



**Isle of Wight  
Council**

**Hearing Statement Matter 6:  
Allocating sites for housing,  
including the Key Priority  
Sites**

**Draft Island Planning Strategy  
Examination in public**

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## Version history

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<b>1.0</b>	<b>27.1.25</b>	<b>First draft (JB)</b>
<b>1.1</b>	<b>3.2.25</b>	<b>Second draft (JB)</b>
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<b>1.3</b>	<b>18.2.25</b>	<b>Revised version to correct broken hyperlinks (JB)</b>

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## Matter 6 – Allocating sites for housing, including the Key Priority Sites

This hearing statement represents the Isle of Wight Council's response to **Matter 6** 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: General approach to the selection of housing sites allocated in the Plan

*Q6.1: Does the 2022 Strategic Housing Land Availability Assessment [Document HO5], together with the Integrated Sustainability Assessment and the Housing Evidence Paper B [Document HO17], demonstrate that all reasonable options for potential housing allocation sites have been identified and systematically considered and that unreasonable options have been discounted at the appropriate stage?*

#### IWC response:

Yes documents [HO5 2022 SHLAA report and appendices](#) and [HO17 IPS Housing evidence paper A – approach to housing in the IPS May 2024](#) do demonstrate that all reasonable options for housing allocation sites have been identified and considered through the plan making process. An important point of context here is that the first Regulation 18 version of the IPS which was published for consultation in 2018/19, included sites that would combine to deliver the then standard method housing requirement of 641 dwellings per annum (and the previous 2016 SHLAA formed part of the evidence base). Subsequent versions of the IPS have included sites to deliver the island realistic housing requirement of 453 dwellings per annum, and a comprehensive re-run of the SHLAA (that assesses over 400 sites) was undertaken in 2022 to help inform the submission version of the IPS and ensure that an up to date assessment and review process was in place as part of the evidence base.

**HO5** includes a detailed methodology that follows planning practice guidance on the preparation of housing land availability assessments. Appendices 2, 3 and 4 respectively set out the detailed

analysis of those sites that were discounted, not considered suitable or not currently developable at the time of assessment.

The selection of sites for the submitted version of the IPS has been carried out in line with the spatial strategy of the plan, and is a matter of planning judgement based on the available evidence at the time various assessments were undertaken. This is in accordance with the guidance in the PPG on housing and economic land availability assessments, which advises (at ID:3-001-20190722) that *“It is the role of the [SHLAA] assessment to provide information on the range of sites which are available to meet the local authority’s... requirements, but it is for the development plan itself to determine which of those sites are the most suitable to meet those requirements.”* The council is confident that the package of sites included in the IPS have been assessed and considered as reasonable options through the SHLAA process and that unreasonable options have either been discounted through the SHLAA process (as set out in Appendices 2, 3 & 4 of that document), or not proposed for allocation if they did not align with the spatial strategy of the plan.

*Q6.2: Appendix 1 to the Housing Evidence Paper B [Document HO15] provides an overview of the scaling back of sites from earlier drafts of the Plan. Is the approach justified? The table at Appendix 1 identifies that the Council considers a notable number of the removed sites could be suitable for development through submitted Policies H7 or H9. Would that be an effective approach?*

IWC response:

The approach to site allocations set out in [HO17 IPS Housing evidence Paper B – Revisiting the IPS allocations approach May 2024](#) is an appropriate strategy to deliver the ‘island realistic’ housing requirement set out in [HO16 IPS Housing evidence Paper A](#). Paper B summarises the update of the ISA assessment of the spatial strategy options. With the preferred spatial option *Use existing settlement hierarchy (a) Increase density/site yield, focus on infill and brownfield, do not allow development beyond settlement boundaries* being assessed as the best performing option, a set of guiding principles was developed (drawn from the outputs of the ISA and consultation responses to the 2018 draft IPS). As Paper B explains in paragraph 5.2, *“Taking these principles the council has identified a number of criteria to help filter sites being considered as proposed allocations.”*

Paragraphs 5.11 - 5.31 of **HO17** explain the site selection process. Of note here is paragraph 5.31 that explains the relationship of the sites filtered out of the allocation process still being able to come forward as windfall development through policies H7 and H9 if they satisfy the requirements of those policies (including their focus on meeting affordable or specific local housing needs), providing the plan with flexibility and highlighting the housing requirement figure of 453 is not a maximum or ceiling, but that non-allocated policy compliant proposals will have a role to play.

**HO17**, paragraph 5.31: *It is important to note that some of the sites removed from the first Regulation 18 Draft IPS in 2018/19, could still come forward for development under the Rural / First Homes exception sites policy or new brownfield sites policy. Of the new sites suggested to IWC during and since the last IPS consultations that have not been taken forward as allocations, some could also still come forward under the aforementioned policies. This position aligns with the housing requirement of 453 dwellings per annum within the submission version of the IPS not*

*being a target to aim for or a ceiling in line with the NPPF. Windfall dwellings delivered through policies H7 and H9 would be in addition to the planned growth on allocated and permitted sites and may result in the windfall allowance of 100dpa within the IPS being exceeded.*

The work set out in **HO17** provides the evidence to justify the approach, taking into account sustainability, consultation responses and the need for affordable housing. The approach to sites, both allocated and potential windfall is deliverable over the plan period and therefore effective. Conversely, making additional allocations which (for wider reasons connected with the constraints of the Island's housing market as explained under Matters 2 and 3) are at a scale greater than is expected to be delivered would not be justified or effective and would not result in 'plan-led' development, as is required by the NPPF. From a windfall perspective, supporting paragraphs 7.10 & 7.11 of the IPS provide detailed analysis of why the windfall allowance is considered to be justified and based on the best available evidence, as well as our answer on Question 7.5.

*Q6.3: Is it justified and consistent with national planning policy, in applying the sequential test on flood risk, that sites with a lower risk of flooding at the edges of settlements are not taken forward /discounted and that previously developed sites in primary settlements (Cowes and Newport) affected by high flood risk pass the sequential test and are subject to the exceptions test?*

IWC response:

Yes. The NPPF recognises (at paragraph 169) that wider sustainability objectives may provide a reason why development in a higher flood risk area should be preferred to development in a lower flood risk area when applying the sequential approach. The PPG on flood risk and coastal change also advises (at ID:7-023-20220825) that "*Application of the sequential test in the plan-making... process will help to ensure that development is steered to the lowest risk areas, where it is compatible with sustainable development objectives to do so...*". Consideration of wider sustainable development objectives is therefore part and parcel of determining, for the purposes of the sequential test in paragraph 168 of the NPPF, whether lower risk sites are "*reasonable available... and suitable for the proposed development.*" The approach taken to allocating sites in the IPS is set out in [HO17 IPS Housing evidence Paper B – Revisiting the IPS allocations approach May 2024](#). Section 5 of **HO17** sets out how the housing allocations (from the first draft IPS in 2018) have been reconsidered, taking into account the consultation responses, [EA2 IPS Integrated Sustainability Appraisal ISA July 2024](#) outputs and the spatial strategy. Paragraphs 5.12 – 5.26 detail how flood risk has been considered in the site selection process. The table under paragraph 5.14 sets out where the (flood risk) sequential approach, sequential test and exception test have been carried out.

