



**Isle of Wight
Council**

Hearing Statement Matter 9: Transport, Infrastructure, Viability, Monitoring and Review

**Draft Island Planning Strategy
Examination in public**

Document information

Title: Hearing Statement Matter 9

Status: Final

Current version: 1.2

Version history

Version	Date	Description
1.0	4.2.25	First draft (JB)
1.1	7.2.25	Second draft (JB)
1.2	7.2.25	Final version

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Matter 9 – Transport, Infrastructure, Viability, Monitoring and Review

This hearing statement represents the Isle of Wight Council's response to **Matter 9** 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: Transport matters.

Q9.1: Is the plan effective in locating development in areas accessible by travel other than the private car, such as bus and train?

IWC response

The council consider that yes, the plan is effective in locating development in areas which have alternative means of travel to the car. This is primarily achieved through the spatial strategy (as set out in policies G1 and G2) which focusses the majority of planned growth in the most sustainable locations within existing settlements. All of the Primary Settlements, Secondary Settlements, and Rural Service Centres are served by regular, [seven day a week bus services](#). Regular rail services (via Island Line) only exist between Ryde, Brading, Sandown, Lake, and Shanklin. Neither Newport nor Cowes are served by train. However, given their size and range of services, facilities, and community infrastructure, it would not be sustainable to omit these settlements as sustainable locations for growth. Policy T4j sets out the council's support for proposals to reinstate a rail link between Ryde and Newport (via Smallbrook) and funding for this was explored with the Department for Transport (as noted at paragraph 9.34). However, there is no current funding to take forward that initiative. The council suggest a modification to paragraph 9.34 to reflect the latest position.

The diagram that is shown at Figure 3.1 Key Diagram on page 32 of the IPS ([CD1](#)) shows the areas of growth across the island. This is in line with paragraph 103 of the NPPF which states: *Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.*

Supporting this, Policy T1 Supporting Sustainable Transport also states that ‘*Development proposals will be expected to contribute to meeting the aims and objectives of the local transport plan, local cycling and walking infrastructure plans and the Isle of Wight rights of way improvement plan.*’

and

‘Proposals for major development will be required to submit a travel plan demonstrating how the above criteria will be incorporated over the life of the development. Development that prejudices the delivery of infrastructure improvements set out in the local transport plan and local cycling and walking infrastructure plans will not be supported.’

Furthermore, in section 2 of **CD1** (The Isle of Wight and the issues we face) it states at paragraph 2.55: *The IPS will work alongside the local transport plan, and Climate and Environment Strategy to ensure opportunities to provide a transport network that is linked to achieving greater sustainability and better movement are taken.*

Proposed modifications (additional text underlined and ~~text to be removed~~):

Paragraph 9.34

It is considered that the opportunity may exist to extend the line beyond the current alignment in the future. ~~Following the successful award of funding from the~~ This was initially explored through a Restoring your Railways Ideas Fund bid in 2021 that looked at the possibility of extending the existing Island Line south of Shanklin to Ventnor whilst also providing new passenger services through Smallbrook from Ryde to Newport. ~~However the Restoring your Railways programme was cancelled by the Government in 2024. the council recently submitted an outline business case to the Department of Transport that explores the possibility of extending the existing Island Line south of Shanklin to Ventnor whilst also providing new passenger services through Smallbrook from Ryde to Newport.~~ The council will remain supportive of the principles and will resist the loss of current and disused railway land where this could prejudice the best use of or possible extensions to the active line.

Q9.2: Whether the plan is effective in providing sufficient accessibility to and around West Wight, including Freshwater, taking account of planned development?

IWC response

Yes the plan is effective in providing sufficient accessibility to and around West Wight, including Freshwater. Policy T2 A Better Connected Island supports proposals to improve transport choice, provides alternatives to car travel and reduce the impact on air quality and climate change. Key infrastructure improvements are listed, including the East-West Green Link project to create a sustainable transport corridor from Ryde to Yarmouth. Further criteria in T2 seek to prioritise public transport, cyclists and pedestrians and the principle of seeking a preferred approach for Military Road is set out.

Documents [GS6](#), [GS7](#), [GS8](#) & [GS9](#) Infrastructure Delivery Plan (IDP) (and addendum updates) identify strategic infrastructure needed to underpin the level of development in the IPS. Wherever

possible, the **IDP** identifies the types and location of infrastructure needed, its cost and the sources of funding and is a live document that will be regularly reviewed and updated. Through the strategic approach set out in policy G1: Our approach towards sustainable development and growth, the council is steering development towards locations that are or can be made sustainable. It should be noted that Freshwater is categorised as a secondary settlement (grouped with Totland as the 'West Wight') and identified transport and accessibility needs will be commensurate with the planned level of growth and proportionate, based upon the needs across the Island, as identified in **GS6 – 9**.

[HO17 IPS Housing evidence Paper B](#) provides further evidence (paragraphs 5.4 – 5.9) of how the spatial strategy will be locating development to where existing capacity is most likely to exist, or new capacity is most likely to be delivered. Criteria c, d, f, g, and m of Policy H3 will ensure that housing (and housing-led mixed use) growth at Freshwater (as elsewhere) addresses the transportation requirements of the development, with consideration being given to all modes of travel. Site specific requirements for allocations HA002, HA005, and HA006 (at Freshwater and Totland) include the need for relevant transport improvements to be provided.

Q9.3: Whether the plan is effective in providing sufficient opportunities for additional cycle paths, shown on Figure 3.1 – Key Diagram?

IWC response

Yes the plan is effective in providing sufficient opportunities for cycle paths. Policy T2 sets out the locations where infrastructure, including shared paths and the proposed cycle paths identified on Figure 3.1 Key Diagram, will come forward and that the council will seek contributions in support of delivering such infrastructure. In addition to the identified improvements, criterion (e) of T2 significantly increases the range in both number and location of opportunities for improved or new cycle paths by establishing a local plan policy link with cycling and walking proposals set out in local cycling and walking infrastructure plans, the development of which is detailed below.

