



**Isle of Wight
Council**

**Hearing Statement Matter 5:
Policies for creating
sustainable, strong and
healthy communities**

**Draft Island Planning Strategy
Examination in public**

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Matter 5 – Policies for creating sustainable, strong and healthy communities

This hearing statement represents the Isle of Wight Council's response to **Matter 5** of the Draft Island Planning Strategy (IPS) examination in public . Answers have been provided to each of the *questions* asked in document [ED4 'Inspectors Matters, issues and Questions'](#) published on 19 December 2024.

Where documents in the IPS examination library are referenced as part of the answer, the document reference and title are used, and a hyperlink provided to that document.

Where the National Planning Policy Framework (NPPF) is referenced, unless stated otherwise this refers to the [December 2023 version of the NPPF](#) that the IPS is being examined under.

Where the council's response suggests proposed modifications to the plan, these are in **blue text and shaded accordingly**.

Issue 1: Whether the approach to policies for the community is justified, effective and consistent with national policy

Q5.1: Is the requirement in Policy C1c and f to only respect the character of the area, particularly in historic places and the National Landscape, consistent with national policy that also refers to enhancing such that the criteria would begin "respect or enhance ..."?

IWC response:

Yes the council consider that adding 'enhance' into criterion (c) of policy C1 would be necessary to ensure consistency with national policy.

In document '[CD7 Document setting out modifications from SoCGs](#)' we had identified some minor adjustments to the wording of some criteria in Policy C1 that fell out of SoCGs – these are reproduced below and include the deletion of criterion (f) as this duplicated previous criteria. The additional further adjustment of adding 'enhance' has also been included below:

Proposed modifications (new text underlined):

b) maximise the potential of the site through appropriate density that has regard to existing constraints, such as adjacent buildings and topography and takes account of and protects and enhances where appropriate views, water courses, hedgerows, trees, incidental green space, wildlife corridors, historic context including the setting of any nearby heritage assets or other features which significantly contribute to the character of the area;

c) respect and enhance the character of the area through their layout and design, particularly in historic places (such as conservation areas) and the National Landscape, especially in larger scale housing developments;

~~f) respect the diverse character and appearance of an area through their layout and design, especially in larger scale housing developments;~~

h) preserve the integrity and heritage significance of traditional shop front or building detailing;'

Q5.2: Whether the requirement in Policy C3 for a Health Impact Assessment is justified for all major developments?

IWC response

Yes the requirements in Policy C3 are justified. Planning Practice Guidance (PPG) recognises (at ID:53-005-20190722) that health impact assessments may be a useful tool to use when considering planning applications where there are expected to be significant impacts on health and well-being of the local population or particular groups within it. Guidance issued by the former Public Health England in 2020 on [Health Impact Assessment in spatial planning – a guide for local authority public health and planning teams](#) included in its Figure 2 indicative types of HIA for plans and development projects and this suggested that an HIA could be appropriate for 'major' planning applications and for other applications determined by local triggers. The Isle of Wight's Health and Wellbeing Board produced a strategy that takes a life approach of 'start well, live well, age well'. Its vision for health and wellbeing for the Island is where "people live healthy and independent lives, supported by thriving and connected communities with timely and easy access to high-quality and integrated public services when they need them". The strategy is currently being updated and likely to focus on certain key priorities for the island which impact on health, including housing and mental health. The Island Planning Strategy recognises the ageing population over the Plan period and that it can contribute to achieving the outcomes of the health and wellbeing board's strategy action plan through land use policies such as Policy C3.

Health Impact Assessment (HIA) ensures that the effects of development on both health and health inequalities are considered and addressed during the planning process. Applying this requirement to all major development embeds the 'life approach' principle and creates sustainable communities. Appendix 1 of document [GS12 IPS Viability Assessment Update report July 2022](#) assesses the viability impact of the Plan policies. Policy C3 is assessed as "This has a low impact on viability. It is a standard assumption to incorporate an allowance for 'professional fees' in development appraisals". Policy C3 acknowledges that any HIA should be proportionate to the scale of the development and so will vary in its extent accordingly.

