

CHRISTOPHER SCOTT

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To: policy.consultation@iow.gov.uk

Date: 13th August 2024

Re: Island Plan Strategy (IPS) Regulation 19 Representations

Introduction:

Christopher Scott and the Planning & Development Hub are a mixed multi-discipline land / property consultancy with an office based only on the Isle of Wight. The experience of this practice is based from a variety of disciplines including architecture, planning, development, sales, lettings, project Management, Town & Country planning, estate management, rural housing, farm diversification planning and affordable housing provision.

This practice has been on the Isle of Wight since 1984 and at one time, this multi-disciplined practice employed some 75 persons across the Isle of Wight. The current structure is a business of around 10 persons specialising in planning and development and the construction of such developments.

From a planning perspective and on-going development perspective as well as project management, we have over the years acted for National house builders and still do so, and also larger investment development builders on the Isle of Wight in dealing with sites from 1 off, up to 250 units.

The practice of Christopher Scott over the years has encouraged inward investment and regeneration right across the pise both in urban and rural settings, and continues to deal with a cross section of developments across the residential, commercial, industrial, leisure, and rural sectors.

This practice obviously has been involved in inward investment opportunities and continues to do so. This unfortunately has over the years has retracted somewhat, due to the returns, speed of getting planning permission and speed of getting delivery from planning to actually putting a spade in the ground.

It is noted from discussions with the National House Builders that they feel that the Isle of Wight is just too difficult a place to do business and many of the larger Housing Associations find the returns and construction costs too limited and the risk and exposure too high which they would not normally have if they were dealing on the mainland.

From a practice point of view we have looked through the IPS and would like the make the following comments, not necessarily in order of importance but need to be looked at as being previously discussed or have been omitted from the latest proposals which we believe would put the viability of this plan at risk on different levels.

This practice has been involved in the Island Plan generation for some years as it has evolved. It wishes to see a conclusion to this process, so it can provide an easy, safe and certain world in which we can take forward. This works from both sides, from the council side, the planning officer side and also from the people who deliver ie the developers and agents such as ourselves.



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Christopher Scott did sit on the SHLAA panel in helping to allocate deliverable housing sites on the Island. This was done in conjunction with Isle of Wight planners, Councillors and private professionals.

We would like to make the following comments:

1. The IPS should be a positive document and should meet the objectives set out within the NPPS and it should be clearly put forward for everyone to understand.

There is a lot of material found within the main body of the strategy which does not allow for development to go ahead and has been falsely accounted, which makes delivery and understanding that delivery difficult.

2. We believe that because of the position of the building industry on the Isle of Wight, the age of the population is becoming older and people are exiting the construction industry particularly the younger generation who are finding work on the mainland. This does not help to deliver new housing or extensions to schools, or new commercial developments in construction terms.

There needs to be an focus within the plan for training within the construction industry which should be linked to apprenticeships, to incentives and even immigration to allow for a wider workforce.

3. Within the housing policy, G2, it shows an area where sustainable housing development will be allowed within settlement boundaries. This assumes levels of primary settlements, secondary settlements, rural service centres and in some circumstances, outside the defined settlement boundaries, sustainable rural settlements which are proved to be sustainable and where there is a clear need for identifying housing needs.

In previous discussions with the Local Authority and allocations of sites going back to the start of this process, it was generally accepted that any development coming forward would be abutting and adjoining the development envelope of the three major development action areas of Ryde, The Bay Area and Medina, would be considered to be appropriate and such sites have either been allocated and now developed. We believe that there should be change to the planning strategy which would include “abutting and adjoining” as this would allow more houses to come forward within the targets given by the Government of 1104 per annum. There are sites within the planning process which have bene subject to positive pre-apps and have not yet come forward with formal planning applications but are found within an area where development has already started, such as Gunville and Newport.

4. It is clear that quite a lot of large sites have been put forward for allocation which come under the heading of Brownfield sites, rather than grey or green field.



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It is our experience in dealing with some of these clients that some of these allocations plainly will not come forward in a substantial basis within the period allocated. Having been involved in the Camp Hill re-generation project some years ago, this appears to be a non-starter and obviously there is a considerable amount to take into account with regards to numbers, accessibility, viability and obviously servicing the existing surrounding stock which is suffering from issues around EPC, ratings and mortgage ability etc.

