



Planning & Development Hub (IW) Ltd

a: Branstone Buisness Park
Stockman's Close
Branstone
Sandown PO36 0EQ

t: [REDACTED]
[REDACTED]
[REDACTED]

Our Ref:
Your Ref:

12 August 2024

Dear Sirs

Reg 19 Response to Draft Island Planning Strategy

Proposed Allocation of Land at Sandown Airport for Employment Uses

I am writing as a formal response to the Regulation 19 draft of the Island Planning Strategy published for consultation in July 2024.

The response is made in two parts. Firstly, comments are made on the general strategy of the plan, with particular regards to the planning for jobs in support of growing the economy in a sustainable manner. Secondly, it addresses the need to enable delivery of allocated sites and pushes for insurances that the Isle of wight council, both as Planning Authority and Highways Authority, provides assistance in the discharge of its own statutory responsibilities. This response comes on the back of a recent refusal of planning permission for an employment scheme on precisely the same site (Sandown airport) proposed to be allocated for economic development. The Island Planning Strategy (IPS) needs to be an enabler and not just a paper exercise!

Strategy and Planning for Jobs

The starting point must be the Core Strategy 2012 which planned for the creation of 7500 new jobs. Essentially these needed to be sustainable and not based in the seasonal of visitor market. This has clearly failed and sites like Kingston in East Cowes and Nicholson Road in Ryde have not come forward which is a significant disappointment to prospective investors in the island.

The Island Planning Strategy no longer has a jobs creation target, but Policy E1 of the draft IPS states the following:

E1 Supporting and Growing our Economy Strategic

*The council **wholeheartedly supports** an environment where businesses have the confidence to invest. It will therefore support the sustainable growth of the Island's economy and proposals that deliver jobs via a range of sectors, including the Solent Freeport, while increasing local wages, skills and job opportunities.*

To contribute to achieving this, the council allocates the following sites (as shown on the policies map):

...
....

f 2.9 hectares at Sandown Airport, Sandown for Class E Offices, B2 and B8 uses.

Clearly, given the experience of the recent planning decision for the airport site, there is no apparent 'wholehearted' support for businesses. A refusal based on the position of a bus stop on highways land (an issue which can be overcome with proactive discussions with the highways authority) smacks of finding reasons for refusal rather than support.

For Policy E1 to be successful, there must be corporate sign-up to the aims of economic regeneration and a commitment to delivering on allocated sites. This concern is aimed at internal procedures (namely Development Management) as well as the wider issue of attracting investment. **There cannot, and must not, be a disconnect between forward planning and development control!**

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

Increases in housing provision must be matched with job creation.

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 projects with regards to the population of the Island and its sub areas. A key finding is that 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.

Younger generation Island residents are moving away from the Island. Graduates are far less likely to return compared to other areas, compounding the trend for an aging population.

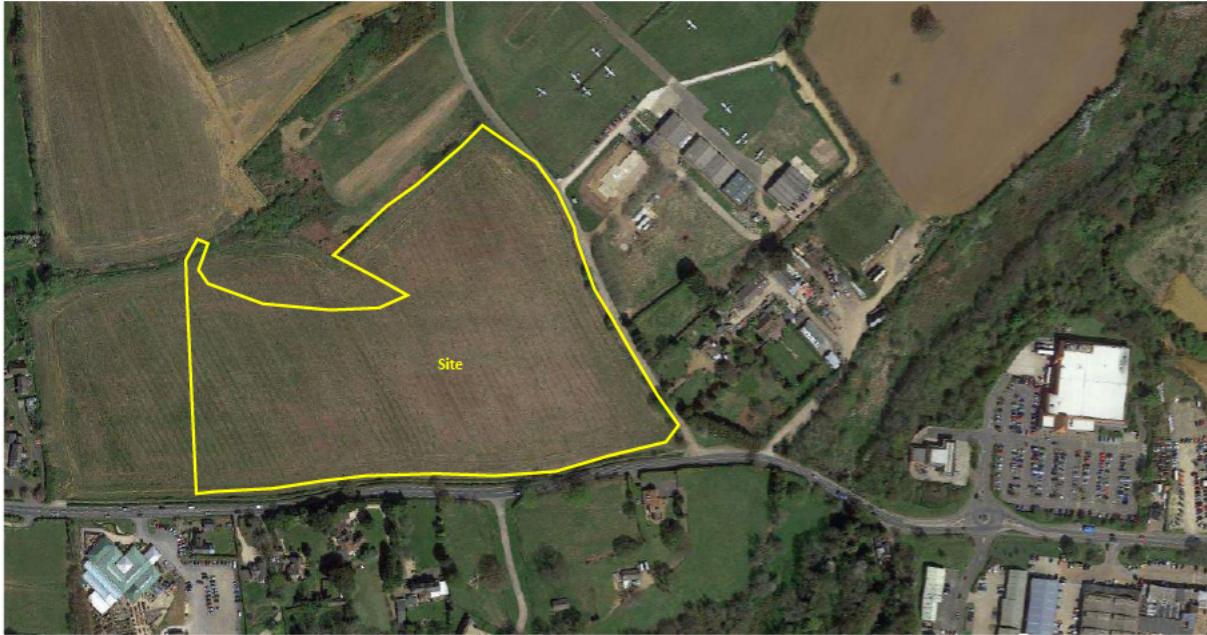
In order for there to be any positive 'plan-led' strategy to deliver the needed jobs on the Island, more sites need to be allocated, backed-up by actual support from to establish greater certainty of delivery.

Sandown Airport – Proposed Allocation

It is requested that the site outlined in yellow in the plan below is considered as an allocation for employment uses.