The Newport and Ryde Local Cycling and Walking Infrastructure Plan (LCWIP) was formally adopted as an SPD by the council on 21 June 2023 following a period of consultation during March and April 2023. An adoption statement has also been prepared. The Newport and Ryde Local Cycling and Walking Infrastructure Plan (LCWIP) was first prepared during 2019 in close consultation with the local community and a range of key stakeholders including Ryde Town Council, Newport and Carisbrooke Community Council, Island Roads and cycling and walking forums Sustrans, CycleWight and Isle of Wight Ramblers. The document identifies cycling and walking improvements required at the local level in Newport and Ryde that will help deliver a long-term approach to developing local cycling and walking networks.

The council also recently consulted (between Friday 29 November 2024 and Friday 17 January 2025) on the content of the following draft documents with a view to adopting each one as a Supplementary Planning Document (SPD) within the Island Plan Local Development Framework:

- Bay Area Local Cycling and Walking Infrastructure Plan Draft Supplementary Planning Document (SPD);
- Bembridge, Brading and St Helens Local Cycling and Walking Infrastructure Plan Draft Supplementary Planning Document (SPD);

- Cowes, Northwood and Gurnard Local Cycling and Walking Infrastructure Plan Draft Supplementary Planning Document (SPD);
- East Cowes and Whippingham Local Cycling and Walking Infrastructure Plan Draft Supplementary Planning Document (SPD)

Each of the Local Cycling and Walking Infrastructure Plans (LCWIPs) were prepared in close consultation with local communities, parish and town councils, the Isle of Wight council and a range of other local stakeholders.

They identify cycling and walking priority improvements at the local level that will help deliver a long-term approach to improving local cycling and walking networks in these areas.

The four documents listed above were endorsed by the Council's Cabinet in May 2023 and June 2024. The council now wish to adopt each of the four LCWIPs as an SPD so that they can be used as a material consideration when determining planning applications and help inform the design of new development coming forward. The decision to adopt these LCWIPs as SPDs is due to be made at the [Cabinet meeting on 13 February 2025](#).

Should government funding be available to prepare more LCWIPs on the island (for example in the West Wight area), then the council would seek to take the same approach as it has already with other LCWIPs to ensure that the cycling and walking infrastructure projects within them become a material consideration in planning decision making, with criterion (e) of Policy T2 providing the appropriate local plan policy 'hook'.

Q9.4: Has the Healthy Streets concept been taken into account in the plan, as referred to by Isle of Wight Council Public Health, and is the plan effective as a result?

IWC response

The Public Health comment ([IPSR105](#)) relating to the reference is noted. The Healthy Streets approach *"is an opportunity to deliver better places for people to live in and thereby improve their health. The Healthy Streets Approach is a human-centred framework for embedding public health in transport, public realm and planning"* by having evidence based on ten indicators to help improve social, economic and environmental sustainability through how our streets are designed and managed. And in taking this approach it requires incremental changes in all aspects of the decision-making processes related to streets and transport.

[CD1 Island Planning Strategy submission version July 2024](#) recognises in supporting paragraph 9.12 to policy T2 A Better Connected Island that: *"The council has a strong aspiration to promote sustainable transport and recognises that high quality connections by road, rail, bus, ferry, walking and cycling and their interconnectivity are all vital to the Island's future economic prosperity and social inclusiveness. These connections provide access to education, employment, business, retail and leisure opportunities. It will work with partners, agencies and developers to ensure that the transport network on the Island supports the level of growth planned for and is sufficiently robust"*.

Policy T1 also references in criterion (g) '20 minute neighbourhood' design principles, which the IPS glossary defines as 'Places that are designed so residents can meet their day-to-day needs within a 20 minute walk of their home; through access to safe walking and cycling routes, or by public transport.' Supporting paragraph 9.3 provides more detail on these principles, which are also referenced in criterion (n) of Policy C1: High quality design for new development and will be a core basis for the emerging Local Transport Plan 4. These core design principles align closely with the ten indicators of the Healthy Streets concept and the underlying objective of delivering better places for people to live in.

The council consider that CD1 has taken into account the Healthy Streets concept and is effective, however for clarity the council propose a minor modification to paragraphs 9.3 and 9.12 as set out below.

Proposed modification (additional text underlined):

Paragraph 9.3

Developments designed as '20 minute neighbourhoods' where people can meet their day to day needs within a 20 minute walk of their home will be encouraged. This also aligns with embedding the Healthy Streets concept in design.

Paragraph 9.12

The council has a strong aspiration to promote sustainable transport and recognises that high quality connections by road, rail, bus, ferry, walking and cycling and their interconnectivity are all vital to the Island's future economic prosperity and social inclusiveness. These connections provide access to education, employment, business, retail and leisure opportunities. It will work with partners, agencies, developers and consider the Healthy Streets approach to ensure that the transport network on the Island supports the level of growth planned for and is sufficiently robust.

Q9.5: Whether enabling access to local bus services in Policy T1(e) is effective, or whether it should seek to encourage additional bus services?

IWC response

Yes Policy T1 (e) is effective. While criterion (e) 'enable access to local bus services' requires consideration of access to existing bus services, criterion (a) 'implement the transport hierarchy of 'avoid-shift-improve' sets the requirement to consider modal shift through the council's developing Local Transport Plan. As set out in supporting paragraph 9.3 "The new local transport plan will provide a series of options to achieve its objectives that will be categorised using the avoid-shift-improve framework (avoid – avoid the need to travel by motorised vehicle; shift – shift the journey from more to less polluting modes; improve – improve the efficient use of remaining vehicles). Proposals should take a sequential approach to this framework, with a preference for avoiding the need to travel and measures that move away from this to shift or improve providing evidence as to why this is necessary."

Provision of public transport, including bus services (both existing and new, dependent upon route/location and capacity) will be part of the possible solution, but is also a commercial decision

for bus operators. Policy T2 provides the mechanism for the consideration of future bus services where it states that the council will support proposals that increase travel choice, provide alternative means of travel to the car and that the council will seek financial contributions to transport schemes where appropriate. T2 also states that “*The creation of new sustainable transport routes will be supported.*” The level of planned growth within [CD1 Island Planning Strategy submission version July 2024](#) provides a degree of certainty for future sustainable transport conversations and decisions by the council as strategic highway authority and commercial bus operators on the island (Southern Vectis).

In addition to **CD1** there are other mechanisms by which the delivery of improved or new bus services will be determined, primarily through the councils Bus Service Improvement Plan (BSIP). BSIP outlines the council’s joint strategic vision with Southern Vectis, as the sole commercial bus operator on the Island, to meet the aspirations of the Government’s national bus strategy; to grow bus usage and raise buses’ mode share. This will be achieved through working in partnership with Southern Vectis, as well as the train and ferry operators on the Island.