Q5.3: Whether the requirements of Policy C4 are justified taking account of the comments from the Isle of Wight NHS Trust and Isle of Wight Council Public Health?

IWC response

The council is satisfied that policy C4 is justified. Policy formulation has taken into account the comments made and note that the policy is also aligned with the Isle of Wight NHS trust's clinical strategy ([Clinical Strategy 2024-2029 :: Isle of Wight NHS Trust](#)). The council took into account

that the land was allocated in the adopted [Island Plan Core Strategy](#) for employment (5.31) and has not been brought forward for that use in the 13 years since adoption, therefore recognised that a different approach was necessary.

The Council is working alongside the NHS and other working bodies which is further outlined in the supporting text to the policy (reproduced below) and evidence documents in the examination library ([CO14 Local Care Plan](#), [CO17 IPS Explainer document Community Policies](#) & [CO18 IOW Independent Living Strategy 2023-2038](#)):

***IPS paragraph 5.30** The outcomes of applying this policy will contribute to service provision and commissioning being delivered in the most efficient and cost-effective way across the whole system. The council is working with the NHS Hampshire, Southampton and Isle of Wight Clinical Commissioning Group and local NHS Trusts and health and care providers to improve the health and wellbeing of the Island's residents by delivering care at the right time and in the right place, and to ensure that people receive co-ordinated care that is appropriate to their needs. This will be supported by seeking developer contributions from qualifying developments to provide primary care facilities where they are needed (see policy G3).*

***IPS paragraph 5.33** It is recognised that to help bring the development forward an element of residential development is likely to be required. There are opportunities to provide a range of types and tenures, particularly key worker and affordable housing. Market housing could also be provided. Development proposals should demonstrate why the level of residential development proposed is necessary.*

In relation to the specific points made by the Isle of Wight NHS Trust ([IPSR37](#)) the Council considers the following minor modifications are necessary for factual accuracy and clarity:

Proposed modifications

The Policy title is amended as follows ([additional text underlined](#)):

C4: Health Hub and supporting development on the land to the North of St. Mary's Hospital site

b) healthcare and care-related employment (which could include a premium economy / patient hotel)

The council note that the Isle of Wight NHS Trust suggest the addition of point F relating to renewable energy sources, however the council consider that this point can be adequately secured through the implementation of other policies in the plan, including **C10 Supporting renewable energy and low carbon technologies** and **C11 Net Zero carbon and lowering energy consumption in new development**.

For factual accuracy in line with IOW Public Health IPSR105 comments, we would also propose a minor modification to paragraph 5.30 of the supporting text to Policy C4 to read:

Proposed modification (additional text underlined)