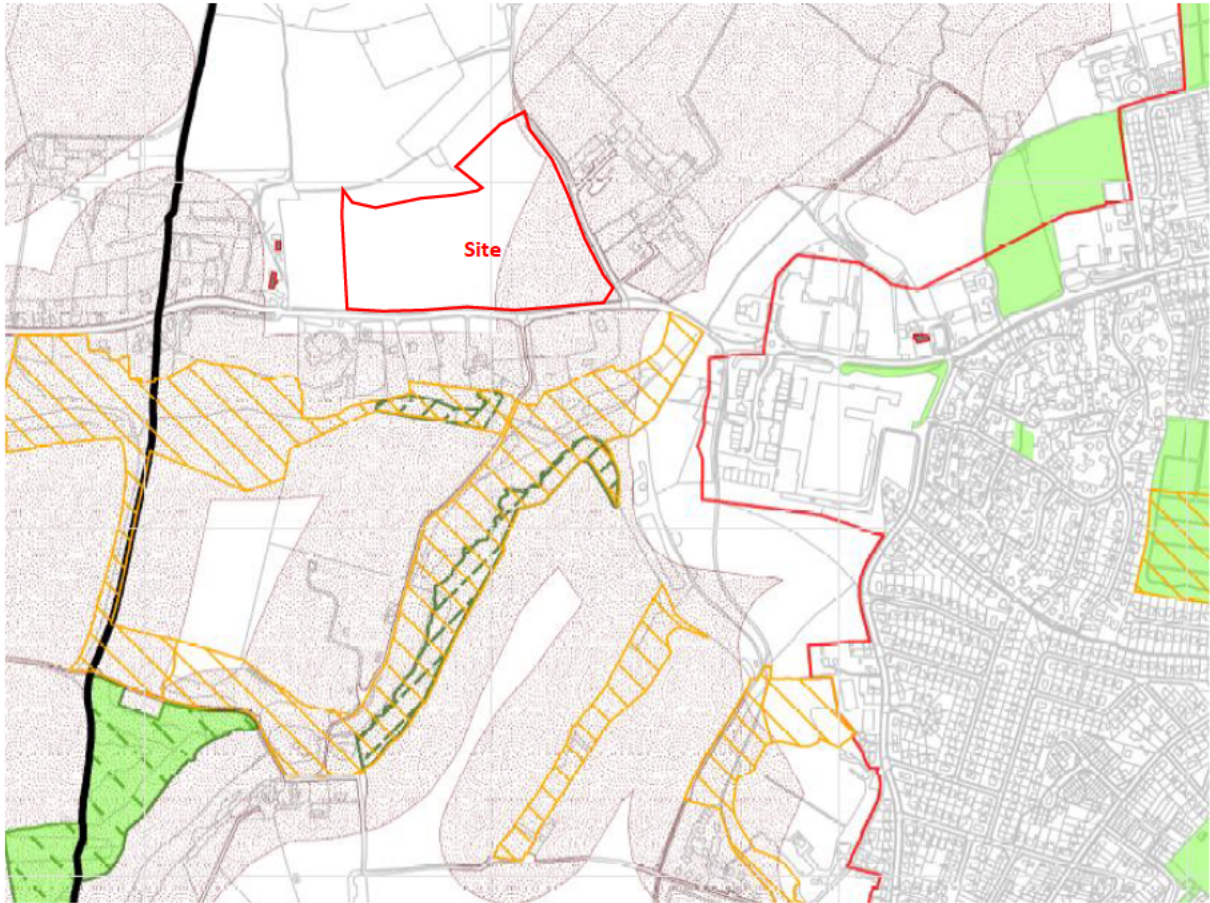


Site Location and Adjoining Uses



The opportunities presented by the site are as follows:

- The site is accessible and already benefits from planning permission for a new vehicular access (to serve the Cheverton Holiday Park). This alternative access avoids the need to secure an upgrade of the existing Scotchells Brook Lane uncton with Newport Road;
- The site sits within the Key regeneration Area for the Bay, where there is an identified need for sustainable jobs in support of promoting a more diverse and sustainable local economy;
- There is identified demand for new employment spaces for both local expanding businesses and potential investors from off of the Island;
- The extensive size of the site lends itself to the potential of promoting a mixed-use scheme (including housing) as a means of enabling and delivering employment uses.
- There are very few opportunities in the Bay area such as this conveniently located site. Other sites such as College Close are found in flood plains and are not deliverable.
- It has been sequentially tested and has been found to be the most acceptable site in the bay.
- It has produced other uses within this environment not only benefitting employment, but also education and tourism.
- It is suggested layout and buildings matches the approved and delivered site at Branstone Park.



Proposed Site in Context of Bay Regeneration area and Settlement Boundary (IOW Council April 2012)

The images below are taken from the recently refused scheme which are now likely to be the subject of an appeal.



Layout for business employment



CGI images of proposed employment park

The merits of allocating the site for employment development are summarised as follows:

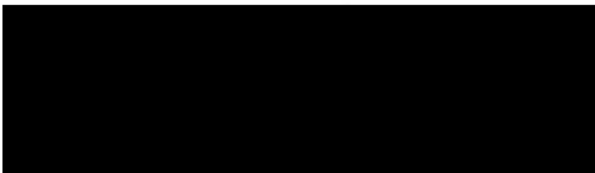
- Providing a greater choice of potential employment sites for investors;
- Realising the potential of an unrestricted employment site that is not impacted by flood risk or biodiversity net gain issues;
- Provision of active management of habitat and landscaping and increasing the biodiversity value of green areas in support of the existing SINC.

The need for new jobs is significant. In light the GL Hearn report of 2022, the aging population and the risk of losing younger economically active age groups, this site represents a major opportunity and should be allocated as such.

The Airport Site allocation should be matched with a genuine commitment by planning and regeneration officers to consider solutions to overcoming any transport issues.

Please consider this letter as a caveated support for policy E1 (Employment Sites) which should be enhanced to include a commitment by the LPA to find solutions to delivery by working proactively with investors and promoters of development schemes.

Yours sincerely



Phil Salmon, MRTPI
Planning & Development Hub (IW) Ltd



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Our Ref:
Your Ref:

12 August 2024

Dear Sirs

Reg 19 Response to Draft Island Planning Strategy

Proposed Allocation of Land to the north east of Fort Warden Rod, Site B, Former Paddock Site, Colwell

I am writing as a formal response to the Regulation 19 draft of the Island Planning Strategy published for consultation in July 2024.

The response is made in two parts. Firstly, comments are made on the general strategy of the plan, with particular regards to the planning for insufficient numbers of homes and jobs actually needed in the plan period. Secondly, this response advocates the need to new allocate new sites, to meet need, and promotes the site at Fort Warden. A plan indicating the site and potential opportunities is submitted in support of this response.

Strategy and Planning for Meeting Need

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 need year on year, 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 projects 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. *75% of those households in West Wight, own their own home. This is the highest on the Island.*
9. *In West Wight, 50% of the existing population is over 60. This will increase to around 65% by the end of the planning period.*
10. *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 thereby repelling any potential interest investors may have.