Applying the preferred (as identified through the ISA) spatial option of '*Use existing settlement hierarchy (a) Increase density/site yield, focus on infill and brownfield, do not allow development beyond settlement boundaries*' including the site size threshold in terms of ability to deliver 10 residential units or above has provided the selection of sites proposed for allocation. A small number of these have an element of flood risk, but when applying the strategy above, there are no alternative sites available and therefore the sequential test is satisfied, and application of the exceptions test is justified and consistent with national policy.

In addition, as all the sites subject to the exceptions test are large, brownfield sites, located within primary settlements, sustainably located (in terms of transport and connectivity) the development

of these sites delivers the policy aims of NPPF sections 7. *Ensuring the vitality of town centres* and 11. *Making effective use of land*. Whilst there may be sequentially preferable sites on the Island for development in flood risk terms, none offer the range of sustainable benefits likely to be achieved through the sites regeneration, or have as negative an impact should these sites remain undeveloped and likely run counter to the elements of the NPPF referenced above.

The council has worked with the Environment Agency to address their concerns raised in their Regulation 19 consultation response ([IPSR11](#)) on those sites where the exception test is being applied. This work, together with the areas of agreement is summarised in a Statement of Common Ground that is currently being finalised and will be submitted to the examination w/c 17<sup>th</sup> February 2025. To confirm, the area that required further work was the use of the most up-to-date flood risk data (taking climate change into account) to understand risk and the ability to ensure development is safe in accordance with the policies of the IPS and NPPF, and not on the principle of the applying the exception test or the approach to site allocations in the spatial strategy.

*Q6.4: Policy H2 'Sites Allocated for Housing' refers to sites in Appendices 1 and 2 of the IPS which comprise both large sites with planning permission and "allocated sites". Would it be necessary for soundness (effectiveness) to have allocation policies in the Plan for the housing sites in Appendix 3, similar to the approach adopted for the proposed employment allocations (Policies EA1-6) and key priority sites (KPS1 and KPS2)?*

IWC response:

The council do not consider it is necessary for soundness to have individual allocation policies in the IPS for each and every residential allocation. The allocations are already made collectively by Policy H2, and its criterion (b) sets out the site specific allocation requirements for specific sites as set out in Appendix 3. However the council do consider that it would be appropriate to move the list of the proposed allocations / permissions from Appendices 1 and 2 to Policy H2 so that it is clearly set out in Policy what the proposed allocations are and ensure effectiveness in this regard. Alongside retaining the site-specific requirements in Appendix 3 (and the link to this in Policy H2), this is considered to be the most practical combination.

**Proposed modification (additional text underlined):**

**Policy H2:**

The sites listed below, and shown on the Policies Map, are allocated for residential or residential-led mixed use development.

Move tables from Appendices 1 and 2 into policy box at this point.

Proposals for these sites should demonstrate how they will deliver.....

The yield identified in the tables above are for indicative purposes only and the.....

*Q6.5: Appendix 3 includes site specific requirements for sites that have planning permission. Is that a justified and effective approach given sites with detailed planning permission are capable of implementation and have already been adjudged to comprise sustainable development?*

IWC response:

Yes the council considers this approach to be justified and effective, as whilst these sites currently have planning permission, any of those permissions could expire within the plan period or a revised form of development might be proposed for various reasons, for example a change in land ownership. By including site-specific requirements in Appendix 3 for some existing permissions, should those permissions expire, or revised proposals be submitted then the adopted plan would retain a set of core requirements for any future planning applications to take into account.

An example of this is the Red Funnel site in East Cowes (HA120) which at the time of publishing the Regulation 18 version of the plan in 2021 benefitted from planning permission, however that permission expired prior to the Regulation 19 period of representation, however the site specific requirements in Appendix 3 for this site can be used to guide future schemes on that site.

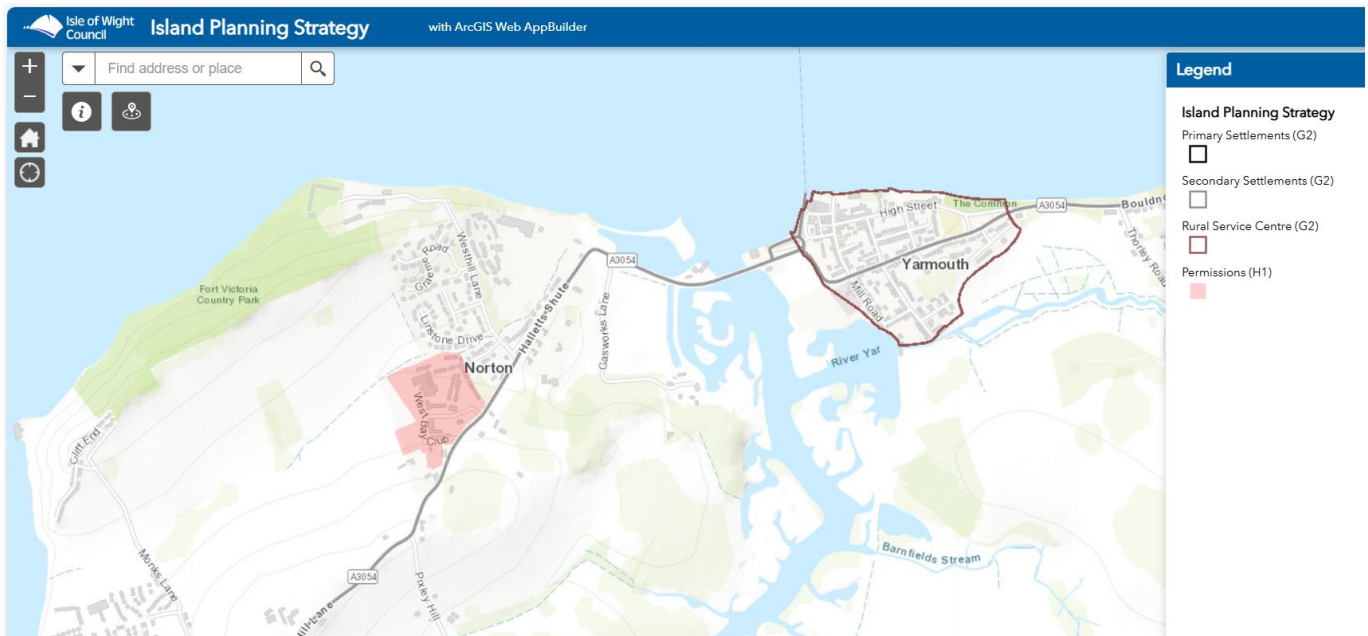
*Q6.6: Are the large sites with planning permission listed in Appendix 1 encompassed within the proposed settlement boundaries on the Policies Map where it is logical to do so?*

IWC response:

Yes the large sites with planning permission listed in Appendix 1 are encompassed within the proposed settlement boundaries, where doing so would align with the spatial strategy for the plan detailed in document '[EA2 Integrated Sustainability Appraisal](#)' and [HO17 IPS Housing evidence Paper B – Revisiting the IPS allocations approach May 2024](#) and set out in Policy G2.

An example of this would be the West Bay Club site, which benefits from planning permission for 26 units, however as shown on the Policies Map extract below, has not been included within the settlement boundary of Yarmouth as the site is not immediately adjacent to the boundary.





Q6.7: The Plan splits sites into those that have specific requirements at Appendix 3 and then Policy H3 sets out housing development general requirements to apply to all sites. How has plan-making determined those sites that warranted inclusion in Appendix 3? In terms of plan effectiveness would there be any internal tension or conflict between Appendix 3 and Policy H3? Is Policy H3 necessary or does it largely overlap with other policies of the Plan?

