

05 February 2025

**BY EMAIL ONLY**

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Dear Louise,

**RE: ISLAND PLANNING STRATEGY. MATTERS, ISSUES AND QUESTIONS (MIQ'S).  
RESPONSE TO THE INSPECTOR'S QUESTIONS. MATTERS 1 - 6.**

This response should be read in composite with the BCM Wilson Hill representation of the 8<sup>th</sup> August 2024, which refined several concerns surrounding the Island Plan Strategy's regressive nature, its spatial approach to growth and specific targeted policies.

The Inspector's Issues and Questions (MIQ's) provide a meaningful insight into those salient considerations, and indeed concerns that BCM Wilson Hill have raised.

When reiterating our representation on the 8<sup>th</sup> August, we "*champion the Island and come as a friend. It is a place that can preserve its assets whilst taking opportunities to permit growth so the economy can flourish, and it can be a place that promotes 'home'. We welcome the opportunity for younger generations to have a choice to live and work in a vibrant place rather than being perceptually forced to the mainland where opportunities are seemingly better. The Island can and should promote itself and compete if the IPS is a forward looking, inspirational and productive plan which recognises its challenges but importantly, sets a vision to excel itself by allowing investment and to encourage confidence that the Island is a place for positive change and growth*".

Unfortunately, the IPS is a construct of the difficulties the Council (and policy makers) have faced against targeted political opposition to suppress growth. It is also a manifest of the past where the Island seeks to use the Solent as a barrier, rather than a productive benefit. Via a forward looking, visionary and aspirational plan, there is no reason why the Island cannot excel itself.



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**Matter 1:**

The Duty to Cooperate should act in composite with the questions raised in Matter 2 and in particular, against Issues 1 - 4.

For example, Portsmouth City Council has confirmed its constraints in land availability (and boundary) terms. When interlaced with policy E12 (Solent Freeport) and the ambition for the Solent area (including targeted areas in Southampton), the IPS becomes a regressive framework which does not marry with the essential need of the Island to be forward thinking, positive and aspirational.

The Council's exceptional circumstances paper (HO15) and those presented by Mr Seely (IPSR52) are not positive and seeks to solely resolve some of the current deficiencies/identified needs, rather than seeking to encourage the Island to excel and promote itself.

In doing so, there is no reason why the Island, via a Duty to Cooperate, cannot encourage an active workforce to live on the Island, but work within the Portsmouth and Southampton Areas or vice versa. That can form a Housing Market Area which enables the Solent to bind this regional area and unify its productivity, which by virtue of policy E12, is the ambition to unlock 52,000 new skilled and semi-skilled jobs including 26,000 direct jobs in the 'Solent Region'.

To suggest, for example, within GS16 that Portsmouth and the Isle of Wight operate within different economic market areas would seem to fly in the face of positive economic plan making and contradicts policy E12.

It seems the Statements of Common Ground (GS15, GS16, GS17) are insular and inward looking. They fail to attempt to contemplate how this important regional cluster can help one another economically, environmentally and socially. To uphold a historic narrative that the Solent is a barrier perpetuates inward looking and regressive market areas and policy creation.

It is too simple for Councils to work in their own silo and deflect a positive responsibility to review the region's economic, housing and environmental needs. If solely looking at the draft 2018 (Reg 18) IPS, the land availability to promote growth was more ambitious, but still only equated to using 1% of the land mass.

**Matters 2, 3 & 6**

Against HO15, there is common ground (as per paragraph 4.12 of HO15) that when reviewing the exceptional circumstances presented by Mr Seely (IPSR52) that *"The detailed demographic*



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*work concludes that should the exceptional circumstances route be pursued, there is a high probability that the housing need number generated would be in excess of the standard method (currently 703dpa), not below it”.*

Mr Seely’s approach, when acting as MP was to stop all greenfield development. That theme is clear within IPSR52. That conviction was well manifested in his role as MP and also how that permeated to elected Councillors, some of which sat on the Development Control Committee. This has resulted in significant disruption to the planning system and its role to assist delivery.

In correlation with the Inspector’s question 2.7, the approach of the Council via HO16, HO17, HO18 and HO19 to set a housing target of 453 dpa based on the Council’s concerns (HO19, Evidence Paper D, page 1 onwards) fails to recognise one of the most important building blocks which has sterilised the Island and its capability of growth.

The Council has struggled (from a policy perspective) to allocate land. For example, the last range of housing allocations was in 1996 via the Unitary Development Plan. Via the adoption of the Core Strategy (March 2012), the Inspector spelled it out clearly that prompt action must be taken to allocate sites. We are now 13 years forward.

The Council has tried to evolve and allocate Area Action Plans (APP’s) from 2014 and then latterly, a new plan from 2018 onwards. After 4 iterations of the IPS since 2018 the Council has been able to gain cabinet approval, but on the proviso that, for example, housing numbers were significantly reduced. The reduction was not a manifest of land use considerations or land availability, but one of political pressure (rightly or wrongly).

The destabilisation has led to considerable effects, none of which feature in the Council’s exceptional circumstances paper.

HO19 raises several actions to help unblock delivery, including profitability, viability, land availability and affordable housing. The IPS does not seem to try and address those barriers. It makes land availability smaller, reduces profitability and viability and currently has no route to deliver a meaningful supply of affordable homes.

Counter to HO19, page 3, the IPS sets to congregate significant/major housing growth in the Newport Area, where the allocations at Newport Harbour and Camp Hill will compete with one another. The Council suggest that they need to increase the range of larger sites, but this flies counter to the NPPF, which seeks to promote small sites (at least 10%) to encourage the growth of SME’s.



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The development industry on the Island (and replicated throughout the UK) is now facing a significant constraint whereby Registered Providers are not utilising S.106 affordable housing stock. This means that development sites cannot be financed, S.106 delivery triggers cannot be met, and major development sites have or will stop.

The approach to affordable housing delivery has not changed in the IPS and is counter to the intentions of H019, where the Council would *“review Affordable Housing Policy taking development viability into account. Consider different approaches to affordable housing dependent upon public/private ownership/developer”*.

The Inspector’s questions (2.10, 2.11, 2.14, 2.15, 2.17, 2.18 onwards) are timely and are correct to raise. To promote, be forward looking and positive is critical to the Island’s future and there is no reason why the IPS should not over allocate (if the questionable 453 dpa is correct) so that flexibility, supply and investment is created to overcome barriers. That approach applies to housing and economic growth.

#### **Matters 4 & 5**

The questions arising from the Inspector are covered in similar theme to the BCM Wilson Hill representation of 8<sup>th</sup> August 2024, and which can be discussed during the hearing sessions.

Kind regards.

Yours sincerely,

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