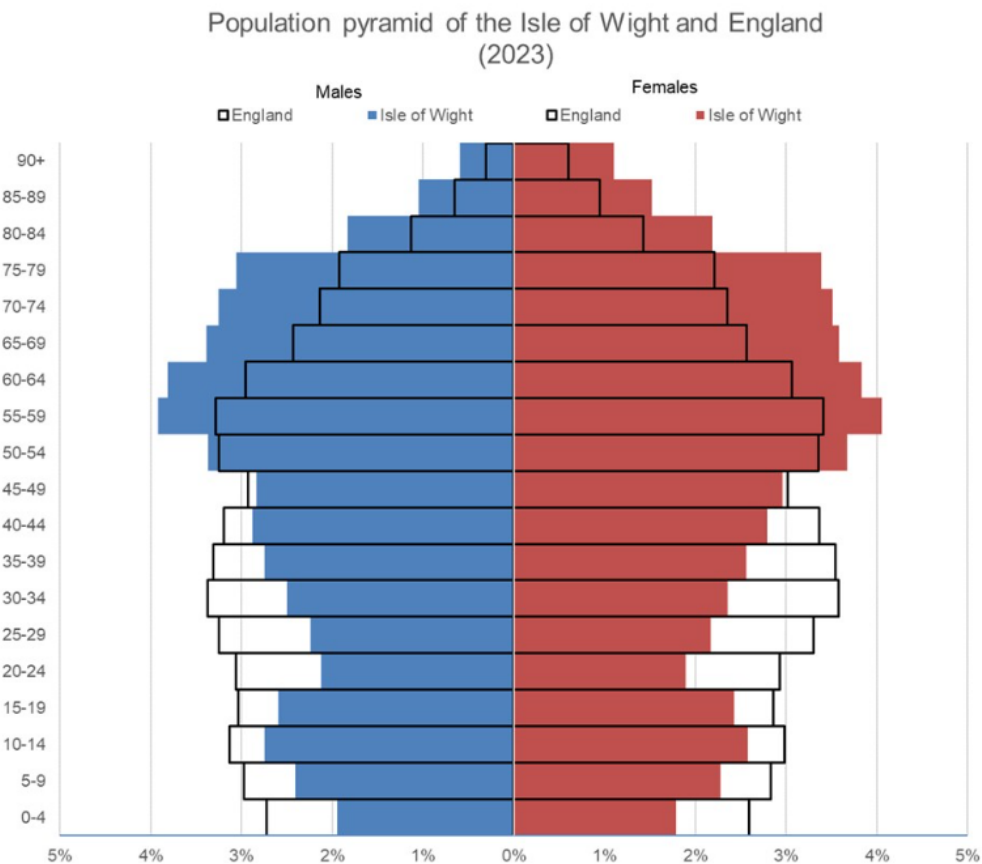
The council is working with the NHS Hampshire, Southampton and Isle of Wight **Clinical Commissioning Group** Integrated Care Service (ICS) and local NHS Trusts and health and care providers to improve the health and wellbeing of the Island’s residents by delivering care at the right time and in the right place, and to ensure that people receive co-ordinated care that is appropriate to their needs.

Q5.4: Whether the requirement in Policy C5 for 20% of dwellings within major residential developments to meet part M4(2) of the Building Regulations is justified and effective, taking into account the requirement in Policy H8 for 10% of new private housing to be built in line with the accessible and adaptable standard for homes set out in part M4(3) of the Building Regulations?

IWC response

The council do consider that the requirement in Policy C5 for 20% of dwellings to meet part M4 (2) is justified as it represents an appropriate strategy for the island where the demographic profile shows higher proportions of the population aged 50 and over compared to the national average. This is demonstrated in the population pyramid below, generated from Census 2021 data and sourced from the JSNA.

Figure 1: Isle of Wight resident population age and sex structure compared to England, 2023



Source: Hampshire County Council 2023-based small area population forecasts and ONS mid-2023 population estimates.

Ensuring a proportion of new build dwellings are accessible and adaptable represents a future-proofed design solution and paragraphs 5.37 to 5.39 of the supporting text set out the benefits of this policy requirement.

The combined requirements of Policies C5 and H8 are considered to be effective (and deliverable over the plan period) as in document '[GS12 IPS Viability Assessment Update report July 2022](#)' it is highlighted that for Policy C5, the previously attributable costs of meeting M4(2) equating to £521 per dwelling based on DCLG Housing Standards Review, would now be absorbed into BCIS build costs, which form the basis of the viability work.

Whilst no direct cost has been attributed in **GS12** to the requirements of Policy H8 (and the requirement for 10% of dwellings to meet part M4(3) wheelchair user dwellings), the council considers that the costs attributed for this would be absorbed / accounted for by a combination of BCIS build costs including some of the features necessary to meet M4(3) and sufficient contingencies and developers profit (at the top end of the scale) allowed for in **GS12**, noting that adaptable dwellings can attract a premium on sale price that offsets cost.