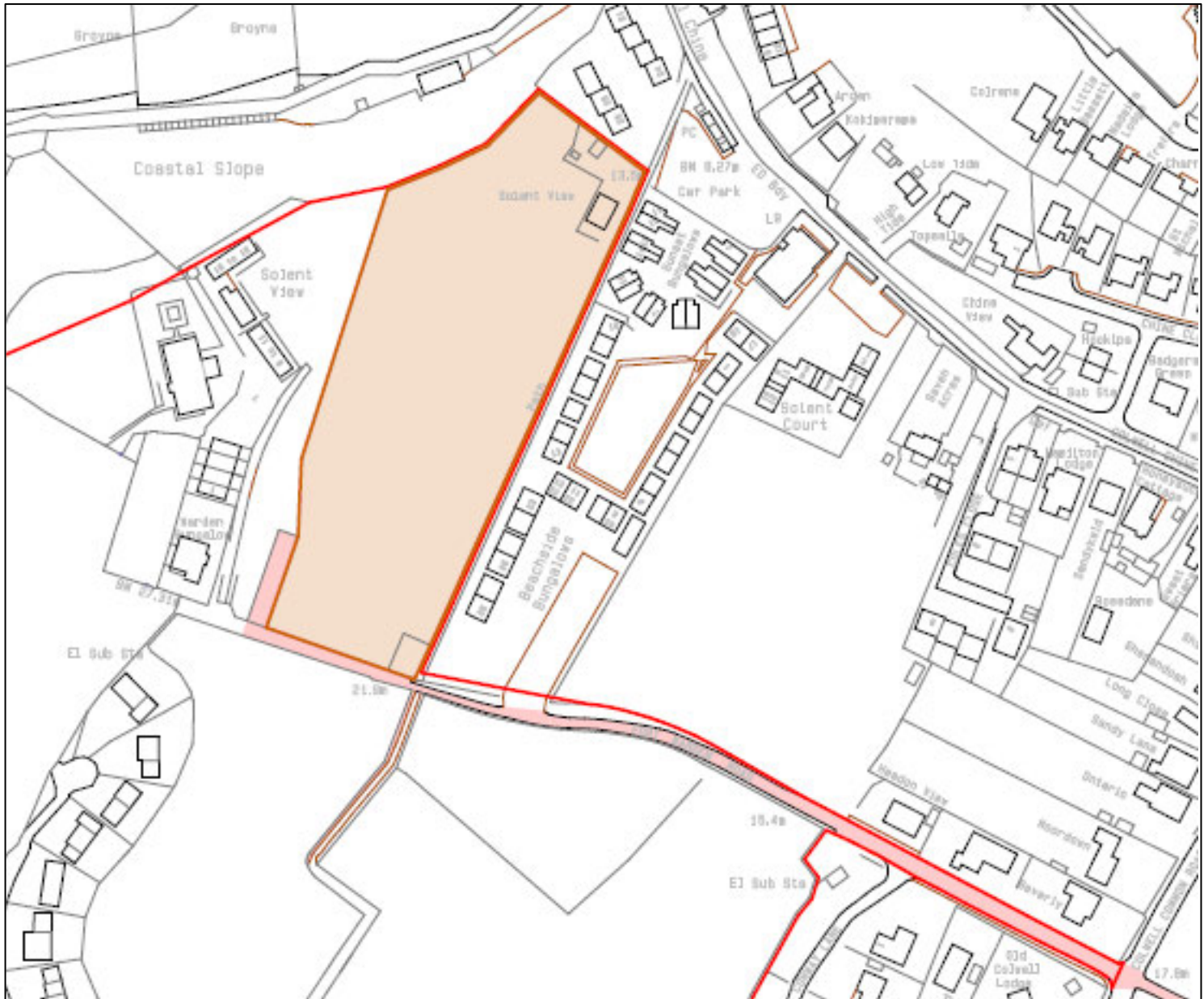
The consequences of not providing for sufficient homes and jobs lead to serious social and economic problems on the island including :

- 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.

In order for there to be any positive 'plan-led' strategy to deliver the needed homes on the Island, more sites need to be allocated to establish greater certainty of delivery.

Fort Warden Site B – Proposed Allocation

It is requested that the site outlined in yellow in the plan below is considered as an allocation for self-building housing to meet a local need for lower cost residential accommodation.



Site Location

The image below is taken from Google earth and illustrates the context of eh site in relation to Colwell Bay, including footpaths linking it to Fort Warden Road and Colwell Chine Road



Aerial View of proposed site



View of site from Fort Warden Road looking North

The opportunities presented by the site are as follows :

- The extends to 1.4 Ha and represents an opportunity for the provision of up to 8 units;
- As a proposal for self-build units, the scheme would be exempt from biodiversity Net gain provision. Nevertheless, there remains an opportunity for onsite landscape and biodiversity enhancement as part of a residential layout;

- The site is accessible. Fort Warden Road provides direct access from Colwell Common Road and the A3054 Colwell Road;
- Bus stops on Colwell Road service regular bus routes.



Fort Warden Road junction with Colwell Common Road

The merits of allocating the site for residential development are summarised as follows:

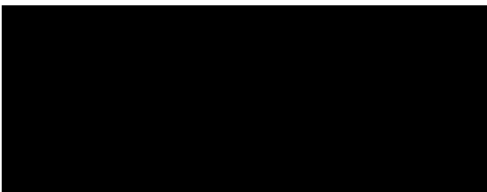
- Significant contribution to meeting housing need in a sustainable location ;
- Providing specific self-build plots to meet need and reflective of demand in the West Wight;
- Provision of active management of habitat and landscaping and increasing the biodiversity value of green areas in support of the existing coastline edge and the nearby SINC.

For effective housing delivery to be achieved, there needs to be far greater certainty in the planning system both in terms of sites that to be supported for housing and economic development (ie allocated sites) and in terms of how planning applications are determined, in support of sustainable aims and meeting local needs.

There has to be a sufficient choice of sites for potential investors, backed up by positive development management procedures that protects the environment and promotes sustainable growth.

Please consider this letter as formal objection to Policy H1 (Planning for Housing Delivery), which should reflect the need to plan for actual housing need, and Policy H2 (Sites Allocated for Housing), which should now include the allocation of the site presented.

Yours sincerely



Phil Salmon, MRTPI
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Our Ref:
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12 August 2024

Dear Sirs

Reg 19 Response to Draft Island Planning Strategy Proposed Allocation of Land at Gunville Road, Newport

I am writing as a formal response to the Regulation 19 draft of the Island Planning Strategy published for consultation in July 2024.

The response is made in two parts. Firstly, comments are made on the general strategy of the plan, with particular regards to the planning for insufficient numbers of homes and jobs actually needed in the plan period. Secondly, this response advocates the need to allocate new sites, to meet need, and promotes the site at Gunville Road, based on its sustainable credentials, its ability to deliver significant numbers of affordable homes, and the previous positive discussions with planning officers. A plan indicating the site and potential opportunities is submitted in support of this response.

Strategy and Planning for Meeting Need

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 need year on year, 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 projects 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 were just 19 student homes on the Island in 2011.*
5. *There is a need to provide for at least 10 self-build units to be provided for per annum on the Island.*
6. *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%.*
7. *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 thereby repelling any potential interest investors may have.

The consequences of not providing for sufficient homes and jobs 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.

In the case of Newport, the lack of accommodation, and the pressure to force households to live together, matched the relatively high levels of deprivation, increases significantly the risk of anti-social behaviour, social breakdown and economic decline.

In order for there to be any positive 'plan-led' strategy to deliver the needed homes on the Island, supporting objectives of economic regeneration, more sites need to be allocated to establish greater certainty of delivery.

Gunville Road Newport

It is requested that the site outlined in yellow in the plan below is considered as an allocation for housing, including the provision of onsite affordable housing.



The site has been the subject of discussions with planning officers over a number of years, recognising the merits the site has in delivering much needed homes in the Newport area, including a contribution to affordable housing.

The site has previously been identified as a 'deliverable site' in the 2018 Strategic Housing Land Availability Assessment exercise.

