

16 August 2024



Our ref: 1656 Land at Merrie Gardens, Lake
Your ref: Comment on draft IPS Reg 19 Consultation

To: policy.consultation@iow.gov.uk
by email

Dear Sir/Madam

RE: ISLAND PLAN STRATEGY CONSULTATION

We are writing on behalf of our client and in response to the Regulation 19 Island Plan Strategy (IPS) consultation and in particular with regards the economic policies and allocations set out in the draft IPS.

Our client, MH Assets, is developer with land in Lake, adjacent to sites comprising of mixed commercial and retail uses. Appendix 1 shows the land in question. This land is proposed for a mixed use development and or employment land, but would not be housing based. The Council is not allocating this land for employment land. The land includes a section which was subject to a recent planning application, and although it was refused, it is relevant to refer to within this representation – the details of this application are as follows:

*19/01096/FUL | Proposed 2 industrial units with 2 flats at 1st floor level | Merrie Gardens
Newport Road Lake Sandown Isle Of Wight PO36 9PF*

The Site Plan for this application is shown as Appendix 2.

There was also a previous application for outline permission for industrial/business and residential development which included a large section of this site – the details of this application are as follows:

P/01811/11 | Replacement of planning permission (P/1919/07-TCP/27927/A: outline for industrial/business and residential development and alterations to vehicular access to include provision of a roundabout at Newport Road junction) in order to extend the time limit for implementation | Land North Of Whitecross House Including Part Of Whitecross Lane/Newport Road And Part Of Merrie Gardens Farm Newport Road Sandown.

The Site Plan for this application is shown as Appendix 3.

For the purpose of this representation, it will consider why the site should be allocated in strategic terms, setting out why the site is suitable, albeit not dismissing the fact that via an allocation (or planning application) that wider ranging material considerations would need to be collated to inform the design and execution of the development.

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In terms of specific policies, this representation will concentrate on Policy E1 (Supporting and Growing our Economy).

The representation will refer to specific paragraphs and set out why it is considered the draft IPS is unsound and is not consistent with national policy.

For the avoidance of doubt, BCM would like to attend any pre-hearing of hearing when the IPS reaches examination stage.

There are several parts of the IPS which are inconsistent with the NPPF and are unsound. The IPS should be a 'forward looking' plan which meets the objective of paragraphs 15 & 16 of the NPPF. It is questionable, given the state of play, whether it:

- Has been prepared positively, in a way that is aspirational but deliverable.
- Does it address economic priorities, particularly with regards amount/number of allocations and in light of importance of The Solent Freeport.
- Is clearly written and unambiguous (as it defers several obligations to a future plan or decision-making process).

We consider the IPS Reg 19 to be unsound because of the insufficient allocations to meet the sustainable growth of the Island's economy as set out in Policy E1. The reasons for our representation are set out below.

Policy E1 and the site allocations for employment land is not sufficient to meet the requirements for the Island's growth and fails to meet paragraph 86 of the NPPF which sets out that planning policies should proactively encourages sustainable economic growth and to meet the anticipated needs over the plan period.

The Council's evidence base (Isle of Wight Employment Land Study 2022 Update) sets out a baseline economic forecast of 350 jobs between 2021-2038, however, their growth scenario makes adjustments based on intelligence about the local structure and prospects of a range of sectors on the Isle of Wight. Combined, these adjustments add an additional 1,930 jobs to the baseline forecasts taking the growth from 0.03% per annum to 0.2% per annum – which relates to an additional 2,280 jobs. This report then considers the demand for employment land and floorspace over the period from 2021-38, translating the additional growth of 2,280 jobs into employment floorspace and concludes and identifies a need for up to 16.7 Ha of employment land across the Island.

Paragraph 2.9 of the IPS states that the IPS has to provide sufficient sites to allow new jobs to be created. Paragraph 2.49 sets out that "forecasts from Oxford Economics (pre-pandemic) indicate that employment on the Isle of Wight is expected to increase by 4,600 jobs between 2015 and 2036, a growth

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rate of nearly eight per cent which is broadly similar to the LEP average". This is a significant increase in jobs from the Council's evidence base, although noting that this covers a longer time period, albeit it is now 2024, some nine years since the 'start' date.