IWC response:

Plan making has used a range of evidence and information to support the inclusion of sites in Appendix 3 to provide site-specific requirements and this process is summarised in paragraph 7.47 of the IPS:

*Additional site specific requirements are set out in Appendix 3, and these have been identified where:*

- *a site is large and has the potential to develop a number of houses and other aspects;*
- *there may be more than one landowner, and a more specific approach is required to ensure the site is delivered in a comprehensive manner;*
- *there is a feature, constraint and/or unique characteristics that require a specific policy approach.*

The majority of sites that do not have ‘site-specific’ requirements are smaller, brownfield sites in town centres or residential areas (for example HA118, HA115, HA055 & HA117).

The council do not consider that there is tension between Policy H3 and Appendix 3 and believe that Policy H3 is necessary as whilst it does include some issues covered by other policies of the plan (e.g. BNG / Policy EV2), it provides a clear policy framework for allocated sites not listed in Appendix 3 to consider whilst also providing a clear set of requirements for sites that may come forward in the plan period that are not allocated. As our answers in the Matter 2 hearing statement set out, the housing requirement in the IPS is a ‘floor’ not a ceiling, therefore providing a clear set of requirements for such sites is considered to be justified and effective.

## Issue 2: Whether the policy approach for the proposed Key Priority Sites is soundly based? (Policies KPS1 and KPS2)

*Q6.8: Is the site at the Former Camp Hill prison (HA39), identified as Key Priority Site 1 (KPS1), likely to come forward for development within the plan period? Is there a clear timeframe or agreed process for site disposal from the Ministry of Justice?*

### IWC response

Yes the council consider that the former Camp Hill site (HA039 / KPS1), which closed as a prison in March 2013, will come forward within the plan period (albeit towards the back end of the period) and this is supported by representations from the Ministry of Justice (MoJ) throughout the plan making process, including at the Regulation 19 stage where comments ([IPSR93](#)) noted:

*'Within its previous response in 2021, the MoJ confirmed it broadly supports in principle the creation of a sustainable, mixed-used, multi-tenured, high quality designed new neighbourhood.'*  
*'It is noted that a masterplan for the whole area will be agreed by the Council to guide the phasing and delivery of this site. The production of a masterplan is strongly encouraged by the MoJ.'*

*'Notwithstanding the above comments, the MoJ remain committed to working in partnership with the council and key stakeholders to assist in the potential delivery of this key priority site subject to the site no longer being required for criminal justice purposes.'*

Ongoing dialogue with the Ministry of Justice over the possible timing of any release will be set out in a Statement of Common Ground (SoCG) between the parties that will be submitted to the examination during the week commencing 17<sup>th</sup> February 2025. This SoCG will reflect the latest ministerial position.

It should be noted that elements of work supporting alternative uses for the site have already begun, for example in early 2021 the MoJ provided the Isle of Wight council with a capital sum to take on the management and responsibility of the prison estate road network surrounding the former Camp Hill site.

*Q6.9: The site capacity is identified at least 750 homes together with other on-site requirements listed in the proposed Policy KPS1. Is that site capacity justified having regard to environmental factors (for example proximity of the Parkhurst Forest SSSI) and infrastructure capacity (local roads, sewerage etc)?*

### IWC response

The council do consider that the capacity is justified taking into account the constraints of the site and the stage at which the land is in the development process. Whilst no detailed masterplanning exercise has yet taken place, the red line boundary of the proposed allocation respects the key

environmental designations (for example the proximity to Parkhurst Forest and SINC) and at a size of 55 hectares, would provide sufficient space to include the proposed 2 hectares of employment space, community facilities, open space and residential development at a density of between 15-20 dwellings per hectare which would allow for a development scheme that respects the location adjacent to designated land.

From an infrastructure perspective, the [St Marys strategic junction improvement scheme](#) that was funded by MHCLG at a cost of £9.6 million and completed in 2021, delivered a comprehensive strategic junction improvement that sought to future proof the highway network and provide capacity to accommodate predicted growth in the Newport area, including the proposed allocations in the local plan. Detailed infrastructure planning will be undertaken as part of the masterplanning work identified in the IPS within Policy KPS1.

*Q6.10: What contribution would the Camp Hill site make to the housing trajectory in Appendix 4? When is it anticipated to start delivering, at what rate and is that reasonable?*

IWC response

As identified in the updated housing trajectory provided as Appendix 1 to our Matter 7 hearing statement, the Camp Hill site is shown as delivering 330 homes within the plan period. The housing trajectory includes these 330 homes in the last five years of the plan period (32/33 – 36/37) at an average of 66 homes per year, recognising the significant amount of masterplanning work that would be necessary for this site before it could come forward but also the fact that once permission is in place, as a strategic site the per annum delivery levels could be at the higher end of island delivery rates.

*Q6.11: The IPS recognises (paragraph 7.31) that there are other proposed allocations (and sites with planning permission) within the vicinity of the KPS1 site at Camp Hill. The submitted approach is to prepare a Supplementary Planning Document to address these sites (that would also include the St Mary's Hospital site) to establish a degree of coordination (for example infrastructure planning). Would this be an effective approach?*

IWC response

The council do consider that an SPD would be an effective approach for the co-ordination of potential development sites in this area. SPDs can include a level of masterplanning detail (including around key infrastructure, design parameters etc) that would not be appropriate at the local plan making stage. Some of these aspects would also rely on the development proposals, particularly those at the former Camp Hill site and St Marys Hospital site as the two largest contributors, being more advanced than they are at present.

*Q6.12: Would it be necessary for soundness to insert additional content into Policies KPS1 and KPS2 regarding heritage as set out in Core Document 7, following the Statement of Common Ground with Historic England?*

IWC response

Yes the council do consider that the proposed modifications to Policies KPS1 and KPS2 that are identified in CD7 would be necessary for soundness to ensure consistency with national policy and welcomed Historic England's input in this regard.

*Q6.13: Is land at Newport Harbour (HA44) justifiably identified as a Key Priority Site (KPS2)? Is the site developable within the plan period?*

IWC response

Yes. The council consider that as a public sector owned, brownfield, sustainably located town centre site in the county town that is capable of accommodating a range of uses, it is entirely justified to be identified as a Key Priority Site. As landowner, the Isle of Wight council has a clear desire to bring the site forward within the plan period, which is highlighted by the extensive work and cost to date on preparing a masterplan for the area.

Ongoing conversations continue to take place over securing investment for some of the potential uses that may be delivered on the site, with the council (as landowner) continuing to explore and undertake feasibility studies with partners and key stakeholders over developing a comprehensive mixed use development that could include a flagship community, arts and leisure facility. The council expects the site to be developable within the plan period – the housing trajectory shows the 250 units being delivered in years eight to twelve of the thirteen year plan period, which reflects the current status of the site and necessary finalisation of the detailed masterplan that would take place once the IPS has been adopted.

*Q6.14: The Newport Harbour site, at approximately 2.5 hectares, is allocated for a mix of uses, including at least 250 homes (35% affordable), serviced employment land, retail, community floorspace and public realm. Is that feasible on the site and compatible with objectives to make efficient use of land (including appropriate densities) and achieve well-designed places?*

IWC response

The council consider that the proposed allocation and the proposed elements highlighted in the policy are feasible on the site. Given the sustainable, town centre, waterfront location it is anticipated that a high proportion of the residential development would be in the form of flatted schemes that would also assist with mitigating flood risk across the site and see less vulnerable uses at ground floor level, including the identified retail and community floorspace.