Q5.5: Are the provisions of Policy C6 justified and effective in providing additional accommodation that may only be required for a relatively short period?

IWC response

Yes – Policy C6 is both effective and justified. The policy's objective is to allow a level of independence to be achieved whilst supporting extra levels of care for dependent relatives. This is considered to be an appropriate strategy as it will provide a small part of a range of choices for older people in finding appropriate housing. Document EA2 IPS Integrated Sustainability Appraisal July 2024, paragraph 4.4.29 did not propose any changes to the policy to improve or mitigate its effects, suggesting an appropriate approach has been taken.

Document HO13 [IOW Housing Needs Assessment 2022](#) reports that data shows a continuing increase in the population aged 65+ over. Policy C6 provides a versatile solution to contribute to the provision of suitable housing. Its place in providing suitable accommodation, though small scale, fits with the aims of the Independent Island Living Strategy 2023 – 2038 (CO18), [IOW Health and Wellbeing Strategy 2022](#) (CO13), and [IOW Local Care Plan](#) (CO14), in widening housing choices for older people, and increasing good quality housing options available to them.

Q5.6: Are the requirements in Policy C11 justified, effective and consistent with national policy, including in regard to the requirement for all homes to be net zero carbon? Having regard to the Written Ministerial Statement of 23 December 2023 are the requirements presented in an appropriate format¹? Is the viability appraisal realistic in regard to the requirement for new homes to meet this policy?

¹ The WMS says the additional requirement should be expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specific version of the Standard Assessment Procedure (SAP), as opposed to an energy use target as expressed in Policy C11.

IWC response

The council consider that the requirements within Policy C11 are justified and effective as they are based on proportionate evidence and considered to be deliverable over the plan period (please also see our answer to Questions 5.7 and 5.8 for more information on this point).

The council accept that the requirements of Policy C11 could be considered as not being consistent with national policy and do not rigidly align with the Written Ministerial Statement of 23 December 2023, particularly around how they are expressed in the policy. Whilst the Written Ministerial Statement (WMS) has not been withdrawn nor, so far as the Council is aware, has it been specifically endorsed by the current Government as continuing to reflect Government policy. In any event the WMS is a material consideration but like any other material consideration setting out policy or guidance it can be departed from where justified. The Council considers that there is such a justification in the evidence-base underpinning Policy C11.

The wider context for Policy C11 is extremely important to highlight. On 24 July 2019 the council declared a climate emergency and committed itself to working towards achieving net-zero carbon status for the Isle of Wight by 2030. Following further work the [GS13 Climate and Environment Strategy](#) was published in late 2021, and revised these targets to be net-carbon zero as a council by 2030, across the school estate by 2035, and as an Island by 2040.

The targets within **GS13**, which are supported by Policy C11 in the IPS, will not only help the council to tackle the climate emergency, but also help in meeting the council's wider priorities of preserving our environment, delivering economic growth, protecting our community, and planning for our future needs as set out in the corporate plan. The council considers it has a strong, positively prepared rationale for the inclusion of Policy C11.

The council also note that in the WMS of 23 December 2023, reference is made to:

'A further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise.'

The change referred to in the quote above is the implementation of the Future Homes Standard, planned for 2025, albeit following a consultation by the then government in 2023, no further details about the date of implementation or what the standards would be have been released. Given this lack of clarity and certainty at a national level, the council consider local requirements are justified.

Turning to how the requirements in Policy C11 are expressed, document '[CO15 IOW Zero Carbon Homes Analysis](#)' provides our detailed consideration of why we have set the KPIs that we have and did not include a percentage uplift. For clarity, page 54 of **CO15** is reproduced below:

The approach based on a percentage improvement is detrimental

Building regulations (and therefore planning policy) are based on a required improvement over a baseline: the 'notional building'. Experience is showing that there are two issues with this approach:

- *The setting of the notional building, in particular the fact that it has the same shape, orientation and, up to a point, glazing proportions as the actual building;*
- *The approach based on relative performance compared to the notional building instead of an absolute performance level, which creates confusion and makes a post-construction verification and feedback loop more complicated.*

Improving the design of a dwelling by reducing the extent of heat loss areas and the number of junctions and by distributing glazed areas with consideration of solar gains are widely considered as essential components of an energy efficient design. The notional building almost neutralises most of these measures: it does not reward efficient designs.

