8 - Supporting High Quality Tourism

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

paragraph 8.97 as well as Policy E8

While we support the thrust and ambition of the policy and its written statement, there is nothing positive (e.g., in terms of target locations or opportunity areas) put forward by the IPS. The approach is far from pro-active enough. For example - as the attached shows - the landowner for whom we act owns land adjacent to the Island Harbour Marina on the River Medina (an important facility and destination for the island where there has been a recent-ish grant of planning permission for holiday accommodation) could sensibly be promoted for further such, high quality and year round, accommodation.

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

Yes

5. Please give details to support your answer to question 4

- **Yes - legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **not effective**
- **not positively prepared**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

The absence of allocations for tourism uses or even "priority areas" though there were such in the Reg 18 version of the plan. It is a fact that the Island still lacks much in the way of high quality year round tourism accommodation, that hotel consents are not being built (at least one - at Red Funnel) and that the principle (if not the detail) was deemed acceptable of the proposal for a high quality, heritage and natural environment-led 60 ha resort with a 5* hotel and top end spa at its core that was proposed within the walls of the Norris Castle Estate is an example (the application itself was refused, however, chiefly because it was judged that the quantum and location of resort lodges caused a substantial level of cumulative harm to the significance of the group of 11 designated heritage assets, three at Grade I). The Norris Castle Estate adjoins the Osborne House Estate, the most popular destination on the island (circa 300,000 visitors a year) - but Osborne has very little by way of places to stay on its estate. We would just like to see more ambition in the IPS in the form of proactive promotion of the island's opportunities - not least to reduce a developer's risks in pursuing ambitious projects having regard to the island's economy. There is no reason at all for not allocating the Island Harbour sites for holiday accommodation - or even housing in the context of the local undersupply.

9. Do you have any comments on the policies map?

No

10. If you wish to attach any documents please do so here

PDF [Binfield-A and B-summary information.pdf](#)
179.4KB

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

Yes - to present the case for a more ambitious approach to high quality year round tourism on the island and allocations such as the proposal attached.

Environment Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 16:13:08

Name/Organisation

Nora Galley, BA MA MPhil, RTPI, FRSA; director, Now Planning Ltd

Email Address

[REDACTED]

1. What type of respondent are you?

Business, Landowners and Developers

2. What Environment policy you are commenting on

EV5 - Trees, Woodlands and Hedgerows

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

The 50m buffer between new development and ancient woodland is inconsistent with the Natural England standing guidance. The policy should instead refer to a 15m unless a greater buffer is justified by the circumstances of the site and the proposed development.

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

Yes

5. Please give details to support your answer to question 4

- **Yes - legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **Not consistent with national policy**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

The reference to the 50m buffer needs to be brought into line with Natural England's standing guidance.

9. Do you have any comments on the policies map?

No

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

This point needs to be discussed at the examination in public.

Environment Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 16:18:36

Name/Organisation

Nora Galley BA MA MPhil MRTPI FRSA, Director, Now Planning Ltd

Email Address

1. What type of respondent are you?

Business, Landowners and Developers

2. What Environment policy you are commenting on

EV11 - Isle of Wight National Landscape (formerly AONB)

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

EV11 is inconsistent with NPPF (December 2023) paragraph 183. The "or" in the first sentence should be changed to "and"; and a reference must be made to the NPPF provision paragraph 183 c) to refer to mitigation.

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

Yes

5. Please give details to support your answer to question 4

- **Yes - legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **Not consistent with national policy**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

As per the comment above; the policy needs to be drafted so as to be consistent with NPPF (Dec 2023) paragraph 183.

9. Do you have any comments on the policies map?

No

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

To speak to the comments above in public and before the inspector

Environment Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 16:22:56

Name/Organisation

Nora Galley BA, MA, MPhil, RTPI, FRSA Director, Now Planning Ltd

Email Address

[REDACTED]

1. What type of respondent are you?

Business, Landowners and Developers

2. What Environment policy you are commenting on

EV14 - Managing Flood Risk in New Development

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

EV14 needs to refer to the NPPF (Dec 2023) paragraph 167 as, otherwise, it is unclear what the policy means with respect to the sequential and exception tests.

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

Yes

5. Please give details to support your answer to question 4

- **Yes - legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **Not consistent with national policy**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

Refer to the provisions of the NPPF as indicated above with respect to the sequential and exception tests.

9. Do you have any comments on the policies map?

no

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

To have a chance to speak to the issue in public and before the inspector

Growth Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 17:06:44

Name/Organisation

Nora Galley BA MA MPhil RTPI FRSA, Director, Now Planning Ltd

Email Address

[REDACTED]

1. What type of respondent are you?

Business, Landowners and Developers

2. What Community policy you are commenting on

G1 - Our Approach towards Sustainable Development and Growth

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

G1 reads as a whole!

We object to the "island realistic housing requirement over the plan period" on grounds set out in full in the attached: in short, the evidence to justify this approach does not exist, the ISA for the Reg 19 IPS does not consider reasonable alternatives to this approach, nor does the ISA or the IPS take into account the implications of failing to meet the island's housing need have not been assessed. We also object on grounds that we know that there other, sustainably located (on the edge of the East Cowes settlement boundary) which Core Strategy SP1 accepts in principle as suitable (only G2 rescinds this provision without reasons for the change).

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

No

5. Please give details to support your answer to question 4

- **No - not legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **Not consistent with national policy**
- **not effective**
- **not justified**
- **not positively prepared**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

The ISA needs to be updated to pull together the reasonable alternatives to the delivery trend-based housing target - and the delivery trend-based target needs either to be dropped or justified in evidence and by the ISA.

9. Do you have any comments on the policies map?

No - save to say it does not allocate otherwise sustainably located sites that could be developed without significant harm to the environment or nationally or locally protected interests.

10. If you wish to attach any documents please do so here

PDF [Rapleys Critique of IPS Housing Requirement Report 190824.pdf](#)
422.9KB

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

We wish to be able to explain why the IPS is neither sound nor legally compliant (with respect to the ISA) and seek to encourage the Inspector to include the omission sites we nominate.

Growth Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 17:46:51

Name/Organisation

Nora Galley BA MA MPhil MRTPI FRSA Director, Now Planning Ltd

Email Address

[REDACTED]

1. What type of respondent are you?

Business, Landowners and Developers

2. What Community policy you are commenting on

G2 - Priority Locations for Housing Development and Growth

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

The policy is too restrictive - most particularly given the absence of reasons in the IPS written statement, in Appendix 6 with reference to Core Strategy SP1 and in a context in which there are sustainably located sites adjacent to the settlement boundary (by way of example) East Cowes (and no doubt also other settlements) AND where the Council is proposing very significantly to undersupply against the island's housing needs over the IPS plan period.

The attached show the sites - and further attachments demonstrate that the proposals cause no significant harm of any kind (heritage, landscape, visual) and insofar as very limited harm to the locally listed Springhill Estate would be caused it would be more than offset by the benefits of the housing supplied, in the mix broadly sought by IPS Reg 19 Policy H8 including the affordable element, benefits that will be harder still to secure if the Council succeeds in justifying its past delivery trend-based housing target.

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

Yes

5. Please give details to support your answer to question 4

- **Yes - legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **Not consistent with national policy**
- **not effective**
- **not justified**
- **not positively prepared**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

The settlement boundaries should be reviewed; a further call for sites needs to be made; and new and additional, sustainably located, housing sites need to be allocated - as omission sites through Main Modifications to the plan or via a pause in the IPS examination to allow for further sites to be put forward and assessed (while a proper assessment of the deliverability of the sites put forward at Appendix 4 - Indicative Trajectory is also undertaken). The sites in the appended plans within the Springhill Estate which adjoin the East Cowes settlement boundary should be allocated; and the appended excerpts from evidence documents on Springhill show that there would be no visual or landscape harm and the heritage harm, including to the locally listed landscape and to the setting of the Norris Castle Estate and Osborne AONB would be minimal. Insofar as harm would be caused it would be justified with reference to NPPF (December 2023) paragraphs 182 (setting of the AONB), 208 (less than substantial harm to the setting of designated heritage assets) and 209 (the effect on the significance of a non-designated heritage asset).

9. Do you have any comments on the policies map?

No - save to note the absence of sites that might be allocated that adjoin the settlement boundaries of the primary settlements.

10. If you wish to attach any documents please do so here

- | | |
|------------|--|
| PDF | Springhill-Parcels 1 to 4-summary information.pdf
1.8MB |
| PDF | Springhill-Parcels 5A and 5B-summary information.pdf
595.2KB |
| PDF | Springhill ASSESSMENT_OF_SIGNIFICANCE- extract.pdf
598.6KB |
| PDF | Springhill HERITAGE_IMPACT_ASSESSMENT-extract.pdf
188.2KB |
| PDF | Supplementary Information- Springhill verified views and visibility study-extract.pdf
1.5MB |

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

To make the case for the inclusion of the Springhill Estate housing sites indicated in the attached plans (Parcels 1-5) - most particularly in the context of the proposal significantly to undersupply housing on the island (well below the evidenced need on grounds that if the need were met the housing would not be delivered in any event) and given the willingness and ability of the Springhill sites' owner to deliver housing - some 175 dwellings adjacent to East Cowes - and do so in accordance with the policies of the Reg 19 IPS (that are consistent with national policy (as at December 2023)).

Housing Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 18:01:18

Name/Organisation

Nora Galley BA MA MPhil MRTPI FRSA, Director, Now Planning Ltc

Email Address

[REDACTED]

1. What type of respondent are you?

Business, Landowners and Developers

2. What Housing policy you are commenting on

H8 - Ensuring the Right Mix of Housing

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

paragraphs 7.82-7.83 and H8

It is doubtful that the viability of delivering the mix of housing sought by Policy H2 has been adequately considered - including on the sale value of the market housing and the profit level needed to induce a developer to deliver that mix (and purchasers of the market housing to want to do so). We understand the objective and the Council's thinking: the effects of such a policy, however, have not been adequately assessed, either by the ISA or the July 2022 Viability Assessment.

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

Yes

5. Please give details to support your answer to question 4

- **Yes - legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If no to question six is this because?

- **not effective**
- **not justified**
- **not positively prepared**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

Policy H8 needs to provide the option of not emulating the mix on specific sites having regard to their context (including existing housing, nearby jobs and services, the housing needs of the specific settlement, recent delivery rates and up to date evidence on delivery rates on the island.

As drafted the policy is too strict - and more likely to lead to reduced delivery than an increase in housing supply having reference to the evidence base documents, including the University of Plymouth and Three Dragons reports.

9. Do you have any comments on the policies map?

No

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

To debate the tensions between meeting the island's actual housing needs and restrictive policies that are likely, as drafted, to suppress delivery rates still further rather than positively increase them. While we laud the Council's ambitions for the highest standards of design and sustainability, the fact remains that the vast share of housing has to deliver a land value that will induce a landowner to sell and a profit that will induce a developer to bid.

IPS visions and objectives - Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 16:07:05

Name/Organisation

Nora Galley - BA, MA, MPhil, RTPI, FRSA; Director, Now Planning Ltd

Email Address

[REDACTED]

1. What type of respondent are you?

Business, Landowners and Developers

2. What IPS vision and objectives policy are you commenting on

Section 1 Introduction

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

1.6 Should refer to the policies of the plan "read as a whole" to comply with the NPPF and case law

1.12-1.13 The ISA does not set out reasonable alternatives for the spatial and housing strategies, nor reasons for departing from Core Strategy SP1 in favour of the more restrictive G2, particularly given the IPS provision - on grounds that are in fact not evidenced - for not meeting the island's objectively assessed housing need - nor does the ISA set out the implications for the island's communities and economy for failing to provide to meet the island's housing needs.

See also the attached paper

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

No

5. Please give details to support your answer to question 4

- **No - not legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **Not consistent with national policy**
- **Not effective**
- **Not justified**
- **Not positively prepared**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

The IPS needs to revisit the opportunities to meet the local housing need, including by carrying out the actions recommended by the University of Plymouth and Three Dragons report and by the still simpler measure of opening a more frequent call for sites.

Settlement boundaries should also be reviewed.

The failure to follow through on the recommended actions, to review settlement boundaries and more proactively engage with landowners and in calling for sites in the island's circumstances of acute and long unmet need is not positive.

9. Do you have any comments on the policies map?

No - it is not as clear

10. If you wish to attach any documents please do so here

DOCX [19 August 2024 - Now Planning Comments on IPS Sections 1-3_ soundness and legal compliance.docx](#)
21.9KB

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

It is essential that the Inspector is able to understand why the ISA is not compliant with the regulations; that the delivery-trend basis for the housing target is not supported by the evidence base; and that there is sustainably sited prospective housing land, capable of complying with the IPS's policies and with a willing developer, whose proposals at Springhill were discounted for unevidenced reasons by the SHLAA.