Other sites that are around which include the Medina site in Cowes which painfully would take 20 years to develop and this has already been given permission on the basis of a standard size 2 bed unit, and we believe that this will take some 20-25 years to develop and we do not believe that this is feasibly or viable at the current time. One further point on this is that it could probably could return to marine and employment use in an area for which there is demand and therefore should be removed from allocated sites.

Other large sites such as Pennyfeathers are of a size which are not attractive to any form of National House builder or a combination of such. Therefore we do not believe that this could be taken forward in a way that would be more benefit by local developers being encouraged to develop smaller sites from 15-80 units. This has a habit of getting in and getting out within a space of 2-2.5 years without any huge amount of disturbance to the local villages or towns.

5. Obviously there has been some slight readjustment over time being the difference between primary settlements which were Development Action Areas with wider development areas, to rural service centres where Bembridge and Wootton have now been elevated into secondary settlements and yet places like Seaview and Nettlestone which have a large amount of sustainability and facilities, are lower to sustainable rural settlement. We would ask that this be re-visited in the light of housing need across the piste in these local areas.
6. We believe that there needs to be a monitoring position put into the plan, which allows monitoring of different areas and provision of a sites coming forward and being delivered. There is a problem with the amount of time where planning permission is granted and actual spades are put into the ground. This can be up to 2-3 years and does not fit into local government policy to get as many houses built as possible in the right place at the right time for the right people. Please refer to the strategy document H1a.
7. Obviously the IPS does have several policies some of which are not linked at all. Further work should be carried out to provide this through a series of connected policies. There needs to be a direct link between the number of jobs and aspirations for the Island going forward, and also the types of housing we are to provide. It is difficult to understand that employment sites are not being given a priority as they were historically which were then able to sustain inward investment. This is seen for instance at St Cross Business Park and other locations.

The recent refusal for a proposed allocated site at Sandown Airport shows a lack of joint awareness between the planning department and development control. The planning



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permission for the site at Ryde belonging to the Isle of Wight Council has now lapsed. This seems a very short sighted view and there needs to be a direct link working with institutions like the Chamber of Commerce to help deliver employment land and employment units. This is effectively been shown to work very well at Branstone Park in Newchurch.

8. Within the Hearn report of 2022, it was recognised that there needs to be construction for 372 affordable housing units on the Island each year. This is just below the amount of total houses have been built at the current time. There needs to be a clear strategy of how this can be improved by providing a larger mix of housing to encourage developers of all sorts to come forward in different formats of affordable houses, therefore increasing the delivery number. The position is that sites allocated to total affordable housing should be looked at as a primary, particularly in the larger urban areas such as Ryde, Cowes and Newport. This would allow affordable housing to come forward in a multi-tenure basis and this should be given top priority as recently as being shown at Acorn Farm in Newport where Sovereign were encouraged to provide housing on fast track basis.
9. We believe that there should be a monitoring board or similar to the SHLAA panel that was used at the start of the plan process, utilising people from different aspects of the property sector which effectively allocated from the period of 2 months and dismissing sites that felt could not be brought forward because they were either unsuitable, unviable or just not up to the core strategy thoughts.
10. It has to be recognised within the planning period National policies and priorities can change. This can be seen particularly around COVID which obviously changed the whole way that the commercial and office market worked which was obviously based on returns to developers. It is important therefore to understand with regards to different sections of the market particularly in the delivery of housing what needs to be looked at:
 - a. A clear set out provision with regards to the delivery and building of housing for the over 65. From 2023 – 2038, the population of the Isle of Wight becomes significantly older with an increase of 29% over existing figures of people aged over 65. This needs to be urgently looked at and work with developers
 - b. There is still an issue that has not been satisfied around gypsy sites. This we understand planned and allowed for 3 sites. This needs to be allocated and remove uncertainty and accept that this something that the Island wishes and expects to have, rather than being thrust upon.
11. There appears to be a problem with development not only on the open market, but also on council property that Island Roads, because of their contract, are able to intersect with consultancy representations which plainly go against a National Code and policy. It is important to note that their consultations and negative reporting, are stopping the delivery of housing and other development across the Isle of Wight. This needs to be re-visited with potentially a new Highways Code to be provided by the Isle of Wight Council Highway's department hence setting a baseline for Island Roads to comment on a more reasonable basis and make the planning decision timetable quicker. We support the H4 policy and feel



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opportunities outside settlement boundaries where there is a specific local need provided shown and opportunities for self-build and small builders.