Draft [Masterplanning work](#) to date has shown that the site does have the capacity to deliver a mixed use scheme incorporating all of the identified uses. The final version of the masterplan is due to be taken forward for council approval should the IPS be adopted.

The LPA would note that the proposed allocation boundary in the IPS does represent a reduced area than had been identified in the draft masterplan. The draft masterplan included land at Seaclose Gate (see extract below) that was identified as having development potential, however the council as landowner is not proposing that land at present.

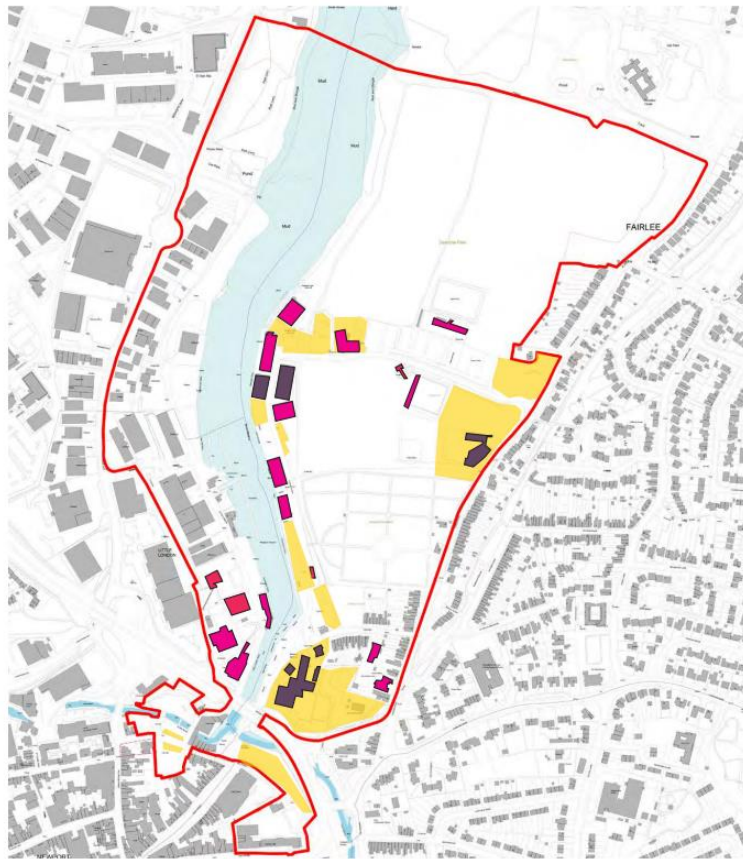


Figure 7. Principles for Development Within Site Boundary

## Constraints and Opportunities Principles for Development Potential

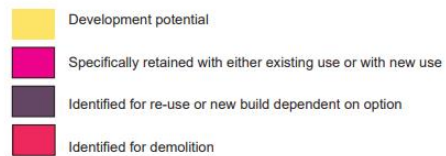
Arising from the assessment of use and appraisal of values including community and heritage a strategy for retaining uses and buildings has provided a structure for the masterplan to develop.

In order to create a balanced masterplan a mix of use classes working with the existing fabric and delivering residential with mixed tenure and mixed type, including family homes has meant looking at the possibilities of utilising both brownfield and greenfield areas within the park. This has taken some pressure off the waterfront areas. The extent of this allocation was the subject of stakeholder consultation and informed by the market research.



- The river is the lowest point in a broad valley feature.
- Land gradually rises to the south, east and west.
- There is a large flat plateau on the eastern bank which allows for the sports pitches.

Figure 6. (above) Site and Surround Topography



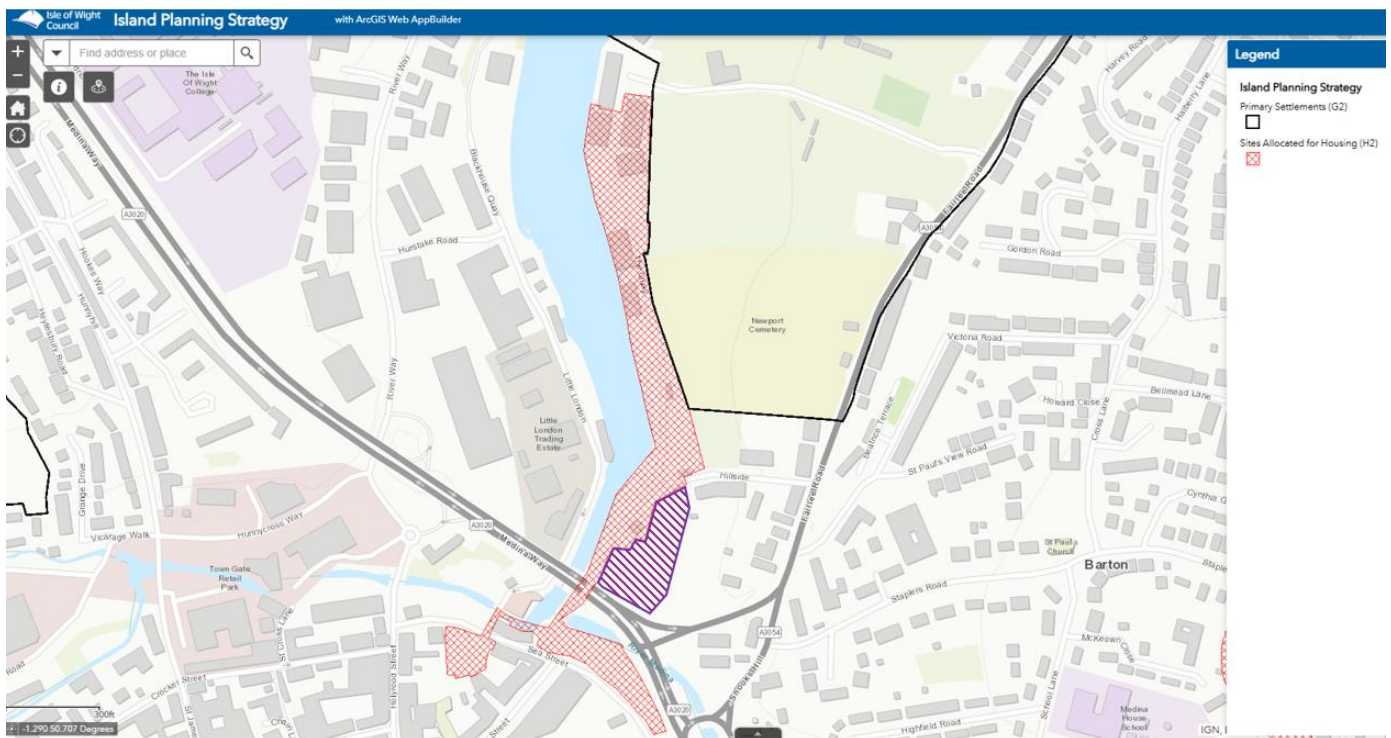
All other buildings within the masterplan assumed to be retained in their existing use.

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The council would however note that a proposed modification is required to the proposed allocation boundary to include council owned land (within the settlement boundary) at the southern end of the site to incorporate the existing Riverside Centre, which the council as landowner is undertaking feasibility work related to a mixed use scheme delivering retail, community floorspace and residential. This is shown on the extract below and is proposed as a modification to the Policies Map.