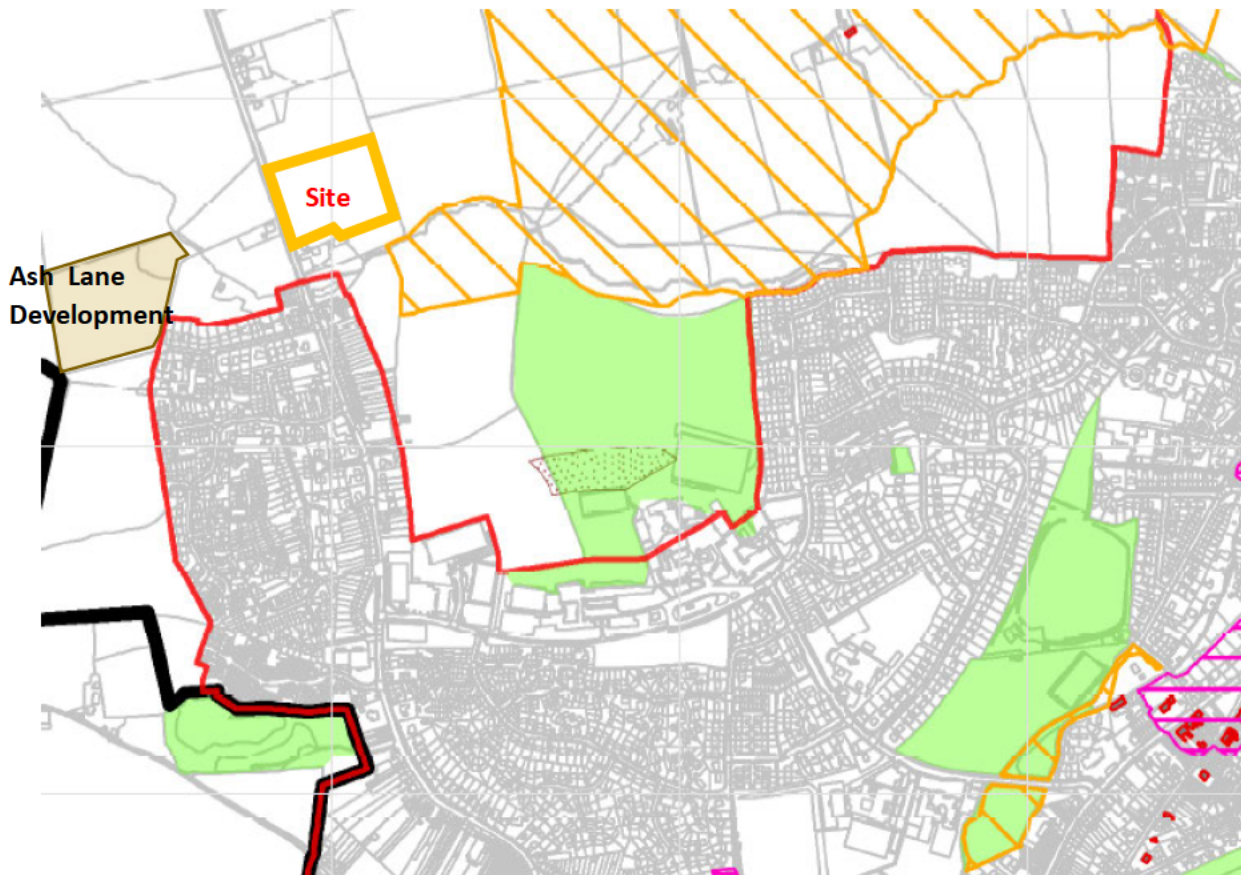
Site Location Details			
Ref No	LDF072	Site Address	Land off Gunville Road, Newport
Parish	Newport	Ward	Parkhurst



Site Assessment Conclusions		
Site is within a Key Regeneration Area with existing access		
Site Status		
Therefore the site is currently considered to be:	Deliverable	X
	Developable	
	Not Currently Developable	

The opportunities presented by the site are as follows:

- The site is close to the existing defined settlement boundary for Newport, and within the Key Regeneration Area for the Medina Valley.






Site (Yellow Boundary) in relation to Core Strategy Plan 2012

- The site is accessible and has a pavement footway linking it directly to a bus stop on Gunville Road
- It has the potential to provide up to 50 homes with current discussions;
- The site is accessible to primary school and secondary school facilities as well as direct links to the town centre.
- The image below is a layout that has been considered positive by planning officers previously showing a scheme for 35 homes, including 13 affordable units (37% affordable).



1.1 The proposed mix is as follows:

OPEN MARKET HOUSES	
	2B 4P BUNGALOW 70m ² 4 No.
	3B 5P SEM-DETACHED 93m ² 4 No.
	3B 5P SEM-DETACHED 93m ² 4 No. DISCOUNT ENTRY
	3B 5P DETACHED 95m ² 4 No.
	4B 5/6P DETACHED 113m ² 4 No.
	4B 6/7P DETACHED 145m ² 2 No.

H.A. AFFORDABLE HOUSES	
	1B 2P FLATS 53m ² 4 No.
	2B 4P SEM-DETACHED 84m ² 5 No.
	3B 5P SEM-DETACHED 94m ² 4 No.

LANDSCAPE	
	BIO-DIVERSITY
	LANDSCAPED BUFFER ZONE
	GARDENS

The merits of allocating the site for residential development are summarised as follows:

- Significant contribution to meeting housing need in a sustainable location;
- Providing specific onsite affordable housing units contributing to meeting needs for Ryde and the IW North East area;
- Provision of active management of habitat and landscaping and increasing the biodiversity value of green areas.

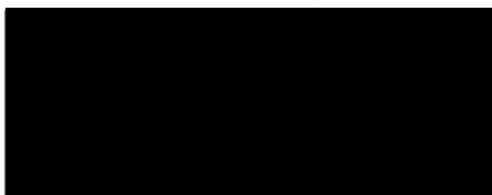
The need for new homes in Newport and across the Island is significant. The Gunville Road site offers an opportunity to deliver a mixed housing scheme akin to the successful Ash Lane housing scheme, also in Gunville, Newport, with a larger delivery than 35%.

Unless the Council, as Local Planning Authority acts proactively and allocates the sites needed, Investors will not have sufficient certainty to unlock the resources to deliver schemes to meet community need.

This site represents a major opportunity and should be allocated as such.

Please consider this letter as formal objection to Policy H1 (Planning for Housing Delivery), which should reflect the need to plan for actual housing need, and Policy H2 (Sites Allocated for Housing), which should now include the allocation of the site presented.

Yours sincerely



Phil Salmon, MRTPI
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12 August 2024

Dear Sirs

Reg 19 Response to Draft Island Planning Strategy Proposed Allocation of Land at Upton Road Ryde

I am writing as a formal response to the Regulation 19 draft of the Island Planning Strategy published for consultation in July 2024.

The response is made in two parts. Firstly, comments are made on the general strategy of the plan, with particular regards to the planning for insufficient numbers of homes and jobs actually needed in the plan period. Secondly, this response advocates the need to allocate new sites, to meet need, and promotes the site at Upton Road, Ryde, based on its sustainable credentials, its ability to deliver significant numbers of affordable homes, and the positive discussions with Officers. A plan indicating the site and potential opportunities is submitted in support of this response.