So, there is a predicted significant growth in jobs and need for employment land. Policy E1 (Supporting and growing our economy) supports the sustainable growth of the Island's economy and allocates six sites. And then the intensification and expansion of four existing sites. However, whilst it is essential to allocate employment sites across the Island, it is questioned whether these allocations are sufficient to meet the requirements for the predicted growth, both as stated in the draft IPS and that set out in the Council's evidence base, noting that the evidence base does not include for growth associated with The Solent Freeport.

With regards the six allocated sites within the IPS, this amounts to 29.2 hectares. However, it is doubtful whether the allocations will meet this identified need. Policy E1, Part b is questionable, when the 14.7 ha site at Nicholson Road has been submitted as a planning application in 2019 and still requires determination by the Isle of Wight Council (who is the landowner). Under the pretext of Policy G5 (although mainly residential related) can the Council ask themselves (as landowners) whether this site can be delivered?

Furthermore, policy E1, Part f forms a 2.9 ha allocation at Sandown Airport. This site has just been refused planning consent (reference 19/01205/OUT). It was refused on Landscape and Visual grounds and it not having suitable or safe highway considerations and access to a bus stop. Given this refusal and also concerns as to whether site b (Nicholson Road) can be delivered, the allocations are clearly not sufficient to meet the predicted growth of jobs and needs for employment land. As such, the Plan and Policy E1 is not effective or sound.

Without these two allocations, the remaining four allocated sites amount to 11.6 ha, a significant shortfall of the identified 16.7 ha.

Policy E12 (Solent Freeport) seeks to support sustainable development proposals which are linked to the Freeport. However, it does not feel that emphasis is given to the importance of this, nor to any further land allocations, noting that the Council's evidence base and Employment Land Study has not considered the freeport within their study as the impacts at the time of the report are uncertain. However, this must be a significant factor that the Isle of Wight Council must incorporate into its future planning needs. A map of The Solent Freeport is included as Appendix 4, and includes the whole of the Island, along with Southampton, Portsmouth and other areas around the Solent and surrounding areas. The following description of the Freeport from their website makes it clear that this is a significant consideration:

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“The Solent Freeport is an investment in our future, providing both instant impact and long-term benefits.

The Solent already contributes £31 billion to the UK economy per annum. Freeport status will add an additional £3.57 billion to UK plc through the GVA uplift, including £1.6 billion in direct GVA in the Solent and £1.9 billion in GVA to be generated for the rest of the UK.

It will act as a magnet for an estimated £2 billion of extra investment comprising £1.4 billion from the private sector and £600 million in complementary public sector investment.

While recognising our proud maritime heritage, we don't live in the past. We have an appetite for innovation and building sustainable, long-term opportunities now and in the future.

The Solent has a track record in translating innovation and new technologies into commercial success. Building on long-standing relationships with our three universities and world-class research assets, the Solent Freeport will support increased R&D funding and innovation in our ports and growth sectors such as Artificial Intelligence.

Building on existing strengths in environmental innovation, the Solent Freeport will support national and local ambitions for net zero by growing capacity for sustainable energy production, improving efficiencies to raise productivity, and investing in environmental mitigation to the impacts of climate change on our communities.

A dedicated Solent Freeport Green Growth Institute (SFGGI) will provide a centre of excellence in green skills and jobs to ensure local communities can benefit from the opportunities created through environmental innovation”.

It seems key that the allocations must give significant weight to the Solent Freeport and the potential in growth on the Island to feed into this. The allocations put forward do not seem to account for this, and along with the question mark over some allocated sites actually being able to progress, then there should be additional sites to meet this. Furthermore, there should be an over-allocation of sites in sustainable and suitable locations to ensure the need for employment land is met, particularly given the Solent Freeport and the clearly positive benefits to the Island to fully contribute and participate into this.