Q9.6: Is the reference at Policies T1g and C1 to ‘20 minute neighbourhood’ design principles reflected in the policies and proposals of the plan such that it is effective?

IWC response

Yes references to 20 minute neighbourhoods are deliverable over the plan period and therefore effective. [CD1 Island Planning Strategy submission version July 2024](#) has a strong focus on sustainable development that is consistent with national policy, underpinned by the spatial strategy of Policy G2. The principle of ‘20 Minute neighbourhoods’ is effective by including it in multiple policies related to both the specific design requirements of a scheme (C1) and overarching sustainable transport principles (T1). 20 minute neighbourhoods are clearly defined in the IPS glossary and will also be a core objective of the emerging Local Transport Plan, therefore **CD1** is effective by ensuring consistency across council strategies.

Q9.7: Policy T2 and Tables 9.1 and 9.2 relate to transport improvements. Is that a comprehensive list and are any listed in Table 9.2 that should be in Table 9.1? Does the policy appropriately deal with Military Road?

IWC response

The transport improvements listed in Table 9.1 are based upon the infrastructure requirements identified in [GS6 Infrastructure Delivery Plan](#) and its various addendums and updates ([GS7](#), [GS8](#) & [GS9](#)) and can therefore be viewed as a comprehensive list, based upon the assessments made at those times. The **IDP** is a live document that will be regularly reviewed and updated over the course of the plan period.

The transport improvements listed in table 9.1 have been identified as ‘Necessary’ as defined in section 1.5 *Categorising infrastructure*, of the **GS6**, i.e. “*The identified infrastructure is necessary to support new development, but the precise timing and phasing is less critical, and development may be able to commence ahead of its provision (e.g.: schools and health care).*”

It should also be noted, as stated in **GS6** “*Not all housing and employment growth planned for individual sites will attract specific additional infrastructure requirements that can be addressed*

through the development of that site alone. In most cases, the infrastructure needs that have been identified reflect the cumulative impact of growth in a wider area e.g. based upon growth in the regeneration areas used for planning purposes by the Council...

The transport improvements listed in table 9.2 have not been identified as 'Necessary' in **GS6** and therefore do not warrant being given the same priority as those listed in table 9.1. They have been identified through the [TR11 SRTM Modelling – Isle of Wight Local Plan](#) where improvements to potential future issues may be required, as explained in paragraph 9.23 supporting policy T2, *“There are a number of further junctions identified where it is indicated that further modelling and assessment would be beneficial, and these are set out in the following table. The council will take this into consideration when determining applications in the vicinity of these junctions.”*

Policy T2 deals appropriately with Military Road, acknowledging that it is part of the strategic road network of the Island, but due to its location a longer-term strategic solution needs to be found, underpinned by a clear understanding of the social, environmental, and economic risks and opportunities around the potential loss or truncation of the road.

A planning application ([20/01281/FUL](#)) for stabilisation works on a section of Military Road was refused in October 2023 due to a range of potential impacts including nature conservation and landscape designations, rights of way and coastal management.

As a major part of the Island's transport infrastructure, it is appropriate that a preferred approach is identified through the development of the new local transport plan (LTP4) that will be able to consider all the potential transport impacts and solutions. While the Military Road is significant to the Island providing a continuous link along the Island's southwest coast between Chale and Freshwater Bay, the likely effect of the road in terms of development proposed in the IPS through the spatial approach (as identified in policy G2) will be minimal. This is evidenced by the transport infrastructure improvements that have been identified as being necessary to accommodate the growth planned for in the IPS, that do not include the Military Road.

Q9.8: Would Policy T2 provide an effective approach to securing transport infrastructure necessary to support sustainable growth? Are these contributions justified through the viability appraisal and would they affect deliverability of development, affecting the effectiveness of the plan? How does this policy relate to Policy G3 regarding developer contributions?

IWC response

Yes Policy T2 will provide an effective approach to securing transport infrastructure necessary to support sustainable growth. As explained in supporting paragraph 9.17 *“The infrastructure delivery plan and local cycling and walking infrastructure plans (LCWIP) identify a number of interventions needed to the existing network. These interventions have been identified to mitigate the impact of new development and associated levels of all types of traffic and, wherever possible, bring forward improvements to the existing network.”* Paragraphs 9.19 & 9.20 provide details on how the schemes identified in T2 will be funded.

[TR7 Island Planning Strategy Explainer Document – Transport](#), provides further insight into how infrastructure needs are assessed for new development under the Frequently Asked Questions section where it states, *“The provision of infrastructure results from the involvement of many*

different organisations and is determined by the level and types of development being planned for. The Infrastructure Delivery Plan identifies strategic infrastructure needed to underpin the level of development in the IPS. Wherever possible, it identifies the types and location of infrastructure needed, its cost and the sources of funding and is a live document that will be regularly reviewed and updated. Local infrastructure needs associated with individual sites result from existing plan policies (including the Local Transport and LCWIP), policy documents and liaison with statutory consultees such as the Highways authority.”

The transport infrastructure contributions required by T2 have been justified through [GS12 IPS viability assessment update report July 2022](#). Supporting paragraph 6.30 of policy G4: Managing Viability explains how all contribution requirements of the plan have been assessed collectively to understand and evidence the viability of implementing the plan, “*The council has undertaken a whole plan viability assessment for the development envisaged over the plan period. The assessment was originally undertaken in 2018 and updated in 2021 and 2022; therefore land values and development costs are based on the rates available at that time. The viability assessment provides a high-level overview that allows the council to set realistic requirements for developer contributions and expectations for infrastructure. This work will form the basis of negotiations with developers and landowners.*”

While the council has sought to ensure the requirements of the plan are viable and will not hinder deliverability of development, policy G4 does allow flexibility in approach, as set out in supporting paragraphs 6.31 and 6.32.

Policy T2 details the transport infrastructure requirements summarised in Policy G3 criterion b) ‘*Provision of or contribution to transport infrastructure, including the provision of sustainable transport routes and facilities. Where relevant, contributions or provision shall relate to projects that have been identified through the council’s infrastructure delivery plan, local transport plan and local cycling and walking infrastructure plans.*’ The two policies are therefore intended to operate in tandem.