Strategy and Planning for Meeting Need

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.

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4. *There were just 19 student homes on the Island in 2011.*
5. *There is a need to provide for at least 10 self-build units to be provided for per annum on the Island.*
6. *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%.*
7. **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.**

8. *The report clearly states that one of the greatest areas of lack of affordable housing that has been built over recent years, is in Ryde. Ryde is the largest single town on the Island and generates the highest level of demand for home for local people.*

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 thereby repelling any potential interest investors may have.

The consequences of not providing for sufficient homes and jobs 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.

In the case of Ryde, the lack of accommodation, and the pressure to force households to live together, matched the relatively high levels of deprivation, increases significantly the risk of anti-social behaviour, social breakdown and economic decline.

In order for there to be any positive 'plan-led' strategy to deliver the needed homes on the Island, supporting objectives of economic regeneration, more sites need to be allocated to establish greater certainty of delivery.

It is requested that the site outlined in yellow in the plan below is considered as an allocation for housing, including the provision of onsite affordable housing.

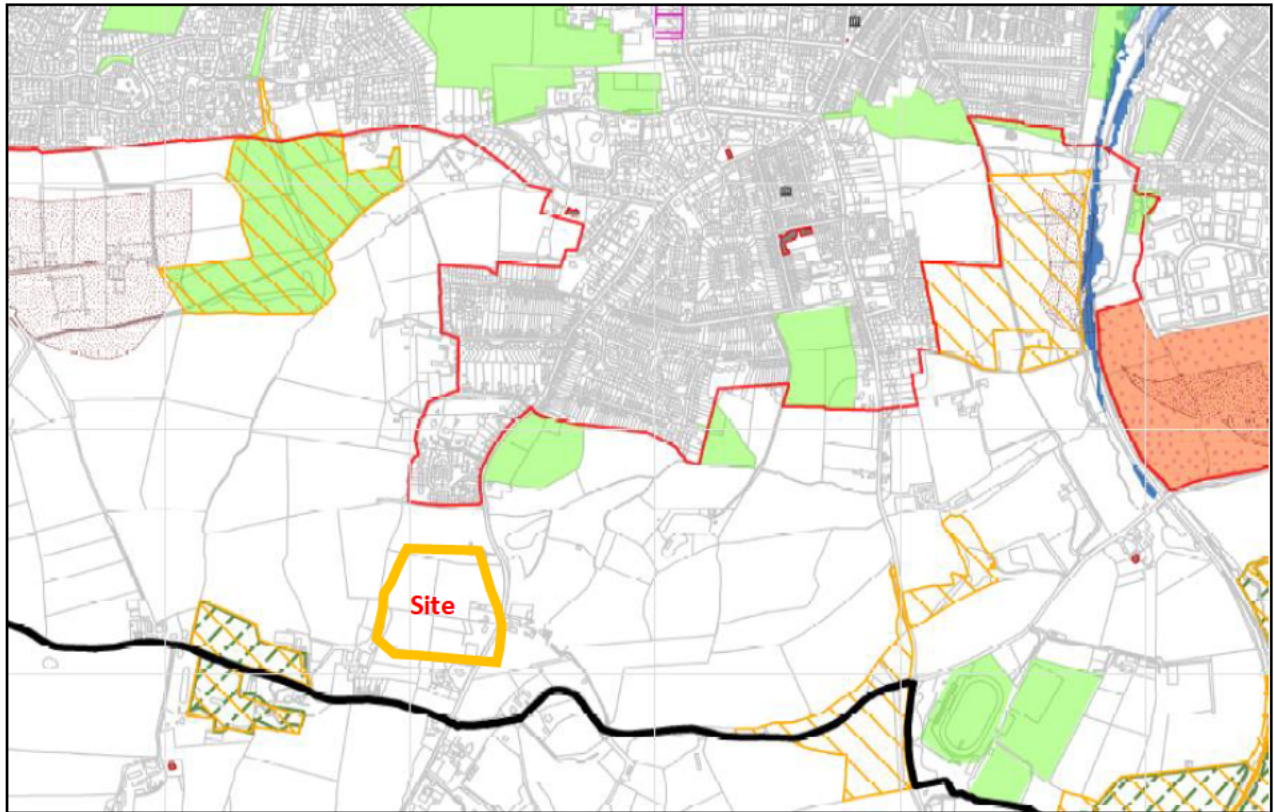


The site has been the subject of discussions with planning officers over a number of years, recognising the merits the site has in delivering much needed homes in the Ryde area, including a significant contribution to affordable housing (100%).

Recent discussions with a major Island affordable housing provider reveals a tangible offer in the site which will be delivered in two phase over two years if approved.

The opportunities presented by the site are as follows:

- The site adjoins the existing defined settlement boundary for Ryde, and within the Key Regeneration area.



Site (Yellow Boundary) in relation to Core Strategy Plan 2012

- The site is accessible, a fact recognised by the Aldermoor Farm appeal decision that noted the position of a bus stop adjoining the site, serving the Local Ryde Bus Southern Vectis Service.
- It has the potential to provide up to 75 homes with current discussions with an RSL indicating up to 75 affordable units which includes the following breakdown :
 - 44 Social rent units
 - 31 Shared ownership including a variety of house types to meet local recognised local need which includes two bedroomed bungalows, 2,3,and 4 bed units. The RSL has a large stock of owned and managed accommodation in the Ryde area.
- The site is accessible to primary school and secondary school facilities as well as direct links to the town centre.
- Whilst the site does power line running across it, there is sufficient space to provide an effective and efficient layout that results in a quality residential environment accommodating significant biodiversity net gain.
- It was marked as a deliverable site in the 2018 SHLAA process.
- It has received several positive pre-apps where upon the comments raised by the LPA have been totally addressed in terms of phasing, landscaping and visual impact.
- The site opposite is owned by an Oxford College which promoted and gained planning permission (now lapsed) reflecting local housing need.
- The image below is the current payout subject to discussions showing a scheme for 75 homes



Current Sketch Layout

The merits of allocating the site for residential development are summarised as follows:

- Significant contribution to meeting housing need in a sustainable location;
- Providing specific onsite affordable housing units contributing to meeting needs for Ryde and the IW North East area;
- Provision of active management of habitat and landscaping and increasing the biodiversity value of green areas.
- This will help meet the target of 372 annual affordable units, as recognised by the 2022 GL Hearn report.

The need for new homes in Ryde and across the Island is significant. The Upton Road site offers an opportunity to deliver a mixed housing scheme akin to the successful Ash Lane housing scheme in Gunville, Newport.

Unless the Council, as Local Planning Authority acts proactively and allocates the sites needed, Investors will not have sufficient certainty to unlock the resources to deliver schemes to meet community need.

This site represents a major affordable housing opportunity and should be recognised and allocated as such.

Please consider this letter as formal objection to Policy H1 (Planning for Housing Delivery), which should reflect the need to plan for actual housing need, and Policy H2 (Sites Allocated for Housing), which should now include the allocation of the site presented.