### Proposed modification (additional land to include as maroon hatching):

#### Policies Map and KPS2 site boundary



*Q6.15: Supporting text to the KPS2 Policy refers to the emerging Newport Harbour masterplan and the Policy refers to a masterplan. Are they one and the same? Are criteria (j) to (o) justified in terms of what the masterplan should address? Should development proposals on KPS2 “have regard to” the Masterplan rather than be developed in “accordance with it”?*

**IWC response**

Yes the emerging masterplan referred to in the supporting text (paragraph 7.33) and the masterplan referred to in the policy are the same document. For clarity it is suggested that the supporting text be modified to just reference ‘masterplan prepared by the Isle of Wight council’ to match the policy text (see proposed modifications below).

The council consider that criteria (j) to (o) are justified as they provide a set of parameters for the masterplan to include and cover some of the key issues raised in public and stakeholder consultations on the masterplan process to date. As the masterplan has not yet been finalised by the council (see our answer to Question 6.14 for more context) it is considered important for local plan policy to provide a clear, definitive ‘hook’ for the masterplan that could then be adopted as an SPD.

The council agree that the policy wording should indicate that development proposals should ‘have regard to’ the masterplan given the detail includes in policy KPS2 also provides a clear set of policy requirements for development proposals in the area.

**Proposed modifications (additional text underlined):**

**Policy KPS2**

**'In order to address sustainable development issues, the site and development proposals within it should ~~be developed in accordance with~~ have regard to the masterplan prepared by the Isle of Wight Council in conjunction with the local community.'**

**Paragraph 7.33: The site allocated lies within the wider area covered by the Newport Harbour Masterplan (prepared by the Isle of Wight council) and will work positively with...'**

*Q6.16: Is the allocation of the Newport Harbour site consistent with national planning policy regarding flood risk in terms of the relationship of the site to the functional fluvial and tidal floodplain of this part of the River Medina and any floodwater storage capacity that the site may perform in its current condition? Does the evidence exist, in the Strategic Flood Risk Assessment Level 2 (2021) and/or the Newport Harbour Masterplan SPD Flood Risk Assessment 2021 [Document HO21] to satisfy the sequential test, and then the exceptions test including that the development on the site can be made safe for its lifetime and not increase flood risk elsewhere?*

#### IWC response

The allocation of the Newport Harbour site is consistent with national planning policy regarding flood risk in terms of the relationship of the site to the functional fluvial and tidal floodplain. In the supporting explanatory text to KPS2 further detail is provided on what is expected with any proposal for the site in terms of addressing flood risk. Paragraph 7.34 of the IPS states that the required site level Flood Risk Assessment will be expected to include, *'safe access and egress should be demonstrated during a design flood and to evacuate before an extreme flood, taking climate change into account. Raising of access routes must not impact on floodplain storage capacity'* and *'compensation storage would need to be provided for any land-raising within the 1 in 100 plus appropriate climate change allowance, including to provide a safe access route.'*

The NPPF recognises (at paragraph 169) that wider sustainability objectives may provide a reason why development in a higher flood risk area should be preferred to development in a lower flood risk area when applying the sequential approach. The PPG on flood risk and coastal change also advises (at ID:7-023-20220825) that *"Application of the sequential test in the plan-making... process will help to ensure that development is steered to the lowest risk areas, where it is compatible with sustainable development objectives to do so..."*. Consideration of wider sustainable development objectives is therefore part and parcel of determining, for the purposes of the sequential test in paragraph 168 of the NPPF, whether lower risk sites are *"reasonable available... and suitable for the proposed development."*

The approach taken to allocating sites in the IPS is set out in [HO17 IPS Housing evidence Paper B – Revisiting the IPS allocations approach May 2024](#). Section 5 of Paper B sets out how the housing allocations (from the first draft IPS in 2018) have been reconsidered, taking into account the consultation responses, [EA2 IPS Integrated Sustainability Appraisal ISA July 2024](#) outputs and the spatial strategy (policy G2). Paragraphs 5.12 – 5.26 detail how flood risk has been considered in the site selection process. The table under paragraph 5.14 sets out where the (flood risk) sequential approach, sequential test and exception test have been carried out. Paragraphs 5.18 – 5.26 detail how KPS2 meets the exception test requirements (i.e. wider sustainability benefits to the community and being safe for its lifetime without increasing the risk of flooding elsewhere).

[EA5 IPS Level 1 SFRA Sept 2019](#) in section 6. Flood risk management through planning details the sequential test, including screening of all SHLAA sites, “A total of 379 sites identified through the SHLAA have been screened for flood risk, against the EA Flood Zone 2 and 3 datasets. This has assisted with selecting sites for Level 2 Assessment, giving a clear picture of fluvial and tidal flood risk to the potential sites allocated for development and representing a step on the Sequential Test.” (paragraph 6.2.4).

Policy KPS2: Key priority site 2 – HA44 Newport Harbour point m requires that “the proposed development will be safe from flooding for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall;” The supporting text to the policy provides more details on the expectations of how this is to be achieved, where paragraph 7.34 states, “All development proposals must be accompanied by a site level flood risk assessment demonstrating how it has met all the relevant requirements of both the level 2 SFRA detailed site summary tables and the Newport Harbour Masterplan flood risk assessment.” And then goes on to set out what the required site level FRA will be expected to include.

### Issue 3: Whether the proposed housing allocations through Policy H2 are soundly based

Q6.17: Is the proposed allocation and site specific requirements of site HA005, at Camp Road, Freshwater, justified and effective having particular regard to the setting of heritage asset (Farringford House – grade I listed), National Landscape and Tennyson Heritage Coast, whether it comprises grade 2 agricultural land or would adversely affect biodiversity and relationship to the settlement gap between Freshwater and Totland? Whether there is adequate access and services to support any development? Given the constraints of this site, is it viable and deliverable?

#### IWC response

The council do consider that the proposed allocation and site specific requirements of HA005 is both justified and effective. Whilst the council has recently refused planning permission on this site (application reference 21/01552/OUT), the reasons for refusal are technical issues rather than matters of principle and the local planning authority believe all the reasons can be overcome and do not undermine the proposed allocation. Taking each of the issues identified in the question in turn:

#### a) The setting of different designated assets

Paragraphs 7.117 to 7.124 of the [Planning Committee report for application 21/01552/OUT](#) provide a detailed summary of the potential impact on designated heritage assets and concluded there would be no impact. This did not form a reason for refusal on the decision notice so at the plan-making stage the council considers the proposed allocation is justified and effective in this regard.