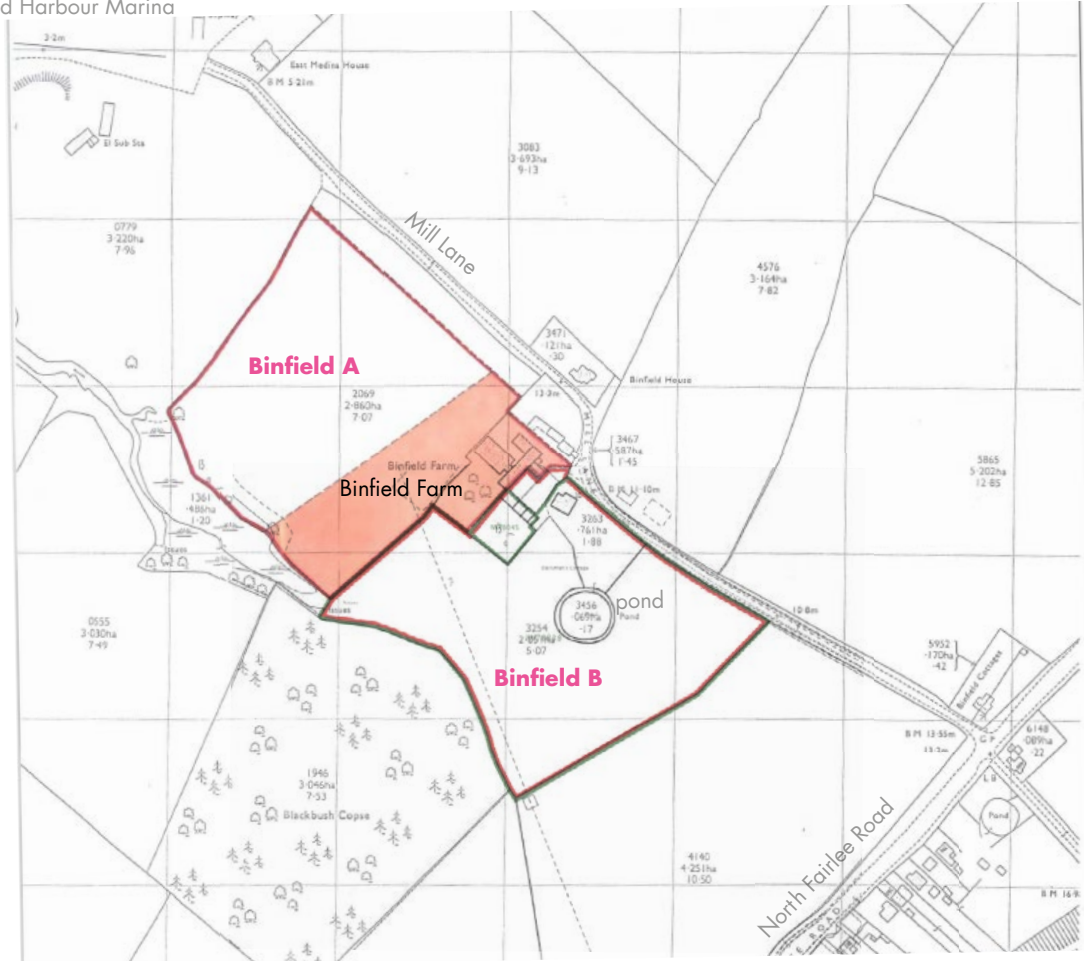
Binfield - A & B

These are low lying flat sites surrounding Binfield Farm, adjacent to the Island Harbour Marina. The sites will be accessed by Mill Lane leading onto Fairlee Road. A variety of uses would be suitable including holiday accommodation. The developable parts of the sites total approximately 4.3ha but it is assumed that the constraints of the pond, the power lines and pylon and possible leisure related uses such as boat parking would reduce the residential yield to approximately 100 units.



	approximate area	assumed developable area	potential housing yield (allowing for other boating uses)
Binfield A	2.86 ha	2.1 ha	42 units
Binfield B	2.28 ha	2.2 ha	60 units
		total units	102 units

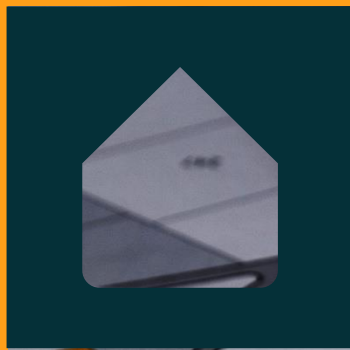
Island Harbour Marina



Isle of Wight Island Planning Strategy (IPS) Regulation 19 version

Critique of the IPS Housing Requirement For Now Planning 19th August 2024

Isle of Wight Island Planning Strategy Regulation 19 version



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Quality Assurance

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2015.

We confirm that the undersigned is an appropriately qualified and experienced Chartered Surveyor/Planner [delete as appropriate] experienced in the commercial property sector.

Created by: Shane Scollard, Associate Planner MRTPI
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1. INTRODUCTION & SUMMARY

- 1.1 This report is commissioned to support the objection by Now Planning on behalf of the Springhill Estate landowner to the Isle of Wight Council's (IOWC) approach to setting the housing requirement in the Island Planning Strategy (IPS) Regulation 19 Draft Local Plan.
- 1.2 The IPS states (paragraph 7.5) 'The Council recognises its objectively assessed housing need figure based on the nationally prescribed standard methodology, but believes it is undeliverable by the island housing market, as set out in evidence papers supporting the local plan. The plan therefore identifies a more island realistic housing target of 453 dwellings per annum [compared to 703 dwellings per annum calculated by the standard methodology] which it believes is at the upper limits of what is deliverable by the Island housing market across the whole plan period.'
- 1.3 We have reviewed these evidence papers¹ and cannot find the justification claimed for capping the IPS housing target to reflect the island's average housing delivery rates since 2012. We also stress the role played more generally by the indisputably failed 2012 Regional Spatial Strategy (RSS) era in meeting the country's housing needs more generally and more specifically by the Council's 2012 (pre-NPPF) Core Strategy that does not allocate housing sites but instead general areas for development (Core Strategy policy SP1). Thus, while we accept that there are undoubtedly some island-specific factors that have also played a part in the significant under-delivery of housing since 2012, not all of those factors are insuperable and they certainly do not provide the justification needed for the IPS cap on its housing target (at just 62% of the island's housing needs over the whole of the 2037 plan period). Moreover, the plan period itself is arguably already at least two-three years shorter than the 15 years required given the late 2025 target date for adoption.
- 1.4 Additionally, the IPS's suggestion (paragraph 7.6 and the table following paragraph 10.7) that the plan can be adopted with a monitoring trigger related to three years of above target delivery is unlikely to be pragmatic nor does it appear to positive in soundness terms. As plans should be reviewed and adopted every five years, the three-year trigger cannot be viewed as effective either. If the IPS is adopted with a below-need target on the scale proposed, our view is that the need to review the IPS at least every five years is even greater.
- 1.5 To support its case for undersupply the island's housing needs, the Council seeks to rely on its 2022 Local Housing Needs (LHN) assessment to demonstrate that it can, by making selective allocations for smaller homes, minimise (thus, by implication, not actually mitigate) the social, economic and environmental harm that is unavoidably consequent upon the significant level of proposed under-provision. Yet the LHN assessment did not in fact test alternatives to the Standard Method (SM) calculations of housing need, either scenarios above or below the SM. The IPS accordingly lacks the evidence required to support its proposed housing target.
- 1.6 Nor, contrary to the requirements of the SA/SEA regulations and guidance, does the IPS's Integrated Sustainability Appraisal (ISA) consider reasonable alternatives to the IPS's under-supply target – either a target based on the SM-calculated housing need (plainly a reasonable alternative to assess) or other any other alternative target to the IPS's 'we have not delivered enough housing in the past so we will not be able to in the future' approach. Accordingly, the ISA also neither provides reasons for the IPS's housing target nor an assessment of the implications, harmful or beneficial, for achieving the IPS's objectives.
- 1.7 As regards the Island's ability to deliver, neither the University of Plymouth (Phase 1 & 2) report nor the Three Dragons report in their assessment of the supply side factors on the island judge that these factors demonstrate that more new homes cannot be delivered. While highlighting challenges in the local market, both reports set out prospective solutions and advise on actions that the Council should take to help mitigate for these factors, including making new land

¹ Most obviously: IWC assessment of supply 2020 Three Dragons report; UoP Phase 1 report Housing Delivery on the Isle of Wight October 2019; UoP Phase 2 report Housing Delivery on the Isle of Wight November 2019, the Local Housing Needs Assessment (GL Hearn 2022) and 2024 review of the Standard Method by LSH / Justin Gardener.

allocations to boost delivery (i.e., a key purpose of the IPS) and exploring public sector-led interventions. Even were it the case that all these recommended interventions had been carried out since these key parts of the Council's evidence base were reported, they certainly had not been undertaken during the period 2012 – 2022-23 on which the Council derives its delivery trend.

- 1.8 The IPS's position that delivering new homes is not viable is also undermined by the IPS Viability Assessment (Aspinall Verdi 2023) which confirms that housing development is viable on the Island, including with the 35% affordable housing requirement proposed by the IPS (Policy H5).
- 1.9 For new supply, neither report (neither Plymouth nor Three Dragons) confirms that the Island is so constrained that it cannot deliver more new homes. Plymouth describe the suggestion that there is a lack of land for development on the Island as an 'assertion' in quotes (i.e., not founded in fact or on the basis of evidenced constraints) and note that major developers disagree that there is a lack of land that is sustainably located and suitable for housing development. They instead report that developers say that there has been a lack of development sites on the Island, but not a shortage of land that is capable of being sustainably developed.
- 1.10 The University of Plymouth report also states that shortfalls in housing delivery are partly due to wider planning delays progressing applications (and we assume they include the time lapse since the Council reviewed its 2012 Core Strategy) While planning delays are not uncommon in England, not all councils fail the NPPF's Housing Delivery Test (and are designated presumption authorities) nor as the Council has been, a presumption authority for the last eight years. The Council's past performance on this measure appears markedly worse than many others in England, and unlike England as a whole, the IoW's housing delivery record remains in line with the long-outdated, very low, RSS-based delivery expectations. The national boost sought by government to the delivery of housing in England, from the March 2012 NPPF forward, has been in effect bypassed by the Council; and the Council's proposed approach to its IPS only continues this course in failing to engage with the island's demographic and social realities. These realities all demonstrate an increasing demand/need for new homes – 703 per annum on the SM (against the 453 per annum (pa) the IPS proposes) more likely than not deliverable were the interventions recommended by the University of Plymouth and Three Dragons implemented and suitable land allocated in proactive work with landowners and local communities. We also note the large share of the annual 453 pa delivery that relies on windfall deliveries – and can find no actual evidence that charts the share in the past that is attributable to windfalls – together with the share of expected housing supply that is associated evidently quite dated, but not yet implemented or perhaps even begun, planning permissions.
- 1.11 While the University of Plymouth and Three Dragons suggest (without evidence) that there is a lack of developable land, the Council does not appear to have reviewed its land supply either, and certainly has made no more recent Call for Sites than in 2022. It would also seem that the Council does not – unlike others in South East – regularly engage with major landowners on the island, including those who own land adjoining settlement boundaries (having reference to Core Strategy policy SP1) in an effort to identify land that might come forward for development and might be capable of satisfying the various existing criteria required for planning support.
- 1.12 We also stress, as we set out below, the NPPF provides clear instructions in Footnote 7 as to the national policies that can constrain delivery (noting that the policies of the NPPF that protect these interests all require balancing judgments). While not explicit in the NPPF, the expectation is that other 'local' constraints can and should be reviewed in light of the identified needs (i.e. no stone left unturned). It would appear from the IPS evidence base that no such assessment of the extent of national constraints on the island has been undertaken – i.e., there is no benchmarking that we could find of the IoW with other councils who are seeking to limit housing land supply to avoid these constraints or to direct development to locations that are not constrained by the Footnote 7 designations. We can also find nothing in the IPS evidence base that shows that such an assessment has been undertaken to understand the nature of and the potential for 'flex' in the local constraints (e.g., the part of the Island which is "dark skies" designated). Instead, reliance is placed on a trend-based housing delivery cap which

does not appear to have any support in the PPG or NPPF – let alone in the IPS evidence base or ISA.

- 1.13 The projection of past housing delivery rates to cap future housing land supply is particularly concerning given that the Council agree that the assessment of need, as calculated using the Standard Method, is reasonable. The Council does not suggest that the SM projects erroneous levels of growth that are inappropriate to the island given its demographic profile (i.e., including the loss of working age population and the increase in the share that is 65+ and not economically active); nor does the ISA (or any other part of the IPS evidence base) consider the consequences of not meeting the island’s housing needs in full and what this would mean for those amongst the Island’s population whose needs will not be met as intended should the SM-calculated need not be delivered in full. The lack of supporting evidence, including a population profile aligned to the housing target means that we cannot see where the Council has assessed the impact / harm of not meeting needs in full. The 2024 ISA (which must be up to date for the Reg 19 plan) appears silent in this regard, despite the 2018 SA concluding that delivering more new homes (than the SM-calculated need) delivers significant benefits. Given this acceptance, it can only follow that delivering fewer homes would fail not only to deliver these significant benefits but also to result in undoubtedly significant disbenefits.
- 1.14 In summary, the Council has failed to review its plan (not until it started in 2021) as the primary policy tool available to boost supply. Instead, the Council has defaulted to meeting development needs where developers have made speculative applications via its sanction under the NPPF (as presumption authority subject to the paragraph 11 tilted balance). Not only does the Council lose the control that an up-to-date local plan provides as to where housing should go, applicants’ costs have been higher and their risks of failure greater, that is where developers on the island have had the resources in the first place to finance those risks (including, if they fail, a costly planning appeal). The NPPF’s tilted balance, notwithstanding its sustainable development objectives, should be a ‘tool of last resort’. The fact that the Council has operated for so many years without an allocated land supply to meet levels of housing need, need that the IPS evidence base does not dispute, only demonstrates why the IPS would do no more than further embed this poor rate of delivery against an ever more acute local housing need looking forwards.
- 1.15 that Council’s claim that if they allocate no more land than past delivery rates justify then – no longer subject to the presumption – the Council will be able more sustainably to deliver development that meets the Island’s needs. The purpose of the presumption is to deliver sustainable development – where Councils’ policies are out of date and where either there are no clear reasons for refusal because of the harm that would be caused to the Footnote 7 protected interests or the disbenefits of permitting the development would significantly and demonstrably outweigh the benefits when assessed against the policies of the NPPF read as a whole.
- 1.16 In conclusion: we cannot accept as positive, justified, effective or consistent with national policy the IPS’s delivery trend-based housing land supply target. The evidence to justify it has not been provided. Nor has the ISA assessed reasonable alternatives to this target nor assessed the implications against the IPS objectives of the sole option the IPS considers.
- 1.17 In the final part of this Note we assess whether the Council might claim “Exceptional Circumstances” to justify the departure from the SM-based calculation; look at the role that planning has played in boosting national housing supply since the IoW adopted its 2012 development plan; review Council’s justification for the under-provision of housing land by reference to the University of Plymouth and Three Dragons reports and the Council’s ‘exceptions papers’ (see Footnote 1 here); and, finally, we consider the limited evidence the Council presents as regards the implications of delivering so few homes.

2. NEED AND EXCEPTIONAL CIRCUMSTANCES

2.1 While we understand that the Council is not seeking to argue “exceptional circumstances” to justify providing for just 62% of the island’s objectively assessed housing need, they are nonetheless seeking to demonstrate that the level of homes suggested by the Standard Method method is not achievable because that number of dwellings is simply not deliverable because 520 houses per annum under the Core Strategy (and the presumption penalty) have not been delivered in the past.

2.2 In this section we look at two themes:

- Firstly, understanding what the IOWC commissioned consultants have concluded when agreeing that Exceptional Circumstances do not exist.
- Secondly, what other Councils’ have done where they suggest that the Method is too high and cannot be supported via migration flows.

2.3 Then, in the next section (3) what Plymouth and Three Dragons have said about the inability to deliver, and the fact that both sets of consultants note that new land allocations would assist with boosting supply, an action has not been carried out following numerous recommendations.

THE COUNCIL AGREES THAT THE METHOD IS A FAIR REFLECTION OF NEED

2.4 The Standard Method has been reviewed by both GL Hearn (2022 – Local Housing Needs) and more recently (2024) by LSH. Neither firm found ‘exceptional circumstances’ to depart from the assessment and effectively confirmed that the number of homes was a fair reflection of housing need. As part of this the consultants tested migration flows and the affordability uplift. By agreeing with the Method both sets of evidence confirmed that there is demand to meet the Method – the projected people exist and the affordability uplift in line with national expectations.