In addition, a relative performance assessment has a number of issues: it is not a 'physical' metric, it cannot be checked by the occupant during operation and therefore it cannot be used to 'close the loop' and inform the development of SAP through in-use data. Finally, a relative target is not the most effective way to drive towards an absolute objective: Net Zero.

Whilst document **CO15** was prepared prior to the WMS, the council has set the requirements in Policy C11 to reward good design, something that cross cuts Policy C1 and of course national policy itself, and is confident that the evidence provides a sound basis for this approach.

Finally from a viability perspective, document '[GS12 IPS Viability Assessment Update report July 2022](#)' is considered to be realistic in relation to the costs associated with meeting the requirements of Policy C11. The overarching conclusion of **GS12**, presented at ES25 in the document is clear:

'Based on the assumptions set out in this report and the financial appraisals appended, we recommend that the Draft Island Planning Strategy is viable on the basis of 35% affordable housing in line with draft IPS policies AFF1 and H5.'

Pages 45 and 83 (Appendix 1) of GS12 sets out these assumptions in relation to Policy C11:

p45: Previously we assumed £2,000 per dwelling applied to 10% of total dwellings on site. As a result of changes to the policy but also Part L of the Building Regulations 2021 we have adopted £4,000 per dwelling to meet these standards. This is between an estimated £3,000-£5,000 per dwelling cost for a semi-detached property. We have then provided a sensitivity on this item showing the implication of a £10,000 per dwelling cost in order to achieve net zero standards in line with LGA research undertaken for IOW Council.

p83: The policy is caveated by viability and feasibility. We have however, included £4,000 per dwelling across the whole site for complying with changes to Part L of the building regulations. We have then provided a sensitivity showing the impact of the cost being up to £10,000 to achieve Future Homes Standard (2025).

The uplift in construction costs of Net Zero carbon homes in operation compared with Part L 2021 (and Part L 2025) is estimated to be between 5 and 8% depending on the typologies. This could be anywhere between £2,000 and £10,000 which reflects the sensitivity analysis referenced above. The Viability Assessment also includes the amounts referenced above explicitly on top of BCIS build costs, whereas some of the cost would be absorbed within BCIS build costs rates,

and this proportion within BCIS would continue to increase as the construction methodologies become more ingrained in the sector.

The council would also highlight that all of the typologies assessed in **GS12** included a minimum of 25% of First Homes on all sites – with the associated low transfer values / 35% discount from market value and cash flow / viability implications – First Homes are no longer a ‘requirement’ but would only form part of any affordable housing mix if they were suggested by the applicant / developer. Appendix 6 of **GS12** shows in the sensitivity analysis that reducing the First Homes discount (or indeed removing the necessity for it altogether) would show all development types as viable.

The council would also note, as highlighted in **GS12**, that supporting paragraph 5.75 to policy C11 does include wording that flags the potential for the viability and feasibility of meeting the policy requirements to impact delivery and sets out a scenario how a scheme could still come forward with an appropriately justified and evidenced Energy Statement.

Q5.7: Has the impact of Policy C11 on housing supply (the rate at which new homes come forward) been appropriately considered, particularly given the Council’s position that issues of supply chains, access to a skilled workforce and market volatility, amongst other things, have influenced who builds on the Island and recent delivery rates?

