

From: [REDACTED]
To: [Policy Consultation](#)
Cc: [Planning - Policy](#)
Subject: Regulation 19 - Island Planning Strategy Consultation Responses - Jacton Properties
Date: 16 August 2024 13:52:11
Attachments: [image207693.png](#)
[image773829.jpg](#)
[image311751.png](#)
[image354589.png](#)
[image482317.png](#)
[image099391.png](#)
[Reg 19 form Policy G1 Our Approach towards Sustainable Development and Growth.pdf](#)
[Reg 19 form Policy G2 Priority Locations for Development and Growth .pdf](#)
[Reg 19 form Policy H1 Planning for Housing Delivery - Copy.pdf](#)
[Reg 19 form Policy H2 Sites Allocated for Housing.pdf](#)
[Reg 19 form Policy H8 Ensuring the right mix of housing.pdf](#)
[Reg 19 form Policy T1 – Supporting Sustainable Transport.pdf](#)
[Reg 19 form Policy C1 High quality design for new development.pdf](#)
[Reg 19 form Policy E1 – Supporting and Growing our Economy.pdf](#)
[Reg 19 form Policy EV10 Preserving settlement identity.pdf](#)

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Dear Sir/Madam

On behalf of my Client Jacton Properties, please find representations to the Regulation 19 IPS attached using the relevant forms

Please note, these refer specifically to my Client’s land interests at New Fairlee Farm, Newport.

If you have any queries or require any further information, please do not hesitate to contact me.

Kind regards
Angela

Angela Brooks MRTPI



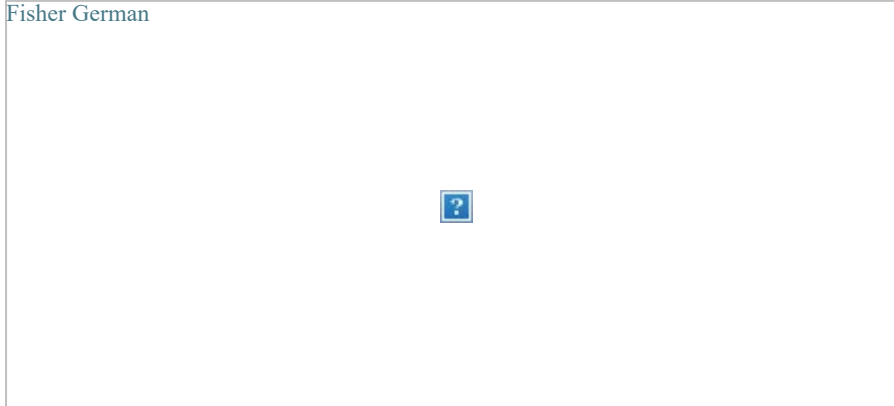
For and on behalf of Fisher German LLP



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Isle of Wight Council**Island Planning Strategy – Regulation 19 Submission version: COMMENTS FORM**

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Name/Organisation: *

Angela Brooks – Fisher German LLP

Email: *

[REDACTED]

Address and Postcode:

The Estates Office, Norman Court, Ashby-de-la-Zouch, Leics, LE65 2UZ

Telephone:

1) What type of respondent are you? *

(Member of the public, statutory consultee (excluding Councillors and Parishes) Business (Landowner and Developers), Councillor, Parish Council, other Local Authorities, Resident Group.)

Planning Agent on behalf of Landowner and Developer (Jacton Properties)

2) What policy are you commenting on? *

(Please complete a separate form for each policy you are commenting on)

Policy E1 – Supporting and Growing our economy

3)

Does your comment relate to a specific paragraph(s)? If yes which paragraph does this relate to? *

You are able to submit a separate form for each policy / paragraph you wish to comment on. If your answer to this question (no 3) is No please put NA in the text box below.

n/a -

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?*

(a plan is legally compliant if it is consistent with [national planning policy](#) and the council have complied with the [Duty to Co-operate](#))

Yes

No

5) Please give details to support your answer to question 4 *

Yes, consistent with national policy

Yes, complies with Duty to cooperate

No, Failure to comply to Duty to cooperate

No, not consistent with national policy

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

There are four 'tests of soundness' set out in [paragraph 35 of the NPPF](#) – (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy

Yes – Positively prepared

Yes – Justified

Yes – Effective

Yes – Consistent with national policy

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 is needed to make the Island Planning Strategy legally compliant and/or sound? *

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You can attach any files or documents with this submission. You should not assume that you will have a further opportunity to make submissions.

These representations have been prepared by Fisher German on behalf of Jacton Properties Ltd. in respect of their land interests at New Fairlee Farm, Newport, as illustrated in respect of Policy H2. Jacton Properties remain fully committed to bringing the land at New Fairlee Farm forward for development and are committed to liaising with neighbouring landowners in order to achieve this.

The land above forms part of a site known as 'Land at and adjacent to New Fairlee Farm' (Ref: HA040), which was previously identified in the November 2018 Draft Island Planning Strategy as a proposed allocation site.

The above site was included within the 2018 Draft Plan as a proposed allocation for a residential led mixed-use development. It was identified as being capable of accommodating at least 880 dwellings, a mix of green, open and recreational space, a range of small-scale community uses (which could include a multi-purpose community building and a convenience shop) and an improved road network including a park and ride hub. Representations were made that that time to support the proposed allocation of the site. The allocation was however removed in the previous Regulation 18 Consultation (July 2021). Representations were submitted on behalf of our client requesting the sites inclusion.

These representations respond to the current Regulation 19 Draft Island Planning Strategy 2024 which still has the site excluded from the Plan. As will be elaborated below, we believe that the allocation above should be reinstated within the Draft Island Planning Strategy.

Policy E1 sets out that the Council “wholeheartedly supports an environment where businesses have the confidence to invest”. And that it will therefore “support the sustainable growth of the Island’s economy and proposals that deliver jobs via a range of sectors while increasing local wages, skills and job opportunities”. The policy goes on to state that in order to contribute to achieving this, the Council will allocate a number of sites for a total of 29.2 ha of employment uses.

It is noted that the amount of employment land proposed to be allocated within the Submission Draft IPS remains the same as what was previously included within the 2018 Draft IPS. However, the quantum of housing to be delivered as been reduced significantly. In order to ensure that this amount of employment development positively correlates with available workforce. As was highlighted in our response to Policy H1, we believe the Council must ensure that sufficient housing land is also available to support this economic growth.

After this stage, further submissions may only be made if invited by the inspector, based on the matters and issues he or she identifies for examination.

9) Do you have any comments on the polices map? *

[\(click here to go to the Regulation 19 Island Planning Strategy Map\)](#)

N/A

10) Do you wish to request to appear at the hearing sessions that will take place? *

- Yes
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11) Please outline why you would like to attend? *

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(Please complete a separate form for each policy you are commenting on)

EV10: Preserving settlement identity

3)

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These representations respond to the current Regulation 19 Draft Island Planning Strategy 2024 which still has the site excluded from the Plan. As will be elaborated below, we believe that the allocation above should be reinstated within the Draft Island Planning Strategy.

Policy EV10 confirms the Council propose to identify 12 settlement gap areas. Within these areas the policy sets out that development in settlement gaps “will only be permitted if it can be demonstrated that there is no significant adverse impact on the physical or perceived separation between settlements, *either individually or cumulatively with other existing or proposed development*”. The reasoned justification which supports the policy however states that the list provided in the policy, and thus logically the areas identified on the maps, are not necessarily exhaustive.