Issue 2: Infrastructure Delivery to support the Plan’s proposals

Q9.9: Strategic Policy INF1 sets out an overarching approach to ensuring growth would be supported by appropriate levels of infrastructure. The policy references technological infrastructure and sewage capacity as areas of particular focus. With reference to the Infrastructure Delivery Plan [Documents GS6-9], is the Plan based on a sound assessment of existing infrastructure capacity and future infrastructure requirements to ensure the plan’s growth would be sustainable?

IWC response

The council is clear that the planned level of growth on the island needs to be supported by appropriate levels of infrastructure and that this growth should not cause unacceptable adverse impacts to the existing infrastructure network and on residents. The council requires applicants to provide or make financial contributions to infrastructure which as a minimum are necessary to

make the development acceptable in planning terms. The council works closely with infrastructure providers to continually update the Infrastructure Delivery Plan (IDP documents [GS6](#), [GS7](#), [GS8](#) & [GS9](#)) and [CD1 Island Planning Strategy submission version July 2024](#) supports proposals for the improvement of existing or delivery of new strategic infrastructure on the island (strategic Policy INF1 and Policies G3, C12 & C13).

Paragraphs 3.29-40 of **CD1** explain the relationship between INF1 and the Infrastructure Delivery Plan (**GS6-9**). INF1 is applicable to all utility infrastructure provision. This works alongside policies G3, C12 and C13 for the provision of or contributions towards the necessary infrastructure to support development.

The responsibility for the supply and maintenance of existing utility services rests largely with the statutory undertakers, for example Southern Water in relation to foul drainage (sewers). It is often difficult to be certain about what the specific infrastructure requirements will be for the island across the entirety of a 15 year plan period as the precise detail and timing of many development schemes is not currently known.

However, the council works alongside infrastructure providers (for example with Southern Water on their [Water Resources Management Plan](#)) to ensure they take account of the levels of growth planned for and the indicative timing of this coming forward so that they can plan for the necessary levels of infrastructure in their investment plans. To reflect this the IDP is recognised as a living document which will be updated and monitored over the IPS plan period, particularly as more detail and information on site specific proposals emerge and infrastructure providers confirm spending and delivery plans.

Q9.10: Various infrastructure projects are identified in the 2024 Update of the Schedule [Document GS9]. For a small number of projects costs remain to be determined and for other projects delivery responsibility and timeframes are to be confirmed. Infrastructure planning is complex, and the responsibility of a various organisations, but do any of current 'unknowns' in the schedule (cost, delivery and timeframe) create significant issues for the delivery of the Plan and the achievement of sustainable development on the Island?

IWC response

No the council do not believe that any of the current unknowns create significant issues for the delivery of the plan and ensuring sustainable development on the island. [GS9 Island Planning Strategy Infrastructure Delivery Plan Schedule Update 2024](#) updates the original IDP which was completed in 2018 ([GS6](#)), with **GS9** reflecting later investment plans by utility and other infrastructure providers. The information flow is two way with the council providing information to infrastructure providers on the planned levels of development, timescales and locations to help inform their infrastructure investment plans which in turn informs [CD1 Island Planning Strategy submission version July 2024](#). Discussion on infrastructure needs and provision is therefore on-going throughout the plan-making process, with the IDP needing to be updated on a regular basis. As unknown costs and timetables are established this is reflected in the updates to the IDP. Discussion is continuing with the infrastructure providers in order to address the current 'unknowns' and the IDP schedule will be updated accordingly.

The IDP reflects the complexity of infrastructure planning and the need for all parties to work together to provide the infrastructure necessary for proposed development. **CD1**, paragraph 3.38

sets out that developers are strongly encouraged to work with infrastructure providers and consider opportunities to address infrastructure requirements as part of their proposal. It continues that “*applicants should demonstrate that engagement has taken place with the required statutory undertakers and infrastructure providers to inform a strategy on how connections will be made to public utilities infrastructure and deliver the required new infrastructure to support development.*” Where sites are close together or form a larger development, work is expected to be undertaken between multiple developers and statutory undertakers to identify solutions. This enables the infrastructure needed for the whole site to be provided comprehensively.

Policies INF1, G3, C12 and C13 seek to operate together to ensure provision of the necessary infrastructure to accommodate development, with the ever evolving IDP as the core evidence underpinning these policies.

Q9.11: Having regard to the proposed levels and distribution of growth on the Island in the Plan, are there any key infrastructure inter-dependencies that could have bearing on the housing and employment trajectories? (in short are there any critical infrastructure investments, which if delayed, could impact the forecast housing and employment delivery?)

IWC response

No, there are no critical strategic infrastructure investments where delay could impact housing and employment delivery. The IPS has a clear framework for the provision of infrastructure on the island to support development through plan policies INF1, C12 and G3. This is supported through the IDP which is updated on an on-going basis through discussion with the infrastructure providers on the level and location of development and its timing. The IDP ([GS6](#), [GS7](#), [GS8](#) & [GS9](#)) identifies critical infrastructure projects.

[CD1 Island Planning Strategy submission version July 2024](#) also sets out, where relevant, site-specific infrastructure requirements for each site allocation in Appendix 3. Site-specific requirements for individual sites include infrastructure provision to make clear developer requirements to bring a site forward. For example, housing allocation HA005 (land to the east of football club, Camp Road, Freshwater) requires close liaison with Southern Water to review their delivery of network reinforcements. The occupation of the development needs to be phased and implemented to align with delivery by Southern Water of sewerage network reinforcements to ensure adequate wastewater network capacity is available to adequately drain the development.

Policy G3 identifies infrastructure necessary for making the development acceptable in planning terms and requires developer contributions to ensure it is delivered including for coastal and flood risk reduction and water management which are identified as critical projects in the IDP.

Q9.12: Are the site size thresholds in Policy G3 (Developer Contributions) for education and healthcare contributions¹ justified? Are there known healthcare and education capacity issues and does that apply across the whole island? Would it be necessary for soundness for the Plan to contain further content around how these contributions would be calculated or is sufficient guidance contained in the 2024 Health Contributions Supplementary Planning Document (SPD) [Document GR2] and the 2014 Children’s Services SPD [Document GR1]?