IWC response

Yes the impact of Policy C11 on housing supply has been appropriately considered, especially within document ‘[CO15 IOW Zero Carbon Homes Analysis](#)’. Issues relating to design and construction methods, workforce skills and cost all formed part of this evidence based work, as well as looking at schemes where these KPIs have already been met. Various extracts from CO15 covering these points are reproduced below:

The uplift in construction costs of Net Zero carbon (in operation) homes compared with Part L 2021 (and Part L 2025) is estimated to be between 5 and 8% depending on the typologies. This ‘Net Zero’ premium is considered acceptable particularly in comparison with other cost increases affecting the housing market. It is also important to see it as a premium that can only be reduced over the next 30 years as Net Zero becomes the norm (page 7).

In general the floor area of the house types modelled in this study are consistent with those considered in the LP viability study, albeit the 4 bed house is larger (page 7).

A series of recommended design specifications have been compiled for each typology in order to demonstrate a good starting point for meeting the KPIs outlined in this guide (page 8).

Each site will have its unique set of opportunities and constraints when it comes to obtaining net zero carbon, which must be investigated. For example, a site may only allow for a suboptimal orientation, meaning that considerable solar gain cannot be attained and that other measures must be strengthened to compensate (page 8).

However, as projects like Cameron Close on the Isle of Wight demonstrate, simple construction methods and non-specialist contractors can achieve ultra-low energy buildings with thoughtful design, a considered programme and support (page 15).

All the technology required to meet net zero buildings is in existence and well understood. There are existing companies located on the Isle of Wight that supply these systems (page 15).

The council has also been working alongside local construction companies such as Sydenhams, who have been using the KPIs within Policy C11 and providing costed design solutions that demonstrate the policy requirements can be met with readily available technology and construction methods.

A final factor to note is that a large proportion of proposed allocations in the IPS (15 out of 30 at the time of submission) are already subject to planning applications, therefore the amount of allocations that would be affected by this policy reflects those coming forward later in the plan period that are not yet subject to planning applications. This provides further time for awareness within the construction sector to be increased over how meeting the policy requirements can be factored into design and construction methodologies.

Q5.8: Is the principal evidence for Policy C11 contained in the Mission Zero Climate and Environment Strategy 2021-2040 [Document GS13] and IoW Zero Carbon Homes Analysis [Document CO15]?

IWC response

Yes the principal evidence to support the requirements and thresholds set out in Policy C11 are documents [GS13 Climate and Environment Strategy 2021-2040](#), and primarily document '[CO15 IOW Zero Carbon Homes Analysis](#)'. **CO15** was a detailed study commissioned by the council, funded by the Local Government Association (LGA), to understand the technical and cost implications of delivering Net Zero new homes on the Island, understand the implications for owners and occupiers and to inform emerging planning policy.

Within **CO15**, five different house typologies were chosen to represent a range of potential developments on the Isle of Wight. These were developed through conversations with the Isle of Wight Council and Southern Housing Group (representing the affordable housing sector and a partner in the work) and reviewing some of the current major planning applications for the Isle of Wight.

Please see our answer to Question 5.7 above in relation to how the evidence within this study has been considered in policy formulation.

Q5.9: Would Policy C12 provide an effective approach to securing infrastructure necessary to support sustainable growth? Are these contributions justified through the viability appraisal and would they affect deliverability of development and the effectiveness of the plan? How does this policy relate to Policy G3 regarding developer contributions?

IWC response

Yes Policy C12 would provide an effective approach. Policy C12 relates to utility infrastructure only and seeks to ensure that development does not adversely affect the ability and capacity of the Island's utility infrastructure to function and to meet the needs of development in connecting to utility services. The Infrastructure Delivery Strategy ([GS6](#)) sets out strategic infrastructure

requirements as a result of new growth on the Island, and where, how and when it is provided. Updates are summarised in [GS9](#) (combining information in [GS7](#) and [GS8](#)). Discussions, meetings and workshops have taken place with a variety of infrastructure providers, both within the Council and with external organisations, to develop an understanding of infrastructure requirements. For some development contributions to strategic utility infrastructure may be required.

