
1 February 2025

Planning Services
Isle of Wight Council
Seaclose Offices
Fairlee Road
Newport

Dear Sirs,

Reg 19 Island Planning Strategy

Hearing Statement – Matters 2 (Amount of employment land), 2 (Amount of housing needed), 3 (Spatial Strategy), and Matter 6 (Proposed Allocations)

I am writing in addition to responses is already made to The Reg 19 submission of the draft Island Planning Strategy, ahead of the public examination hearings.

I note the inspectors matters issues and questions raised in his letter of the 16th of December 2024 and submit this statement in accordance with those, where pertinent to my objections.

Background and Qualifications

I have been I fully chartered town planner and a member of the Royal Town Planning Institute since July 1994. I have worked in planning since 1985. I have held numerous positions in local government and in the private sector, holding roles as a policy planner, development control officer, implementation officer and planning consultant. I have worked at Gosport Borough Council (1989 to 1990), MSJ Keys Young (Sydney Australia 1990 to 1991), Portsmouth City Council (1991 to 2005), and the Isle of Wight Council as Deputy Head of Planning Services (2005 to 2013). Since 2013, I have been a director of my own planning consultancy.

I am the father of three sons two of which are of adult age whilst the youngest is still at college on the Island. All three of my sons will be requiring housing accommodation on the Island at some point within the new plan period.

My interest in the Draft Island Planning Strategy is both professional and personal.

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Amount of Employment Land Required

The current Core Strategy 2012 planned for the creation of 7500 new jobs. Essentially these needed to be sustainable and not based in the seasonal of visitor market. This has clearly failed since no new major employment sites have been brought forward for development since the adoption of that plan. Identified sites Kingston in East Cowes and Nicholson Road in Ryde have not come forward which is a significant disappointment to prospective investors in the Island.

The Island Planning Strategy no longer has a jobs creation target, but Policy E1 of the draft IPS states the following:

E1 Supporting and Growing our Economy Strategic

The council wholeheartedly supports an environment where businesses have the confidence to invest. It will therefore support the sustainable growth of the Island's economy and proposals that deliver jobs via a range of sectors, including the Solent Freeport, while increasing local wages, skills and job opportunities.

To contribute to achieving this, the council allocates the following sites (as shown on the policies map):

f 2.9 hectares at Sandown Airport, Sandown for Class E Offices, B2 and B8 uses.

In order for investors to be attracted to the Island to create new job opportunities there needs to be a level of trust and expectancy that the Isle of Wight Council is likely to grant planning permission where objectives of sustainable economic growth and job creation are to be met. Unfortunately, even where sites have been proposed in the draft Island Planning Strategy, permissions have still been refused. The proposed employment park at Sandown Airport on a site intended to be allocated, is a point in question. The refusal is now the subject of an appeal. However, the lack of proactive working by planning officers to seek the appropriate delivery of the site, smacks of a lack of fruition by the local planning authority to deliver sufficient land for new employment.

There is no apparent 'wholehearted' support for businesses, especially where the Sandown airport site is concerned. Moreover, off-Island investors seeking to support and deliver new employment sites are now more likely to invest elsewhere rather than the Isle of Wight. The result will be the maintenance of an economy that is based on lower paid jobs, seasonal employment, and a further decline on manufacturing and business based opportunity.

For policy E1 to be successful, there must be corporate sign-up to the aims of economic regeneration and a commitment to delivering on allocated sites. This concern is aimed at internal procedures (namely Development Management) as a well as the wider issue of attracting investment. **There cannot, and must not, be a disconnect between forward planning and development control!**

Amount of Housing Required

The new national planning policy framework December 2024 emphasises the need for local planning authorities to seek the delivery of houses to meet actual need.

The Island Planning Strategy seeks to provide for an average of 453 homes per year, as set out in the proposed Policy H1 (Planning for Housing Delivery). The justification for this is based on what the local planning authority believes is deliverable. The figure is not based on the nationally prescribed methodology for determining housing need.

The draft IPS is short of providing for actual need by a significant margin. The December 2024 housing delivery schedule reveals that at one end the Island's housing need is a little over 700 dwellings per year, but in fact could be as high as just over 1000 dwellings per year. Through a lack of housing delivery to meet year on year need, actual housing requirements have risen significantly.

The lack of delivery of housing to meet actual need on the island derives from two unacceptable approaches undertaken by the local planning authority. Firstly, the planning authority failed to complete the local plan beyond the Core Strategy Adopted in 2012. Secondly, it has failed to grant sufficient sites planning permission, as flexible approach, to contribute to need. At that time of the 2011 examination, the public examination inspector stated (Inspectors Report 14 December 2011 M. Heatherington para 16) :

“As also noted above, the Council's five-year land supply assumes the delivery of some sites that are not presently allocated. Clearly, the prompt preparation of forthcoming AAPs, notably those for the Medina Valley and Ryde (proposed in the Local Development Scheme (LDS) for submission in 2012 and 2013 respectively), will be a significant factor in bringing sites forward to meet both the five-year requirement and the longer term Core Strategy total. However, a significant degree of additional flexibility is provided by policy SP1's support in principle for development on appropriate land within, or immediately adjacent to, the defined settlement boundaries of KRAs, SRAs and RSCs.”