Such policies whilst not specifically endorsed by the NPPF have been found sound elsewhere and there is no objection in principle to the identification of such gaps where appropriate, for example the Gap between West Cowes and Gurnard, particularly the northern part, which would appear to be an optimal location for such a policy, as would the gap between West Cowes and Northwood. The gap between Cowes and Newport is however not supported in its current form. Whilst the Council may argue that the policy does allow development subject to demonstrating that there will be no significant adverse impact on the physical or perceived separation between settlements, the identification of areas on the map, despite being non-exhaustive, does create a perception against development in that location and thus the Council are obligated to adequately justify such identification of land and the policy intervention provided which as a starting point excludes development in a way not consistent with the NPPF.

The Council's evidence on this matter is included within the Isle of Wight Settlement Coalescence Study. This provides a summary of the nature of the gap, guidelines for the maintenance of gap and a selection of viewpoints. There is no clear explanation as to why the area was drawn with the boundaries it was drawn with, i.e. why land within the area is considered to ‘function’ as forming part of the gap, whereas other land was excluded.

We consider the gap identified between Cowes and Newport is overtly and unjustifiably expansive, and the designation of such a large area may serve to dilute the impact of this designation within the most sensitive areas. We do not believe that there is any justification for inclusion of our client's land interests within the gap, nor much of the remaining land east of the A3054, and even potentially most of the land east of the River Medina.

The identification of settlement gaps should focus on areas which are most at threat and within which development would be particularly harmful on settlement coalescence (such as the examples listed above), or otherwise there simply is not a need for a policy intervention and it cannot be justified. As set out previously, we concur that some areas identified would meet this threshold and are entirely sensible. The identification of the vast swathe of land north of Newport is however not necessary because there is limited threat of coalescence, in actual or particularly perceptual terms. If there was an area to be drawn, this would logically be the area west of the Medina, as this is both where the gap is smallest, but also through which there is the most direct route between settlements, thus directly increasing the perception of development. This is a point largely coherent with the site specific guidelines as contained in the Settlement Coalescence Study, which focuses far more on the A3020 (Guidelines 1 and 4 specifically). For the land east of the Medina, the gap is far larger, and the key receptor, namely the A3054 and A3021 is an undirect route of circa 4.5km.

Notwithstanding the above, there is simply no justification for inclusion of our client's land, east of the A3054 as its service, if any, to the separation of Newport and Cowes, in spatial, physical or perceptive terms, is negligible. The submitted Landscape and Visual Appraisal concludes at Paragraph 5.4 that "*In terms of visual effects no medium (within 2km) and long-distance views (beyond 2km) are anticipated to be significantly adversely affected. The only views to be affected will be the near distance views from Public Rights of Way within the Site. However these could be mitigated by an appropriate landscape strategy which may reduce their affects to **Not Significant***". Given the local views referenced are seen in the context of being almost surrounded by Newport (as discussed below) and are thus localised in nature, as would any effect of development. There simply would not be any perception of the gap being negatively impacted through the development of the site, not would there be actual harm.

Given the spatial role of the gap as a whole is predicated on the north-south spatial separation of Newport and Cowes, it is noted that when considering our client's land interests at New Fairlee Farm (east of Newport), there is already significant existing development north of the site, including existing ribbon development on the A3054, Little Fairlee Farm and the significant Medina College campus. The housing and college campus in particular would be read as an extension of Newport to the north, thus any development to the south of this cannot be seen to play any tangible role in the spatial function of a gap in a manner which could be described as coalescence, actual or perceptual. Notwithstanding this, the area benefits from existing mature vegetation which limits both near and longer distance views, particularly from the A3054, but also on the public footpath which cross the site (N118). From locations where there is clear sight of Cowes, the existing built form as set out above is generally visible, thus an appreciation that Newport sits in the foreground, with open land beyond. There is therefore some argument that the land north of the collage and surrounding built form does play some, albeit limited, role in the gap. However, development south of this would clearly be read and function as part of Newport, thus would cause no harm to actual or perceived coalescence. The identification of our client's land, and wider in the area, is therefore not effective or justified, thus not sound and should be deleted.

Notwithstanding our concerns in respect of the identification of our client's land as part of the Cowes - Newport gap, we also do not believe that the evidence document is internally consistent with the policy direction proposed to be taken forward, thus not justified. The evidence provides guidelines for each gaps specific considerations to aid the determination of applications and does not seem to advocate for a 'one size fits all' universal policy approach. Paragraph 1.5 of the Isle of Wight Settlement Coalescence Study states that the document "*reviews potential local plan policy approaches to preventing settlement coalescence and puts forward a recommended approach*". Whilst the document still forms evidence and thus would be a material consideration and should inform application submissions and determination, it is to us inconsistent that the Policy approach, which is starting point for determination, does not reflect the site specific guidelines are not within the Policy, nor is there any reference to the need to adhere to guidelines within the Policy, which are far more specific and helpful than the approach intended for the Policy.

Policy EV10: Preserving settlement identity

For proposals within the following settlement gaps, consideration will be given to the function of the land and the impacts of the development on actual or perceived coalescence. Regard will also be had for the associated guidelines as contained within the Isle of Wight Settlement Coalescence Study;

- Cowes – Newport
- Cowes – Gurnard
- Cowes – Northwood
- East Cowes – Whippingham
- Ryde – settlements to the south
- Ryde – Nettlestone – Seaview
- Nettlestone – St Helens
- Brading – Sandown – Yaverland
- Sandown – Lake – Shanklin
- Freshwater – Norton Green – Norton
- Freshwater – Totland

9) Do you have any comments on the polices map? *

[\(click here to go to the Regulation 19 Island Planning Strategy Map\)](#)

See above

10) Do you wish to request to appear at the hearing sessions that will take place? *

Yes

No

11) Please outline why you would like to attend? *

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Planning Agent on behalf of Landowner and Developer (Jacton Properties)

2) What policy are you commenting on? *

(Please complete a separate form for each policy you are commenting on)

Policy 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? *

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These representations respond to the current Regulation 19 Draft Island Planning Strategy 2024 which still has the site excluded from the Plan. As will be elaborated below, we believe that the allocation above should be reinstated within the Draft Island Planning Strategy.

As will be detailed in our response to Policy H1 below, we believe this policy should be amended to remove reference to the delivery of an “island realistic housing requirement” over the plan period. Instead, we consider that the Council should deliver at least 703dpa (utilising the latest affordability ratio and 2024 as a base date in accordance with the PPG) (an increase from 668 since the last consultation), in line with the standard methodology for assessing housing need.

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Contact details:

Please complete your name and email address in the boxes below so that we can contact you if we require any additional information on any comments, you may have made, or you have shown interest in participating in a hearing session(s)

Anonymous comments will not be accepted.

Name/Organisation: *

Angela Brooks – Fisher German LLP

Email: *

[REDACTED]

Address and Postcode:

The Estates Office, Norman Court, Ashby-de-la-Zouch, Leics, LE65 2UZ

Telephone:

[REDACTED]

1) What type of respondent are you? *

(Member of the public, statutory consultee (excluding Councillors and Parishes) Business (Landowner and Developers), Councillor, Parish Council, other Local Authorities, Resident Group.)

