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Dear Planning Strategy Team

## **ISLAND PLANNING STRATEGY REGULATION 19 (PRE-SUBMISSION) CONSULTATION**

Carter Jonas is instructed by Wadham College to respond to the Isle of Wight Council's ("the Council") Regulation 19 Pre-submission Publication Island Planning Strategy ("the Planning Strategy") Consultation.

Wadham College owns Land at Millhouse Farm, Upton Road, Ryde ("the Site" - Council's HELAA reference RYD019), which is located immediately to the south of Ryde, on the eastern side of Upton Road, running in a north-easterly direction to the rear of properties fronting Mitchell's Road and Oakwood Road. The land to the north-west of the Site is occupied by allotments and an area of public green space.

Wadham College has read with some disappointment the assessment of the Site, in the Council's Housing and Strategic Housing Land Availability Assessment (SHLAA), suggesting its development would have an unacceptable impact on landscape, and moreover that a "settlement gap" policy has been drafted to prevent any future development.

The Site is in a sustainable location, and the Isle of Wight is in desperate need of housing development sites. The Site is available for development now and could be built out within the next 5 years, it is suitable for development and that development is achievable. The site is well located at the edge of Ryde and benefits from being within walking and cycling distance of health and education facilities. Furthermore, it is within a reasonable walking distance to several bus routes, including routes into the centre of Ryde, and beyond.

Development in this location would constitute sustainable development in accordance with the presumption in favour of sustainable development, as set out in national policy.

Wadham College's view is that in this respect the Local Plan is unsound, having reviewed its contents and supporting documentation and evidence. The Plan is unsound in three ways:

- (a) Its omission of Land at Millhouse Farm, Upton Road, Ryde as a housing allocation
- (b) The overall housing requirement, and lack of strategic solution via the Duty to Cooperate.
- (c) The Council's policy approach to green gaps / settlement gaps is not consistent with national policy

Moreover, the plan may well need a comprehensive review, and redraft in light of:

- The Government's consultation on "*Proposed reforms to the NPPF and other changes to the planning system*" and the "*National Planning Policy Framework: draft text for consultation*", and
- The Secretary of State's written ministerial statement (WMS) entitled "*Building the homes we need.*"

Whilst Wadham College notes that the consultation, and the WMS, are not yet adopted Government policy both have material weight in planning. The direction of travel in planning is clear, and is more positive than is currently set out in the Planning Strategy.

Hereunder these matters are considered in 'Local Plan order,' first, housing need, then 'environment policies', and then the omission of a development allocation at the Land at Millhouse Farm, Upton Road, Ryde.

## POLICY H1: PLANNING FOR HOUSING DELIVERY

Legally compliant	Yes	Positively prepared	No
Sound	No	Justified	No
Compliant with the duty to cooperate	No	Effective	No
		Compliant with national policy	No

Planning for the right number of new homes is vital to the sustainable future of the Isle of Wight. This is to meet the needs of all parts of the community of Island, including key workers, older people, and those who cannot afford market housing.

Wadham College reads with great concern the Council's approach to identifying its housing requirement. The figure of 453 dwellings per annum (dpa), quoted in Policy H1 is significantly lower than the current Local Housing Need figure of 703 dpa (derived from the extant standard method). 453 dpa is also even further away from the figure of 1,104 dpa which is presented in the current consultation documents supporting the new Labour Government's proposed redraft of the National Planning Policy Framework (NPPF).

Wadham College has read the housing evidence papers which support the Planning Strategy and is not convinced by the arguments that are presented therein. Great weight is placed by the Council on what it suggests is a difficult housing market and that homes are not delivered in a timely manner on the Island. The Council suggests that this is an acceptable reason to therefore constrain the amount of land which can be allocated for development. This argument is counterintuitive. Making more land available for development can help to drive competition, and choice, in development land and ultimately in the purchase of new homes. Matters of the housing market and sales rates should be managed through the Planning Strategy's development trajectory.

It is also disappointing to see the Council attempting to constrain developable sites in the face of what it identifies in its own Development Plan vision – which is past under delivery of housing and a chronic lack of Affordable Houses.

Under the current (Dec. 2023) NPPF, if the Council is taking an alternative approach to assessing housing need, then it requires exceptional circumstances to do it (para. 61). However, the Council's argument appears to be that it is not seeking to assess housing needs in a different way, simply that it cannot accommodate its own needs. Therefore, Wadham College presumes that Council accepts that its Local Housing Need is 703 dpa, and it is choosing not to attempt to meet that figure. This cannot be a positive, and sound, approach to planning.