¹ Also set out in Policy H3

IWC response

Two site size thresholds are set out in Policy G3, and the council considers both to be justified. Criterion d) requires the provision of or contribution to educational infrastructure for housing developments of 10 dwellings or more. Criterion e) requires a contribution for primary healthcare infrastructure for all qualifying developments of 20 or more dwellings.

[GS9 Infrastructure Delivery Plan Schedule Update 2024](#) identifies the healthcare and education capacity issues across the island. The education and healthcare contributions collected will contribute to primary and secondary places, further education provision and improvements to primary care facilities and that contributions collected would be for healthcare infrastructure only (e.g. new or extensions to physical premises). This is an appropriate strategy to fund address pressures from new housing development. An alternative means of funding would need to be found if not collected through developer contributions.

Guidance on how both contributions would be calculated is contained in [GR1 Childrens Services Supplementary Planning Document](#) for education and [GR2 Health Contributions SPD May 2024](#) for healthcare respectively. It is considered that supplementary planning documents on these contributions is the best way of providing more detailed guidance on these matters due to the level of detail needed to cover different types of facilities and developments.

For example, **GR1** provides eleven pages of detail on contributions for primary and secondary schools for new school provision or extensions to existing facilities. A flowchart identifies the process that is followed in order to calculate contributions. Paragraph 2.1 of **GR1** identifies the threshold of 10 dwellings as to when contributions will be collected. As set out in paragraph 8 of the report to the Council's Executive on 6 May 2014 (these committee papers are unavailable online however the paragraph is reproduced below), this threshold was agreed at the time with the Childrens Services team at Hampshire County Council (who at the time performed the regulatory education function for the Isle of Wight).

'This lower limit of ten units is considered 'relatively minor' in assessing the impact of new development on school provision and this has been discussed in full with Children's Services and is in broad accordance with contribution policies set by LPAs in partnership with Hampshire County Council.'

GR2 provides twelve pages of guidance on where health contributions will be sought and explains the circumstances where they would apply, with the document being prepared in partnership with the Hampshire & Isle of Wight Integrated Care Board (ICB). Section 7 of **GR2** explains how the contributions will be calculated. Paragraph 8.2 identifies that the threshold for considering a request for a contribution towards health provision on the island has initially been set for all proposals with a net increase of 20 dwellings or more. This threshold was proposed by the Hampshire & Isle of Wight ICB during preparation of the document as it was consistent with similar approaches to requesting contributions that have been adopted in other areas (for example Devon, Somerset, Hampshire), taking into account a range of issues including the impact of new development on healthcare facilities and that a proportion of people occupying a new scheme will already be accessing healthcare services within that area.

Supplementary planning documents also assist as a way of providing worked examples to help applicants understand what can be complex individual topics to understand. Worked examples are

given in Tables 5 and 6 of **GR2** to take applicants through the process. Providing this level of detail in [CD1 Island Planning Strategy submission version July 2024](#) would add significantly to both the policy wording and supporting text.

Supplementary planning documents can also be reviewed quickly if circumstances change. Both **GR1** and **GR2** (and the thresholds within) will be kept under review across the plan period.

Issue 3: Plan-wide viability

Q9.13: Does the Viability Study of the Plan, updated in 2022, [Examination Document GS12], make reasonable assumptions, based on adequate, proportionate and up to date evidence, about the cost of meeting all of the policy requirements set out in the Plan along with any other relevant national standards? In particular, the cumulative cost of implementing Policy C11 (net zero carbon), Policies AFF1/H5 (affordable housing), Policy H8 (optional technical standards for accessible housing), Policy EV13 (water consumption standards), Habitats mitigation and costs for biodiversity net gain.

IWC response

Yes document [GS12 IPS Viability assessment Update report July 2022](#) does make reasonable assumptions about the cost of meeting all of the policy requirements of the plan, along with other national standards. The council note the conclusion of GS12 at ES25 – *‘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.’*

In terms of the assumptions related to the cost of meeting the IPS policies, paragraphs 3.4 to 3.14 of **GS12** set out the comprehensive suite of IPS policies that have been considered within the viability work. Appendix 1 of GS12 sets out a detailed policies matrix that lists the IPS policies and highlights their impact on viability (Low, Medium, High) and for each of the medium and high, where possible attributes a cost of meeting that policy requirement. Where relevant, some of these costs are also then set out in Table 5.6 ‘Residential cost assumptions’ on page 44 of **GS12**.

Taking in turn each of the policies listed in the question and setting out the cost assumptions made:

Policy	Cost assumption and data underpinning
C11	£4,000 per dwelling (to meet Part L of the Building Regulations) plus sensitivity analysis of £10,000 per dwelling (to align with document CO15 IOW Zero carbon homes analysis). CO15 sets out that 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 amounts referenced above are added explicitly on top of BCIS build costs for each dwelling, 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.
AFF1 / H5	Paragraphs 5.14 and 6.2 of GS12 confirm that the approach to valuing affordable housing in the viability assessment is aligned with the policy requirements. Tables 6.1 (page 44) and 6.2 (page 45) of GS12 provide detail on transfer value for intermediate tenures with the conclusions at paragraphs 6.12 and 6.13 confirming the transfer values set out in AFF1 are reasonable across each house type and are reflected in the financial appraisals.
H8	Appendix 6 of GS12 includes in each of the residential development appraisals a cost of over £10,000 per dwelling for those expected to meet Part M4(3) [by Policy H8] and Part M4(2) [by Policy AFF1]. M4(2) is to become mandatory following a recent government consultation and decision ² . The figure of £10,000 is significantly higher than Government estimates of £1,400 per dwelling.
EV13	£9 per dwelling based on 021c Cost Report 11th Sept 2014 FINAL.pdf - this looked at the cost of providing flow restrictors to showers / dual flush toilets required to meet the then Code 4 SH. As with C11, there is a high probability that these costs are now subsumed within BCIS build cost rates used within viability work however an additional sum has still been allocated in GS12 .
EV2 (BNG)	£287 per dwelling brownfield / £1,011 per dwelling greenfield plus professional fees allowance to cover preparing assessments and mitigation plans. Mandatory BNG came into force in 2024 (albeit there are a number of exemptions). Government estimates in their initial impact assessment of BNG considered an average of 0.7% of build cost to meet BNG. Based on an average 75sqm property at £1,500 per sqm this would equate to £788. The BNG market is still emerging in terms of costs, and is extremely site specific in terms of habitat types being required, therefore the sum of £1,011 per dwelling is considered appropriate.
EV3 (habitat mitigation)	<p>The costs set out in table 5.6 of GS12 were the fixed costs per dwelling to meet the 'Bird Aware' Solent SPA mitigation at the time of assessment. These costs are reviewed annually and as set out below the changes from GS12 to 2025 are not considered to have a material impact on viability.</p> <p>£337 per 1-bed dwelling, <i>now</i> £465 (+£128) £487 per 2-bed dwelling, <i>now</i> £671 (+£184) £637 per 3-bed dwelling, <i>now</i> £875 (+£238) £749 per 4+ bed dwelling, <i>now</i> £1,029 (+£280)</p>