Developers are strongly encouraged to work with infrastructure providers and consider the opportunities to address infrastructure requirements as part of their proposal. Applicants need to demonstrate that discussion has taken place with the statutory undertakers and infrastructure providers to provide a strategy on how connections will be made to public utilities infrastructure and deliver the required utility infrastructure to support development.

[GS12](#), Appendix 1 explains how the costs associated with each policy in the plan have been considered and which allocated sites are affected. Policy C12 is assessed as having a medium impact on viability.

Policy G3 covers developer contributions for other types of infrastructure including affordable housing, highway infrastructure, ecological / environmental mitigation, education and health infrastructure, coastal and flood risk reduction (including water management), digital infrastructure, open space, SANGs, cultural, public realm provision, community and sports infrastructure/ facilities.

Q5.10: Is there a reasonable prospect that infrastructure deficits and requirements can be addressed through a combination of the funding programmes of infrastructure providers, other delivery organisations and through the use of developer contributions and Community Infrastructure Levy?

IWC response

The council considers there are reasonable prospects for the delivery of identified infrastructure provision. Infrastructure provision on the island is a shared responsibility between strategic providers and public bodies, alongside contributions from developers. Infrastructure requirements also change and need to be updated on an on-going basis. [GS6](#) Section 1 outlines that it is very much a living document which will be updated and monitored over time, particularly as more detail and information on site specific proposals emerge.

The Island has not introduced a Community Infrastructure Levy because of potential national changes expected to the collection of developer contributions. Instead, use is made of S106 agreements, and contributions or infrastructure provision is collected through Policy G3 Developer Contributions.

Section 9 of [GS6](#) sets out the island's identified infrastructure requirements and identifies their costs, who will deliver it, timing and the level of significance. Not all infrastructure is of the same priority and timescales vary considerably. For example, some of the coastal defence schemes are identified as being achieved over the next 100 years. Other infrastructure will be determined on a site by site basis as the sites come forward for development. Section 9 makes clear that infrastructure will be achieved through partnership working between strategic providers and public bodies alongside developer contributions.

Some of the infrastructure identified in the IDP has been achieved already e.g. the rollout of broadband through IOW Rural programme and installation of BT Openreach superfast network and St. Mary's Roundabout in Newport. Work has also begun on widening of St Georges Way. Coppins Bridge works were completed 2022. An upgrade to the Island Line including new trains, increased service frequency, upgraded track and improvements to rail infrastructure including creating level access from the train to platform and a new passing loop at Brading station have been completed. Capital investment approved from Investing in our Future programme by the Department of Health and Social Care to create new emergency care, reconfigure wards and deliver a new high dependency ward at St Mary's Hospital commenced in November 2022. Work by Southern Water on waste water facilities began in late 2023.

Q5.11: Is the approach in Policy C14 insofar as it relates to the loss of existing community facilities effective and consistent with national policy, including paragraph 103 of the Framework?

IWC response

Yes the council consider that the three criteria in Policy C14, specifically (f), (g) and (h) provide a decision making framework that is consistent with the three bullets in paragraph 103 of the NPPF, albeit this part of national policy is primarily focused on open space and recreational land. Paragraph 5.97 of the IPS goes on to provide a definition of what constitutes social and community infrastructure, and this list includes a variety of indoor and outdoor recreation and sports facilities. It is considered that taking a consistent approach to all types of social and community use in relation to the potential loss of these facilities, and the policy requirements within policy C14 should a loss be proposed, is justified given the essential role that this infrastructure plays within island communities.

As paragraph 103 of the NPPF is primarily focused on open space and recreational land, it is worth highlighting that there are other policies within the IPS, notably EV6 and EV7, which cover development proposals that may result in the loss of such land and it is considered that in combination, the suite of IPS policies (C14, EV6, EV7) provide appropriate protection for open space and social and community infrastructure.

Q5.12: Is Policy C15 consistent with national policy, particularly with regard to paragraph 105 of the Framework in relation to Local Green Space?