Moreover, if it is the Council's view that it simply cannot support the delivery of 703 dpa and does not have the 'capacity' to do so (whether that is physical or market capacity) then it should turn to the Duty to Cooperate. However, the Council suggests – and it appears to be agreed by neighbouring authorities – that:

*“The Isle of Wight is recognised and accepted as a standalone housing market within the south-east sub-region. It is not realistic therefore to either consider mainland authorities to meet any shortfall in provision on the island, or for the island to be able to contribute to meeting shortfalls experienced on the mainland.”*

We are then left with a very unsatisfactory 'void' or hanging need of 250 new homes per year, or 3,750 homes over the plan period. Wadham College accepts that commuting for work between the mainland and the island is predominantly away from the island, but there is some in commuting. More research should be undertaken which considers where the additional housing needs could be met on a regional basis.

In the Duty to Cooperate paper the question is asked: “Can the IOWC play a role in meeting unmet housing needs in Portsmouth & Southampton.” But the direct question is not asked in reverse, even from an academic ‘capacity assessment’ point of view. This work needs to be undertaken, collectively amongst the authorities, as a matter of urgency, and would be a clear example of something to consider in a cross border strategic plan.

Turning to the WMS, this makes clear that:

*“...housing need in England cannot be met without planning for growth on a larger than local scale, and that it will be necessary to introduce effective new mechanisms for cross-boundary strategic planning. This will play a vital role in delivering sustainable growth and addressing key spatial issues – including meeting housing needs, delivering strategic infrastructure, building the economy, and improving climate resilience. Strategic planning will also be important in planning for local growth and Local Nature Recovery Strategies.”*

The Isle of Wight, along with its neighbours, must plan more positively and more strategically to meet the identified housing needs of the region.

On those housing needs, the NPPF consultation includes a table setting out what the housing needs will be post its adoption. As mentioned above, this has material weight. The table suggests that the housing need on the Isle of Wight is now at 1,104 dwellings a year. The Council – along with its neighbours – should be planning for these needs, and should consider reviewing its overall spatial strategy, and allocate more of the suitable and sustainable sites (like Land at Millhouse Farm) that it has in its SHLAA, or at very least commit to a very early review of its plan to respond to the new NPPF.

Land at Millhouse Farm, Upton Road, Ryde has the potential to deliver additional homes in a suitable location and should be allocated for development to help meet the needs of the Isle of Wight for which the draft plan is currently not catering.

### ***Necessary modification***

Policy H1 should include the Local Housing Need figure of 703 dwellings per year, and the Council should allocate sufficient land to meet that need. The housing market will, to an extent, dictate when the houses will be delivered, but this is no reason to constrain the amount of available land.

As part of this, Land at Millhouse Farm, Upton Road, Ryde should be allocated for development.

The Council should give serious consideration to reviewing its overall housing need, and spatial strategy, to respond to the new NPPF and the increased housing need identified in its supporting revised housing needs calculations.

At very least the Council should commit to an early review of its plan to respond to the revised NPPF, and to the expected move towards to strategic planning.

## POLICY EV10: PRESERVING SETTLEMENT IDENTITY

Legally compliant	Yes	Positively prepared	No
Sound	No	Justified	No
Compliant with the duty to cooperate	Yes	Effective	No
		Compliant with national policy	No

Wadham College is unconvinced by the necessity for this policy and considers that its role is fulfilled by proposed policy EV9: Protecting our landscapes and seascapes. There is no need to have a separate policy which seeks to avoid “coalescence” unless it is proposed to be new Green Belt, which would require *Exceptional Circumstances*.

Proposed policy EV10 uses phraseology such as “open” which is associated with Green Belts, and as such suggests that the policy is aimed – in its essence at least – at preventing development at the edge of settlements in the same way as designated Green Belt. The “gaps” are therefore not positive, properly justified, and neither are they consistent with national policy.

If the Council’s desire is to manage and promote ‘character,’ and for development to respond positively to that character, then proposed Policy EV9 requires precisely that.

The sheer number – 12 – of the proposed “gaps,” and their scale can only be considered to be “*extensive tracts of land*.” Whilst this is a criterion used for managing Local Green Spaces, it is also relevant to consider in the context of these “gaps.” The Council is seeking to control development in a way which Government describes in PPG as a “back door approach” to delivering Green Belt, a situation made all the more acute when combined with proposed policy EV7: Local Green Spaces. This is entirely unsound.

Wadham College does note that proposed policy EV10 includes the following caveat:

*Development in settlement gaps will only be permitted if it can be demonstrated that there is no significant adverse impact on the physical or perceived separation between settlements, either individually or cumulatively with other existing or proposed development.*

Whilst it is noted that this caveat does provide for some development in the “gaps” it does nothing more than is already required by Policy EV9:

- a ensure new development avoids both direct and indirect adverse effects or cumulative impacts upon the integrity of landscapes and seascapes;
- b protect important vistas and character, from and to the land and sea

If is appropriate to avoid coalescence, then the correct tool to use in planning is the Green Belt. If the Council believes that the “gaps” are of sufficient importance to be “preserved” then it should present an exceptional circumstances case to create new Green Belt.