² [Raising accessibility standards for new homes: summary of consultation responses and government response - GOV.UK](#)

The council considers all of these cost assumptions to be based on adequate and up to date evidence wherever possible, noting that not every new dwelling would be liable for all of these costs (for example not every new dwelling is within the SPA buffer (EV3), some development is exempt from mandatory BNG (EV2) and not all development coming forward would meet the affordable housing threshold (e.g. windfall) – so whilst other policies may be applicable, AFF1/H5 would not be). The council would also note that the viability appraisals also included a sum of £6,000 per dwelling for other Section 106 costs on top of those specifically listed and costed in GS12. Again, not every dwelling would bear an additional £6,000 of Section 106 cost providing a further buffer.

From an AFF1 / H5 perspective, the council would also note that the viability assessment work (see paragraph 5.15) also assumed 25% of the affordable housing on every site would be 'First Homes' at a minimum discount of 30% from market value (secured in perpetuity). This (previous) government product is no longer a requirement of policy H5 (nor national policy – see footnote 31 of the December 2024 NPPF), and paragraph 7.61 of **CD1** recognises that the product may impact the ability to deliver other affordable tenures³, therefore this being an option for a developer rather than a requirement would have a positive impact on viability.

Underpinning all of the information above is that developer profit has been set at 20% within all of the viability work, which is at the top end of the range advised by planning practice guidance. As highlighted in paragraph 5.26 of **GS12**, a contingency allowance of 3% to 5% is also included (as well the developer profit), the combination of both representing a generous margin and allowing for an appropriate buffer.

Q9.14: Has the Local Plan Viability Study examined appropriate typologies of development that reflect the types of schemes that are likely to deliver the growth identified in the Plan? Have reasonable assumptions been made on the sales values that can be achieved on the Island and the existing use values, together with a reasonable premium necessary to incentivise the release of sites?

IWC response

Yes [GS12 IPS Viability assessment Update report July 2022](#) has examined appropriate typologies that reflect the type of growth identified in the plan. Paragraphs 4.10 to 4.12 of **GS12** sets out the methodology for the typologies and at paragraph 4.12 identifies that both 'scheme typologies' (e.g. housing, build-to-rent, older persons schemes) and 'site typologies' (e.g. greenfield or brownfield) are used. Further filtering was provided by looking at value zones, so that chosen typologies were assessed in both higher and lower value areas.

Paragraphs 5.4 and 5.5 of **GS12** provide further context for the site typologies by assessing the type and scale of proposed allocations within the IPS and using these as the basis for choosing where to focus the viability testing. Table 5.1 on page 40 provides a list of the development typologies assessed in **GS12** and represents a comprehensive spread across value, scale and current land use to ensure that all of the proposed allocations would fall into one of the categories. Appendix 2 of GS12, page 90, provides a comprehensive overview of the twenty-one different typologies assessed.

³ [What's the problem with First Homes? - Chartered Institute of Housing](#) and

In relation to reasonable assumptions on sales values, Section 2 of **GS12** provides a detailed summary on this issue which uses the findings of the 2018 viability study that supported the first Regulation 18 version of the IPS as a starting point, considers a large number (twelve) of individual case studies from completed sales on the island in the period since 2018 (paragraphs 2.22 to 2.50), at paragraph 2.53 includes analysis of information provided by developers as part of site specific viability assessments since 2018 (which showed that sales values in the 2018 local plan viability report were either correct or understated) and concluded (paragraph 3.5) for [GS11 IPS Viability Assessment July 2021](#) that a reasonable approach was taken considering all of the evidence and that asking price data suggested higher sales values.

Section 4 of **GS12** then provides a further analysis and update to this position by using Land Registry HPI data and transactional data to identify whether the value assumptions arrived at in **GS11** are still applicable. Paragraph 4.2 and tables 4.34 and 4.4 of **GS12** provide the outcome of these in adjusted land values which the council consider are based on reasonable assumptions and proportionate evidence.

In relation to Existing Use Value (EUV), paragraph 4.20 of **GS12** sets out how PPG expects this to be calculated, which is that EUV 'should be informed by market evidence of current uses, costs and values.' Tables 5.9 to 5.12 (pages 54 and 55 of **GS12**) summarise the BLV assumptions (which are the EUV plus premium to incentivise release) for plan making purposes and Appendix 3 (page 92) provides the detail behind these assumptions (including Table 4.1 on page 108). The council consider these to be based on reasonable assumptions and market evidence.

Q9.15: Given the focus of the Plan to deliver on previously developed land (brownfield sites) does the plan-wide viability evidence demonstrate that this source of land supply can viably deliver 35% affordable housing? Is the benchmark land value for brownfield land on the Isle of Wight in the Local Plan Viability Study reasonably robust?

IWC response

Yes [GS12 IPS Viability assessment Update report July 2022](#) does demonstrate that brownfield sites can deliver 35% affordable housing. Section 6 of **GS12** sets out the results of the viability appraisals across both the lower and higher value areas, and for developments of different scales on brownfield land and as shown in Table 6.6 of **GS12** (page 62) all of the brownfield scenarios with the exception of two are shown as either Viable or Marginal when delivering all of the IPS policy requirements, including 35% affordable housing at the discounts set out in Policy AFF1. The marginal scenarios on brownfield land are all in the lower value areas, and as paragraphs 6.4, 6.7, 6.8 and 6.9 of **GS12** set out, there was and is sufficient evidence to reduce concerns on viability in these scenarios:

6.4: All of the typologies generate a positive RLV but a negative balance (RLV – BLV).