IWC response

The council considers that an additional criterion to policy C15 is necessary to ensure consistency with national policy, specifically paragraph 105 of the NPPF that identifies Neighbourhood Plans as part of the local development plan that could designate Local Green Spaces.

Proposed modification (additional text underlined):

f) location of social and community infrastructure;
g) designation of Local Green Spaces

Q5.13: Is the effective level of policy making relating to restricting second home and short term holiday let ownership of new build properties at Neighbourhood Plan level? How does this relate to Policy E9?

IWC response

Yes the council consider that the most effective level of policy making for any restrictions on second homes / short term holiday accommodation is at Neighbourhood Plan level. The reasons for this are set out in detail in documents '[CO16 IPS evidence paper – second homes May 2024](#)' and '[EC3 IPS evidence paper – short term let holiday accommodation](#)'.

CO16, particularly the table at paragraph 4.2, highlights that high levels of second home ownership are not an island wide issue. There are concentrations in particular parts of the island, but an island wide policy is not necessary – there are only three parishes where the % of second homes exceeds 10%, with the majority less than 5%. **CO16** also flags other areas in the country where second home restrictive policies have been taken forward in neighbourhood plans (paragraph 1.9) and the council consider these to be the most appropriate, locally focused policy vehicles to tackle this issue, should those particular parishes consider the impacts are such that levels of second home ownership need restricting.

Document **EC3**, particularly section 4, details why the IPS cannot introduce a policy that effectively supersedes planning legislation in relation to short term holiday let accommodation. As identified in paragraphs 4.2 and 4.3 of **EC3**, the (previous) Government undertook various consultations on this issue that provided a direction of travel at the time, however, to date no changes to the Use Classes Order relating to short term holiday let accommodation have been made. Policy E9 seeks to provide a policy basis where such applications for short term holiday let accommodation that may be received can be steered to the core tourist accommodation areas identified on the Policies Map. This is considered to be a justified and effective approach of positively directing a tourism related land use to identified tourist accommodation areas.

Q5.14: Various modifications to Policies C1, C3 and C10, are presented in Core Document 7, in light of the statement of common ground with Historic England. Are these proposed changes necessary for soundness?

IWC response

Please see our answer to Question 5.1 which covers the proposed revision to Policy C1 suggested by Historic England ([IPSR90](#)) and considers that a modification is required to ensure consistency with national policy.

For the proposed revisions to Policies C3 and C10, the council considers that the suggested revision to Policy C3, reproduced below, is **NOT** required for soundness however would provide further clarity on the link between the historic environment and wellbeing.

Policy C3	<p>New criterion (d):</p> <p><u>d. improving access to and/or appreciation of the local historic environment.</u></p>
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For Policy C10, the proposed revisions identified in CD7 and reproduced below, **are considered** to be required for soundness as the additional wording provides clarity to aid implementation in respect of designated sites and would therefore be more 'positively prepared' as a result.

Proposed modification

Policy C10	<p>In line with the targets and objectives of the Isle of Wight Climate and Environment Strategy and to support local energy security and resilience on the island, the council will support proposals <u>in appropriate locations</u> for:</p> <p>a) major development of renewable energy schemes, in appropriate locations and where there is appropriate grid capacity and storage;</p> <p>Within areas of protected and sensitive landscapes and townscapes, development should generally be small scale or community based. It is expected that major wind and photovoltaic schemes will be located outside of the <u>National Landscape AONB</u> and <u>other protected designated</u> areas, and grade 1-3a agricultural land (for photovoltaics) and will be informed by consideration of any impacts on the setting of <u>protected designated</u> areas <u>and designated heritage assets</u>.</p> <p>Proposals outside the settlement boundaries or site allocations should demonstrate they have taken account of:</p> <p>g the visual impact on the character of the area;</p> <p>h the consistency of the proposal with nature conservation and <u>the conservation of heritage significance</u> asset objectives.</p>
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