2.5 They have also confirmed that housing need is now greater than when the 2012 plan was drafted and its policies developed.

2.6 Unlike a projection of past delivery, the use of household projections reflects demographic changes and the fact that the scale and distribution of future housing need does not necessarily reflect that seen in the past.

2.7 Past trends do not know that the aging population generates a new demand for housing, nor how changes in international migration in recent years may increase (or decrease) the demand for new homes. Obviously, an aging population and declining workforce is a known issue on the Island and one that can only be captured in a demographic projection.

2.8 The data demonstrates that there is a growing need for homes in the future and so, a growing demand. It is unclear why evidence of past delivery – a point in time when the drivers of housing need and demand were very different – should be used to inform future decisions around market demand.

EXCEPTIONAL CIRCUMSTANCES & PAST DELIVERY ELSEWHERE

2.9 The IOWC considers that past trends present a cap or maximum rate of delivery on the Island – a rate that cannot be exceeded without resulting in unsustainable development.

2.10 We are aware that in late 2023 North Norfolk Council were challenged to provide justification to support their case to depart from the Standard Method to adopt a lower number. In response, and via an EiP question, in early 2024 their consultants confirmed that no council has successfully demonstrated Exceptional Circumstances for a lower number and, from the sample of plans at examination and departing from the Method the majority were promoting more new homes – including via economic uplifts.

- 2.11 While this debate was related to the ‘need’ assessment, in North Norfolk suggestions that the Standard Method was not deliverable, because in their case it contained errors and a lower assessment was more robust, were dismissed. North Norfolk Council’s demographic consultants had advised that the 2016 based projections should be used because they considered them ‘more realistic’ and had questioned the robustness of the population trends in the 2014s.
- 2.12 North Norfolk has recently received an ‘Interim letter’² firmly rejecting their approach. The letter, issued in May, but only published in July, discusses potential errors in the Standard Method that may result in a projection that is too high and does not accurately reflect past trends or future need as estimated by the Council’s consultants. The Inspector notes that:
- “Despite the Council’s concerns about their accuracy, however valid, the 2014 based projections are to be used to support the objective of boosting housing supply”*
- 2.13 The Inspector goes on to state:
- “The discrepancy [suggested errors in the 2014 based data] is not such an extreme outlier nor a specific local factor, and although use of the standard method leads to a significantly higher local housing need figure, this reflects national policy. Furthermore, there is no obvious reason why housing provision in the district should be unnecessarily restricted”*
- 2.14 Here the Council is not suggesting they have Exceptional Circumstances to adopt a lower need estimate, but there are clear parallels in that North Norfolk considered delivering the 2014s unrealistic, but their alternative was.
- 2.15 As we go on to demonstrate – the observation that there is “no obvious reason why housing provision in the district should be unnecessary restricted” applies here and even more so given the need here is agreed. As we go on to discuss the IOWC does not appear to have fully assessed its land constrains and therefore opportunities in line with the NPPF.

SUMMARY

- 2.16 Given that the Council has accepted (does not challenge) the assessment of need using the Standard Method – i.e., that the Method correctly assesses the Island’s actual housing needs, it is wholly unclear (and the ISA does not assist – not that we can find in its 695 poorly structured pages) then it follows that the Council has accepted that there is demand on the Island for exactly that quantum of new homes.
- 2.17 Thus it is unclear why the migration and household formation trends assumed by the Standard Method will not translate into viable demand for new homes (with reference again to the Aspinall Verdi Viability Appraisal within which we could find nothing to state that viability would be compromised if the objectively assessed housing need were provided for the IPS).
- 2.18 The need assessment demonstrates demand for homes is increasing compared to the past, which in turn would suggest the future demand for land is higher and development likely to be more deliverable. Relying on historic past trends (including over Covid) does not reflect the fact demand is increasing and so, over the plan period, development more likely to respond. The IWP approach does not reflect this fact.
- 2.19 Even if it is accepted, as the Council maintains (but we reject for the absence of sound evidence), that these flows will not result in the delivery of new homes, no assessment has been made in the evidence base, nor in the ISA, as to what the implication of underproviding homes will be. Most obviously there is no housing target aligned population projection to compare with the full need. Common sense suggests at least one of the effects will be higher still housing prices (to buy and rent) as demand increasingly outstrips demand. Other effects

² <https://www.north-norfolk.gov.uk/media/10490/eh006-f-inspectors-post-examination-hearings-letter.pdf>

could well be continued loss of working age people on the island and a still greater skew towards people 65+ - with attendant losses in what might otherwise be a smaller and less broadly skilled workforce (with consequences for the growth and competitiveness of the island's economy and the delivery of / access to needed services, including in health and social care) and less spending money to support local shops and services to meet the needs of the island's residents.

3. THE IOW CONSTRAINT / DELIVERY EVIDENCE

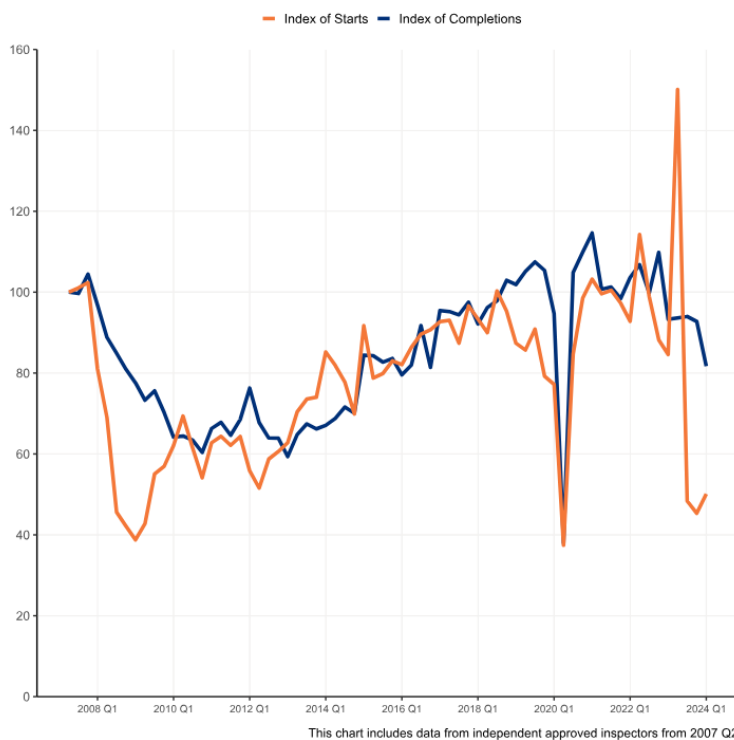
- 3.1 In this section we briefly review the Council's delivery evidence that seeks to justify why need cannot be met in full.
- 3.2 We focus on two themes:
- a. Firstly, that despite struggling with housing land supply since the 2012 plan was adopted, the plan has not been reviewed and new allocations have not been made. This means that the Government's primary tool to boost supply via plan led review has been used.
 - b. Secondly, we look at the Plymouth and Three Dragons evidence, noting that both sets of consultants advised that new allocations were needed, and that there was a range of interventions available to boost supply. Importantly neither set of consultants tested the possible supply to understand how and where it was constrained by reference to the NPPF 'footnote 7' constraints, or where land was not absolutely constrained and could not be developed without conflict with these footnote constraints.
- 3.3 Finally, we set out our understanding of how the Council should, following the NPPF, assessed its constraints first by reference to the NPPF footnote 7, and then looking at other plan barriers, and where these could be flexed to boost supply.

Experience of Boosting Supply in England and Elsewhere

- 3.4 The Council claims that past trends present a cap on delivery – a cap the market cannot exceed in the Island context.
- 3.5 But, in context, the Island's relative supply position is rapidly worsening. Since 2012, England as a whole has boosted housing delivery – moving from c60,000 starts to 100,000 pre and post covid per quarter (Source – Gov.UK)
- 3.6 It is clear that IOWC has not engaged with the NPPF requirement to 'boost' housing delivery, with its reasonably flat delivery profile – a trend that is proposed to be embedded in the new plan.

Figure 3.1 Housing Starts in England

Figure 2. Index of building control reported new build dwelling starts and completions, quarterly (Seasonally Adjusted), England, 2007 Q2 to 2024 Q1



Source: Gov.uk

- 3.7 Given the IOWC has not reviewed its plan, not provided new allocations, nor redrafted policies to address the NPPF boost, it is not surprising that past delivery has been weak and is significantly lagging behind England as a whole.
- 3.8 It is well established that land allocations are essential to de-risking delivery, bringing forward the type of large sites both Plymouth and Three Dragons cite as needed, and can boost supply compared to relying on windfalls and tilted balance. In our experience an urgent plan review is cited in most 5 year land supply appeals when councils address the length of any shortfall in evidence.
- 3.9 In summary, the fact that the LPA has not reviewed its aged plan and not topped up its land supply via allocations is very likely to have constrained housing delivery in the past. This results in the low rates of housing delivery seen in the past that are now proposed to be projected forward.

The University of Plymouth and Three Dragons evidence

- 3.10 The Council has invested considerable effort to demonstrate that the loW market is unique and cannot deliver more new homes than trend. But this is not what the evidence base appears to conclude. Both GL Hearn (2022 – Local Housing Needs Assessment) and Lambert Smith Hampton (LSH 2024) endorse the Standard Method ‘need’ assessment, agreeing that the people in need of homes here are genuine and therefore this demand exists. Or, as relevant, the uplift to improve affordability is reasonable.
- 3.11 The University of Plymouth and Three Dragons evidence is used by the Council to support this past trends assessment but, on examination neither firm concludes that there is a cap or limit on development here. Both firms make recommendations to boost supply and importantly, both make the point we have discussed above, that new land allocations have a role to play in boosting supply, but obviously the Council has not acted on this advice. These actions cannot

have informed the past trend period analysed and used to evidence the housing target in this plan. Evidence Paper 'D' confirmed a number of actions remain outstanding today.

3.12 Importantly for the loW plan neither consultant finds that there is a land supply constraint, albeit both suggest that identifying capacity will be challenging. Three Dragons state:

"Given the geography and constraints the loW does not have many opportunities for very large sites to come forward and the benefits that can bring for delivering both housing numbers and affordable housing"

3.13 They therefore do not agree with the Council that there are no opportunities for large sites to come forward but in their opinion, not evidence or fact, there are few.

3.14 While Three Dragons sought to understand delivery issues across the Island it is noticeable that they struggled to identify any 'large sites', and struggle to identify a sample exceeding 20 units. We would suggest that 20 units would not be large enough to overcome some of the delivery barriers that may require scale.

3.15 Plymouth appear even less committed to the Council's constraints, noting that there is a 'perceived' land constraint in the area and go on (page 5, no para numbers) to outline how poor planning has delayed development on the Island.

3.16 Obviously a perceived land constraint is very different from one that has been evidenced in line with the NPPF and the Council cannot under-provide homes because their consultants' report a 'perceived' constraint. The authors also do not appear to endorse this perception and, their second report (No page or para numbers) make the observation that there is not a lack of development land in the island, but an issue forming this land into large development sites:

"The main limiting factor, at least in attracting larger national housebuilders and being able to deliver enough affordable housing, was the number and availability of larger sites, rather than land per se"

3.17 Plymouth also reported that this was not a circumstance unique to the Island, but "some of the mainland based businesses also disagreed that this was necessarily an island specific issue, as well as citing examples of similarly populated areas around the UK that had found large enough sites for them to develop."

3.18 As regards under-performance in the Planning Service, we note that this is partly a reason for poor delivery although, for unknown reasons, the Plymouth team suggest that a supply of 2,000 homes demonstrates the loW Planning Service as a whole has not under-performed. But this is clearly at odds with established planning view that the Council that is in longer term tilted balance, and has an exceptionally dated plan, is obviously under-performing. Councils are required to maintain up to date plans and more than 5 years deliverable land supply.

3.19 We would also suggest that the Plymouth team have highted a number of reasons why more homes may be needed on the Island as opposed to supporting the case for lower numbers. Most obviously Plymouth cite a lack of labour supply in the construction industry – and the tight labour market as one delivery side issue. But, elsewhere these types of statements would support an economic uplift on housing need (the SHMA explicitly does not consider alternative levels of growth including whether an economic uplift would be justified).

3.20 So, it may be correct that a lack of labour on the Island is an issue – this is not a justification to limit housing – instead should be read as a justification to boost housing land supply.

3.21 Finally, while both the University of Plymouth and Three Dragons suggest that there are delivery 'issues' that will constrain delivery, they do not go so far as to quantify this nor suggest that these issues would justify the trend-based cap in the Reg 19 IPS. Further, as above, it is plainly the case that Aspinall Verdi find housing delivery on the island to be viable., even with the contributions to affordable housing (and others) proposed.

- 3.22 If there is any concern with viability and deliverability Aspinall Verdi note it is related to brownfield regeneration sites and not new greenfield allocations (brownfield land generally always being more costly to develop).
- 3.23 On this count too, it is difficult to see on what basis there is for the Council's view that more new homes than the number capped by the Reg 19 IPS cannot be delivered.

The absence of an NPPF Footnote 7 constraint assessment

- 3.24 As stated above neither the University of Plymouth nor the Three Dragons reports included an assessment of the loW land supply. As such neither report has mounted the evidence that would be required to conclude whether new land is available that could be allocated or not. Their evidence is largely related to delivery side issues – which may be contradicted by the finding that housing is viable to deliver on the Island. This appears at odds with the approach outlined in the NPPF, which relies on a robust understanding of land constraints before concluding need cannot be met in full.
- 3.25 While there is no prescribed method to testing / flexing constraints we can find no assessment of land which is not nationally constrained and no consideration of how land can be sustainably brought forward. But there is clear guidance around what policies can or should apply as constraints.
- 3.26 Footnote 7 expands on which policies can or should constrain development:
- “The policies referred to are those in this Framework [the NPPF] (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.”*
- 3.27 Further to this, paragraph 181 notes that the following should be given the same protection as habitats sites:
- “a) potential Special Protection Areas and possible Special Areas of Conservation;*
b) listed or proposed Ramsar sites ; and
c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.”
- 3.28 LPAs require a robust understanding of their NPPF constraints and its ability to sustainably accommodate housing needs, ahead of seeking to meet unmet need be accommodated with its neighbours. Should need not be accommodated due to national constraints, a sound justification not to meet development needs in full can be made through Exceptional Circumstances to depart from local housing need following review of local constraints and policies.