6.7: These results have changed since the appraisals were undertaken in 2021 where all typologies were shown to be viable at 35% affordable housing with the exception of the large 1,200-unit strategic site. The major reason for this shift in viability is due to rising build costs outstripping our assumption for house price inflation on the island.

6.8: We have undertaken sensitivity analysis on the following variables across all typologies to understand how movements in our assumptions affect viability:

- Site Specific S106
- Profit
- Benchmark Land Value
- Density
- Build Costs
- Market Values
- Carbon Reduction Costs
- First Homes Transfer Values

6.9: The results of the sensitivity analysis reduce our concerns on the marginality of certain typologies as there is considered to be sufficient areas for movement in the appraisal to provide viable results with manipulation of certain variables

As set out in our answer to Questions 9.13 and 9.14 some of these sensitivity analysis points would already have a positive impact on viability across all of these scenarios, for example there is no longer a policy requirement for First Homes as part of every affordable housing offer.

For those brownfield scenarios that are shown as unviable, these relate specifically to brownfield apartment schemes and **GS12** highlights in paragraph 6.12 that a more cautious approach has been taken in the viability assessment for these schemes as value is 'heavily dependent upon the location and quality of development' however 'Apartment schemes have been successfully delivered on the Island and our appraisal results do not indicate that apartment development cannot come forward.' Paragraph 7.2 also notes that 'As we have demonstrated in our market report, there is a premium for apartments in waterfront locations and some sites will lend themselves to this typology'.

Paragraph 7.2 of **GS12** notes that 'we would recommend that the Council takes a flexible approach to affordable housing policy (in relation to the tenure and mix of onsite affordable housing) on such sites' and the policies of the IPS (H5 and G4) provide the flexibility that may be necessary, however the council do not consider that a wider distinction is necessary given the information provided above.

The benchmark land value for brownfield land in **GS12** is considered to be reasonably robust – an assessment of previous brownfield land values used in the 2018 report and carried forward into [GS11 IPS Viability Assessment July 2021](#) was carried out and a further uplift applied to reflect the increases in value highlighted by Figures 2.3 and 2.4 (page 10 of **GS12**).

Q9.16: Does the viability evidence support the requirements at Policy AFF1 and Policy H5 for older persons housing to provide affordable housing? Does the viability evidence enable a distinction to be made between older persons accommodation within either the C3 or C2 land use in terms of requiring affordable housing or accommodation?

IWC response

The viability evidence in [GS12 IPS Viability assessment Update report July 2022](#) and [GS11 IPS Viability Assessment July 2021](#) highlights that a flexible approach should be taken to older persons housing schemes and the provision of affordable housing. Whilst Policy G4 covers issues of managing viability in general and offers a degree of flexibility (together with paragraph 7.63 of **CD1**), this is not specific to older persons housing. Policy H5 requires the provision of affordable housing from schemes of 10 or more 'dwellings' and it accepted that some older persons housing could fall into Class C3 and therefore be required to deliver 35% affordable housing. Please see our answer to Question 9.17 in terms of making a proposed modification to Policy H5 to ensure the viability evidence related to older persons housing is properly reflected in policy.

GS12 sets out at paragraph 5.1 the various types of older persons housing, some of which falls within Class C2 (the types under bullets two to four in paragraph 5.1) and some with Class C3 (bullet one in paragraph 5.1). The local planning authority would assess each case on the type of accommodation being proposed and whether it was considered to fall into Class C2 or C3, or indeed a mix of both. The proposed modification in our answer to Question 9.17 covers this issue by providing clarity in development plan policy over

Q9.17: Is it necessary for soundness (justified and effective) for Policy H5 to be modified to exempt older persons housing proposals from providing affordable housing on viability grounds?

IWC response

Yes the council consider that it is necessary for soundness (justified and effective) for Policy H5 to be modified to allow a more flexible approach for older persons housing that falls into use class C3 (in combination with existing paragraph 7.63 of **CD1**), whilst also providing clarity that affordable housing would not be expected from Use Class C2 development.

Proposed modification (additional text underlined):

Policy H5 (add at end of policy)

Affordable housing will not be required from development proposals of older persons housing falling entirely within Use Class C2. For older persons housing falling into Use Classes C3, the council will take a flexible approach to the provision of affordable housing and may consider a financial contribution more appropriate than on-site provision.

Q9.18: Overall, taking account of the evidence in the Local Plan Viability Study, would the requirements of the policies of the Plan put the viability of its implementation at serious risk?

IWC response

No the council do not consider that, taking account of the evidence within [GS12 IPS Viability assessment Update report July 2022](#), the policy requirements of the plan would put implementation at serious risk. As our answers to Questions 9.13, 9.14 and 9.15 demonstrate, the viability evidence is based on proportionate information whilst also including sufficient flexibility and caution within many of the cost assumptions and allowances. **GS12** provides a high level overview, proportionate for the plan-making stage, that allows **CD1** to set realistic and

deliverable policy requirements. The council would also highlight, as identified in our answer to Question 9.13, that developer profit has been set at the highest end of the range throughout the assessment on all typologies.

The council accept that some typologies are shown to be marginal, but as paragraphs 1.15 and 1.16 of **GS12** set out, the financial viability assessment has followed accepted and up to date guidance and the conclusions in the executive summary, reproduced below, can be relied upon.

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.

Q9.19: Given national planning policy states that up-to-date policies are assumed to be viable, is Policy GS4 necessary? If it is, would the Policy be effective? Would there be any prioritisation of criteria (a) to (f) or would the Council look to implement these options equally, notwithstanding the critical need for affordable housing on the Island?

IWC response

The council do consider that Policy G4 is necessary – paragraph 58 of the NPPF does set out that policy compliant planning applications should be assumed to be viable, however the paragraph goes on to state that ‘*It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.*’

The council therefore consider it to be positively prepared and justified to include a policy within **CD1** that provides further, local interpretation of this part of national policy and provides a clear set of criteria for applicants, should it be necessary, to base any open book viability assessments on. As our evidence base and hearing statements (particularly Matters 1 and 2) have set out, the island housing market has different and unique characteristics to mainland housing markets, that sometimes means issues, for example volatility of build costs, can be more keenly felt. The council consider that the policy will be effective as it covers the entirety of the plan period and provides a framework for applicants to consider should there be significant changes in market conditions that a plan review would take a longer period of time to react to.