Irrespective of the inspector accepting the local planning authorities argument at that time, he was assured that the completion of the key regeneration area plans and allocations would be brought forward quickly and ensure the delivery housing meeting need at that time. Unfortunately, for the residential community of the Island and those wishing to invest in housing development, neither the key regeneration area plans were taken forward nor were any housing allocations made. The result is that investors have had to argue the case on a 'site by site' basis for bringing sites forward and run the risk of refusal of planning permission even where they have identified how schemes can meet local housing need.

The Island is left with an extremely uncertain housing delivery market. For investors to have confidence and bringing sites forward they have to have a level of certainty that planning permission will be granted. This is certainly not the case at the moment.

With regards to the 'exceptional' case that the Isle of Wight council offers as to why it is not planning for housing delivery against need, this is unacceptable and unjustified especially more so now in light of the current National Planning Policy Framework (Dec.2024).

I have personally worked as a planning officer for a number of different authorities mostly on mainland Britain. In each case, the respective authorities could argue why their own area was unique. For example, Gosport Borough Council is a peninsula authority with constrained highways access. Portsmouth City Council is a tightly bound city, surrounded by harbours and the sea and again has constrained highways access. Nevertheless, both authorities have over the years acted proactively in identifying sites for housing and delivering much needed accommodation against housing needs targets. The Isle of Wight is no more exceptional than any other local authority area.

Without proactive and positive planning, the Isle of Wight community will remain in housing crisis where a lack of affordable housing discriminates those of lower earnings, and where the housing market is dominated by those moving to the Island from elsewhere, of retirement age, who can afford the inflated housing prices.

Whether the actual housing need for the Island is to be 703 dwellings per year or 1104 dwellings per year, the current draft IPS is woefully short of planning for housing need. At an assumed rate of 453 homes per year, the plan's shortfall ranges from 250 homes to 651 homes annually.

The GL Hearn report commissioned by the Isle of Wight Council and published in 2022 (as an update to a previous housing needs assessment of 2018) highlighted a number of key statistics and projections with regards to the population of the Island and its sub areas. In summary, these are:

1. *During the period time of 2023 to 2038, the population of the Isle of Wight will become significantly older with an increase of 29% over existing figures of people aged over 65.*
2. *Over the period there is a need for 1752 new units to be provided for the private sector needing support, not care. That is 116 units per year. On the affordable housing side of this, the need is 25 units per year.*
3. *By 2038 there will be a need to have 1683 units to utilise wheelchair access.*
4. *There will be a 47% increase in dementia on the Island during planning period ending 2038.*
5. *There were just 19 student homes on the Island in 2011.*
6. *There is a need to provide for at least 10 self-build units to be provided for per annum on the Island.*
7. *Across the UK, 18% of all housing stock is occupied as affordable housing. In Hampshire it is 14% and on the IOW it is 11%.*
8. *It is recognised in the report that there is a general need for the construction of 372 affordable housing units on the Island, each year.*

Since the adoption of the current 2012 Island Plan Core Strategy, delivery of new homes has been poor compared to actual need. In planning terms, there are a number of key factors leading to this namely:

- Insufficient allocation of sites for housing (the Core Strategy was never backed-up with area actions plans for the Medina Valley, the Bay and Ryde as required by the public examination planning inspector);
- Insufficient planning approvals granting planning permission for new housing sites;
- An ongoing and unjustified political debate centred around the review of planning policy which has delayed the new plan;
- A complete lack of certainty for developers as to whether their sites would be supported by the LPA. Planning decisions on housing sites are, at best, inconsistent. thereby repelling any potential interest investors may have.

Spatial Strategy

The identification of potential housing sites should have been driven by the local planning authority based around key objectives of sustainability, accessibility a meeting local community need.

New major allocations need to be focused on existing towns and settlements that have good highways infrastructure, a mix of local community facilities and shops and, ideally, have excellent connectivity to the mainland. As such, Cowes, East Cowes, Ryde, the Bay and to some extent Newport should feature. The local planning authority will argue undoubtedly that they have allocated sites. However, these are insufficient to meet need whilst uncertainty of planning permission being granted on other sites remains high.

The consequences of not providing for sufficient homes and jobs will lead to serious social and economic problems on the Island including:

- Increasing demand for homes and increasing prices (homes becoming unaffordable)
- Reduced opportunity for affordable homes;
- The younger working generations being priced out of the housing market;
- The Island further becoming a retirement destination rather than a self-sufficient economically balanced society.

The risk to younger economically active age groups is that the harder it is find accommodation, the more disillusioned they will be in the Island itself and the draw to move to the mainland will grow stronger.

As a planning consultant acting for landowners, developers and investors, it is clearly apparent that objectors to applications are generally of an older age group, often retired, and resistant to change. Those that genuinely need homes do not, as a rule, involve themselves in the planning process.

A balance needs to be struck. However, there has to be an acceptance that planning for actual housing need is a fundamental priority.

In order for there to be any positive 'plan-led' strategy to deliver the needed homes on the Island, the Island Planning Strategy needs to be revised. In particular, two essential approaches need to be adopted. These are:

1/ to accept the mandatory housing target when issued by government, leading to more allocations. Policy H1 should be revised to reflect actual housing need.

2/ To plan proactively for windfall sites and acknowledge the sustainable credentials of sites even if they sit outside of defined settlement boundaries. Policy G2 needs to be revised to allow for development adjoining settlement boundaries (recognising their sustainable location).

Yours sincerely

Phil Salmon
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