4. IMPLICATIONS OF NOT MEETING NEEDS IN FULL

4.1 Finally, we briefly look at the implications of not meeting needs in full. We understand that these are discussed in the Evidence Paper C as opposed being tested via the SA process (although we also accept that it is possible that we have overlooked this in the 695 pages of the ISA). Paper C states

4.2 As regards 'implications' the Council state:

"Planning for a lower number of houses is likely to result in social, economic and environmental impacts which need to be understood both in terms of their nature (positive or negative) and their significance. In doing so the plan can be developed to ensure that the strategy taken to the provision of housing is directed to fulfilling the most urgent of housing needs and identify any possible areas of mitigation or maximising positive impacts"

4.3 This statement suggests that impacts are likely, that these impacts need to be 'understood' and a strategy developed in response.

SOCIAL IMPACTS

4.4 We would note that effects are not 'likely' (as stated by IWOC) but certain. But the Council cannot 'understand' the impact of delivering fewer homes than need because no work has been undertaken to assess this.

4.5 The SA simply dismissed meeting need in full as a reasonable scenario. So does not develop any 'understanding'. Evidence Paper C presents no data as regards the future constrained population profile and appears to rely on data from the 2022 Local Housing Needs Assessment that only modelled the delivery of the Standard Method in full.

4.6 For the Island we would suggest a particular risk is that the migration flows implied by the Standard Method continue to arrive to the detriment of existing Island residents. The Council's solution to manage this is through targeting the limited new supply; but this cannot be an effective remedy given the Council has no control over the existing stock. House prices will continue to increase, and homes continue to be inaccessible for young people.

4.7 If modelled, we would expect to see average household sizes increase in response because the population grows faster than the housing stock. This is opposite to the Governments stated objective to improve household formation.

4.8 The alternative view could be that the population does not grow in line with the Method because migration inwards is reduced – including those younger Island residents who move away at some point (eg to university) and then find they cannot return to the Island.

4.9 In which case the population will be lower and less able to sustain local services, but there would also be a quantified effect on the economy.

4.10 We would suggest that the scale of housing under-provision is such that the effects of this need to be properly modelled, assessed, and considered as part of the SA process.

ECONOMIC IMPACTS

4.11 While the Council's housing evidence base does not present a profile of the population in the plan – there is a view expressed by Icení in the Council's economic evidence base (2022 ELR). Table 5.2 shows that if only 486 homes are provided the Island's 'economically active' population will fall – even with assumptions increasing older age activity rates.

4.12 This confirms that, with only 486 homes a year the population is aging with significant implications economy, and the ability to address the skills and labour concerns expressed in the Council's delivery side evidence. With fewer homes now proposed (the ELR modelled 486 vs 453 in the IPS) the labour supply is likely to decline further.

4.13 As noted above IWOC appear to cite a lack of skills and labour as one reason to justify a lower housing target than need. But as the ELR demonstrates, without housebuilding at levels higher than proposed in the IPS labour supply falls. Elsewhere a lack of labour is cited as a justification for more homes (economic uplift) and housebuilding, through skills and education training, a route to address skills issues. Obviously labour can only be skilled if homes are available today and are built in the future.

Figure 4.1 – Labour Supply (GL Hearn Economic Needs)

Table 5.2 Estimated change to the economically active population (2021-38) – Isle of Wight

	Economically active (2021)	Economically active (2038)	Total change in economically active	% change
Delivery constrained (IPS – 486 dpa)	66,323	66,031	-292	-0.4%
Standard Method (665 dpa)	66,323	69,532	3,210	4.8%

Source: Derived from demographic projections

SUMMARY

4.14 The 2024 SA does not explore the implications of the constrained housing target on the basis that delivering need in full is not a reasonable alternative.

Evidence paper C does discuss the impacts/implications of the Council’s choice, but this is unsupported by evidence because no work appears to have been undertaken to understand and contrast the population profile resulting from a constrained target. Given the Council is not meeting ‘need’ as calculated to address the Standard Method, older evidence, prepared to support the Standard Method, cannot simply be applied to evidence the lower, constrained target.

4.15 While the Council has presented little evidence re the implications of under-delivery there is a significant risk that trend-based migration continues to the detriment of Island residents. This risk does not appear to have been explored.

4.16 The limited demographic analysis in the ELR would confirm there is a cause for concern – even with adjustments to older age economic activity rates, and fewer homes than now proposed, the size of the economically active population falls.

4.17 While the ELR has not presented the profile of the population alongside a lower housing target – with a declining economically active population the age profile of the Island will be aging and the IOWC should look to quantify this and thoroughly assess the implications through a robust SA process.

4.18 IOWC council appear to have taken concerns regarding a lack of labour on the Island, and skilled labour, as a justification to constrain delivery looking forwards. Whereas this strongly supports the case for more homes (to house a larger supply of labour) and a increased flow of housebuilding to train and retain a labour force on the island and better develop economies of scale.

5. SUMMARY & CONCLUSIONS

- 6.1 The Council has estimated future housing delivery by projecting forward past trends – suggesting that delivery was maximised in the past and there is no route, following the NPPF, to sustainability boost supply.
- 6.2 In our view any assessment based on past trends cannot be robust and especially where the past trend period being analysed reflected a ‘failed’ development plan – a plan that did not provide sufficient land and, as a result, the Council has relied on the Tilted Balance.
- 6.3 We cannot estimate what would have been delivered had the 2012 plan been reviewed in a timely manner. But given keeping plans up to date is a core element of an efficient planning system, and new allocations de-risk development, the lack of a plan calls into question the relevance of the past trend analysis.
- 6.4 A reliance on past trends is even more concerning given that more new homes would be needed even if the UK population was not growing. By planning for past trends, no allowance is being made to accommodate an aging population which will, unless addressed, have clear social and economic implications.
- 6.5 A major concern is that the Council does not appear to have developed a robust understanding of what its population would look like if sufficient new homes are not delivered, and instead relies on scenarios developed only on the understanding need will be met in full.
- 6.6 A very limited view of the implications of delivering fewer homes is presented in the Employment Land Review. This demonstrates that with 489dpa, the size of the labour force falls. While the full data is not presented, this still confirms that constraining housing delivery results in very different profile of the population that has not been tested elsewhere.
- 6.7 While we understand there are a number of challenges facing the Island’s housing market, neither the University of Plymouth nor Three Dragons confirm a ‘cap’ on delivery. Both suggest a number of actions including making new land allocations.
- 6.8 As regards the Island’s ability to make new land allocations, there is no assessment of the Island constraints undertaken in line with the NPPF and footnote 7, and no evidence that other policies that may constrain land have been flexed to boost housing supply.

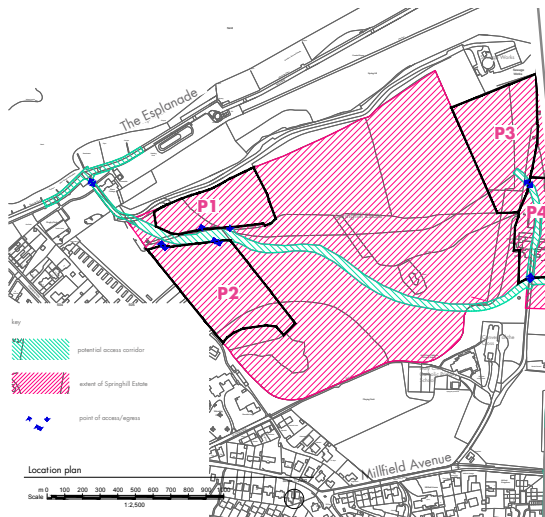


Springhill Estate parcels P1 to P4

The significance of the Springhill landscape lies principally in the fact that it formed part of one of the several estates on the Isle of Wight that were developed and owned by members of the English aristocracy in the 18th and 19th centuries. Springhill House itself is a 19th century replacement building formerly used as a Convent. Parcels 1, 2 and 3 are all located within the Springhill Estate in the peripheral pasture zone of landscape characterisation as set out in the Landscape and Visual Impact Assessment (Sept 2021) within the Wight Character Area. Parcels 1 and 2 abut the East Cowes settlement boundary and Parcel 3 is immediately to the south of the Southern Water pumping station. The ground rises from 7m near the Esplanade to 43m AOD at Springhill House itself. The East Cowes Esplanade Conservation Area is generally at 7m but rises to approx. 20m at the southern edge of the woodland, within the Conservation Area. Access to all three parcels would be via an easement which the Springhill landowner has with Southern Water and, where two lanes are needed, on land in the Springhill Estate's ownership.

Although the Springhill Estate is a locally listed landscape, Parcels 1, 2 and 3 are all visually enclosed by the strong structure of hedgerows. All three lie on former and current pasture land, the product of agricultural practice that has not shown any evidence of deliberate design. The key characteristics of this zone are "grassland pasture, subdivided by hedgerows with mature trees. Gently sloping ground, generally discrete and enclosed with glimpsed views in high places to higher ground. Western edge views into the caravan park through the treebelt. Medium - low sensitivity". (See the excerpts attached from the Norris Estate Resort Landscape and Visual Impact Assessment (2021), the Heritage Impact Assessment (2021) and Verified Views and Visibility Study (2023), documents that were submitted when the Springhill Estate formed part of the site for the Norris Estate Resort application (refused principally on grounds that the resort proposals caused "substantial harm" to the significance of Norris's group of 3 Grade 1 and 8 Grade II designated heritage assets.)

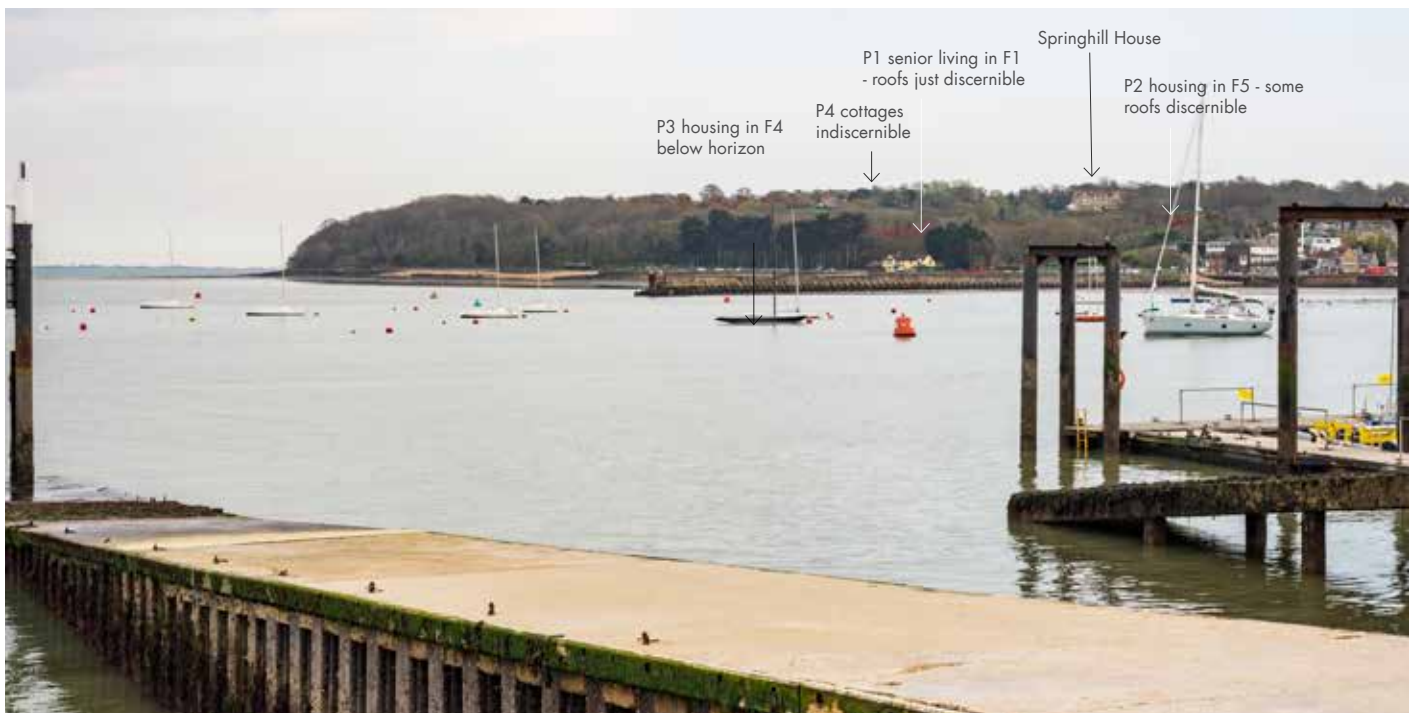
P4, the Springhill Farm site, is in a residential and school use area, influenced by those uses and fallow fields. The land is discrete and enclosed by a mature treebelt. Low sensitivity. Springhill Estate contains some veteran trees, but none are in the proposed residential sites. However the hedgerow structure to the fields at Springhill is well defined creating a series of strong enclosures which could contain any future development. Verified views show that at year 1 the development as illustrated here (with the photograph taken from East Cowes Esplanade) would be barely discernible in the view and would leave the open views to Springhill House undisturbed. Laid out as illustrated, the four parcels would contribute 137 sustainably located dwellings broadly in the mix that the Reg 19 IPS seeks at policy H8.