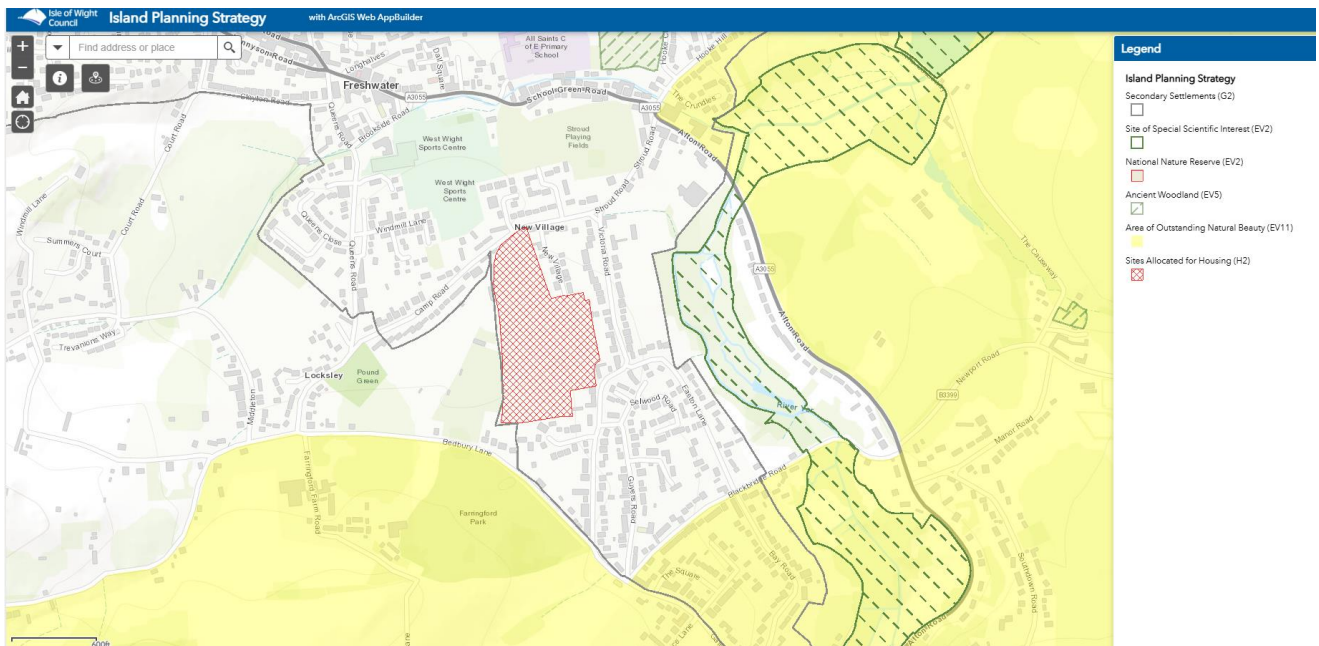
b) Grade 2 agricultural land

Paragraphs 7.33 to 7.38 of the [Planning Committee report for application 21/01552/OUT](#) provide a detailed analysis of this issue. This issue did not form a reason for refusal on the decision notice so at the plan-making stage the council considers the proposed allocation is justified and effective in this regard. More specifically DEFRA land classification maps confirm that the wider area of land that the proposed allocation HA005 is in is grade 3 and therefore, has the potential to fall into Grade 3a which is considered to be good quality agricultural land. An Agricultural Land Classification report was undertaken in relation to the proposed allocation site in 1998, on behalf of the then Ministry of Agriculture, Fisheries and Food, now DEFRA. The report was based on seven borings (one per hectare) and one soil pit. The survey found that the soils on the site were deep, moderately well drained clay loams and sandy clay loams resting over clays, with a minor soil wetness limitation. Therefore, the land was considered at that time to fall within Grade 2, and so based on the current ratings, Very Good. No subsequent classifications have been undertaken since that report twenty seven years ago.

The proposed allocation would result in the loss of approximately six hectares of Grade 2 farmland. The council would note that when commenting on the recent planning application for this site (ref: 21/01552/OUT), Natural England did not object to the loss of Grade 2 farmland but instead provided standard advice. The aforementioned planning application was [refused](#) by planning committee on 5 November 2024, however the two reasons for refusal did not relate to the principle of residential development nor loss of agricultural land.

In the wider context, approximately 8,000 hectares of farmland in the Island is used for growing crops (21%) with significant concentrations of Grade 2 farmland located at Atherfield, Bowcombe, Wroxall and the Arreton Valley. Much of the Island's farmland falls into Grade 3, although DEFRA's Agricultural Land Classification maps do not distinguish between Grade 3a and 3b farmland. While the proposed allocation would result in the loss of six hectares of very good farmland, this is considered to be a minor proportion of the 8,000 hectares currently in use to grow crops. The council conservatively estimate that there is approximately 750 hectares of Grade 2 farmland on the Island, with the proposed allocation therefore representing 0.8 per cent of that total.

As the Policies Map extract below shows, the vast majority of land to the south and east of Freshwater that is immediately adjacent to the settlement boundary is designated National Landscape (formerly AONB) therefore has a statutory environmental value and protection. The proposed allocation is not within the National Landscape designation, whilst also being surrounded on three sides by existing residential development. While it is noted that allocations could occur on lower grade land, in this location much of that land (which displays the same sustainable characteristics of HA005 in terms of location and spatial relationship to existing development) is located within the National Landscape or in areas further afield that are unlikely to be suitable for development of this scale.



c) Biodiversity

The [decision notice for 21/01552/OUT](#) saw two reasons for refusal relating to biodiversity and ecology, however both were due to insufficient information being provided by the applicant which meant as competent authority the council were unable to conclude beyond scientific doubt that the development would not adversely impact the integrity of designated sites, as required by the Habitat Regulations. The council consider that the two reasons for refusal could be overcome through the submission of appropriate, up to date information and accompanying mitigation provisions, therefore do not consider this to fundamentally undermine the proposed allocation.

d) Settlement gap

Whilst the Core Strategy does not include a 'settlement gap' policy, the visual impact of the proposal on the surrounding area was considered in detail in paragraphs 7.39 to 7.50 of [Planning Committee report for application 21/01552/OUT](#) and concluded that the overall impact of the development would not detract from the character of the area, given its predominantly residential character. Our answers to Questions 4.17 and 4.18 provide detailed analysis of the settlement gap issue in Freshwater. The council considers the proposed allocation is justified and effective in this regard.

*Q6.18: Are the proposed requirements in Core Document 7 for the site specific requirements for site HA006 Heathfield Campsite, regarding setting of the Scheduled Monument, necessary for soundness?*

IWC response

The council do not consider that the proposed addition to the site specific requirements on page 11 of document [CD7 Document setting out proposed modifications from SoCGs](#) is necessary for soundness, however, do believe that the inclusion of mention of the nearby Scheduled Ancient

Monument of Golden Hill Fort provides greater clarification in terms of the impacts any development scheme should consider.

*Q6.19: Whether the development of site HA18, Green Gate Industrial Estate, East Cowes, would be viable and deliverable taking account of the risk of flooding in this location?*

IWC response

The gradient of the land provides for a sequential approach across the site, matching vulnerability (use) to risk (flood zone). The Medina Valley is a ria formation (sunken valley) and as such has relatively little floodplain bounded by increasing gradient of land moving away from the main channel of the estuary. This results in sites that can be located in close proximity to the river, but due to the rise in land, be covered by multiple different flood zones.

In the case of site HA18, the majority of the site is subject to flood zones 2 & 3, with increasing risk (and predicted depth) over time. However, due to the aforementioned gradient of the site, the primary access of Thetis Road is only minimally inundated at low spots, but most of the access road is unaffected. An approximate estimation of increase in extent to the year 2125 (using current upper end allowances) indicates that the road is further inundated at its eastern edges but still remains navigable. This is evidenced by the January 2025 updated Level 2 SFRA site summary sheet and accompanying mapping. As development could be made safe (through both resilience and resistance measures) and there is a safe means of access, the site is viable and deliverable as a brownfield site within the primary settlement boundary of Cowes. The council are working with the Environment Agency to agree the position of both parties with regards to the allocation of the site and the outcomes will be documented in a Statement of Common Ground to be submitted to the examination w/c 17<sup>th</sup> February 2025.