Planning Agent on behalf of Landowner and Developer (Jacton Properties)

2) What policy are you commenting on? *

(Please complete a separate form for each policy you are commenting on)

Policy G2: Priority Locations for development and growth

3)

Does your comment relate to a specific paragraph(s)? If yes which paragraph does this relate to? *

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n/a -

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?*

(a plan is legally compliant if it is consistent with [national planning policy](#) and the council have complied with the [Duty to Co-operate](#))

Yes

No

5) Please give details to support your answer to question 4 *

Yes, consistent with national policy

Yes, complies with Duty to cooperate

No, Failure to comply to Duty to cooperate

No, not consistent with national policy

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

There are four 'tests of soundness' set out in [paragraph 35 of the NPPF](#) – (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy

Yes – Positively prepared

Yes – Justified

Yes – Effective

Yes – Consistent with national policy

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 is needed to make the Island Planning Strategy legally compliant and/or sound? *

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You can attach any files or documents with this submission. You should not assume that you will have a further opportunity to make submissions.

These representations have been prepared by Fisher German on behalf of Jacton Properties Ltd. in respect of their land interests at New Fairlee Farm, Newport, as illustrated in respect of Policy H2. Jacton Properties remain fully committed to bringing the land at New Fairlee Farm forward for development and are committed to liaising with neighbouring landowners in order to achieve this.

The land above forms part of a site known as 'Land at and adjacent to New Fairlee Farm' (Ref: HA040), which was previously identified in the November 2018 Draft Island Planning Strategy as a proposed allocation site.

The above site was included within the 2018 Draft Plan as a proposed allocation for a residential led mixed-use development. It was identified as being capable of accommodating at least 880 dwellings, a mix of green, open and recreational space, a range of small-scale community uses (which could include a multi-purpose community building and a convenience shop) and an improved road network including a park and ride hub. Representations were made that that time to support the proposed allocation of the site. The allocation was however removed in the previous Regulation 18 Consultation (July 2021). Representations were submitted on behalf of our client requesting the sites inclusion.

These representations respond to the current Regulation 19 Draft Island Planning Strategy 2024 which still has the site excluded from the Plan. As will be elaborated below, we believe that the allocation above should be reinstated within the Draft Island Planning Strategy.

Policy G2 classifies the Island's settlements into four levels, as follows:

- Primary Settlements;
- Secondary Settlements;
- Rural Service Centres;
- Sustainable Rural Settlements

Newport is identified as a Primary Settlement alongside Cowes, East Cowes, The Bay (consisting of Sandown, Lake and Shanklin) and Ryde.

We have no objection to the methodology of splitting settlements into tiers, which is common practice within development plans. We are, however, concerned that Newport's status as the largest and most sustainable settlement on the Island is not being fully recognised within the Plan. Newport contains a range of higher order services, facilities and employment opportunities. Despite this Newport is placed with the other Primary Settlements, which play a demonstrably different role and function to Newport. Paragraph 2.5 of the Reg 19 Draft IPS recognises that as a 'county town' Newport acts as the hub for commercial, business and civic functions on the Island. Consequently, it is described at Paragraph 3.17 as the *"focus for planned growth within the IPS (48 per cent of homes allocated in the plan) and contains the two key priority sites at Camp Hill and Newport Harbour"*. We contend that it would be more logical if Policy G2 designated Newport to its own tier within the hierarchy (County Town), above the Primary Settlements. Therefore, emphasising that as a result of its inherent sustainability.

After this stage, further submissions may only be made if invited by the inspector, based on the matters and issues he or she identifies for examination.

9) Do you have any comments on the polices map? *

[\(click here to go to the Regulation 19 Island Planning Strategy Map\)](#)

N/A

10) Do you wish to request to appear at the hearing sessions that will take place? *

Yes

No

11) Please outline why you would like to attend? *

If you have answered No to Question 10 please put NA in the text box below

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The Isle of Wight Council is the data controller for the personal information you provide on this form. The council's Data Protection Officer can be contacted at dpo@iow.gov.uk. You can contact the council by phone on 01983 821000, or by writing to us at County Hall, High Street, Newport, IW PO30 1UD

For more information on the Isle of Wight Council's Privacy Statement, which explains how my information is used. Please visit the website: www.iwc.gov.uk/privacy

How to send to us.

Email: policy.consultation@iow.gov.uk

Post: Planning policy, Seaclose offices, Fairlee Road, Newport, Isle of Wight, PO30 2QS

Please ensure that you have answered all the questions in full.

The closing date for representations is by midnight on Monday 19 August 2024

Isle of Wight Council**Island Planning Strategy – Regulation 19 Submission version: COMMENTS FORM**

Your comments on the Plan will help us and the Inspector appointed to oversee the examination process, to identify any plan issues relating to soundness, legal compliance, and compliance with Duty to Cooperate and any changes that may be needed before adopting the Plan.

Please read the [guidance notes](#) carefully before completing this form.

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Planning Agent on behalf of Landowner and Developer (Jacton Properties)

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(Please complete a separate form for each policy you are commenting on)

Policy H1 – Planning for Housing Delivery

3)

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This policy sets out that the Council are planning to deliver 6,795 dwellings over the 2022 to 2038 plan period, equating to 453 dwellings per year (a reduction from the 486 dwellings previously promoted). This housing requirement is described by the Council as a 'Island realistic' requirement when compared with the Government's standard method which results in a higher requirement of 703 dwellings per year (10,545 dwellings over the proposed Plan period).

Paragraph 61 of the NPPF states that in order to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, which uses the standard method as the starting point for determining the housing requirement for the Plan. An alternative approach, which departs from the standard method can only be progressed where exceptional circumstances justify this. The example provided in the NPPF includes demographic justification why Local Housing Need may be inappropriate. Footnote 25 affirms that examples could include "areas that are islands with no land bridge that have a significant proportion of elderly residents". This again is a demographic argument, which is not the argument advanced by the Council, which instead is an issue of housing delivery.

Draft IPS Evidence Paper A – Approach to the housing number in the draft IPS, states that the Council have gathered evidence which provides a "clear indication that the island has a reduced ability to deliver homes at the scale sought by the standard method". The Paper outlines that there are deliverability issues on the Island due to it being a localised market with "particular economic challenges which hamper the delivery of higher levels of housing". It is also stated that because housing delivery on the Island relies on small Island-based developers with smaller sites, lower delivery rates and smaller development pipelines, it would not be possible to deliver the full standard method amount. A lack of major national housebuilders operating on the Island has also been cited as justification for the lower housing requirement.

The Council have provided a paper to explore the 'exceptional circumstances argument', 'IPS Housing Evidence Paper – Exceptional circumstances - May 2024.' The Council reference that whilst 200 responses asked the Council to consider an exceptional circumstances case, not one provided an alternative figure. i.e. the motive behind such comments was simply to reduce the quantum of housing to be provided, not provision of a more rational, justified target. The Council acknowledges many of the comments received did not want any greenfield development. The Council however, through this paper, seemingly rejects an exceptional circumstances argument, clearly stating at Paragraph 5.1 that "Pursuing a case for 'exceptional circumstances' is not seen as the appropriate approach to assessing local housing need for the Isle of Wight and is not being taken forward in the IPS." Further stating that such an argument would ultimately likely represent a similar level of growth as Local Housing Need if a demographic argument was made instead, due to the need to provide for historical under delivery and other factors. Thus, the Council have accepted the Local Housing Need figure, but have chosen not to Plan for it nonetheless.