12. Self-Build

This practice has the leading force in providing self-build projects and for small builders firstly in Whippingham and then Ash Lane, Newport and has expanded to areas such as Brighstone. The Island Plan indicated that there is probably a need for 10-15 units per annum. It is our experience that this is totally understated and there is probably a demand for around 50-75 units a year under the heading of opportunities for self-builders / small builders to grow and therefore add to the labour pool going forward as the plan develops.

13. Agricultural

There needs to be a clear policy on the diversification in the countryside, particularly around agricultural and horticulture which would allow viability to sustain those businesses going forward.

The Isle of Wight enjoys a worldwide reputation in regard to horticulture and any development around that should be encouraged.

14. Diversification of farming and rural economy

The fact is that the plan does accept diversification, however there is a general lack of understanding within the local authority as to how current agriculture, tourism, leisure activities interact going forward. There are great opportunities to provide and expand leisure and tourism in these locations as well as providing sustainable rural tourism and holiday lets.

It is also accepted that within existing farm settlements etc, development and diversification of those areas should be supported as long as they are within a sustainable position. This would help to provide balanced communities. In a world where BNG is starting to rule, there are going to be large agricultural swathes of land across the Island which will be wilded up, and therefore the reduced amount of area for growing will be reduced, and as such, the need for farm diversification and rural diversification becomes even more relevant.

15. Tourism Units and Second Homes

There has been a lack of understanding by the Isle of Wight Council on the amount and type of properties there are on the Island. There was an audit which was previously carried out some years ago and this has not been updated. It is important that we understand what accommodation there is currently available across the Island, divided into whether they are hotels, bed & breakfast, self-catered, short term holidays, camping sites, tree houses etc. This would then work out the future requirements and needs for holiday accommodation on the Isle of Wight and would help planning for all those people involved in this including operators and ferry companies and marketing companies.

Since Covid, the Isle of Wight has become a somewhat attractive location however with increasing ferry charges this is now slowly reversing. It is important that the Isle of Wight that depends on tourism and holiday accommodation should be encouraged and therefore



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restrictive polices put into place which would create an issue and also cause issues with employment, particularly in areas where part time employment is seen, such as the Bay Area. This needs to be addressed.

This is a national problem and there needs to be a balance between providing good quality holiday accommodation fit for purpose that increases the revenue all year round, with the conflict and fight against affordable housing in more luxuriously locations. It is quite possible to do both and it is quite possible to find a link between these two to encourage holiday accommodation to potentially support locally qualified affordable housing, something that should be explored and included within the plan when planning is granted for holiday units.

16. **Employment and Industrial Strategy**

The IPS does not contain a clear and concise employment led strategy for industrial and commercial land and with possible future inward investment to the Island and expansion of existing businesses on the Island.

This strategy should be looked at and discussed fully with full consultation and this should be reflected in the future plan for the next 15 years. This should include:

- a. Future job growth, rates, growth, aspiration with targets and goals
- b. Growth in certain employment areas
- c. Potential new job creation e.g. Island Distribution and logistics which in 2020 employed 25 people and now employs 300 people in 2024. Things do change and the plan needs to accommodate that.
- d. Creation of more green jobs
- e. Suitable site allocation areas across the Island on both private and public owned land
- f. Potential super site allocations for inward investment as previously included in previous plans.
- g. Training linked to future job growth
- h. Future growth and apprenticeships to create future growing workforce and for the young, and re-training of second generation jobs.
- i. A clear statement to encourage young people to stay and work on the Island, encourage immigration
- j. Policy for new companies to come to the Isle of Wight on land already allocated and existing companies to have an ability to expand in a way that would create more employment particularly in regards to high value jobs. This could targeted companies who employ more than 50 people like Vestas and GKN.
This would provide a positive and straightforward for these companies for investment from what are multi-national companies.