### **Necessary modification**

Delete policy EV10: Preserving settlement identity

## OMISSION SITE: LAND AT MILLHOUSE FARM, UPTON ROAD, RYDE

Wadham College suggests that Land at Millhouse Farm, Upton Road, Ryde should be allocated for development; it is available and suitable for development, and that development is achievable early in the plan period.

Wadham College notes with interest the following which is reported in the 2022 Strategic Housing Land Availability Assessment (SHLAA) where the site is given the reference number RYD019:

- Immediately adjacent to the Settlement Boundary
- The site is not located within any environmental designations including, ancient woodland, LNR, marine conservation zone, NNR, RAMSAR, SAC, SINC, SPA, SSSI, scheduled ancient monument or RIGG
- The site is not located within any environmental designations including heritage coast, historic park or garden, open space.
- The site is located in FZ1 and is not class 1 or 2 agricultural land.
- The site is close to existing residential, no compatibility issues are envisaged
- The site is not located in a mineral or mineral safeguarding area.
- The site is not located in an AONB
- The site is not located in a conservation area and there are no listed buildings close by. Unknown archaeological potential. Early consultation with IWCAHES recommended.
- The site is not located in an environmental designation. There are no TPOs on the site but there are a number of large trees individual and groupings that need to be considered. The site is within the Biddlesford Copse range. There are hedgerows (S41 priority habitat) across all boundaries of the three fields that comprise the site.

Wadham College agrees with these assessments and suggests that they lend themselves to a finding that the site is suitable for development.

However, the Council suggests that the Site is not developable for the following reasons:

### Landscape

- Landscape Character Area Key Factors: Changed Countryside – Equestrian.
- Landscape impact: green fields on the rural fringes of Ryde that site on relatively exposed topography, with land sloping away to the east and the west from the site centre and continuing off-site for some considerable distance. There would be significant visual impacts. Development would be inconsistent with the settlement pattern. Strategic Gap. Landscape value is medium, but sensitivity is medium.high

### Access

- There is a bus stop to the north about 100m from the north edge of the site. This is Route 37 and serves Ryde | Haylands | Binstead | Ryde and runs Mon to Sat up to every 60 mins.
- There are no public rights of way or cycle links close by and the immediate roads do not benefit from footpaths.
- Whilst Ryde has a wide range of facilities and services the site is outside of the settlement area with no footpaths to nearby Haylands.

The Council then goes on to conclude:

*Currently not suitable. Unacceptable landscape impact. Strategic Gap. In addition, it is away from the strategic road network. Upton Road lacks pedestrian footways and development here would encourage car dependency.*

Wadham College is disappointed to see the landscape arguments presented in the SHLAA. With its planning application (P/01213/15) a Landscape and Visual Appraisal (LVA) was prepared by CSA Environmental in February 2015. The appraisal describes the landscape character and quality of the application site, along with its visual characteristics. The report also appraises the suitability of the site to accommodate the proposed development and any mitigation measures that may be necessary.

The Site falls outside the AONB and there are no other statutory or non-statutory designations for landscape character or quality covering the application site or land within its vicinity. It is a positive factor weighing in favour of the application that the new housing, to meet local needs, can be delivered on land not specifically protected for its landscape character or quality.

The topography of the area is such that there are a number of opportunities to see the site in the near and middle distance. However, the LVA continues that in virtually every view the site is seen within the context of existing development within Ryde and is partially screened by vegetation.

In terms of landscape quality and condition, the Appraisal considers that the location of the site on the edge of Ryde exerts an urbanising influence on the character of the site. Overall, the landscape quality of the site is considered to be medium. In terms of landscape value, there is no public access onto the site and it does not contain or adjoin any heritage assets and as set out above, the site is not designated for its landscape quality. It is, however, open and characteristic of the neighbouring countryside, and as such is also considered to be of medium value.

The Appraisal concludes that in landscape terms, residential development on the site, in accordance with the Illustrative Masterplan, would not give rise to any significant landscape or visual effects on the surrounding countryside, nor would it be incompatible with the character of the existing settlement.