Evidence suggests that driving down housing needs would exacerbate issues on the island, paragraph 5.9 states:

*“Using ‘exceptional circumstances’ to drive down the housing need number in the IPS **would do nothing to address some of the severe demographic and social issues the island continues to face.** Artificially reducing housing need, and by definition at the same time reducing the amount of affordable housing that can be delivered, **would do absolutely nothing to help address the significant affordability and access to affordable housing issues that the island faces, and in fact would simply exacerbate these issues and make them worse.**” (our emphasis)*

The submitted plan is clear therefore that there is no exceptional circumstances argument advanced and accepts the Local Housing Need figure. The argument advanced is simply that such a figure is undeliverable. The Council however do not provide a figure based on maximum assumed delivery, but instead on the quantum of housing that would be needed to deliver the Islands affordable housing , which paragraph 7.5 of the Plan asserts is the “*upper limits of what is deliverable by the island housing market across the whole Plan period*”.

A further key piece of evidence that Evidence Paper A refers to is the Three Dragons Assessment of Housing Supply Report 2020. This report highlights that the IoW does not have many opportunities for very large sites to come forward and the associated benefits that this can bring for delivering both housing numbers and affordable housing.

There are economies of scale that are likely very applicable here, with larger sites providing the confidence needed for volume builders to develop the delivery processes and contracts to expedite delivery on the island. Particularly in locations more easily accessible to the ferry terminals to minimise distances once delivery vehicles and staff arrive.

The Three Dragons report also cites feedback from housebuilders who operate on both the Island and the mainland. According to them, rates of delivery on the mainland are around two to three times that of the IoW. The lack of large sites is stated as the reason for reducing the attractiveness of the Island to national volume housebuilders and a reason behind the lower delivery (Paragraph 7). Whilst logistical issues, labour availability, sales rates and values are also seen as issues, it is nevertheless evident that the lack of large-scale housing sites on the Island has been a considerable barrier to delivery both in terms of overall numbers and from an affordable housing perspective (indeed only 5% of the Island’s housing completions are stated as being for affordable homes). This points strongly that the avenue to increasing and expediting delivery is not removing larger strategic scale sites such as that promoted by our client, but actually increasing such sites where possible.

Moreover, within the Three Dragons Report, an analysis of the IoW current dwelling supply/delivery is set out. Within this section, an analysis of ‘large’ sites (sites of 20 dwellings or more), that have been permitted since 2012 is provided. As paragraph 4.3.5 states “*The data from IoW shows a very limited number of much larger sites, **with just 1 site over 500 dwellings gaining planning permission in the last 8 years** and a further 2 sites over 100 dwellings. Only 1 of these has started construction*”. Paragraph 4.3.6 goes on to state that “*Where sites have been completed **the time taken from permission to completion, whilst steady and in some cases quite slow, does not seem to completely stall and sites do get completed.** The steady nature of progress **is down to the type of developers and the market** (mainly local developers with limited market)*”. Again, increasing supply may increase the number and type of developers operating on the island.

The Council's argument that the island is simply not capable of delivering a higher quantum of growth appears to be challenged in the evidence. Paragraph 4.4.1 of the Three Dragons Report states "*in reviewing the data and comparing it with national studies, once planning permission is gained developments are not taking any longer on the IoW than the norm. The level of permissions on large sites that are not converted to completions would also appear to be fairly similar. Therefore, the IoW does not appear to perform any differently to the rest of the country – however where it does differ is perhaps in respect of the size of sites. Given the geography and constraints it 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 relatively quickly once planning permission is gained*".

Clearly the Council has a large site available in respect of our client's land interests and neighbouring owners, which has been assessed by the Council as acceptable in the SHLAA and was also formally identified as a draft allocation in a previous iteration of the Plan. The *identification* of the site has seemingly been removed to facilitate a reduction in housing requirement, as the Council has not provided strong rational for removal, nor contrary evidence to justify its removal. But that reduction in requirement due to historic shortfalls in delivery is itself potentially the result of a lack of similar scale sites having been allowed historically, which the Three Dragons Report concludes would provide opportunity to increase supply. This creates a self-fulfilling prophecy, cyclical in nature, where the Council state that the housing requirement cannot be met, at least in part due to the lack of delivery of large sites, thus providing justification for removing large sites from the supply, which will serve to continue to constrain housing delivery.

As a result, we believe that the Council's current reduced housing requirement of only 489 dwellings per year, will unnecessarily prevent the IPS from planning for an increased number of large-scale housing sites during the plan period. This will undoubtedly continue to perpetuate the current trend of a lack of large-scale housing sites leading to a lack of volume housebuilders operating on the Island.

It is noted that the Council have decided on the 489 dwellings per year requirement after looking at historic delivery patterns over 15-year 'plan period' cycles within the last 20 years. This information is set in Table 2 of Evidence Paper A and shows 489 dwellings per annum to be the average across all the 15-year periods considered. Whilst we note that looking at what was completed previously may at first seem sensible for determining what could be a realistic target, we are concerned that this approach fails adequately reflect available supply. There has not been a site allocation document for significant time, with a range of sites, including strategic allocations, which has likely further impacted likely delivery.

Paragraph 74 of the NPPF confirms that "the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)".

Furthermore, contrary to wider arguments advanced within the Plan, the Council confirm that higher rates of delivery are considered possible on the island. The Draft IPS (Table 7.1) details that within the next five years the 489 target which the Plan states is the upper limit of delivery rates possible on the island, is anticipated to be exceeded no fewer than 3 times. This includes delivery of 735 dwellings in year 3, 760 in year 4 and 608 in year 5. In this context, it is not considered unfeasible that 703 dwellings per annum can be achieved, should sufficient sites be allocated to allow this, given the Council acknowledges such delivery rates are indeed possible.

Table 7.1 Island Planning Strategy indicative housing trajectory

Source of supply	Year 1	Year 2	Year 3	Year 4	Year 5	Years 6 to 10	Years 11 to 15	Total
Large sites with permission	250	225	292	387	296	906	240	2,596
Allocated sites	0	0	20	133	284	1465	805	2,707
Windfall	100	100	100	100	100	500	500	1,500
Total	350	325	735	760	608	2,439	1,545	6,797

In years 6 to 10 delivery equates to 488 dwellings per year, and in years 11 to 15 of the Plan period delivery further reduces to 309 dwellings per year. We believe this ‘tailing off’ in housing delivery in years 6 to 15 of the plan period clearly demonstrates that the Council have not allocated enough sites to deliver towards the end of the plan period, to enable delivery of the higher rates of housing that will be seen in the early years of the plan period. As such, we consider that should the Council sufficiently increase the number of housing allocations within the Draft IPS, it is wholly reasonable to expect that they can deliver the standard method amount of 703 dwellings per year. Importantly, our client’s typology, larger scale development, would feed that end of Plan period need, with the necessary lead in time and prolonged build out, giving much needed supply into those latter years of the Plan period.