Yours sincerely

A large black rectangular redaction box covering the signature area.A small black rectangular redaction box covering the name of the sender.

Planning & Development Hub (IW) Ltd



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12 August 2024

Dear Sirs

Reg 19 Response to Draft Island Planning Strategy

Proposed Allocation of Land at Fort Warden, Site A, Colwell

I am writing as a formal response to the Regulation 19 draft of the Island Planning Strategy published for consultation in July 2024.

The response is made in two parts. Firstly, comments are made on the general strategy of the plan, with particular regards to the planning for insufficient numbers of homes and jobs actually needed in the plan period. Secondly, this response advocates the need to new allocate new sites, to meet need, and promotes the site at Fort Warden. A plan indicating the site and potential opportunities is submitted in support of this response.

Strategy and Planning for Meeting Need

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 need year on year, 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 projects 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. *75% of those households in West Wight, own their own home. This is the highest on the Island.*
9. *In West Wight, 50% of the existing population is over 60. This will increase to around 65% by the end of the planning period.*
10. *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 thereby repelling any potential interest investors may have.

The consequences of not providing for sufficient homes and jobs 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.

In order for there to be any positive 'plan-led' strategy to deliver the needed homes on the Island, more sites need to be allocated to establish greater certainty of delivery.

Fort Warden Site A – Proposed Allocation

It is requested that the site outlined in yellow in the plan below is considered as an allocation for mix of housing and retirement living.



The opportunities presented by the site are as follows :

- Part of the site already benefits from planning permission for apartments. The permission granted in May 1998 (Ref : TCP/17112/R – P/00429/98) approves the construction of 72 apartments in 4 blocks, and 21 houses, with access from Fort warden Road, including the provision of open space and landscaping. The approved layout is illustrated below:

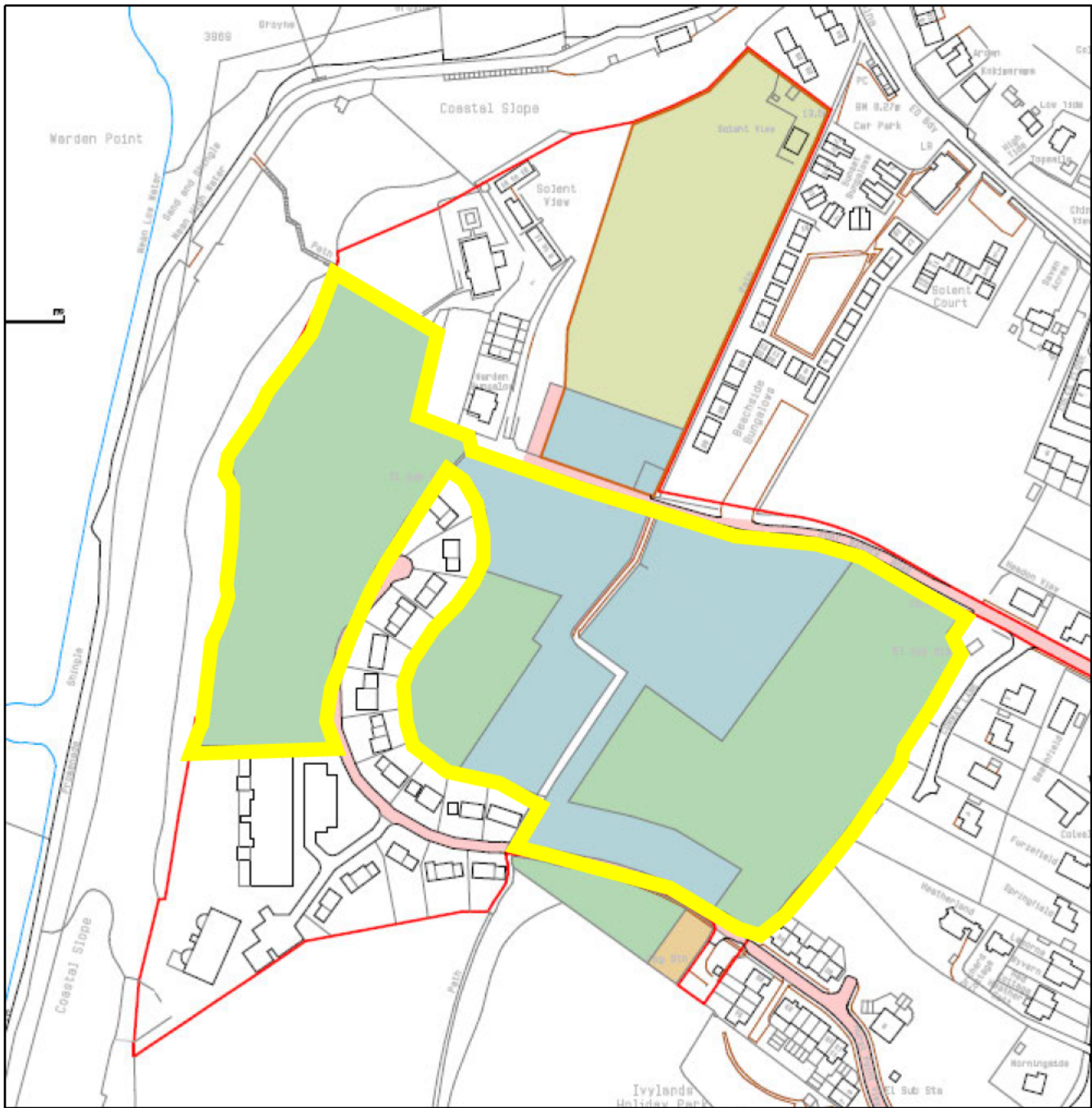


Approved 1998 layout (part implemented)

- The 1998 permission has been partially implemented with the construction of two block of apartments and houses thereby ensuring that the base permission remains extant. 50 apartments remain undeveloped.
- Land stability on the seaward side of the site mean that the remaining elements of the approved scheme cannot be delivered. However, there is opportunity to reconfigure the development area by identifying a revised development footprint and providing for significant biodiversity net gain.
- The site is located in an accessible area, served by regular bus services on the A3054 Colwell Road.
- The site has a developable are of 15000 sqm with potential provision of 60 retirement and housing units.

The plan below identifies areas that could be brought forward for development and the provision of biodiversity net gain.

The areas shaded in blue are potential development areas. The green shaded zones are opportunities for biodiversity net gain.



Proposed Allocation Site

The merits of allocating the site for residential development are summarised as follows:

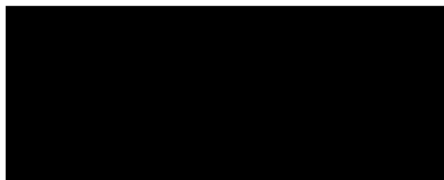
- Significant contribution to meeting housing need in a sustainable location (that already benefits from planning permission)
- Providing specific retirement living contributing towards meeting retirement housing needs and releasing open market housing elsewhere on the Island into the available housing stock;

- Provision of active management of habitat and landscaping and increasing the biodiversity value of green areas in support of the existing SINC.