With regards to our client's land, Sandown Airport is the only proposed allocation within the Sandown, Lake, Shanklin 'Bay Area'. Even if the reasons for refusal on the recent planning application at Sandown airport site (reference 19/01205/OUT) can be addressed, there is still a clear need for further allocations for employment land. Our client's land (Appendix 1) sits within a locale comprising commercial sites, with retail, hospitality (fast-food), car sales and hotel immediately adjacent to the land, with other

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business/industrial uses in very close proximity, has very good transport links, including close proximity to a good bus service – i.e. entirely suitable to be allocated for employment land.

Of note, the recent refusal of part of this land for a live/work scheme (2 industrial units with 2 flats at 1st floor level, planning reference 19/01096/FUL) was not refused on the principle of the development, but on its visual appearance and impact on the listed building, on the residential amenity of future occupiers (living above the industrial units) and other matters where insufficient information has been submitted (see Appendix 2 for the site plan). The application was appealed (Appeal Ref: APP/P2114/W/20/3255053), and whilst it was dismissed, no principal concern was raised over further commercial uses at the site. The main issues of concern were the residential element and the impacts visually and on the listed building. The client's land encompasses this site but also extends some distance from the listed building, to reduce any impacts on the historic asset.

Our client's land would be accessed via the existing spur road that serves the public house, fast food restaurant and hotel (Premier Inn) and which had previously been approved to serve these uses. Of significant note is the following paragraph in the Inspector's decision which stated:

"32. The spur road that connects the appeal site to the Newport Road is sufficient in width and standard for two-way traffic, including commercial vehicles, and includes raised pavements and street lighting. I also saw that the Newport Road is a busy main road, subject to a 30mph speed limit at this point with street lighting. Visibility sightlines from the spur road onto the roundabout are restricted to an extent in both directions. Nonetheless, I saw that approaching traffic is apparent as it enters the roundabout, in particular in the more imminent nearside direction from the right. I note that the Council, including as Highway Authority, did not object for these reasons and in the absence of any objective evidence to the contrary, I have no reason to differ".

It should also be noted that outline permission was given for most of this land for industrial/business and residential development – planning reference P/01811/11 (see Appendix 3 for the site plan). Whilst this was approved on 22/03/2012, it was assessed and determined under the current local plan policies and provides further weight to the allocation of this land for employment land. Of specific note the following are points set out within the officer report:

- *"The site is allocated for employment uses but remains undeveloped due to the high cost of the road improvements". [noting that significant highway improvements, including a roundabout, have been undertaken and operational since then].*
- *"The land to the rear of Merrie Gardens is allocated for employment uses and therefore the principle of this use is established. It is considered that this would not impact upon the character of the area, subject to design details".*

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Thus, from an allocation perspective, this land is in a sustainable location for commercial purposes, is in an appropriate location in terms of away from residential area, good transport links with the access being approved for such uses, and the technical matters raised on the refused one can be overcome. With concerns over the deliverability of other allocated sites, from a structural perspective, there is no reason why the land should not be allocated for employment purposes.

The IPS is not consistent with national policy including section 6 of the NPPF which sets out (in paragraph 85) that "Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development". Paragraph 86 paragraph b) specifically refers to identifying strategic sites and to meet anticipated needs over the plan period. The draft IPS and policy E1 does not meet this.

Significant and favourable weight should be given to this representation and the IPS allocations and thus Policy E1 must be re-evaluated.

I trust that the above representations will be taken into account and positively reviewed.