In the case officers report for the same application – where consent was recommended, and ultimately it was given – is states:

*“Officers consider that the application would not have an impact on the sensitivities of the character area, with the scheme proposing to retain the strong hedgerow boundary, trees and in turn the enclosed character of the existing fields.”*

The Council then, has made a ‘policy on’ assessment in the SHLAA which is not an appropriate approach. The Council has decided that the Site is unsuitable for development because of its “Strategic Gap” policy. First, this should be a spatial strategy point, not a land availability assessment point (land availability assessment should concentrate of physical constraints to development, not spatial strategy and strategic policy options). Second, Wadham College has argued that the “gaps” are not a sound policy and should not be adopted as part of the development plan.

Moreover, nothing has materially changed on the ground since consent was given for development on the Site in November 2016, therefore there is nothing to justify this change in approach to landscape management.

Turning to access and sustainable travel, the site is in a sustainable location, with a good level of accessibility to a wide range of community, retail, health and leisure facilities. The TA which supported the planning application considers the design of the proposed priority junction access off Upton Road and concludes that it meets the minimum visibility requirements detailed within Manual for Streets 2 (as requested by Island Roads). The access has also been demonstrated to work successfully in capacity terms, now and in the future. 6.7

The traffic impact of the proposed development at off-site junctions is likely to be negligible, with the junctions continuing to operate within capacity.

The proposal also incorporated a new footway and pedestrian crossing on Upton Road to the north of the proposed site access. This would negate the concerns identified in the SHLAA.

Therefore, as Wadham College outlines in these submissions, there is no reason to preclude this site from development. The site is in a sustainable location, adjacent to a highly sustainable settlement. A scheme can be designed that reflects its edge of settlement location, responds to its context and is integrated with the surrounding area. Through appropriate studies and assessments, proposed development can be safely accessed, would not result in a significant impact on views into the site, would not result in adverse impacts on local wildlife (with opportunities identified to enhance biodiversity) and the new residential development would not be at risk from flooding (and would not increase the risk of flooding elsewhere).

The omission of the site is not robustly justified in evidence.

### **Necessary modification**

The vision for Land at Millhouse Farm, Upton Road, Ryde is for innovative and modern residential development in a highly sustainable location.

The previous planning consent on the site demonstrated that the site has capacity for up to 70 dwellings.



Therefore, Morrell's suggested policy wording for the Pullens Lane Allotments, is as follows:

**Housing allocation: RYD019**  
**Land at Millhouse Farm, Upton Road, Ryde**

**Site specific requirements**

*A greenfield site of approximately 2.9 hectares is allocated Land at Millhouse Farm, Upton Road, Ryde to deliver a sustainable, high quality residential development which shall provide:*

- a) *at least 70 homes providing a mix of sizes and an affordable housing contribution in line with H5 and H8 with a focus on affordable one and two bedroom accommodation;*
- b) *Improvements to vehicular and pedestrian access with specific consideration to ensuring pedestrian and cycle links; and*
- c) *a mix of onsite open and recreation space.*



*The layout and design of the development should where possible retain the existing trees, and hedges.*

*Archaeological and biodiversity assessments may need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects.*

*The developer will need to liaise closely with Southern Water to review SW's delivery of network reinforcement. Occupation of the development will need to be phased and implemented to align with the delivery by Southern Water of any sewerage network reinforcement required to ensure that adequate wastewater network capacity is available to adequately drain the development.*

*On and off-site provision and contributions to community infrastructure, including education and health provision, may be sought in line with policies G3 and G4 and secured through a section 106 legal agreement.*

## **CONCLUSION**

Wadham College is very concerned that the basis of the Island Planning Strategy, and especially the identified housing needs and requirement, are out of date. In light of the recently published NPPF consultation, and associated Ministerial Written Statement, Wadham College suggests that the Council may need to comprehensively review its plan, and redraft it.

The housing requirement, as presented, is unsound.

More specifically, Wadham College would like to see Land at Millhouse Farm, Upton Road, Ryde allocated for development, which would help to meet the identified need for new homes, and Affordable Housing, on the Isle of Wight.

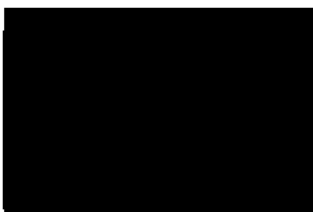
## PARTICIPATION AT THE ORAL PART OF THE EXAMINATION

Wadham College confirms that it does wish to take part in the oral part of the Local Plan examination. This is to be able to present its full concerns about the housing needs assessment to the Inspector.

I trust that the comments are useful to the Council, and I confirm that I am happy for my name, organisation, address and postcode to be published alongside my comments at the appropriate time in accordance with GDPR regulations.

Please also keep me informed of the progress of the plan up to and including adoption, but prior to that the preparations for the examination.

Yours Faithfully,



**Peter Canavan BA(Hons) MSc MRTPI  
Partner**

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