The council would look to implement the options in G4 on a bespoke basis as should this policy be implemented, it would only ever be on a case by case basis, and some or all of the criteria may not be applicable to certain sites. The council would therefore look at the individual circumstances to determine whether there should be any prioritisation between the options or whether they should be implemented equally.

Issue 4: Monitoring and review

Q9.20: Does the Plan contain an adequate framework for monitoring the implementation of the policies?

IWC response

Yes, the Council considers that [CD1 Island Planning Strategy submission version July 2024](#) has an adequate framework for monitoring implementation of the plan policies.

CD1, paragraph 10.6 states that the Plan will be reviewed to assess whether it needs updating at least once every five years. This approach is consistent with NPPF paragraph 33 which states that policies in local plans should be reviewed to assess whether they need updating at least once every 5 years and then be updated as necessary. Government guidance on Plan-making, paragraph: 065 Reference ID: 61-065-20190723 is reflected in paragraph 10.6 of **CD1**. In reality, this is likely to be a 'long-stop' date for the reasons explained in response to Question 9.22 below.

Section 10 of **CD1** is dedicated solely to plan monitoring and review and sets out three key thresholds which if breached over three consecutive years would trigger a review of Plan policies H1, H2, H5, H8 and AFF1. A table sets out Plan policies each with policy performance indicators.

The Plan monitoring reports are produced on an annual basis and will be used to assess the IPS plan policies. The council will prepare and publish a monitoring report (AMR) every year to understand whether the policies of the Island Planning Strategy are working and contributing to delivery and achieving the corporate objectives. Not all Policy Performance Indicators will be measured and reported every year in the AMR, some will have more periodic updates.

Q9.21: Is paragraph 10.7 of the Island Planning Strategy an effective approach to plan review in terms of setting out 3 key housing delivery indicators that could trigger an immediate review of the relevant policies?

IWC response

Yes the council considers the triggers in paragraph 10.7 for reviewing three key housing delivery indicators to be an effective approach given that [CD1 Island Planning Strategy submission version July 2024](#) is planning for a housing requirement that is less than the Governments standard methodology housing figure. This is considered a robust approach that takes account of varying levels of delivery on a year by year basis rather than setting a figure reflecting the standard methodology which simply isn't deliverable, as explained in [HO16 Housing Evidence paper A – Approach to Housing in the IPS](#) and our Matter 2 hearing statement.

The annual authority monitoring reports will be used each year to assess the level of annual, affordable and windfall housing completions. Thresholds set in paragraph 10.7 are:

- *Annual housing completions* Above 453 units for three consecutive years
- *Affordable housing completions* Above 159 units for three consecutive years

- *Windfall housing completions Above 100 for three consecutive years*

Where the threshold is exceeded for three consecutive years this will trigger a process of reviewing policies H1, H2, AFF1, H5 and H8.

On-going discussions with neighbouring authorities on housing will also take place on a regular basis throughout the Plan period. The Statements of Common Ground with neighbouring authorities ([GS15 New Forest National Park Authority](#), [GS16 Portsmouth City Council](#), [GS17 Southampton City Council](#) and [ED7 New Forest District Council](#)) identify common ground that each local planning authority is located in a separate housing market area (HMA). It has been agreed that being located within separate HMAs does not preclude further assessment of meeting housing needs between the authorities, but it does limit the power and strength of the key functional linkages between places where people live and work, with the Solent being a key barrier that prevents significant overlap of the Isle of Wight HMA.

The council would also highlight, as set out in our Matter 2 hearing statement and referenced in Question 9.22 below, that transitional arrangements in paragraph 236 of the NPPF (December 2024 version) mean that should CD1 be adopted, the council would be expected to start work on a new local plan, prepared against the reformed plan-making system, immediately and the council will be publishing an updated Local Development Scheme by 6th March 2025 to reflect this.

Q9.22: Are there circumstances for the Isle of Wight to indicate that a review of the IPS within a specific period of time would be necessary for soundness? Or would that be instigated in any event by recent changes to national planning policy⁴ without requiring additional content in the Plan?

IWC response

Yes the council consider there are circumstances for the Isle of Wight to indicate that including provisions for time limited reviews are necessary for soundness. The first of these is paragraph 33 of the NPPF, which sets out that local plans should be reviewed at least once every five years. Therefore to ensure consistency with national policy, this should be reflected in the local plan and is at paragraph 10.6 of [CD1 Island Planning Strategy submission version July 2024](#).

The second circumstance is the approach to the housing requirement in **CD1** as set out in [HO16 IPS Housing evidence paper A – approach to housing in the IPS May 2024](#). To ensure that the plan, and any future reviews, remain forward-looking and positively prepared, it is considered necessary to re-visit the approach to the housing requirement **if levels of delivery consistently exceed the housing requirement in the IPS**. Such a situation occurring may suggest that some of the delivery barriers that are currently in existence may have relaxed or changed, therefore, to enable the plan to remain justified and effective, it would be appropriate to re-visit the housing requirement.

The council note the recent changes to national planning policy and as set out in our response to Question 2.3, there are plan-making transitional arrangements set out in paragraph 236 of the NPPF (December 24 version) that would apply to the Isle of Wight Council.

⁴ For example, paragraph 236 of the December 2024 NPPF.

As the housing requirement of 453 dwellings per annum (dpa) in **CD1** is less than 80% of the local housing need calculated using the December 2024 standard method of 1,062dpa (the **CD1** figure represents 43% of the December 24 standard method), post-adoption of **CD1** the council will be expected to begin work on a new local plan under the revised plan-making system, subject to the relevant provisions being brought into force in 2025.

Whilst exact details of the revised plan-making system are yet to be published, the provisions within and commentary around the Levelling Up and Regeneration Act 2023 point to a much more streamlined and quicker plan-making process of 30 months. The council will publish an updated LDS by 6th March 2025 which makes clear reference to preparing a new local plan post adoption of **CD1**.

No additional content is necessary to **CD1** as the transitional arrangements of paragraph 236 apply in any event as a matter of national policy, however given the exact timescales and content of the new plan-making system remain unknown at this time, it is considered justified to keep the time limited plan review triggers covered in the first part of this answer within **CD1**.