As the Council will be aware, the sites that it has consented in recent years (which are small to medium scale in size) are helping to drive forward the delivery of homes within the five year period (as shown in the Housing Trajectory). As the Council’s evidence shows, the delivery of larger sites, i.e. those of 500 dwellings or more, takes more time. However, as per the Three Dragons report, it is understood that once delivering, such sites can deliver at similar rates as would be anticipated on the mainland. Therefore, it is clear that the allocation of larger sites is likely to ensure the delivery of higher numbers of dwellings later on within the plan period, increasing the delivery of market and affordable houses and allowing the Council to adopt a housing requirement at the very least closer to actual Local Housing Need. We disagree with the Council’s assessment of housing delivery and consider the approach advocated to be neither positively prepared or consistent with national policy, thus not sound. The basing of the housing requirement on that required to meet affordable housing needs is also not supported, as is not in accordance with the NPPF or PPG. The Council cannot seek to rectify 5-year land supply issues solely through the reduction of the housing requirement, when there are deliverable sites which have been accepted as acceptable in evidence

A further issue with the Draft Plan is in relation to the proposed Plan period post adoption. The Council confirm within the document that the Plan is intended to run from 2022-2038. The Council state within the LDS that plan is anticipated to be adopted in November 2025. This provides only a 13-year Plan period post adoption, not the provision of 15-years as required by Paragraph 22 of the NPPF. The wording adopted by the NPPF is clear and unequivocal, that the 15-year period is expressed specifically as a minimum, which indicates it should be exceeded only. The NPPF could have adopted more flexible language (which it did in early iterations of the NPPF), but this requirement, which has been present in all iterations of the Framework since 2018, is clear this is a minimum threshold to deliver a sound plan period, and to be sufficiently consistent with National Policy (Paragraph 35d).

The proposed adoption date also assumes only a year from submission to adoption and provides no contingency for any potential delays prior to submission. We are not aware of many Plans being adopted within such timescales, and can point to many examples which have or are likely to take in excess of 3 years.

We have just attended the Erewash EiP, wherein the Inspector confirmed that she was going to require a 15-year Plan period and asked the Council to consider the implications of this. We cannot see a reason why the same requirement would not be placed on the IPS. The Plan period should therefore be increased, with the requisite increases in development need in order to adhere to the requirements of the NPPF.

The land at and adjacent to New Fairlee Farm was previously identified as an allocation for around 880 dwellings. Whilst it is anticipated that homes could start to be delivered on the New Fairlee Farm site in the latter years of the five year period, it is nevertheless clear that it will provide the majority of its dwellings within years 6 to 10 of the plan period. Therefore, through the allocation of larger allocation sites such as the land at and adjacent to New Fairlee Farm, the Council have a real opportunity to ensure that the higher (than what was previously average) housing growth they are anticipating for the first five years of the plan period, will be continued throughout the IPS plan period.

Moreover, the allocation of more deliverable large-scale sites within the IPS, such as the land at and adjacent to New Fairlee Farm, will also have the benefit of attracting volume housebuilders who are currently not attracted to the Island due to the lack of sites of a suitable size and quantum. Even on the mainland, many PLC housebuilders will now simply not engage with sites below a certain size, thus again suggesting an issue of supply composition, rather than an inherent constraint of the island. This will further drive increased delivery rates as the outputs from the smaller Island-based builders and windfalls which have formed the bulk of historic supply will be complemented by the delivery from volume housebuilders, in accordance with the NPPF (which advocates a range of site sizes and typeologies).

As a consequence of the above, we do not believe that the Council has demonstrated exceptional circumstances that would warrant a departure from the standard method, which they themselves concede in respect of demography. We also do not agree that the evidence is consistent in affirming the Council's argument in respect of delivery, and consider it has been the lack of suitable large site allocations and permissions which have resulted in historical low delivery (particularly the period which informs the Council's assessments). At the very least the Council's anticipated delivery rates within the first 5 years shows a higher rate of building is possible on the island. Given the Council's reasons for reducing the housing requirement significantly below Local Housing Need is entirely predicated to a lack of ability to increase annual housing delivery, this admission that higher rates are possible means the Council's proposition that delivery is inherently constrained is essentially untenable. It is irreconcilable that there is both no ability to deliver higher dwelling numbers on the island, but higher dwelling numbers are anticipated to be delivered in years 3-5.

In addition to the above, we also wish to highlight the important role providing new housing plays in economic growth. At paragraph 9.15 of the Council’s Island Infrastructure Investment Plan (May 2018), it is stated that **“Providing new housing and employment space that meets the needs of modern businesses is key to supporting economic growth. New housing plays a key role in creating attractive and vibrant places to live, which influences labour markets in terms of the size of the catchment population and their demographic characteristics. For example, a significant shortage of homes catering to first time buyers could result in greater outwards migration of young people which are vital to replacing retiring workers. Providing sufficient employment space in the right locations and of the right type is vital to allowing businesses to expand, new business to take-up their first premises, and providing employment opportunities for the local labour market catchment”**.

Consequently, the delivery of new homes should be seen as being intrinsically linked to the delivery of employment growth or potentially even being able to sustain existing levels of economic activity. Within the Isle of Wight, it is noted that there is a disproportionately high number of people within the older age brackets (ages 50 to 54, 55 to 59, 60 to 64, 70 to 74 and 75 to 79). As shown on the age population pyramid overleaf. The Council’s demographics clearly do not allow those in the cohort who will retire in the next plan period to be replaced by natural growth and replacement. Those who retire will not immediately vacate their house, and may not do for many years, thus clearly new housing is needed for replacement workers if the islands economy is not to fall of a cliff in terms of available workforce. This demographic case actually provided the justification for the Melton Local Plan to deliver a requirement above its OAN, and strongly points to a need to increase, not decrease housebuilding.

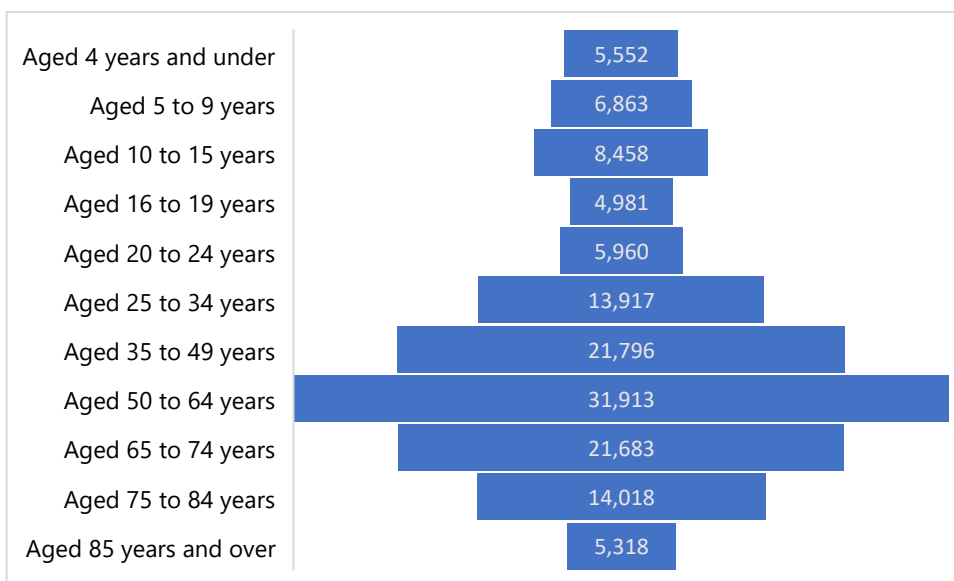


Figure: Isle of Wight Age Composition (Census 2021 - NOMIS)

The Island’s Joint Strategic Needs Assessment Demographics and Population report 2018/19 (Published February 2020) states that a key influence behind the for the Isle of Wight age composition is migration. According to the report, there is a combination of net inward migration of older adults from other parts of the UK and an outward net migration of young adults to the rest of the UK and abroad. Therefore, at present, the Island is struggling to encourage young people to stay.