Springhill Estate locator plan



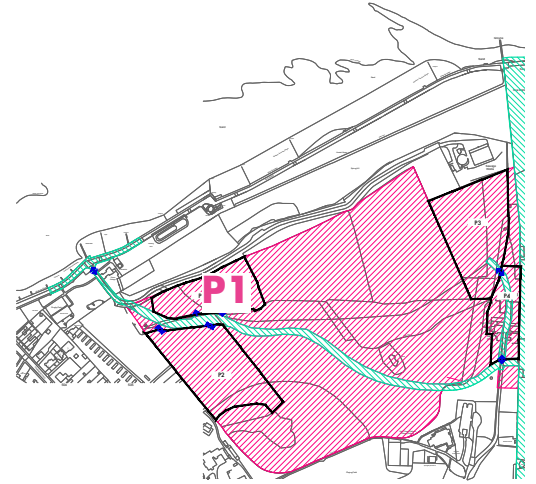
Springhill Estate landscape character



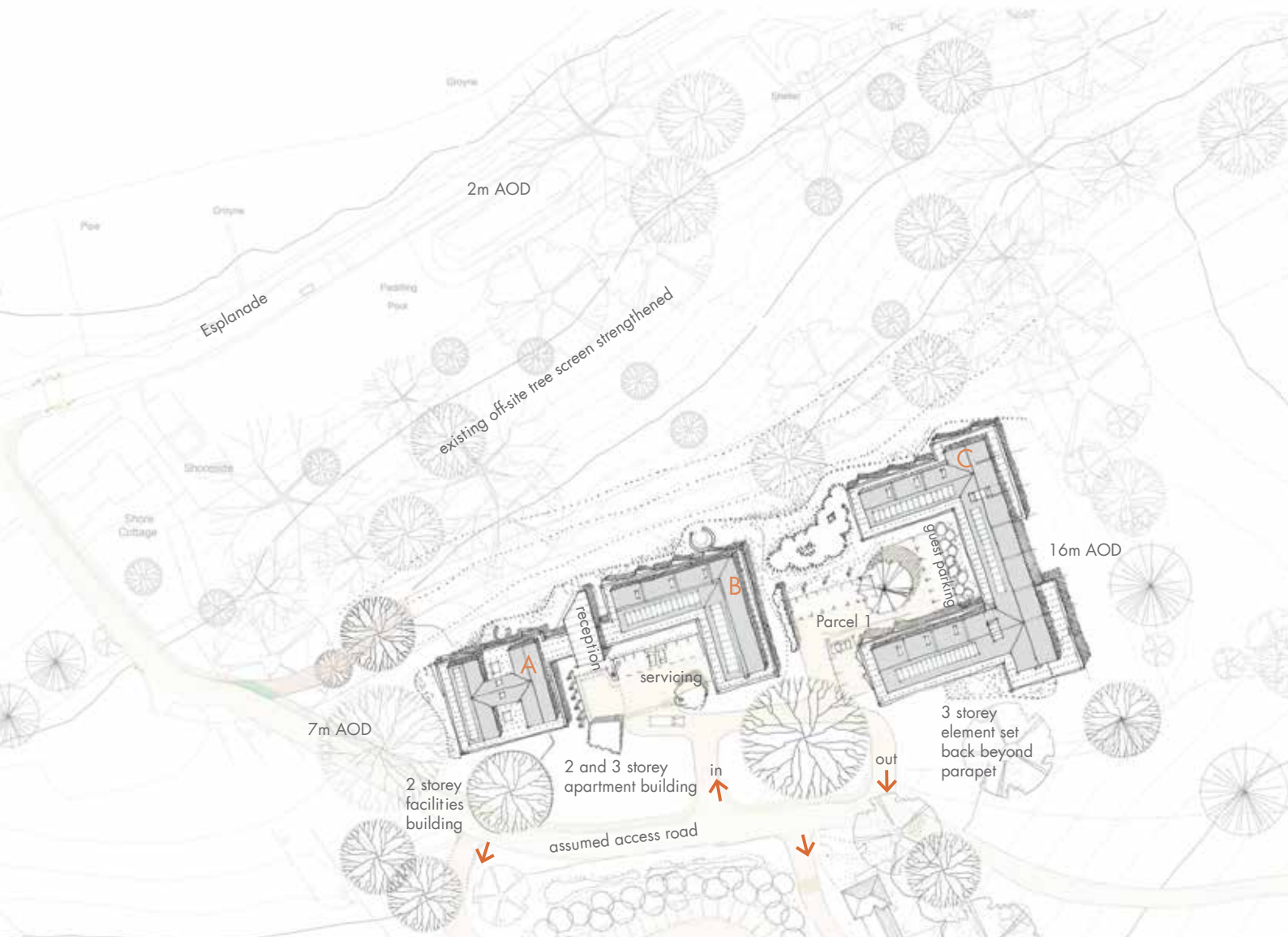
verified view from West Cowes Esplanade after first year

Springhill - Parcel 1

The illustrative drawing shows senior living accommodation within two blocks of two and three storey buildings, arranged on the Site to avoid the root protection zones of significant trees, hedgerows and any other set back lines. The westerly building is suggested as amenities and treatment rooms for the residents, primarily in a 2-storey block, but on the eastern side of it is a suggested L-shaped building which is 2 and 3 storeys, primarily apartments where the top (second) floor is set back, reducing the scale. The easterly building is, again, a 2 storey U-shaped building with a set back third floor, giving potential views from these apartments but without the impact of a typical 3-storey building.



P1 .71 ha/ 1.75 acres approx.
potential density 77 dph approx.

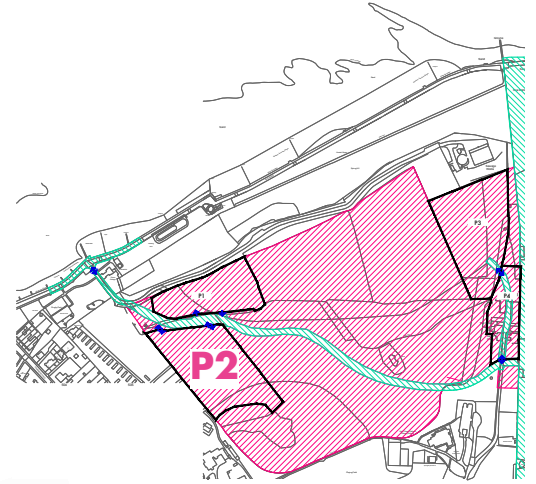


Parcel 1 - possible layout for senior living

Springhill - Parcel 2

Parcel 2, near the entrance from the Esplanade where the proposed access road is two lanes, will accommodate a small residential development of up to 40 dwellings to serve the local community that meets the ambitions of the Reg19 IPS Policy H8. The residential mix will be to Isle of Wight standards. This housing and its playspace is absorbed into the landform and its contours with 'fingers' of new woodland extending into this curvilinear shape to create an enhanced landscape screen. The existing, thickened, boundary/hedgerow planting would be a considerable biodiversity and visual enhancement to W10.

It is assumed that a water catchment swale will need to be provided on the northern edge of the residential parcel and that space will be provided in the north western corner for play. This indicative design provides for perimeter blocks with appropriate garden lengths. The houses overlook public spaces, and parking to the Council's standards is provided within an enhanced and augmented landscape boundary treatment to strengthen the existing landscape structure of this part of Springhill.



P2 1.07 ha/ 2.6 acres approx.
potential density 37 dph approx.



additional woodland to absorb development into woodland structure

parking and residential built into contours

up to 40 houses/apartments to loWC's dwelling mix, parking and playspace standards

residential, landscape and playspace proposals up to circa 40 units

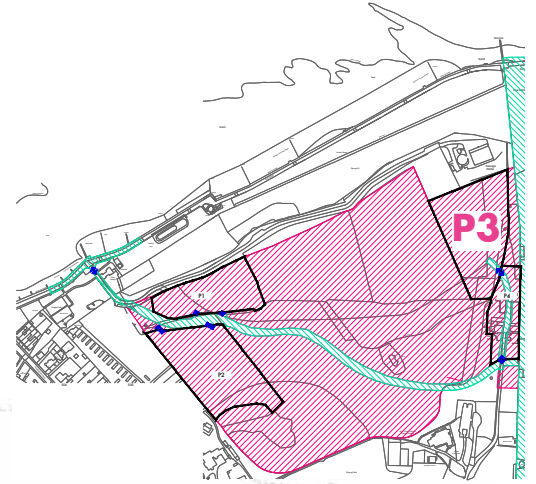
P2

play

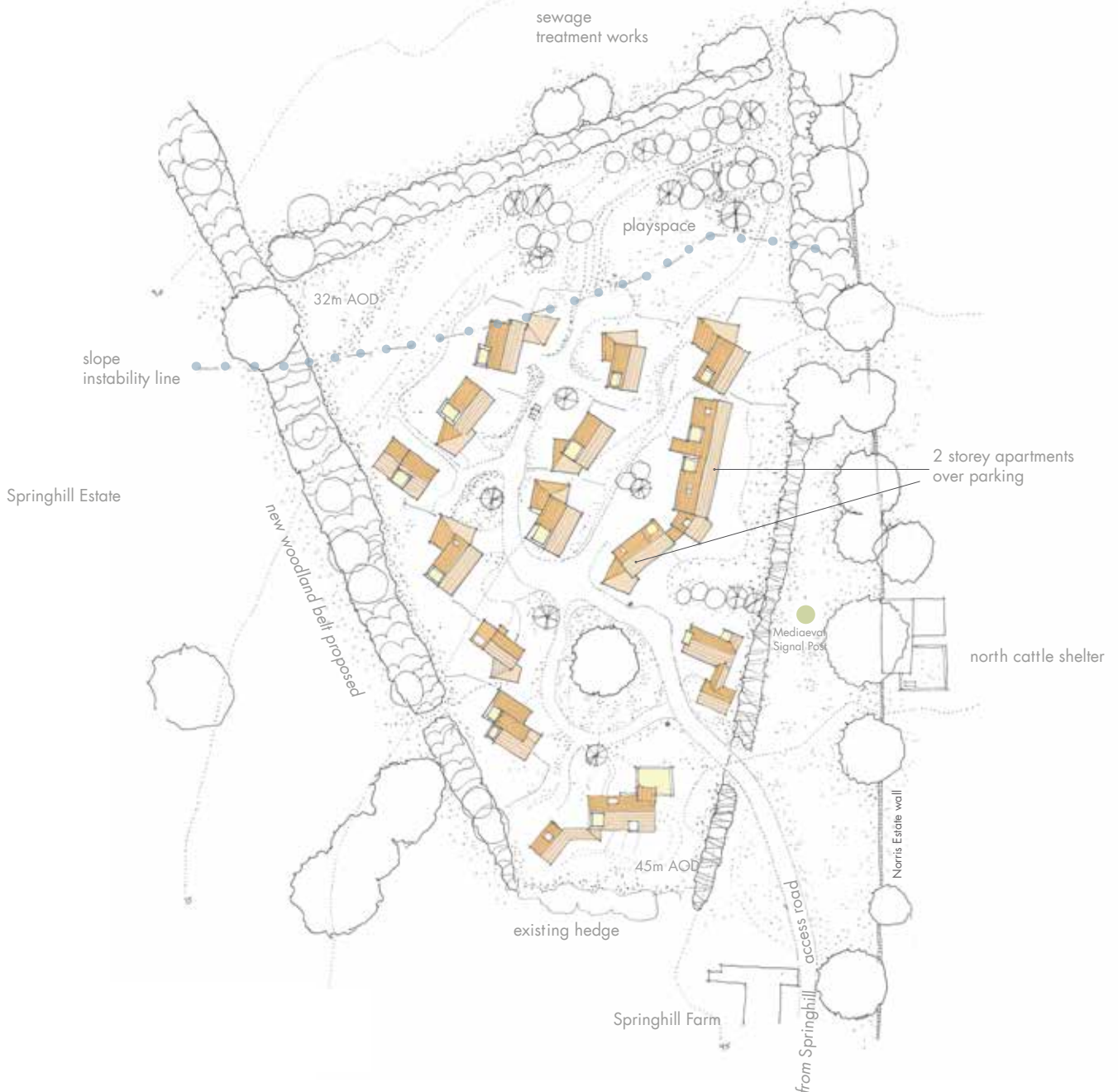
infrastructure, landscape and layout to respect topography and rising ground

Springhill - Parcel 3

The layout proposes up to 30 dwellings within a larger area of land where the development avoids the unstable land to the north. All two storeys except where carparking for apartments is incorporated into the residential element, taking advantage of the slopes. All are laid along the contours with larger houses occupying more space focused on the retained oak tree. The access road will connect to the access drive passing through Springhill and Springhill Farm. None of the houses focus their views on the sewage works, but instead have oblique views through gaps in the trees to the north west. To the west significant new woodland and hedgerow planting is proposed.



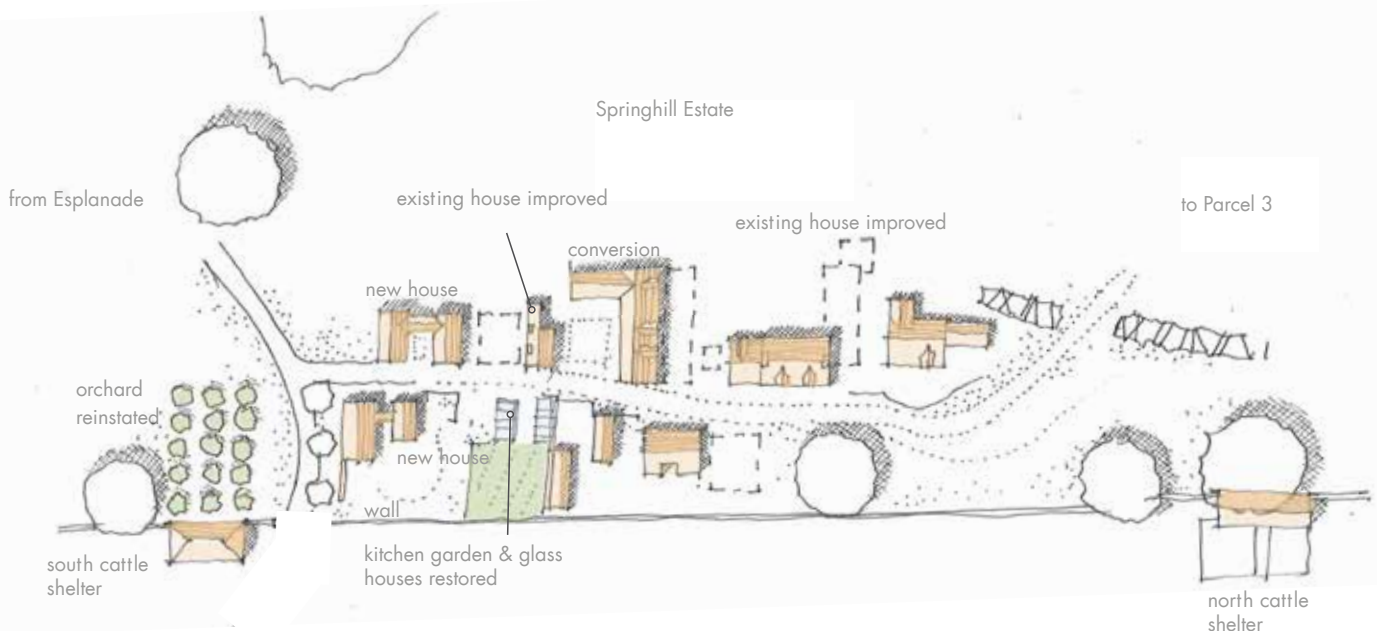
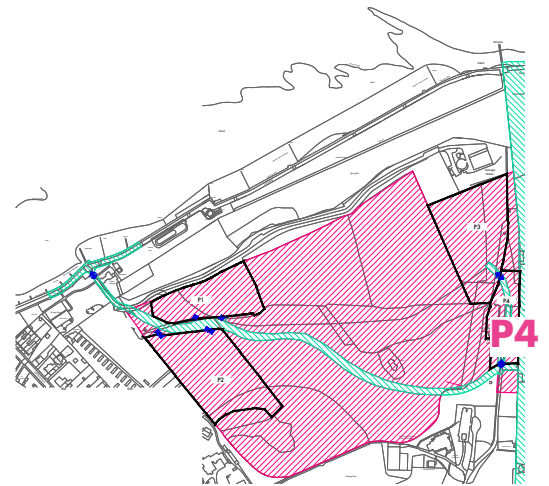
P3 .68 ha/ 1.68 acres approx.
potential density 17 dph approx.