The need retirement living homes is significant. In light the GL Hearn report of 2022, the aging population, the projected rise in care needs for dementia, and demands for assisted living, this site represents a a major opportunity and should be allocated as such.

Please consider this letter as formal objection to Policy H1 (Planning for Housing Delivery), which should reflect the need to plan for actual housing need, and Policy H2 (Sites Allocated for Housing), which should now include the allocation of the site presented.

Yours sincerely



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Regulation 19 Consultation Process

Submission on behalf of Newclose Cricket Ground, Newport

Introduction:

[REDACTED] and the Planning & Development Hub are a mixed multi-discipline land / property consultancy with an office based only on the Isle of Wight. The experience of this practice is based from a variety of disciplines including architecture, planning, development, sales, lettings, project Management, Town & Country planning, estate management, rural housing, farm diversification planning and affordable housing provision.

This practice has been on the Isle of Wight since 1984 and at one time, this multi-disciplined practice employed some 75 persons across the Isle of Wight. The current structure is a business of around 10 persons specialising in planning and development and the construction of such developments.

From a planning perspective and on-going development perspective as well as project management, we have over the years acted for National house builders and still do so, and also larger investment development builders on the Isle of Wight in dealing with sites from 1 off, up to 250 units.

From a practice point of view we have looked through the IPS and would like to make the following comments, not necessarily in order of importance but need to be looked at as being previously discussed or have been omitted from the latest proposals which we believe would put the viability of this plan at risk on different levels.

Strategy and Planning for Meeting Need

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The Site

The overall existing site as shown on the Land Registry is appx 8.399 hectares.

It is currently used at present as The County cricket ground with one of the best cricket surfaces apparently in the country which encompasses the playing surface, practice ground, pavilion facilities, equipment store, bar, assembly room and dining room, and substantial ancillary car parking for spectators and members. It is the new home of Newport Cricket Club who have moved from Victoria park, Newport.

The club hosts many sporting events throughout the year and it also hosts events for various purposes including club and community meetings, weddings, wakes, shows etc.



Car Park area (north side of Pavilion) and south elevation overseeing the cricket ground



Gold Standard Cricket Ground

During Covid, the NHS used this facility as part of its response for the treatment and prevention for Code as a testing centre and offices. This did provide valuable financial support through these difficult trading times.



Island Covid Testing Centre, Newclose

It was chose of its existing parking, its access, and its proximity to a regular bus service which is found just outside the main entrance. At that time, the site was found to be within a 30mph limit.

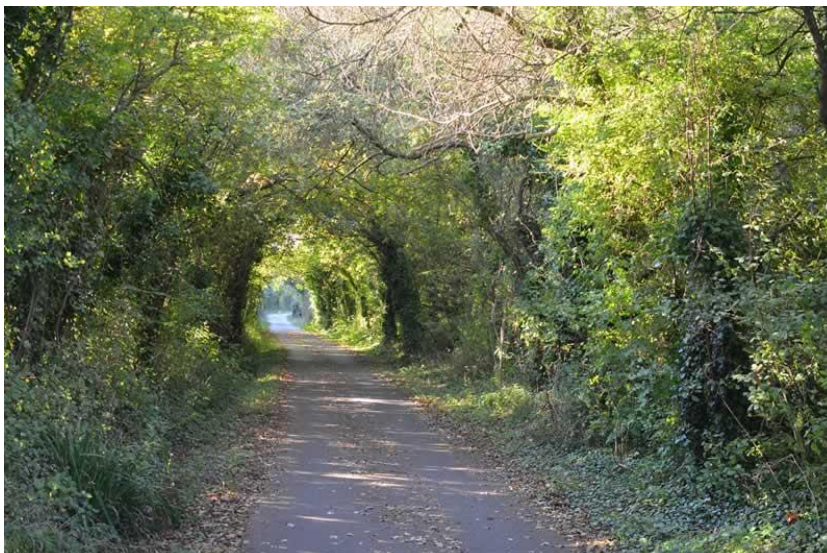
The subject site has an open ground area in grass which is regularly maintained and mowed, and used occasionally for overflow car parking when events take place.

The access that has been provided allows for suitable visibility and splay lines to accommodate large traffic movements with a clear line of sight both left and right.



Newclose Bus Stop adjacent to the pavilion

The ground and pavilion is also accessed directly from the Newport / Sandown cycle route (National Route 23). Gated access allows for access to the pavilion facilities, restaurant and sports ground.



2.6 The following facilities are accessible to the site (including distances):

- Bus stops (10m)
- Newclose link to Cycle path (100m)
- Asda Superstore 1km
- Newport Town Centre (1.6km)



Existing Planning Permission

The current approved uses for the site consist of the following:

- Gold Standard Cricket ground and pavilion
- Marquee for special events (also in support of the cricket ground)
- Use of the facilities for events

Planning Permission for a 60 room hotel (ref P/00763/13) was granted in 2013 on land to the north of the cricket ground (currently used as overflow car parking). The permission recognised the sustainable location of the site, with excellent public transport and cycle links to the centre of Newport. The permission was never implemented and lapsed in 2016.