*Q6.20: Whether the capacity of housing allocation HA020, former Somerton Reservoir, Cowes, is justified taking account of the neighbouring woodland designated as a Site of Importance for Nature Conservation?*

IWC response

The capacity of housing allocation HA020 is justified – this site is subject of a planning application (P/00356/18) for 146 homes which has a resolution to grant conditional planning permission subject to the signing of a Section 106 agreement. At the time of writing, it is anticipated that this agreement will be completed in February 2025. All constraints, including the neighbouring SINC, were fully considered as part of the [Officer report and recommendation to Planning Committee in April 2022](#).

*Q6.21: Whether the capacity of housing allocation HA022, Somerton Farm, Cowes, is justified having particular regard to landscape buffers, effect on neighbouring occupiers (e.g. BAE) and the capacity suggested in planning application reference 22/01720/OUT?*

IWC response

The capacity of housing allocation HA022 is justified – this site is subject of a planning application (22/01720/OUT) for approximately 163 homes which, subject to the signing of a Section 106 agreement, is due to be granted planning permission imminently. At the time of writing, it is

anticipated that this agreement will be completed in February 2025. All constraints, including those referenced in the question, will be fully considered as part of the officer report that will be available to view [here](#). For clarity, the proposed allocation is for 160 units, as indicated on page 206 of the IPS (and as included in the housing trajectory – see Appendix 1 to Matter 7 hearing statement). There is a typographical error on page 214 (within Appendix 3) that shows the indicative yield as ‘at least 130’. A modification is proposed to correct this.

**Proposed modification (revised text underlined):**

**Appendix 3 HA022 site specific requirements**

**a) At least 160 homes...**

*Q6.22: The 50m buffer zone from adjoining ancient woodland referred to in Policy EV5 appears to mean most or all of housing allocation HA025, land rear of 84 Wyatts Lane, Northwood, would be undeliverable. On that basis, is allocation of this site justified and effective?*

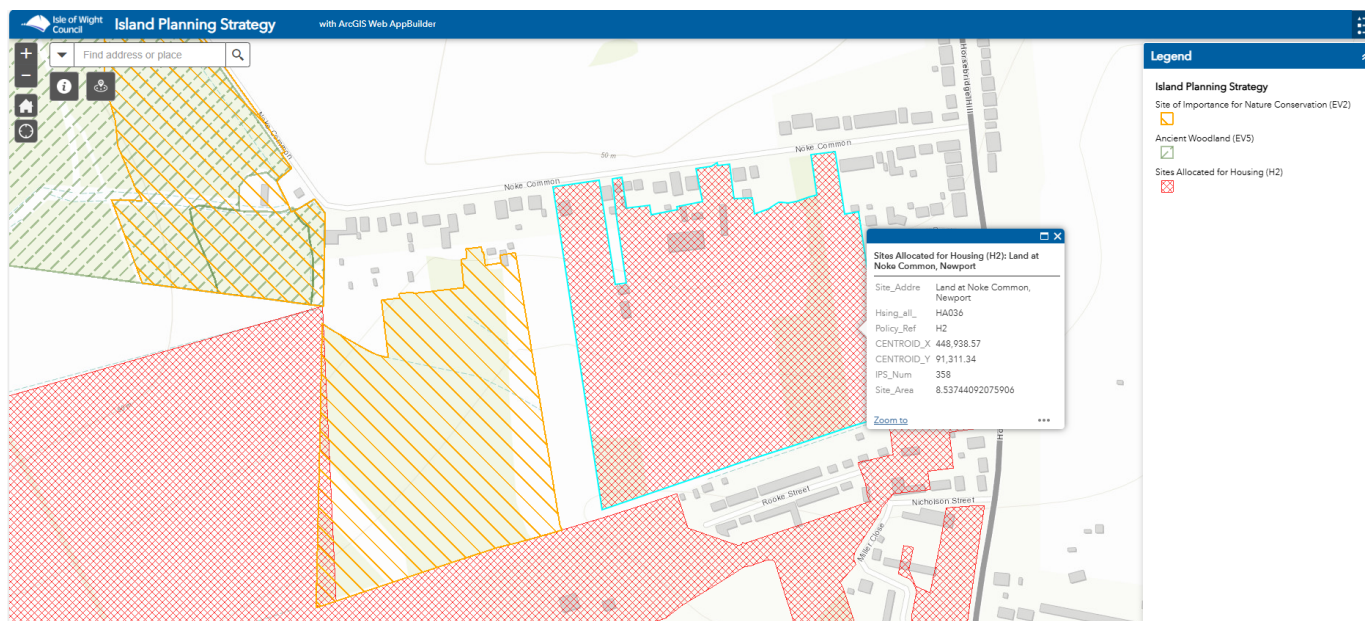
IWC response

Please see our answer to Question 4.2 in relation to the proposed 50m buffer zone to ancient woodland. The council consider that it possible to maintain a 50m buffer and still achieve approximately 20 units on the northern portion of the site, which is rectangular in shape and would equate to at least 0.30ha (with a potential emphasis on smaller units / flatted scheme). Any shared external amenity space / landscaping could be located within the buffer area to the south of the developed area.

*Q6.23: Whether the capacity and extent of housing allocation HA036, land at Noke Common, Newport, is justified taking account of the neighbouring woodland designated as a Site of Importance for Nature Conservation?*

IWC response

Yes the capacity of housing allocation HA036 is justified as the SINC designation is next to the proposed allocation, but does not fall within the red line. This is shown on the Policies Map extract below. Part of this site already benefits from planning permission (P/00463/17 & 22/00045/ARM) for 10 units.



The allocation can be brought forward in line with Policy EV2, that provides detail on development proposals that may impact designated sites. Site specific requirements in Appendix 3 also directly refer to the need for appropriate buffers to woodland. The council considers that for clarity, direct reference is added to these requirements to highlight the nearby SINC designation.

Q6.23 may also have intended to refer to KPS1 (HA039) as the Policies Map extract above shows there is a small overlap between the northern part of KPS1 (HA039) and the Noke Plantation SINC (a slim 'isosceles triangle' on the north eastern edge of the northern part of the allocation). This is a map drafting error, and the proposed allocation boundary should not overlap the SINC designation. As policy KPS1 identifies in criterion (h), any development would be required to utilise appropriate buffers to the SINC and there is sufficient space within the overall allocation to comfortably allow that. A modification is proposed to the Policies Map to correct this error.