Parcel 3 - market housing: 2, 3 and 4 bedroom dwellings

Springhill - Parcel 4

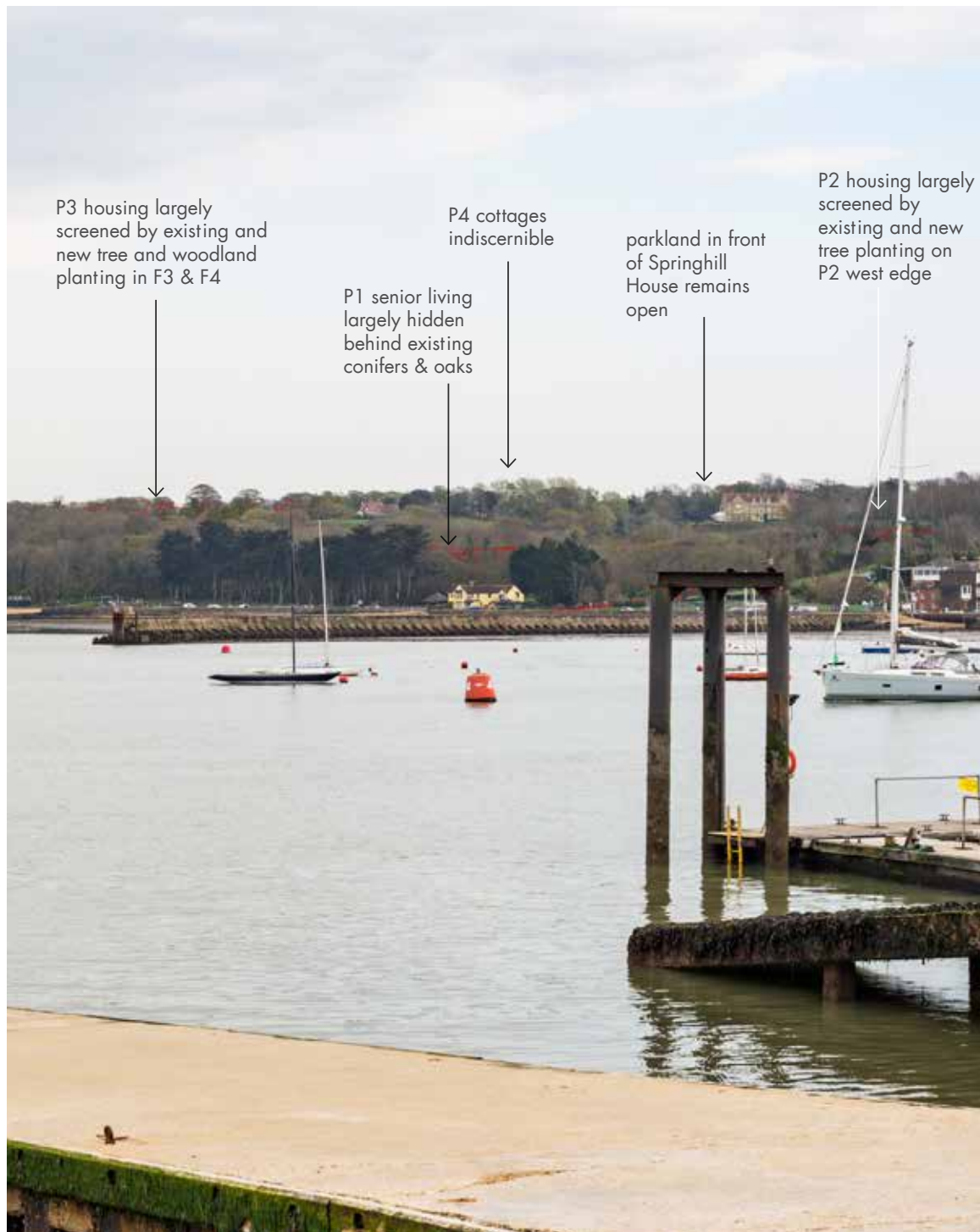
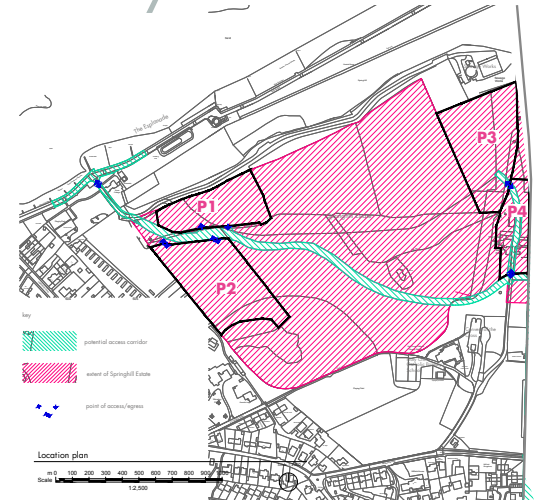
Springhill Farm Parcel 4 is a small group of buildings based around the practical running of the farm which had served the Springhill Estate. Several of the buildings about the Norris Estate Wall giving the hamlet a linear quality which is broken into a series of enclosures by greenhouses, walls, the form of existing houses and derelict barns which run perpendicular to the wall. Many of the buildings have been treated unsympathetically and there are large scale extensions and formerly agricultural buildings which are no longer needed. The kitchen garden is derelict as is the orchard to the west. The proposal removes inappropriate extensions, improves existing buildings, inserts new buildings where possible, and converts former agricultural buildings such as the stable block to residential use. Allowing for the removal of some buildings this will create up to 12 dwellings. The orchard and kitchen garden would be restored as an amenity for the immediate community.



Parcel 4 consists of old and new buildings in a sequence of spaces; existing buildings would be improved, bad extensions removed, heritage assets respected and the orchard and kitchen garden restored. The precise yield depends on detailed appraisal of the buildings and conversion plans. Initial appraisals suggests a total of 12 new units as 2 bedroom flats in conversions, and 3 and 4 bedroom houses as new build. The proposal consolidates and respects the farm characteristics of the existing core buildings.

Springhill - parcels P1 to P4 potential yield

	approximate area	potential yield	proposed mix
P1	.71 ha	55 units	senior living: mainly 2 bedroom apartments plus some individual rooms
P2	1.07 ha	40 units	Isle of Wight standard mix: 2 x 1 bed, 12 x 2 bed, 16 x 3 bed, 10 x 4+ bed
P3	.68 ha	30 units	a range of 2 bedroom apartments, 3 and 4 bedroom houses
P4	not relevant	12 units	as determined by existing buildings/conservation requirements
	total units	137 units	



ASSESSMENT OF SIGNIFICANCE

THE NORRIS CASTLE ESTATE, ISLE OF WIGHT

JCH01152
Norris Castle Estate
Norris Castle Estate (Group) Ltd
October 2021

4.11 THE SPRINGHILL ESTATE

Description

- 4.11.1** The Springhill Estate is located to the west of Norris and parts of it lie within the Site. It is locally listed and is therefore a non-designated heritage asset, which is of sufficient significance to warrant consideration in the planning process. The Isle of Wight Gardens Trust has undertaken research and assessment for Springhill, which has included an Inventory of the Estate produced in 2019.
- 4.11.2** The estate was laid out by William Goodrich in the late 18th century. Goodrich was a privateer, who left the Americas after the American War of Independence and established a shipping business in Bristol. He worked closely with his brother-in-law Robert Shedden who travelled to Bristol at the same time and the two went into partnership together as merchants. Goodrich established the Springhill Estate in the late 18th century and it passed into the ownership of Shedden in 1812, before being passed to his son, George, in 1826 at the time of Robert's death.
- 4.11.3** The original estate covered a large area of land on the north coast of the island, sat between East Cowes to the west, and Norris Farm (which was yet to be purchased and transformed by Seymour) to the east. However, unlike at Norris there does not seem to be any conscious design intent to transform the landscape.
- 4.11.4** The estate comprised Springhill, a large house set on a plateau at the south-east extent of the estate enclosed by planting, which was approached from the south. The southern approach was marked by a modest lodge, with a second estate entrance on the shore at the north-west extent of the estate. There were a small number of farm buildings to the north of Springhill, with the majority of the remainder of the estate formed by large pasture fields. There is little evidence on historic mapping of any deliberate design interventions or planned changes, although a productive garden including a small vegetable garden and orchard were developed within its eastern extent. The remainder of the land was primarily used for grazing (the vast majority of the estate is recorded in pasture use in the 1844 Whippingham Apportionment) and comprised large field parcels, with sporadic planting. This was confirmed by Historic England who stated in their designation report that there was a "limited level of design intervention to the existing landform". This meant that the landscape worked within the existing field boundaries and planting to create a modest seaside estate and farm. Existing mature oaks were also incorporated into the landscape, with many of them still surviving today.
- 4.11.5** In contrast with the neighbouring estates at Norris and East Cowes Castle, the Springhill Estate appears to have remained more visually



Figure 46: Springhill House, most recently used as a convent, is set in a commanding position overlooking the parkland and the Solent beyond.



Figure 47: A view south from the elevated land within the Springhill Estate. The elevated land permits views of the Solent, beyond the established hedgerow. These views all appear to be incidental and no formal views were incorporated into the original landscape, in contrast to both Norris and Osborne to the east.

enclosed with a dense woodland screen enclosing the majority of views to the Solent. The carefully controlled views to the water provided at Norris were not replicated within Springhill, although some views are provided from the southern, elevated parts of the Springhill Estate. This would have provided views to the Solent from the residential buildings, with the lower parts of the Estate, which were used for grazing, more enclosed and therefore sheltered from the wind, which would have aided the agricultural function of this land. The northern extent of the Estate (which ran to the shoreline) was donated by George Shedden to the people of East Cowes in 1924. This allowed the construction of the eastern part of the Esplanade.

- 4.11.6** The southern part of the Springhill Estate, including the land west of the Convent, is gently sloping and has a more open "parkland" character, with the land to the north subdivided into smaller fields, often with very limited views between them due to the mature hedgerows which mark the field boundaries.
- 4.11.7** The eastern extent of the estate has a more domestic character and scale. The land between the buildings and the eastern boundary of the Estate are depicted on the 1863 and 1864 OS Maps as being more formally laid out and cultivated. Remnants of this survive today, with a modest walled kitchen garden, including a partially standing glasshouse, to the north and a larger orchard to the south. Although these have suffered from poor maintenance and have fallen into disrepair, their historic use remains visible today. The southern extent of the land was used during the 20th century as the cemetery for the neighbouring Convent and is enclosed by a tall wall.
- 4.11.8** There have been some changes to the Springhill Estate over the course of the 19th and 20th centuries, the most notable of which was the demolition of the original principal building and the construction of a new Springhill house in the mid 19th century house in a broad Tudor-revival style. The house itself has been further altered and is not listed. There have been further changes within the estate including the amalgamation of field parcels, loss of historic routes and construction of new buildings, including large agricultural sheds to the north-east and the School of the Holy Cross next to Springhill House.
- 4.11.9** The buildings within the Springhill Estate are not identified on the Isle of Wight's Local List. They include the Victorian Convent (which is located outside of the Site Boundary) and a series of modest farm buildings. The Convent was originally constructed in the 1860s by Thomas Burrell and replaced an earlier building within Springhill. Named Springhill House, it was a grand dwelling constructed in a simple, Gothic-revival style popular in the mid 19th century. It is a

4.11 THE SPRINGHILL ESTATE

double pile building with steeply pitched roofs, tall gables and chimney stacks providing a degree of verticality. The building has seen various alterations in the 20th century to respond to its use as a convent. It is now vacant.

4.11.10 The farm buildings to the north appear to have originally been constructed as part of the initial development of Springhill by Goodrich. A simple courtyard of buildings are shown on the 1844 Tithe map in a similar location to those seen today. They comprised a farmhouse, to the north, and a large U range of buildings, likely barns, enclosing a large courtyard.

4.11.11 The buildings have subsequently altered to serve residential uses and there is evidence of numerous unsympathetic 20th century alterations. This includes the addition of poor-quality extensions, replacement of windows and loss of architectural features.

4.11.12 These buildings, despite their unsympathetic alterations, collectively assist in demonstrating the development of Springhill as a modest agricultural estate overlooking the Solent.

Significance

4.11.13 An application to register the landscape was considered by Historic England in 2019. However, Historic England took the decision that it was not of sufficient interest, and the land was not registered. The reasons for this, given in the Assessment Report undertaken by the designations team, were:

- *Level of Historic interest:*
- *the level of survival of the original layout of the late-C18 and early C19 Springhill park and garden, which had a relatively modest level of landscape design intervention, has been negatively affected by later developments within the former grounds, and the loss and modification of early landscape features;*
- *the involvement of William Goodrich, Robert Shedden and the Shedden family is of local rather than national interest for its association with prominent C18 and C19 local figures, and the connection with Cowes and international trade at this time.*

Level of Group value:

- *Springhill has good group value with other coastal estates on the northern tip of the Isle of Wight, including the registered landscapes at Norris Castle (Grade I) and Osborne House (Grade II*), where highly graded listed buildings are also located. However, this group value is not of sufficient interest in its own right to raise the level of historic interest of the estate in the national context."*



Figure 48: The farmhouse within the Springhill Estate.



Figure 49: The remnants of the kitchen garden, located to the south-east of the farmhouse.

4.11.14 However, the estate is considered by the Isle of Wight Council to be a locally listed landscape and therefore represents a non-designated heritage asset, as defined by the NPPF. This means that, while the landscape is not registered or of national importance like the neighbouring Norris Castle Estate, and therefore is of lower sensitivity than the remainder of the Site, it is still considered to be of sufficient significance to merit consideration in decision making (and place making) and the significance and sensitivities of the Springhill Estate have been considered throughout the design process.

4.11.15 Although it has been recognised by Historic England and the Isle of Wight Council as being of local interest, it is a landscape that originally provided very little evidence of any deliberate design, planting or landforms. It presents a poor contrast to the carefully considered Norris Castle Estate to the east and the more formal grounds of Osborne further east. The extensive alterations during the 19th and 20th centuries, which have included the demolition and reconstruction of the principal building, the amalgamation of field parcels, loss of approaches and modern interventions, including the provision of hard standing and large agricultural buildings, have further degraded the limited significance of the landscape.