Within the IPS Housing Evidence Paper – Exceptional Circumstances May 2024 the Council concludes that restricting housing growth will not prevent that pattern of migration, it will happen regardless. Thus, not building enough housing will add further pressure to the market and the demographic make up of the island as discussed below, and contribute to the drain of younger people from the island.

Whilst the reasons behind younger people leaving the Island are varied. It should not be overlooked that a lack of suitable housing (such as homes suitable for first time buyers/family homes) can ultimately drive the decision-making process behind leaving the Island. A point acknowledged at paragraph 2.28 of the Draft Plan. Also, unless additional younger people can be attracted to the Island through the provision new housing and/or encouraged to stay on the Island by the provision of affordable housing, businesses could struggle to find workers to drive the proposed economic growth of the Island. If a lack of available workforce occurs, this could damage the long-term economic position of the Island as certain businesses may not be able to continue operating on the Island and therefore may choose to relocate elsewhere. Moreover, even if businesses do choose to remain on the Island, they would be less inclined to invest in expanding their facilities, if they are unable to grow their workforce.

We therefore consider that if the Council wish to continue proposing the allocation of 29.2 ha of employment uses through the IPS (which is set out within Policy E1 – Supporting and Growing our Economy) they must also ensure the housing requirement is increased in order to support this, unless employment density across the island decreases significantly.

[\(click here to go to the Regulation 19 Island Planning Strategy Map\)](#)

10) Do you wish to request to appear at the hearing sessions that will take place? *

Yes

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If you have answered No to Question 10 please put NA in the text box below

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Isle of Wight Council**Island Planning Strategy – Regulation 19 Submission version: COMMENTS FORM**

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Anonymous comments will not be accepted.

Name/Organisation: *

Angela Brooks – Fisher German LLP

Email: *

[REDACTED]

Address and Postcode:

The Estates Office, Norman Court, Ashby-de-la-Zouch, Leics, LE65 2UZ

Telephone:

1) What type of respondent are you? *

(Member of the public, statutory consultee (excluding Councillors and Parishes) Business (Landowner and Developers), Councillor, Parish Council, other Local Authorities, Resident Group.)

Planning Agent on behalf of Landowner and Developer (Jacton Properties)

2) What policy are you commenting on? *

(Please complete a separate form for each policy you are commenting on)

Policy H2 – Sites Allocated for Housing

3)

Does your comment relate to a specific paragraph(s)? If yes which paragraph does this relate to? *

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n/a -

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?*

(a plan is legally compliant if it is consistent with [national planning policy](#) and the council have complied with the [Duty to Co-operate](#))

Yes

No

5) Please give details to support your answer to question 4 *

Yes, consistent with national policy

Yes, complies with Duty to cooperate

No, Failure to comply to Duty to cooperate

No, not consistent with national policy

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

There are four 'tests of soundness' set out in [paragraph 35 of the NPPF](#) – (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy

Yes – Positively prepared

Yes – Justified

Yes – Effective

Yes – Consistent with national policy

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 is needed to make the Island Planning Strategy legally compliant and/or sound? *

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You can attach any files or documents with this submission. You should not assume that you will have a further opportunity to make submissions.

These representations have been prepared by Fisher German on behalf of Jacton Properties Ltd. in respect of their land interests at New Fairlee Farm, Newport, as illustrated below. Jacton Properties remain fully committed to bringing the land at New Fairlee Farm forward for development and are committed to liaising with neighbouring landowners in order to achieve this.

The land above forms part of a site known as 'Land at and adjacent to New Fairlee Farm' (Ref: HA040), which was previously identified in the November 2018 Draft Island Planning Strategy as a proposed allocation site.

The above site was included within the 2018 Draft Plan as a proposed allocation for a residential led mixed-use development. It was identified as being capable of accommodating at least 880 dwellings, a mix of green, open and recreational space, a range of small-scale community uses (which could include a multi-purpose community building and a convenience shop) and an improved road network including a park and ride hub. Representations were made that that time to support the proposed allocation of the site. The allocation was however removed in the previous Regulation 18 Consultation (July 2021). Representations were submitted on behalf of our client requesting the sites inclusion.

These representations respond to the current Regulation 19 Draft Island Planning Strategy 2024 which still has the site excluded from the Plan. As will be elaborated below, we believe that the allocation above should be reinstated within the Draft Island Planning Strategy.

In the context of our comments across these representations, we believe the Council need to look again at the number of sites that have been allocated for housing, in order to increase the number of site allocations. This should involve a revisiting of all the previous allocation sites from the 2018 Draft IPS to ensure that the housing requirement derived from the standard method can be delivered.

In order to ensure that the Plan is clearly evidenced, and therefore capable of being found sound at Examination, it is important that the Council provide additional Site Assessment evidence which clearly explains the rationale for selecting allocation sites.

Furthermore, the Council's reasoning for excluding the sites in the current version of the Draft IPS is not clearly expressed within any of the published documentation. Housing Evidence Paper B, Revisiting the Draft IPS Allocations Approach (May 2024), only contains a brief 'Table of Sites Removed' which assigns each of the sites one of five potential brief 'reasons' for removal. It is not evident from the published information, why each site fell into one of the five categories.

Moreover, with regards to R5 – which was assigned to the land at and adjacent to New Fairlee Farm, this is expressed as three potential reasons, as follows:

“Adjacent greenfield site not forming a logical extension to the settlement boundary / less certainty of delivery / site specific issues”

It is not clear in the Evidence Paper which of the three has been the reason for removing the site. As a consequence, we asked the IoW Planning Policy Team to provide more commentary on the exact reasons for the deletion of the site from the Plan. In correspondence from the Policy Team we were informed that “the sites removal was due to it being an `adjacent greenfield site not forming a logical extension to the settlement boundary` rather than the other two issues listed under R5”.

