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Planning Services
Isle of Wight Council
Seaclose Offices
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Newport

Dear Sirs,

Reg 19 Response to Draft Island Planning Strategy

Policy H1 Planning for Housing Delivery

I am writing, both as a planning consultant and as a local resident with two adult children and a teenage child (all of whom will need housing at some point within the plan period), to respond formally to the Regulation 19 draft of the Island Planning Strategy published for consultation in July 2024.

The response is made primarily to Policy H1 (Planning for Housing Delivery) and G2 (Priority Locations for Development and growth). Nevertheless, the outcomes of the need to review these policies will have consequences for the rest of the plan in terms of reviewing an overarching spatial strategy, and the allocation of sites to promote both housing and jobs.

Background and Qualifications

I have been a fully chartered town planner and a member of the Royal Town Planning Institute since July 1994. I have worked in planning since 1985. I have held numerous positions in local government and in the private sector, holding roles as a policy planner, development control officer, implementation officer and planning consultant. I have worked at Gosport Borough Council (1989 to 1990), MSJ Keys Young (Sydney Australia 1990 to 1991), Portsmouth City Council (1991 to 2005), and the Isle of Wight Council as Deputy Head of Planning Services (2005 to 2013). Since 2013, I have been a director of my own planning consultancy.

I am the father of three sons two of which are of adult age whilst the youngest is still at college on the Island. All three of my sons will be requiring housing accommodation on the Island at some point within the new plan period.

My interest in the Draft Island Planning Strategy is both professional and personal.

Strategic Overview

The Island Planning Strategy seeks to provide for an average of 453 homes per year, as set out in the proposed Policy H1 (Planning for Housing Delivery). The justification for this is based on what the local planning authority believes is deliverable. The figure is not based on the nationally prescribed methodology for determining housing need.

The draft IPS is short of providing for actual need by a significant margin. Through a lack of housing delivery to meet year on year need, actual housing requirements have risen significantly.

The new national government has issued a draft National Planning Policy Framework (NPPF) for consultation. The key elements of the NPPF, as far as they impact the draft IPS in this instance, are as follows:

- Clarification of the 'presumption in favour' of sustainable development
- Reintroduction of mandatory housing needs targets
- Restoration of the requirement for all LPA's to demonstrate a 5 year supply of housing land

The government have issued an update of the housing delivery figures for each local planning authority area (July 2024). Applying the current standard method of calculating housing need, the Island's annual requirement is 703 dwellings per year. By applying a new proposed method of calculation, the annual need rises to 1104 homes per year.

Whether the actual housing need for the Island is to be 703 dwellings per year or 1104 dwellings per year, the current draft IPS is woefully short of planning for housing need. At an assumed rate of 453 homes per year, the plan's shortfall ranges from 250 homes to 651 homes annually.

The GL Hearn report commissioned by the Isle of Wight Council and published in 2022 (as an update to a previous housing needs assessment of 2018) highlighted a number of key statistics and projections with regards to the population of the Island and its sub areas. In summary, these are:

1. *During the period time of 2023 to 2038, the population of the Isle of Wight will become significantly older with an increase of 29% over existing figures of people aged over 65.*
2. *Over the period there is a need for 1752 new units to be provided for the private sector needing support, not care. That is 116 units per year. On the affordable housing side of this, the need is 25 units per year.*
3. *By 2038 there will be a need to have 1683 units to utilise wheelchair access.*

4. *There will be a 47% increase in dementia on the Island during planning period ending 2038.*
5. *There were just 19 student homes on the Island in 2011.*
6. *There is a need to provide for at least 10 self-build units to be provided for per annum on the Island.*
7. *Across the UK, 18% of all housing stock is occupied as affordable housing. In Hampshire it is 14% and on the IOW it is 11%.*
8. *It is recognised in the report that there is a general need for the construction of 372 affordable housing units on the Island, each year.*

Since the adoption of the current 2012 Island Plan Core Strategy, delivery of new homes has been poor compared to actual need. In planning terms, there are a number of key factors leading to this namely:

- Insufficient allocation of sites for housing (the Core Strategy was never backed-up with area actions plans for the Medina Valley, the Bay and Ryde as required by the public examination planning inspector);
- Insufficient planning approvals granting planning permission for new housing sites;
- An ongoing and unjustified political debate centred around the review of planning policy which has delayed the new plan;
- A complete lack of certainty for developers as to whether their sites would be supported by the LPA. Planning decisions on housing sites are, at best, inconsistent. thereby repelling any potential interest investors may have.

The Need to Revise Housing Provision Policy

The consequences of not providing for sufficient homes and jobs will lead to serious social and economic problems on the Island including:

- Increasing demand for homes and increasing prices (homes becoming unaffordable)
- Reduced opportunity for affordable homes;
- The younger working generations being priced out of the housing market;
- The Island further becoming a retirement destination rather than a self-sufficient economically balanced society.

The risk to younger economically active age groups is that the harder it is find accommodation, the more disillusioned they will be in the Island itself and the draw to move to the mainland will grow stronger.

As a planning consultant acting for landowners, developers and investors, it is clearly apparent that objectors to applications are generally of an older age group, often retired, and resistant to change. Those that genuinely need homes do not, as a rule, involve themselves in the planning process.

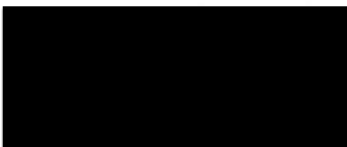
A balance needs to be struck. However, there has to be an acceptance that planning for actual housing need is a fundamental priority.

In order for there to be any positive 'plan-led' strategy to deliver the needed homes on the Island, the Island Planning Strategy needs to be revised. In particular, two essential approaches need to be adopted. These are:

1/ to accept the mandatory housing target when issued by government, leading to more allocations. Policy H1 should be revised to reflect actual housing need.

2/ To plan proactively for windfall sites and acknowledge the sustainable credentials of sites even if they sit outside of defined settlement boundaries. Policy G2 needs to be revised to allow for development adjoining settlement boundaries (recognising their sustainable location).

Yours sincerely



Phil Salmon
Director/Planning Consultant