4.11.16 Springhill represents the area of lowest significance and sensitivity within the entire Site. It is not a designated heritage asset, nor does it form part of a designated heritage asset. Its significance is primarily derived from its historic interest and associations with Goodrich and Shedden. As confirmed by Historic England, this significance is of a local order only. It does not represent a clear planned estate, with the original design largely incorporating pre-existing field parcels and any historic pleasure grounds or planned elements having been lost due to redevelopment or lack of maintenance. It therefore possesses very limited architectural and artistic interest and is of limited significance as a non-designated heritage asset.

4.11.17 The Springhill Estate shares some group value with the Norris Castle Estate, as part of a collection of 18th and 19th century grand seaside estates on the northern coast of the Isle of Wight.

HERITAGE IMPACT ASSESSMENT

THE NORRIS CASTLE ESTATE, ISLE OF WIGHT

JCH01152
Norris Castle Estate
Norris Castle Estate (Group) Ltd
January 2022

2.7 THE SPRINGHILL ESTATE

2.7.1 Outline planning permission is sought for the development proposed within the Springhill Estate (with the exception of the access road for the resort which is part of the full application). The Springhill Estate will be altered both through the introduction of new development and by the conservation and re-use of the existing Springhill Farm buildings. Much of the Estate is also included within the HLEMP which will ensure the on-going management and conservation of the landscape.

2.7.2 The principal access into the Norris Estate will be provided through Springhill, via a junction at the Esplanade. This will use the existing vehicular access into the water treatment works, which lies close to the historic secondary link between Springhill and East Cowes, which is depicted on 19th century mapping.

2.7.3 The alignment of the road will follow the contours and remain to the north of the more expansive parkland setting of Springhill, which represents the most sensitive area of Springhill. Development will be focused in 4 areas (see submitted plans for field references):

- Parcel F2: up to 25 C3 dwellings and overflow car park serving the resort
- Parcel F3: up to 17 C3 dwellings
- Parcel P4: up to 8 C3 dwellings in the redevelopment and conservation of the existing Springhill Farm buildings, conservation and reinstatement of kitchen garden and orchards and construction of new dwellings

2.7.4 The remainder of the landscape will be retained as pasture, with on-going management of the existing trees and hedgerows. Much of the woodland and some hedgerows have suffered from a lack of management and have been thickened by self-seeded growth. Selective tree removal and management of the trees within the Site will therefore be undertaken to respect the surviving features of the 18th and 19th century landscape. The high quality, mature trees within the landscape, which include a number of oaks that pre-date Goodrich's ownership of the Springhill Estate will be retained and protected.

2.7.5 The nature of Springhill is such that individual field parcels within the northern extent of the Springhill Estate are generally visually well contained and do not strongly relate to one another. This provides the opportunity to design individual, modest developments which respond to the characteristics of their immediate surroundings. The siting of development within Fields F1, F4 and F5 mean that they will not be widely visible from within the wider Estate and will be well contained.

2.7.6 The alterations to the historic Springhill Farm buildings represent the most sensitive alterations due to the higher significance of this part of the Springhill Estate and its proximity to Norris Estate to the east. The redevelopment here will include the retention and conservation of those historic farm buildings of the highest significance, namely the farmhouse itself and the surviving 19th century agricultural buildings to the south. The later extensions will be demolished, with small-scale new development constructed which responds to the historic courtyard and the characteristics of the area.

2.7.7 The landscape works within the Springhill Estate will also include the reconstruction of the kitchen garden, including the proving houses, and the conservation, management and where necessary re-planting of the orchard.

2.7.8 The access road for the Norris Estate Resort will also pass through part of the historic orchard. This will entail the loss of any surviving trees here and the demolition of a short stretch of the boundary wall to Norris. Simple pilasters will be constructed to mark this new entrance.

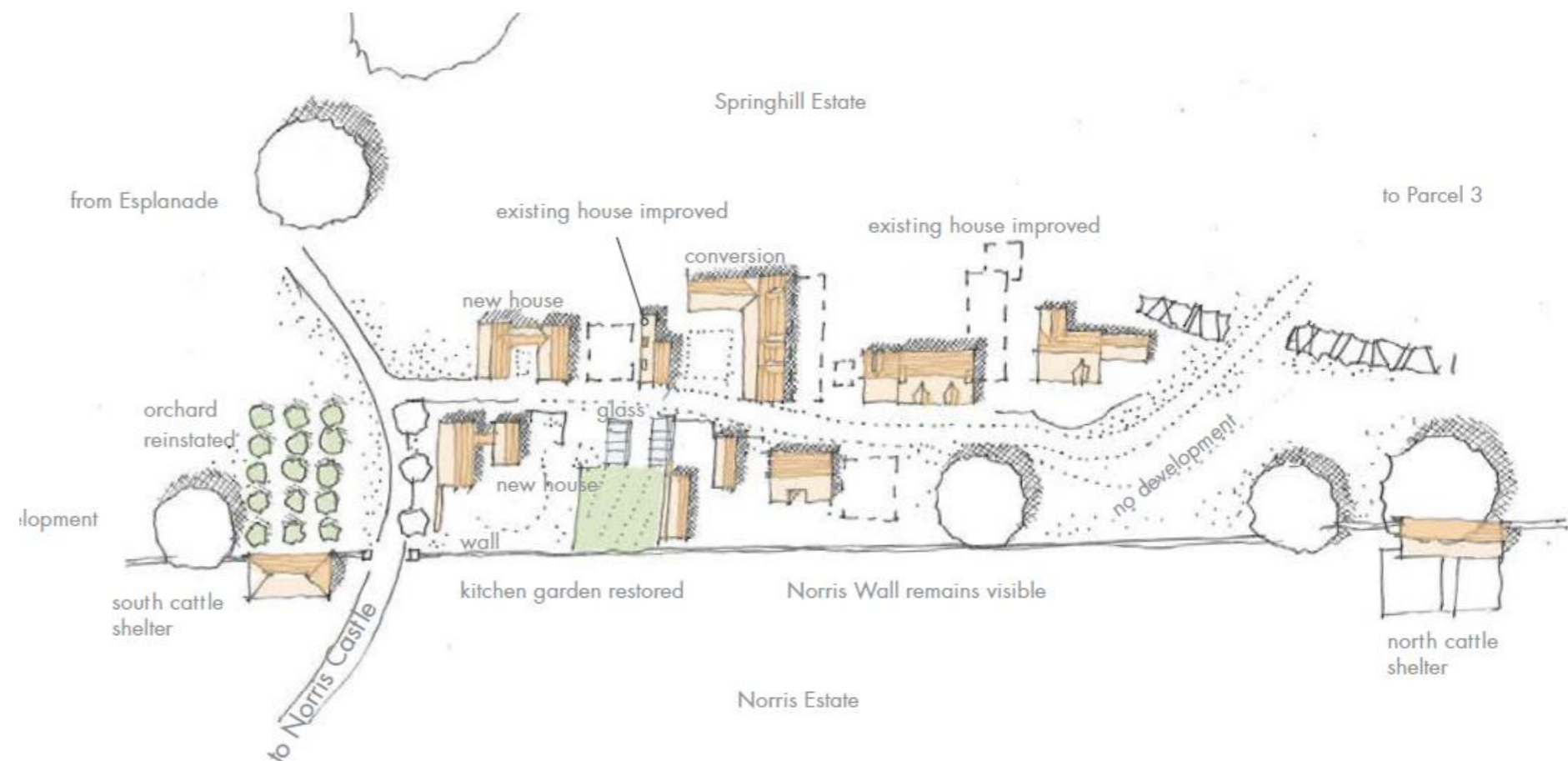
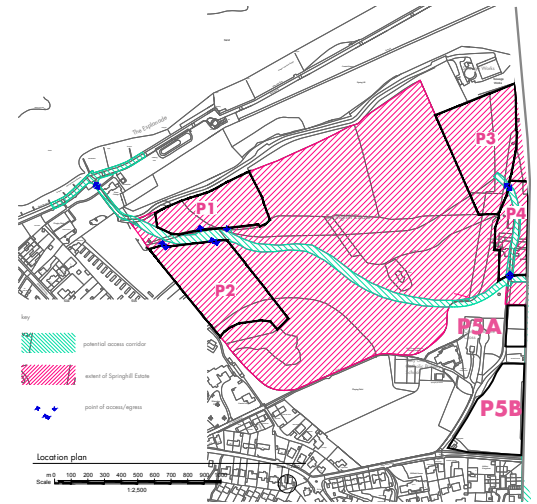


Figure 8: Springhill Farm proposed layout. Source: Rummey Design.

Springhill - Parcels 5A & 5B

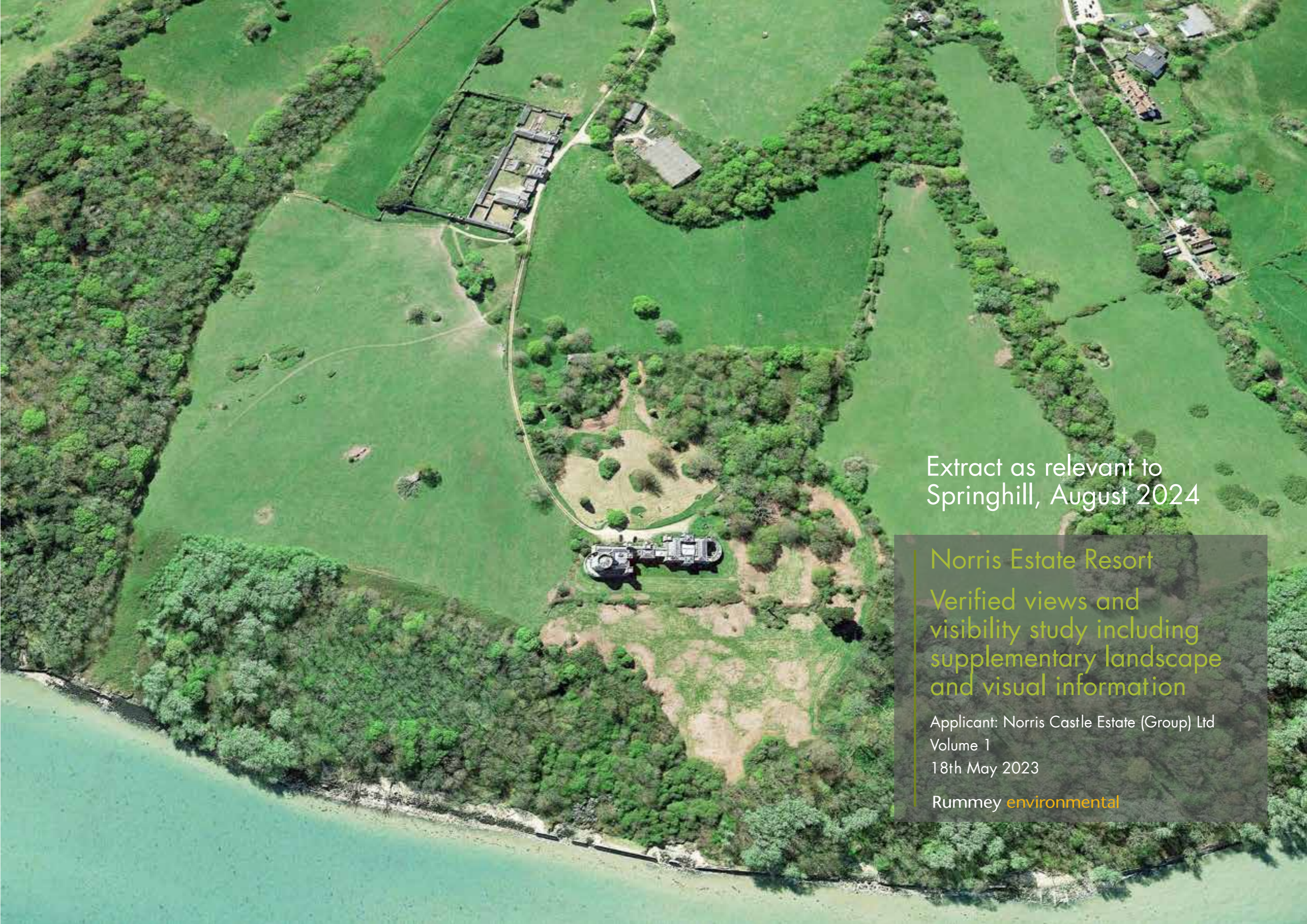
The site, P5, abuts the East Cowes settlement in the Millfield Avenue area and is a contained triangular relatively flat field to the west of Norris Estate and to the south of Springhill House. It carries no designations and is bounded at the south by Millfield Avenue and to the west, along its length, by a private road. The site area (two parcels A and B) is in total approximately 1.049 ha. Allowing 10% and 18% non-developable land for trees which abut the site and some of which are included in the site, gives a potential developable land area of 0.875 ha. A density of 45 dwellings per ha produces a yield of 39 dwellings. This will be variable across the site; smaller mews and 'almshouses' could be located in the vicinity of Springhill House with a lower density of family oriented houses to the south of the site closest to Millfield Avenue, but including a small number of 2 person apartments. There is a copse of trees which contains the southern curtilage of Springhill House and this is not included in the site area.



	approximate area	potential yield	proposed mix
P5A	.189 ha x 90% = .17 ha	9 units	small mews/'almshouses', predominantly 2 person dwellings
P5B	.86 ha x 82% = .705 ha	30 units	some 2 person apartments, predominantly 3 & 4 person dwellings
	total units	39 units	

Proposed mix to be designed to fit Isle of Wight recommended mix, in aggregate.





Extract as relevant to
Springhill, August 2024

Norris Estate Resort
Verified views and
visibility study including
supplementary landscape
and visual information

Applicant: Norris Castle Estate (Group) Ltd
Volume 1
18th May 2023

Rummey **environmental**

Section 4: Visualisations

4. Visualisations

4.1 Methodology

- 4.1.1 This component of the document has been prepared by Andrew Martin Visualisation to explain the methodology used for producing Accurate Visual Representations (AVR's), also commonly known as Visually Verified Montages (VVM's) for the proposed Norris Estate Resort.
- 4.1.2 The methodologies described in this document are based on current best practice and follow recommendations from The Landscape Institute's "Guidelines for Landscape and Visual Impact Assessment" (3rd Edition 2013), and LI Technical Guidance Note 06/19 "Visual Representation of Development Proposals" (09/2019).
- 4.1.3 The viewpoints were specified in advance by Rummey Design after consultation with Isle of Wight Council and Historic England. The entities responsible for the preparation of the views set out in the following pages are:
- Photography and camera alignment
Arc Minute Ltd
62 Grove Park Terrace
London W4 3QE
Tel: 07774 857627
 - Survey of existing views and camera locations
Datum Survey Services Ltd
Brickfield Business Centre
Brickfield House
High Road
Thornwood
Epping CM16 6TH
Tel: 07977 111935
 - Production of verifiable images
Andrew Martin Visualisation
39 High Street
Lenham
Kent ME17 2QB
Tel: 07968 735845

4.2 Photography

- 4.2.1 The images are captured using a full frame 61 megapixel digital SLR and a 52mm lens (also 24mm lens but those photographs are not reproduced here) with a survey instrument grade (accuracy <0.02deg) levelling mount.
- 4.2.2 The surveyor was provided with reference photos of researched viewpoints and OS coordinates of the proposed viewpoint locations from which the photographs were to be taken.
- 4.2.3 The camera is mounted on a tripod at a nominal (+/- 100mm) height of 1.65m above the ground and high quality architectural photographic practice is used to capture the view. Standard operating procedure is to use a 24mm lens for close to medium views and a 52mm lens for medium to long distance views, employing shift where necessary as a vertical framing device to maintain 2-point perspective. Images are captured in RAW format and a photograph is taken of the camera in it's location.
- 4.2.4 Once the camera has been set up according to the above stages the scene is captured in a RAW format using standard professional architectural photographic practice.