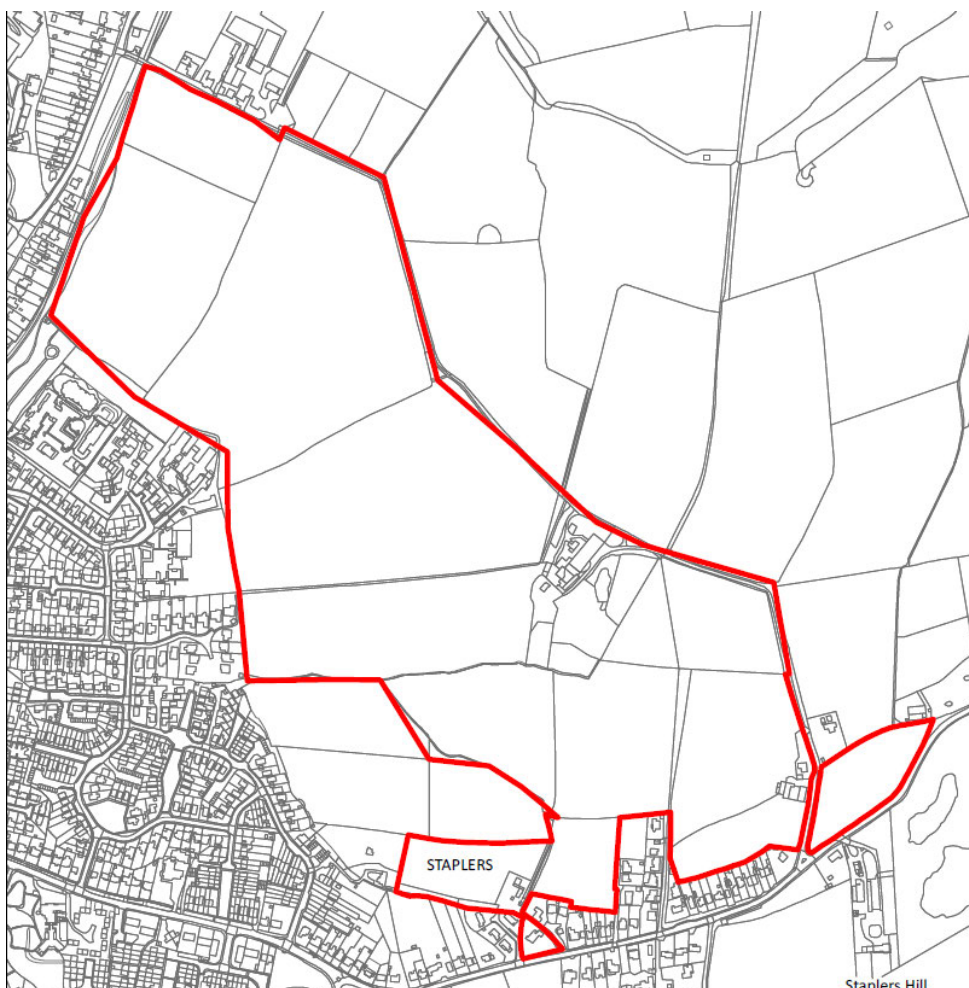
Whilst we appreciate the additional information, this response does not fully explain why the Council have come to this conclusion. Particularly as the land was previously deemed an acceptable location for a proposed housing site allocation. Indeed, within the 2018 SHLAA, the land at and adjacent to New Fairlee Farm was judged to be suitable for housing due to its location **adjoining the settlement boundary** and its potential to accommodate a mix of uses including open space and buffers to the wider countryside (SHLAA Refs: IPS359, IPS005, IPS310, IPS311, IPS346 and IPS270). The allocation of the site was supported in evidence, its removal is not supported in evidence.

We believe that the site **does form** a logical extension to the settlement boundary and the built form of Newport. This has been evidenced by the Landscape and Visual Appraisal which accompanies these representations. Moreover, we have also prepared an accompanying Illustrative Masterplan which shows how the site is capable of delivering a logical extension to Newport, alongside ample open space and new planting to buffer it from the countryside.

In reality it given the evidence the Council holds, and that discussed above provided by the promotor, it appears as though the site has been primarily removed as a result of the lower housing requirement advocated through the Plan, which as already discussed is a result of historical delivery which may be artificially constrained by the lack of sites which can increase delivery - largescale greenfield extensions of existing sustainable settlements in particular. The Council's approach is contrary to the demographic evidence as set out above and is likely to be inherently harmful to the Islands economy and society. The approach proposed will almost certainly contribute to further rising house prices further making home ownership and accessibility difficult for younger people, essentially forcing them to relocate to the mainland, with houses taken by older residents from the mainland who will benefit from existing equity in properties. The Council's evidence confirms that once delivering, sites of the scale of our client's can deliver in accordance with delivery expected on the mainland. The Council have not provided evidence to reject the SHLAA, thus the site should be considered acceptable. Given the need for more housing is clear in the Council's evidence, and has been restricted purely on delivery reasons, there is no sound justification for rejecting suitable housing sites for arbitrary reasons, particularly not those immediately adjacent to the islands most sustainable settlement.

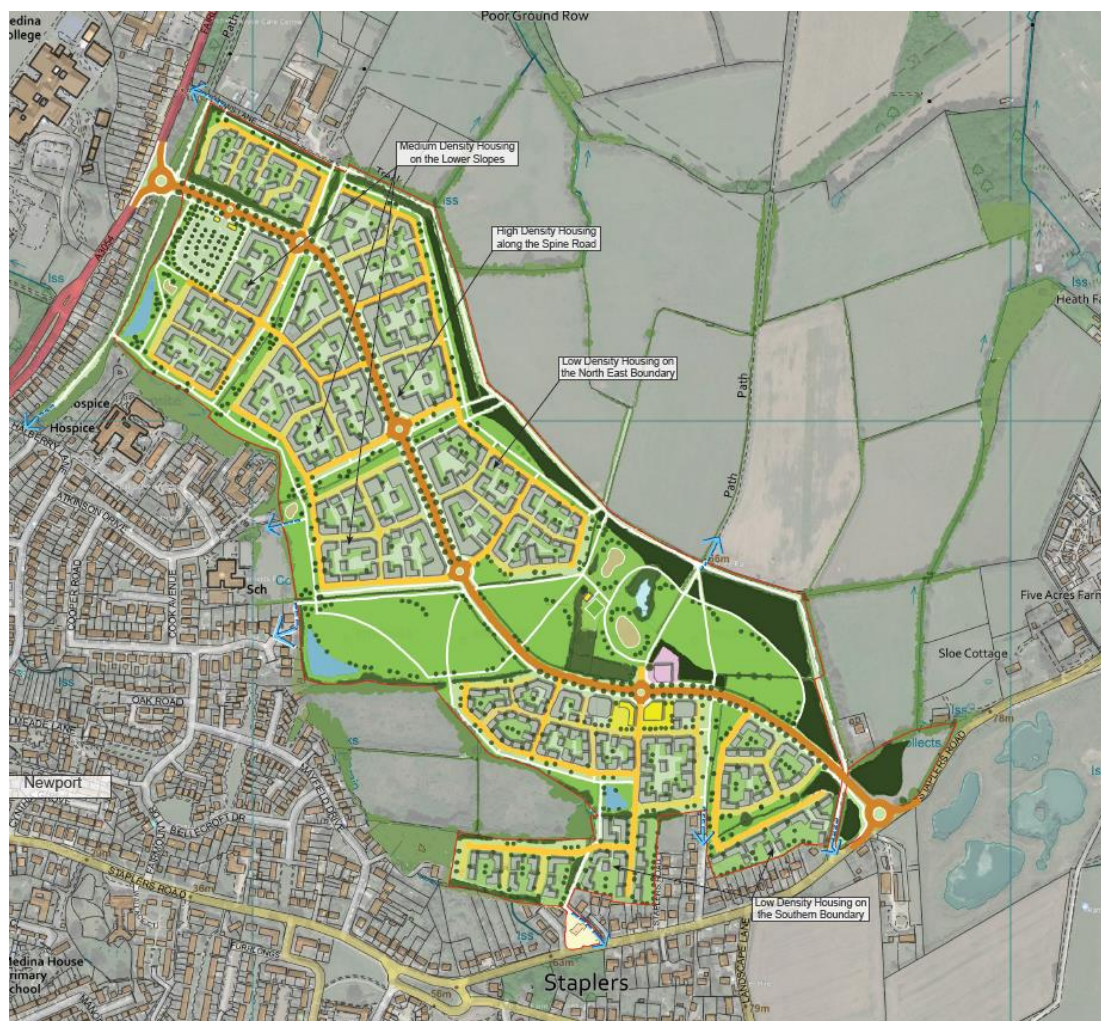
These representations are written to support of the promotion of the land at and adjacent to New Fairlee Farm.

As has been outlined above, the land at and adjacent to New Fairlee Farm was previously identified by the Council, in the Draft IPS 2018 as a proposed housing allocation site. Following the previous IPS consultation, the Council have removed the site due to it being deemed to not form a logical extension to the settlement boundary.