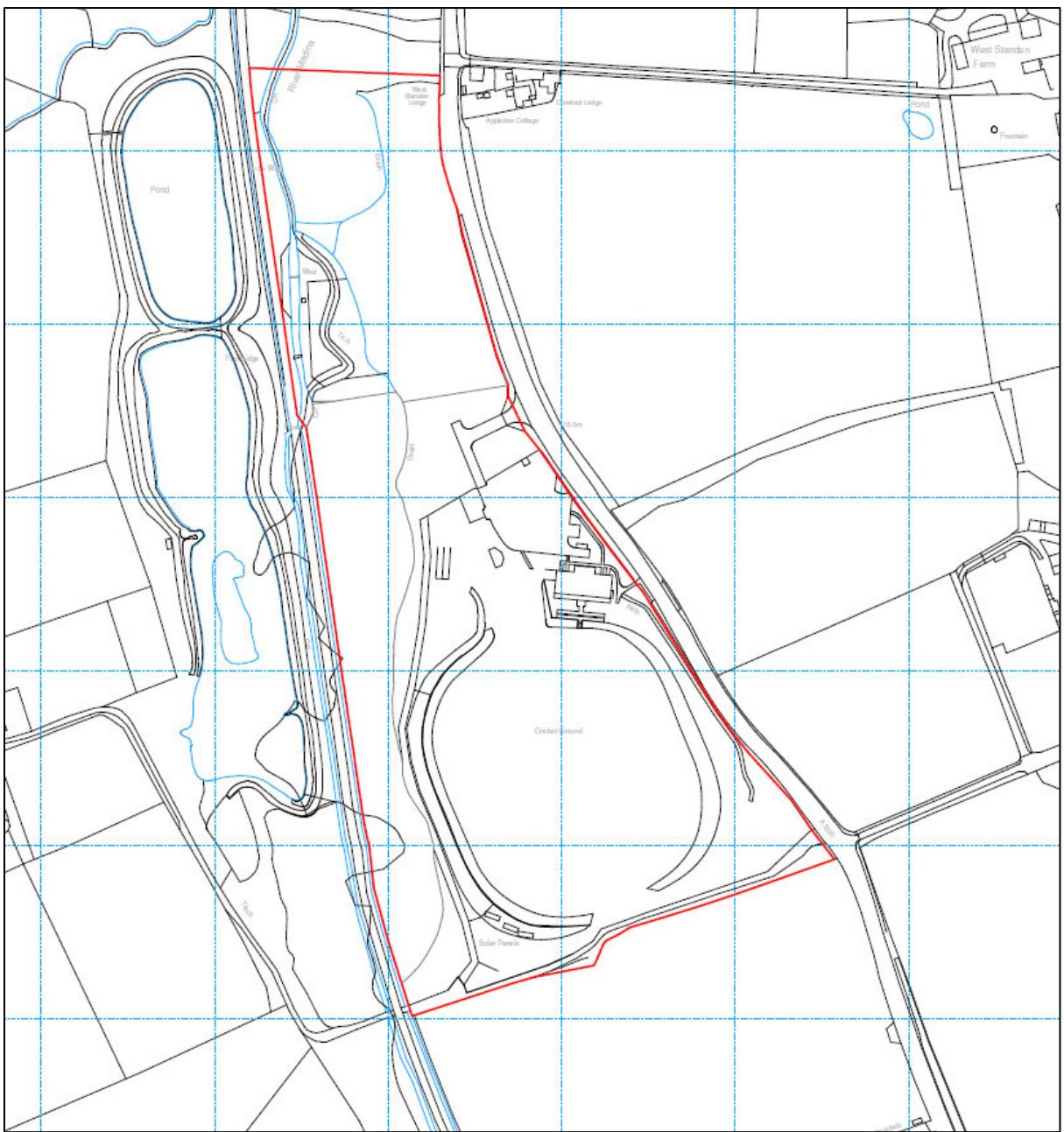


2013 Approval layout for 60 room Hotel



Approved front elevation of 60 room hotel

Location Plan and Site Ownership

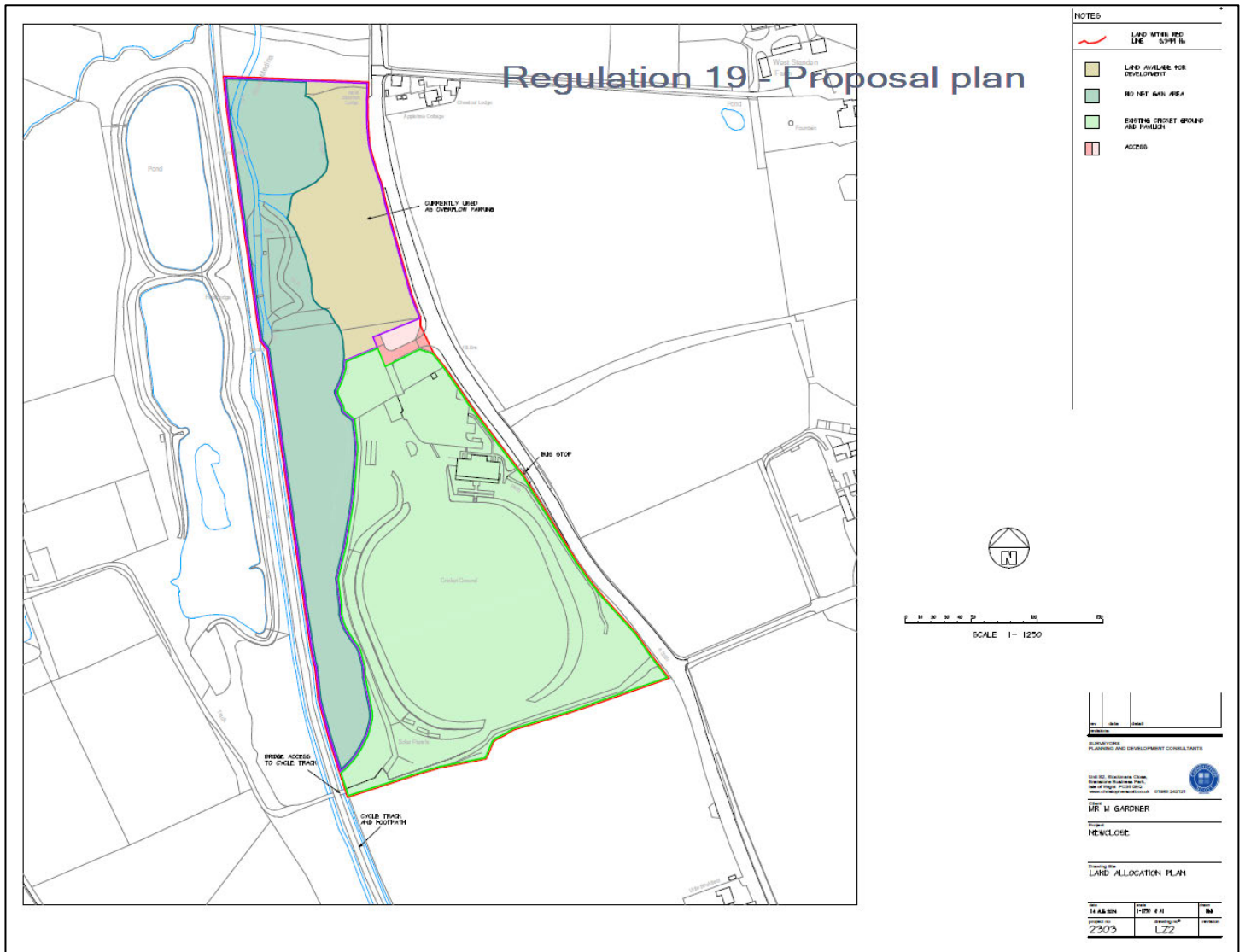


Site Ownership Plan Newclose Cricket Ground

Potential Possible Uses

In light of the sustainable location of the site in close proximity to cycle and public transport links to Newport, the following potential uses should be considered for allocation to meet local economic housing needs :

- Mixed use scheme (employment units and affordable housing, similar to Branstone Park)
- Employment starter spaces
- Leisure uses
- Holiday lodges/tourism
- Biodiversity Net Gain (creation and enhancement of habitats based on the ecological significance of the adjoining woodland and water course environment)
- Retirement living hamlet with extra care facilities.



Developable Area Newclose Cricket Ground

Conclusion

Newclose represents a planning opportunity given its accessibility and relationship with Newport. It already plays a part in providing community uses both in terms of leisure and sport, as well as the emergency testing centre during the covid pandemic.

The current Reg 19 Draft Island Planning Strategy is deficient in planning for actual housing and economic need. The LPA has to identify more sites, matching aims of sustainability, to offer choice to potential investors and to provide for long term jobs and homes.

CS PS Aug 2024