4.3 Post-production

- 4.3.1 The RAW image is converted into a TIFF image and remapped to remove all lens distortion using a sophisticated lens calibration and rectification system. The image is then placed into a background template and further positioned so that the calculated position of the image's optical axis is aligned with the centre of the background, so that the resultant image is a geometrically accurate 2d reproduction of the scene.
- 4.3.2 The following data describing the camera and photograph is recorded as a text layer:
- Date and time
 - Camera OS Location
 - Camera OS AOD
 - Azimuth
 - Elevation

- Roll
- Focal Length
- Shutter
- Aperture
- Kelvin
- ISO
- Image size in pixels and mm
- Pixel size

4.4 Survey

- 4.4.1 A Leica Total Station is used to record a set of 15-25 3d coordinates within the view to a tolerance of +/- 2mm XYZ out to around 750m. These coordinates are aligned to OS using a Leica Viva GNSS system to a working accuracy of +/- 2mm Eastings and Northings and +/- 25mm AOD. Where a view is in a rural location and there are no fixed survey points then temporary survey targets are placed and the survey will be undertaken at the same time as the photography, as happened in this case.
- 4.4.2 Deliverables: The completed survey data was issued as follows:
- Microsoft Excel Spreadsheet comprising point numbers, co-ordinate data and descriptions.
 - JPEG copies of each photo with point locations and view-specific point numbers clearly marked.
 - AutoCAD DWG file containing 3D survey points with view specific point numbers.

4.5 Sea based views additional information

The OS coordinates of the proposed locations were pre-registered into a mobile phone navigation device and the boat operator used this to both position the boat and to remain on that coordinate as best as possible against the tide. The surveyors GNSS receiver was chronologically and spatially synchronised with the camera to record an accurate camera coordinate.

Section 4: Visualisations

Later in the day a series of fixed shoreline-based features were accessed (with some difficulty) and surveyed directly with the GNSS device and their locations recorded with a mobile phone camera for future reference in the alignment process.

4.6 3D model

- 4.6.1 The 3D model of the development has been built in accordance with the Architect's and Landscape Architect's supplied drawings, level of detail and instructions.
- 4.6.2 Due to the size of the site and spread of the viewpoints, the 3ds Max scene was set up in metres. The 3D model was then imported into the scene and its scale and location checked against an imported 2D CAD Ordnance Survey (O.S.) map extract of the site.

4.7 Camera alignment

- 4.7.1 The camera alignment values are calculated using a unique camera resection system that operates independently of 3ds Max. The data obtained by this process along with the OS coordinates are moved to a local point of origin to reduce their numerical size, and are related to the relevant eastings and northings of the site.
- 4.7.2 Camera alignment for the sea based views was obtained in the traditional manner using the 3ds Max viewport and as the camera coordinate and lens focal length we fixed, known values and lens distortion had been removed from the image, the only adjustments needed were in the camera orientation XY & Z values.
- 4.7.3 All data is then entered into a spreadsheet along with all other relevant camera and image data.

4.8 Viewpoint camera matching

- 4.8.1 A script is then run in 3ds Max to automatically set up 'Physical' cameras in a fully aligned state, render out survey points to verify the alignment and create a text audit summary of the data used.

- 4.8.2 Once the process of camera matching is complete, the 3D model of the proposed development has been accurately positioned within each of the existing views.

4.8.3 Output package:

- A high resolution layered tiff file with marked survey points and corresponding rendered objects as separate layers.
- Information describing the physical parameters of the camera and the time and date of the image capture.
- 3ds Max Physical Camera aligned to survey.
- A spreadsheet and DWG of survey points and camera coordinates in original OS and local coordinates.
- A photographic record of the camera in it's position.

4.9 Lighting

- 4.9.1 The 3D model is then ready for a lighting set-up using the Daylight System within 3ds Max. Because the time the photograph was taken is known, it is possible to input the information of the location and time to get an accurate skylight result corresponding to those when the photograph was taken. If the conditions were overcast, an appropriate overcast HDRi is used instead of the Daylight System to illuminate the scene with an accurate ambient light of the sky.

4.10 Rendering

- 4.10.1 The scene is then ready to be rendered – a process whereby the computer processes the 3D model into a 2D image at the same resolution as the original photograph. The 2D rendered image is saved as a 16-bit TIFF with its alpha channel, providing an accurate mask for use in the post production phase.

4.11 Post-production

- 4.11.1 Post production is carried out using the industry standard Adobe Photoshop to montage the verified rendered output into the original background plate for each view. Masks are created in Photoshop where the line of sight to the rendered image of the proposed scheme is interrupted by foreground

objects, enabling the proposals to sit in the **correct place with** regard to foreground objects. The rendered layer of the proposed scheme is then adjusted to have the correct brightness, contrast and colour balance so as to 'sit' in the image without looking alien. The result is an accurate and verifiable image/view of the proposed scheme in context.

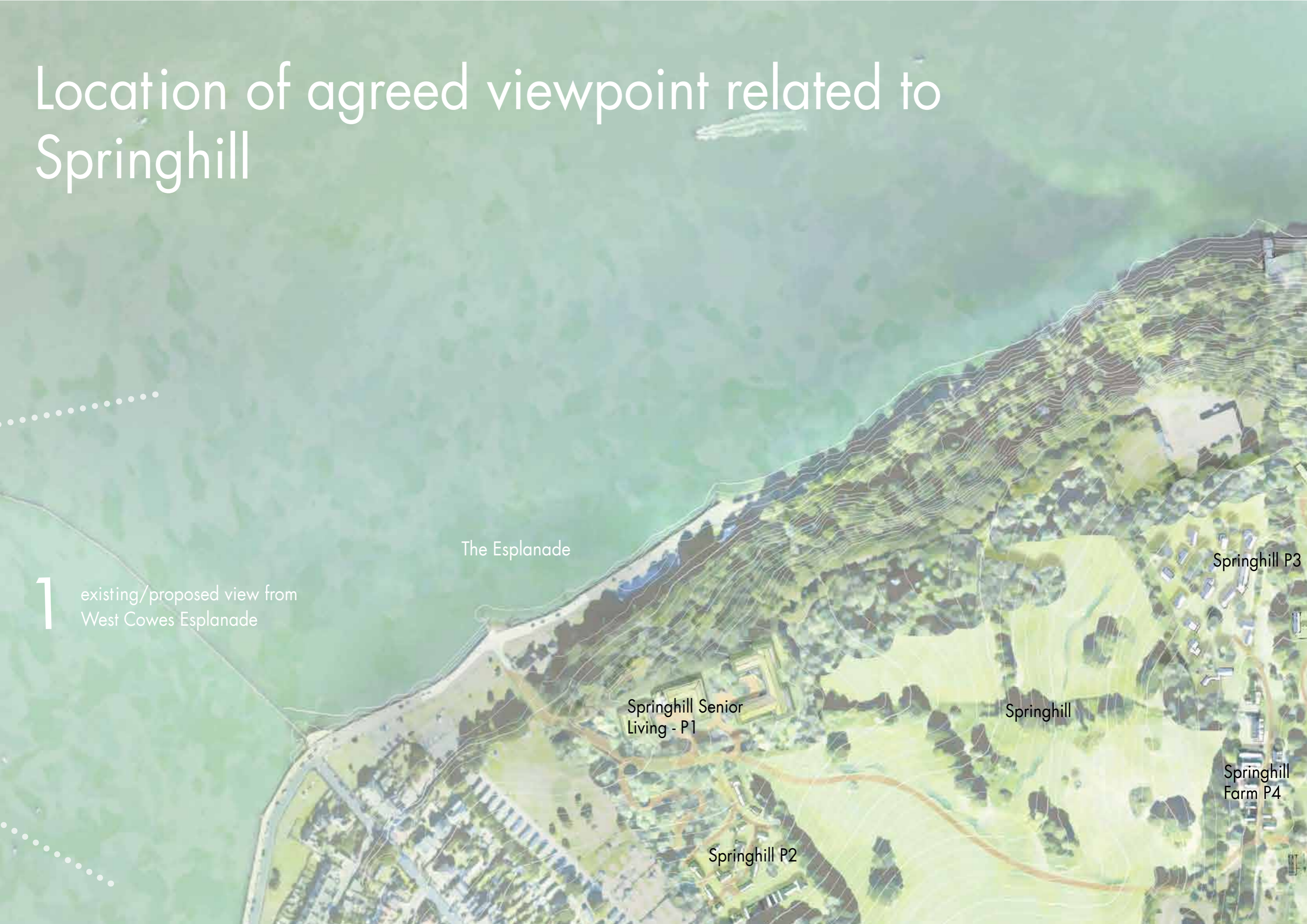
4.12 Assumptions and limitations

The following assumptions and limitations have been made with the 3D model, appropriate to the level of design information available at Masterplan stage for an Hybrid Planning application of this sort:

- The built forms of the 3D model are constructed to the level of detail supplied by the Architects (ie. Masterplan stage plus detail of the developments on the Norris Estate). There is no detail to the facades, etc, which results in the proposed development appearing more visible than is likely in reality; this level of rendering, i.e. wireline was agreed with the Statutory Consultees.
- Whilst parts of the application are in Outline (for example the residential components of Springhill), individual buildings have been modelled to give a reasonable representation of ground levels, roof slopes and therefore heights, eaves levels, etc to take account of the topography.
- The buildings are shown in wireline and so do not reflect the colours of materials that are likely to be used.
- The photographs were taken in April 2023, i.e. with some leaves on the trees. Some visibility through trees is discernible, so there is a 'median' screening from vegetation.
- The AVRs reflect the likely tree growth on site of proposed vegetation (at 1 year and 15 years), but do not reflect any growth of existing vegetation, either on or off-site.
- The AVRs assume that the development and planting in all views are completed at the same time and do not reflect any construction phasing included as part of the development programme.

Location of agreed viewpoint related to Springhill

1 existing/proposed view from West Cowes Esplanade



Section 4: Visualisations



Location of viewpoint 1



View 1 - existing view from West Cowes Esplanade

The East Cowes Esplanade, which is backed by conifers, lies between Springhill Estate and the Medina Estuary. Norris Estate lies beyond the ridgeline. Springhill House and Springhill Farm are visible on the high ground of Springhill Estate. The trees on the skyline mark the boundary between Springhill and Norris Estates and follow the line of the listed Norris Estate west wall. The existing listed Bathing House is at the extreme left hand side of the headland, at sea level.



Wireline of proposed development is modelled and superimposed on the existing verified photograph, taking no account of existing trees or proposed planting, in order to determine what development may be visible in theory. Development is shown in wireline including P1 housing in field F1, P2 in F5, P3 in F4 and P4 at Springhill Farm.



View 1 - proposed view at Year 1 showing visible development within retained tree structure and landform, with proposed structural planting. P1 senior living is set behind the existing woodland W9 above the existing house and will be barely discernible. Roofs of P2 housing may be partially visible through gaps in the existing tree belt along the site boundary, which is supplemented with new trees. P3 housing is set below the skyline and will be barely discernible within the existing vegetation structure. P4 farm cottages lie within the area of existing cottages and will be barely distinguishable within the existing building groups. Proposed cottages mostly sit behind existing buildings. All development is set below the treed skyline so no development breaks the horizon.



View 1 - proposed view at Year 15 showing visible development within retained tree structure and landform, and with proposed structural planting after 15 years growth. The proposed tree planting to strengthen the landscape structure will further integrate any visible development, especially P2 housing within Field F5 so that it is barely discernible by Year 15. The thickened boundary tree belt and tree planting around the proposed car park will particularly assist in this area of the site. The 'parkland' in front of Springhill House remains as open grassland. It is possible that a few roofs may just be visible above trees in P1 but, provided a recessive colour is used will be barely discernible within the mature tree structure. The Senior living P1 development will be barely visible.

Verified Viewpoint 1 is the same location as VP L3 in the LVIA described as: *'view from West Cowes Esplanade. The 4 storey Springhill House and the lower profile existing cottages on the upper slopes of Springhill Estate are just discernible. Mature tree belts form the horizon and layers of trees and hedgerows screen most of the fields on the site. The central slopes, in front of Springhill House, are discernible. Distance to site: approx. 1km'*

Summary:

P1 senior living is barely discernible within the existing vegetation structure and additional planting will sustain this screening.

P2 some market housing roofs may be discernible behind the treebelt along the settlement edge of West Cowes but will by Year 15 be integrated by additional woodland planting within the proposed car park and against the western site boundary.

P3 housing may be visible as roofs in Year 1 but no development will break the skyline. Providing that roof colours are recessive, these will be barely discernible by Year 15. The existing mature vegetation structure with supplementary planting will provide a high level of integration by Year 15.

P4 cottages are located within the existing cottage groups and will be indistinguishable from the existing built form at this distance.

No development within Norris Estate is visible in this view due to topography and existing mature vegetation.

The LVIA attributed medium visual sensitivity to receptors of this view. As the development is over 1km away and the proposed development is barely discernible even in Year 1, with proposed planting achieving further integration in Year 15, this photomontage supports the LVIA finding of No significant effect.

Conclusion

The open parkland, which is the setting in front of Springhill House, is retained in views. Foreground development, primarily P1, is set behind the dense, mixed tree screen to the north of that development parcel and the conifers along the Esplanade. The proposed 55 space overflow car park set within the contours of the land, with proposed new woodland, will largely screen P2, by Year 15 year making it barely discernible. P3 development is set below the skyline of the existing trees on the Norris boundary, and with retained trees and proposed planting will be barely discernible by Year 15. Any development within P4 for Springhill Farm is largely invisible in this view.