We believe that the conclusion that the site does not form a logical extension to the settlement boundary to be illogical. The site currently adjoins the existing settlement boundary to the south and west. Moreover, the northern boundary of the site adjoins existing dwellings on Fairlee Road and therefore the site clearly benefits from a very close relationship with the existing built form of Newport.

As detailed within the accompanying Landscape and Visual Appraisal (September 2021), no medium or long-distance views of the site are anticipated to be significantly affected by the proposed development. This is due to the surrounding urban grain of Newport, which will result in the proposed development being 'lost' in the views of the Town from the surrounding area. Therefore, we would urge the Council to re-consider its assessment that the site will not form a logical extension to the settlement boundary.



Moreover, the below Masterplan has been prepared which shows how a development on the site could be delivered. This illustrates how there clearly is scope for a residential development on the site to comprise a logical extension to the built form of Newport.

The above Masterplan shows how the site can accommodate a scheme comprising:

- Around 825 dwellings (based on a 35dph scheme) to 940 dwellings (based on a 40dph scheme);
- An affordable housing contribution in line with emerging policy;
- A local centre which could include a multi-purpose community building and small convenience store, to serve the day to day needs of nearby new and existing residents;
- A park and ride hub located off Fairlee Road (subject to discussions with the Council confirming it is still required as the current Draft Plan has deleted reference to this being required);
- Two vehicular access points, located off Fairlee Road and Staplers Road;
- Improvements to the road network by the provision of a new spine road to connect Staplers Road and Fairlee Road;
- New public open space to provide spaces for play, recreation, ecological mitigation and enhancement; and
- Significant landscape planting buffers along the northern boundary of the site to screen and soften the appearance of the development.

The Landscape and Visual Appraisal has informed the development of the above Masterplan to ensure that the proposed scheme is 'landscape led' and the Masterplan demonstrates how a strong landscape mitigation strategy can come forward to reduce the impact on the local views of the site. Moreover, the Masterplan has also been designed to ensure that the more visible elements of the Site will remain green and effectively integrate the proposed site into the existing landscape.

Please note: the dwelling capacity of the site as expressed above should be seen as indicative at this stage. It has arisen based on an initial 'landscape led' assessment of the developable areas of the site and this would be refined further as part of the detailed masterplanning process which would occur ahead of the preparation of a planning application. Moreover, the indicative capacity has not taken into account the eventual dwelling mix of the site. As the site is of a sufficient size to incorporate a broad range of dwelling types, it is envisaged that the eventual mix is likely to comprise smaller properties, which will naturally increase the number of dwellings that can come forward on the site.

The land at and adjacent to New Fairlee Farm should therefore be seen as a logical and appropriate location for residential development and its allocation re-instated within the Island Planning Strategy to allow the island to deliver the housing it is absolutely clear it needs.

9) Do you have any comments on the polices map? *

[\(click here to go to the Regulation 19 Island Planning Strategy Map\)](#)

Reallocation of our client's interests as set out above.

10) Do you wish to request to appear at the hearing sessions that will take place? *

Yes

No

11) Please outline why you would like to attend? *

If you have answered No to Question 10 please put NA in the text box below

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Angela Brooks – Fisher German LLP

Email: *

[REDACTED]

Address and Postcode:

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(Member of the public, statutory consultee (excluding Councillors and Parishes) Business (Landowner and Developers), Councillor, Parish Council, other Local Authorities, Resident Group.)

Planning Agent on behalf of Landowner and Developer (Jacton Properties)

2) What policy are you commenting on? *

(Please complete a separate form for each policy you are commenting on)

Policy H8 – Ensuring the right mix of housing

3)

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n/a -

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Yes

No

5) Please give details to support your answer to question 4 *

Yes, consistent with national policy

Yes, complies with Duty to cooperate

No, Failure to comply to Duty to cooperate

No, not consistent with national policy

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

There are four 'tests of soundness' set out in [paragraph 35 of the NPPF](#) – (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy

Yes – Positively prepared

Yes – Justified

Yes – Effective

Yes – Consistent with national policy

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 is needed to make the Island Planning Strategy legally compliant and/or sound? *

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These representations respond to the current Regulation 19 Draft Island Planning Strategy 2024 which still has the site excluded from the Plan. As will be elaborated below, we believe that the allocation above should be reinstated within the Draft Island Planning Strategy.

Policy H8 sets out that development proposals for 10 or more dwellings should aim to deliver the percentage splits for housing sizes and tenures as set out within the policy. Whilst the mixes prescribed for affordable housing are “based on the needs from the Island housing register for the last five years”. We would caution the Council that the percentages included within the policy are only a snapshot in time. Invariably, housing needs will change over the plan period and therefore we believe its wording should be amended to be more flexible to respond to the likelihood of changing housing needs on the Island over time.

Similarly, the prescriptive nature of the tenure mix for private/market homes is also not considered to be robust and should be amended to allow developers, when they apply for planning permission, to deliver a mix of housing which will respond to local market demand, and if necessary to deliver maximum affordable housing, viability.

After this stage, further submissions may only be made if invited by the inspector, based on the matters and issues he or she identifies for examination.

9) Do you have any comments on the polices map? *

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N/A

10) Do you wish to request to appear at the hearing sessions that will take place? *

Yes

No

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Planning Agent on behalf of Landowner and Developer (Jacton Properties)

2) What policy are you commenting on? *

(Please complete a separate form for each policy you are commenting on)

Policy T1 – Supporting Sustainable Transport

3)

Does your comment relate to a specific paragraph(s)? If yes which paragraph does this relate to? *

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Yes – Positively prepared

Yes – Justified

Yes – Effective

Yes – Consistent with national policy

No

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

Not, Consistent with national policy

Not, Effective

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

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These representations respond to the current Regulation 19 Draft Island Planning Strategy 2024 which still has the site excluded from the Plan. As will be elaborated below, we believe that the allocation above should be reinstated within the Draft Island Planning Strategy.

When compared with the 2018 Draft IPS Policy 'BCI 1 – A Better Connected Island', we note that the 2021 Policy T1 – Supporting Sustainable Transport, has omitted the previous reference to the provision of a Park and Ride Scheme on Fairlee Road, Newport.

As detailed within the supporting text to the 2018 Draft Policy BCI 1 (paragraph 7.5), the Council acknowledged that a Park and Ride Scheme on Fairlee Road would result in a *“positive impact on the transport network and air quality”*. Additionally, it was stated that *“The exact location and number of spaces will be determined in partnership with the developer and the relevant public transport service providers through the detailed planning application process”*.

As detailed below, the land at and adjacent to New Fairlee Farm is capable of delivering a Park and Ride facility. Therefore, it is not clear why this commitment has now been deleted. Indeed, none of the transport related background evidence published with the 2024 Submission Plan contains any reasoning for this omission. As well as reinstating the New Fairlee Farm housing allocation in Policy H2, we believe Policy T1 should be amended to include the provision of a Park and Ride Scheme on Fairlee Road, Newport. This is supported within the Island Transport Plan Strategy 2011-2038 which states at C.9.2 that the Council *“will need to consider a range of strategic options including the possible development and/or expansion of existing park and ride facilities”*.

After this stage, further submissions may only be made if invited by the inspector, based on the matters and issues he or she identifies for examination.

9) Do you have any comments on the polices map? *

[\(click here to go to the Regulation 19 Island Planning Strategy Map\)](#)

N/A

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