17. **Further Use and re-use of previously developed land for development**

Under the policy of H1 and H9, the IPS encourages the use of brownfield land and perhaps grey field land for development across the board, ie, residential, commercial, leisure and mixed use.



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Because there is a need to increase the delivery of up to 16,000 units over the planning period, we need to have sites across the Island which have had part development commenced and have not been totally built out as the original planning permission gave, and could also involve an increase in numbers to help deliver the above desired targets.

eg: The Whitecroft land has planning permission for x units, y have been built out and there are areas in the state that are classified as brownfield land which would help 25-35 new homes. The infrastructure is in place which makes delivery and viability more attractive.

Thomson House: Whitecroft is another area which forms part and parcel of Whitecroft estate historically and was allocated for affordable housing. The buildings that were brownfield have now been demolished and it now appears to be a meadow. This has potential to provide 15-20 more affordable housing units to balance against the open market units next door.

Fort Warden Totland: This has planning permission for 90 properties and some 50 have been built out. Therefore there is still the opportunity to build 40 amount of units to be built out. Because of the local landslip issues within the permission already granted, these areas cannot be developed however there are within the grounds of this former 2 holiday camps which is a brownfield site, an opportunity to provide 40-60 units particularly with regards to reflect the age requirements in West Wight and local needs ie. For retirement or care use.

18. Monitoring Policy for house building

No note has been made within the plan to have a monitoring function and to review the delivery of all housing within the 15 year period. There is a very large need to be providing housing for the elderly with care, support and first time buyers and affordable housing. Allocated sites that exist at the start of the planning period may satisfy the aims of H2, H1 and H3, however certain items can change and do change.

Covid changed the market drastically in the early 2020s with an increase of people working from home and the need for a home office with an addition bedroom and also increased migration from the Home Counties to re-locate to the Isle of Wight to live.

More recently land slips and substantial land movements have occurred in the South coast of the Island from Niton, St Lawrence, Ventnor, Bonchurch, and even Luccombe and Shanklin. Insurance companies have been carrying out a survey across the Island recently to indicate what insurance could be supported and therefore this needs to be looked at with regards to developments and allocation of new home sites in those particular areas. These allocations need to be reassessed. The insurance companies may therefore restrict or refuse insurance on such properties and therefore even more would affect mortgage availability and the ability for people to buy. This would have a clear effect on the market place and delivery figures. There is a real need to re-look at those proposed allocated sites in the areas mentioned above and these could be potentially allocated in safer locations away from the Coast which could be outside the defined development envelope. Therefore the policy of abutting and adjoining the envelope would be an appropriate policy to be retained.



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19. Q Class Housing

The IPS appears to be silent on this. The existing National Policy can help delivery housing by conversion of former farm buildings which does provide a contribution to the housing numbers that need to be required each year. The Plan should also look at the prospects of this type of housing making a contribution to affordable housing on the Island.

20. Previous Permissions on Land not totally developed

There are existing sites on the Island where planning permission has been granted for certain uses and ancillary buildings and uses attached to enhance the economic return and offer. These lands are still available for some re-use and in certain circumstance could be used for employment or other uses where there is a specialist need. This can help sustain the built area going forward and also to assist by providing further uses on what is likely redundant land to benefit the Island community and economy. An example of this is Newclose Cricket Ground where planning was granted for a new cricket pavilion with a 65 bed hotel and car parking. The hotel has not been built so other uses could be incorporated in what is seen as a sustainable location. Other sites include Mole Valley Farmers at Blackwater etc. It is recommended that these sites be investigated further to encourage development where permission has previously been granted.

21. There are existing sites that were originally allocated at the start of the planning process and which now have got outlined or reserve matters permission and where there is sufficient land to allow more units to be provided on the site. For example the RST site in Ryde when originally submitted, was for over 190 units. Planning permission has been granted for 145 units because of previous highway concerns. These have now been largely resolved, so this again, could provide an opportunity to provide a further 40 + units in an existing residential site.

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Please note: Letter sent by email only; original filed at Christopher Scott



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