### Proposed modifications (additional wording underlined):

#### Appendix 3: Housing Allocation HA036

**(e) landscaping and biodiversity enhancements to include appropriate buffers to woodland, retention of trees on site and provision of adequate ecological buffer zones on site boundaries, taking account of the nearby Noke Plantation that is a designated SINC (C194A).**

**Archaeological and biodiversity assessments will need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects, including any impacts on the nearby SINC.**

## Policies Map:

**Adjust allocation boundary of KPS1 (HA039) so there is no overlap with adjacent SINC designation.**

*Q6.24: The table of allocations refers to generic policy requirements on housing allocation HA046, land at Crossways, East Cowes, when there are specific policy requirements set out in appendix 3. To be fully effective, should this be corrected (subject also to the above question relating to the layout of housing allocation policies)?*

### IWC response

Yes the table of allocations in Appendix 2 should be corrected to refer to HA046 being subject to site specific requirements. For clarity, the proposed modification to the table is set out below:

### **Proposed modification (additional text underlined):**

#### **Appendix 2, page 207 of the IPS**

Settlement	Housing allocation reference number	Address	Specific (App 2) or generic (H3) policy requirement	Indicative yield (in plan period to 2037)
East Cowes	HA046	Land at Crossways	<b>Generic</b> <u>Specific</u>	125

*Q6.25: Whether the capacity of housing allocation HA119, Pennyfeathers, is justified? The list of allocated sites provides an indicative yield of 290 with the site-specific requirements referring to at least 800. Comments suggest a planning application for up to 900 may be submitted, with an assumption of at least 875 being possible within the plan period.*

### IWC response

The council consider that the capacity of the allocation is justified – capacities in proposed allocations are not definitive and the wording ‘at least 800’ provides a clear recognition that the number of homes would be in excess of 800. The site has previously benefitted from an outline planning permission for up to 904 dwellings, which was granted in 2017. Since the granting of that permission, a number of additional ‘land’ takes are required from a development site through a combination of national and local policy, including Biodiversity Net Gain and the more stringent requirements over drainage and the management of surface water. For these reasons, it is considered that a site capacity of between 800 and 900 is appropriate, which the proposed allocation would support.

The council has been in detailed and positive pre-application discussions with the proposed applicant and recognises that an application may be submitted for ‘up to 900’, however at the time of writing we have not been provided with an indicative layout to comment on. The description of ‘up to 900’ (which also appears in the EIA Scoping Request) also provides a

degree of flexibility and from a plan-making perspective an allocation of 'at least 800' and an emerging application for 'up to 900' are considered to be in conformity with each other.

With regards to the number of dwellings that may be delivered in the plan period, the updated housing trajectory provided by the council addresses this point and includes a higher number of dwellings within the plan period from this proposed allocation (increasing from **290 to 700**).

*Q6.26: There is indication that SANGs may not be necessary for housing allocation HA119, Pennyfeathers. Is the requirement in the site-specific requirements for SANGs justified?*

IWC response

The council consider that on-site SANGs could still be an option for this proposed allocation, however accept that more detailed application preparation work may demonstrate that alternative mitigation solutions are available, and we also recognise the DAS comments from Natural England provided to the landowner ([referenced in IPSR34](#)) which suggest that a contribution to the established strategic 'Bird Aware' mitigation package would be acceptable. In that light, the council proposes a minor modification to the wording of criterion (b) in the site specific requirements set out in Appendix 3 for HA119, which also covers off the scenario where any potential application does not get delivered, and a future scheme coming forward would require on-site SANGs as part of an agreed mitigation package at that time.

**Proposed modification (additional wording underlined):**

**Appendix 3: Housing Allocation HA119**

**b) mix of onsite SANGs (if necessary as mitigation), open and recreation space, play equipment and playing pitches;**

*Q6.27: Whether the capacity of housing allocation HA120, land at Red Funnel, Cowes, is justified taking account of comments from Red Funnel that housing capacity should be 30 and commercial space should be restricted to class E and 520m<sup>2</sup> and taking account of flood risk (within Tidal Flood Zones 2 and 3 on Proposals Map)?*

IWC response

The council notes the comments from Red Funnel ([IPSR31](#)) and recognises that the site is currently subject to a planning application (24/00807/OUT) for a mixed use scheme including up to 30 homes and 520 sqm of flexible commercial space, and that this scheme has been generated from up to date evidence supporting the application submission. As such, the council agrees that modifications to the site capacity and site specific requirements are necessary, and this change has also been reflected in the updated housing trajectory for the IPS (covered in the council's Matter 7 hearing statement).

**Proposed modification (additional wording underlined):**

**Appendix 3: Housing Allocation HA120**

A brownfield site of approximately 2.4 hectares is allocated at land at Red Funnel and surrounds, East Cowes to deliver a sustainable, high quality mixed use development resilient to climate change and sympathetic to the character of the area and which shall provide delivery of:

a approximately ~~30~~ 40 homes providing a mix of sizes and an affordable housing contribution in line with H5 and H8;

b tourist accommodation;

c approximately 520m<sup>2</sup> of flexible commercial space (Use Class E) ~~1850m<sup>2</sup> of non-residential floor space including retail, leisure, and commercial premises (use class E & B1 and B2)~~;

d demolition of unused buildings;

e terminal buildings with associated marshalling facilities;

f public transport, access and highway improvements as required as well as opportunities to enhance or create links to the local sustainable transport network;

g on-site parking and cycle provision;

h enhanced public realm, open and recreation space;

i pedestrian connectivity improvements;

j appropriate landscaping and boundary treatment;

k an appropriate level of public access to the waterfront;

l an appropriate level of access to the waterfront and marine-related infrastructure, where it is required for existing and future marine and maritime-related businesses;

m seawall and coastal defence improvements; and

n any other measures that enhance East Cowes as a destination.

Development and required infrastructure will be delivered on a phased basis in line with housing delivery.

Proposals should demonstrate that the level of retail and leisure uses will not have an unacceptable impact on the town centres of East Cowes and Cowes.

*Q6.28: Whether housing allocation H121, land rear of Harry Cheek Gardens, Northwood, is deliverable with particular reference to highways access and reference to proposals not preventing adjacent sites from coming forward?*



IWC response

The capacity of housing allocation HA121 is deliverable – this site is subject of a planning application (23/00849/FUL) for 27 homes which is due to be granted planning permission imminently. At the time of writing, it is anticipated that this permission will be issued in February 2025. All constraints, including those referenced in the question, will be fully considered as part of the officer report that will be available to view [here](#).

Q6.29: Whether the site-specific requirements at appendix 3 adequately deal with archaeology (see comments of the Isle of Wight Archaeology and Historic Environment Service – in particular in relation to HA002, HA005, HA022, HA025, HA033, HA064, HA065, HA0120 and 16 Medina Yard, Cowes)? Would the proposed modifications in Core Document 7, suggesting additional text on archaeology, be necessary for soundness?

IWC response

The council consider that the proposed modifications in document CD7 that relate to the site allocations referenced in the question are necessary for soundness as the additional text would ensure consistency with national policy, particularly paragraph 200 of the NPPF (Dec 2023).

Whilst not directly answering a Matter 6 question, the council would also propose the following factual correction over the identified location of a large site with planning permission.

The Harcourt Sands site (permission references P/00573/15 & P/01127/16) is listed in Appendix 1 of the IPS as being within Ryde (first column ‘Settlement’) – and whilst for the purposes of the IPS it is within the ‘Ryde’ settlement boundary, the land does officially lie within the ward of Nettlestone & Seaview. To correctly record the location in the ward of Nettlestone & Seaview the council would propose the modifications below to Policy H1 and Appendix 1.

**Proposed modification (additional text underlined):**

**Policy H1 (table at the end of the policy)**

	Large sites with planning permission	Allocated sites	Windfall	Total
Nettlestone & Seaview	<del>78</del> <u>206</u>	0	30	<del>108</del> <u>236</u>

**Appendix 1 (page 203)**

<del>Ryde</del> <u>Nettlestone &amp; Seaview</u>	P/00573/15, P/01127/16	Land at former Harcourt Sands Holiday Park	Specific	128	128
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