Yours sincerely,



Richard Holmes BA(Hons) pg dip MA

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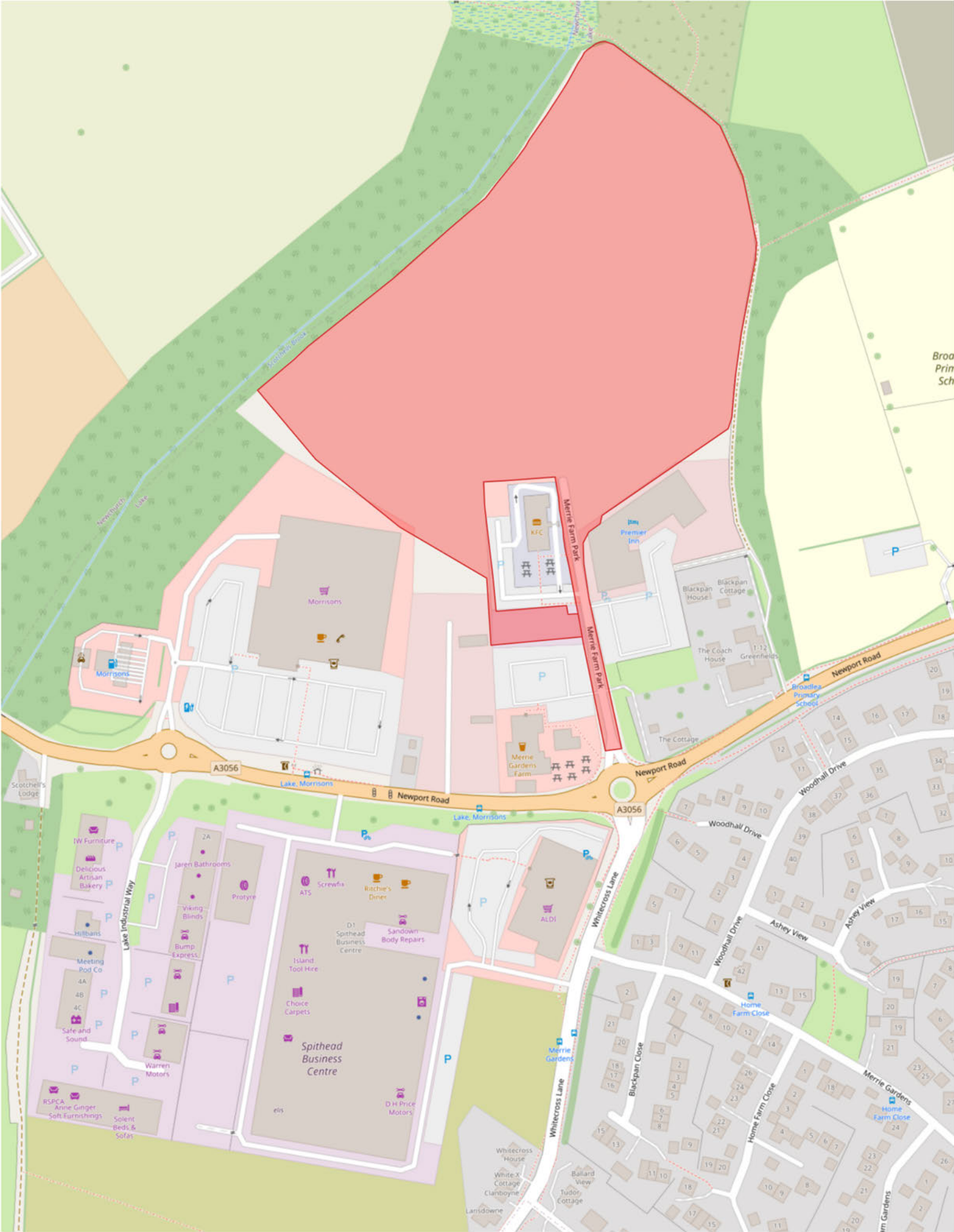
Please note: Letter sent by email only; original filed at BCM

Appendices:

1. Employment Land at Lake
2. Site Plan 19/01096/FUL
3. Site Plan P/01811/11
4. Map of The Solent Freeport



Appendix 1 - Employment Land at Lake



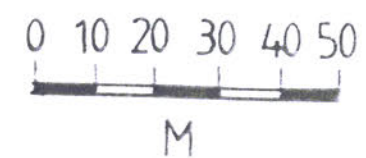


Appendix 2 - Site Plan 19/01096/FUL

MERRIE GARDENS NEWPORT ROAD SANDDOWN ISLE OF WIGHT



title plan Scale 1:1250 (AT A3)





Appendix 3 - Site Plan P/01811/11



Appendix 4 - Map of The Solent Freeport

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