

Summary of Responses to the Island Planning Strategy, Regulation 18, Second Consultation

September 2022

This document provides a summary of the responses made on the draft Island Planning Strategy (IPS) consultation which concluded on 1st October 2021 following a 9 week public consultation. The responses are summarised by each section of the plan and individual plan policy.

Overall, 2,834 comments were made on the Plan from over 600 different respondents. The table below shows the number of responses made on each section of the IPS. The chapter generating the largest proportion of responses was Section 7 Housing, together with proposed housing allocations.

Table 1 The number of responses to the Island Planning Strategy by chapter

Plan Chapter	Support	Object	General comments	Total	%
General Comments on the Whole Plan	5	25	14	44	2%
Sections 1-3	17	89	23	129	5%
Section 4 Environment	113	142	124	379	13%
Section 5 Community	63	101	61	225	8%
Section 6 Growth	29	189	28	246	9%
Section 7 Housing	149	685	105	939	33%
Section 8 Economy	39	91	56	186	6.5%
Section 9 Transport	41	71	42	154	5%
Section 10 Delivery Monitoring & Review	2	1	6	9	0.3%
Site allocations	38	468	16	522	18%
Appendices	0	0	1	1	0.03%
Total comments				2834	

This summary is not a formal document of the plan making process; it provides the reader with a summary of the consultation responses received on each section of the draft Island Planning Strategy and a council response. Not every individual comment received is mentioned within this summary, but each has been logged and reviewed in the formulation of the Regulation 19 submission version of the Island Planning Strategy.

General Comments on the Whole Plan

Total number of comments 44

Object	25	Support	5	General comment	14
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Key issues

- Support the new plan and its user friendly style
- Support the focus on the environment and affordable housing
- Support references to the South Marine Plan but link marine licences with the Marine Management Organisation and add reference to the South Inshore and offshore Marine Plan
- The island has a housing crisis particularly for more vulnerable people
- Support the changes made to the planning strategy
- Object to the Island Planning Strategy
- Some parts of the Plan are difficult to read and contradictory. A digital Plan makes it difficult to access. Check plan for typo and grammar errors. Poor key to maps. The plan is long to dissuade people from commenting. Documents should be available at parish council offices and community centres. Consultation events should have a summary of the overall strategy, implications for the island and be better advertised. Few opportunities to debate the Plan.
- The strategy is not deliverable, is too short term, does not take account of Brexit or impacts on green spaces and environment. Need for achievable and sustainable carbon targets
- Policies should not include loopholes to enable unsustainable development to take place
- Undertake a wider economic impact assessment on the Plan
- Should identify in the Plan the aspects the Council will deliver
- Re-prioritise the Plan sections to 4. Transport 5. Economy 6. Housing 7. Growth 8. Community 9. Environment
- The Plan should seek to keep the island green
- There are no DtC matters with NFDC. Southampton City Council supports further collaboration on relevant cross boundary issues
- Bus transport is neglected in the Plan and more reference is needed to site specific public transport improvements. Priority should be given to bus access in town centres and cultural areas and new development made bus friendly
- Add reference to empty and derelict buildings to the issues the island faces
- Developers should pay a bond to ensure highways and utilities can be connected
- The island should become an `Island Park`
- The charm and ecological beauty of the island is at risk of overdevelopment
- Need to create better jobs on the island
- The plan should focus on improving the lives of islanders rather than aspirational housing
- The plan does not consider deprivation / need for affordable housing in appropriate locations, beautiful landscape with areas of SSSI, reliance on tourism and the finite amount of space, infrastructure and services available. The island roads are at capacity
- Add planning for young people as a key local plan theme
- The Plan should be used as an advisory document ahead of being formally adopted
- Add new policy to protect amenity for future residents and neighbouring uses
- Freshwater including Totland and Colwell does not align with parish boundaries. Plan ignores Freshwater's community led approach to planning

- The evidence base should include Historic England documents to give context and significance to sites
- The Plan is too focussed on housing and should take account of changes due to the pandemic
- The housing meets national targets not local needs
- Development should have a sharper urban rural divide to stop sprawl
- Agricultural land should be protected to increase self sufficiency
- Clarify why the number of permissions granted exceed Government requirements. Given the climate emergency and need to conserve and enhance the natural environment have some planning permissions been granted
- Change of use applications should be required for changes to holiday or second homes
- The Plan should recognise the downsides of being a visitor destination
- At least 30% of land and sea should be restored for nature and climate by 2030 with a clear target for recovery added
- Add Heritage Coast definition; SANGs, CIL; and ELS to the glossary
- Concern at use of the word `regeneration` it implies run down and deteriorating
- The constraints of settlements other than The Bay should be recognised
- Replace references in the Plan to Wootton with Wootton Bridge
- Background evidence to the plan is outdated and some policies do not have evidential context
- The Plan needs a clear ambitious approach. It fails to meet the needs of the local population and business and reduce the use of resources and pollution
- The Plan should be bolder and more ambitious
- A comprehensive housing and business study is needed to help inform future business and employment opportunities and the number and types of housing
- The plan ignores neighbourhood plan policies

Council Response

The plan has been reviewed throughout to improve clarity and to update where needed. New policies have been added on climate change and short term holiday lets.

Section 1 Introduction

Total number of comments 7

Object	3	Support	1	General comment	3
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Key issues

- Support the goals set out in the introduction
- The approach to housing focusses on the number of new houses set by government policy
- Add a reference to the AONB, and AONB Management Plan
- The Introduction covers the same issues as the Foreword but in a different order.
- The Isle of Wight has to deal with a unique set of circumstances special to an island which should be recognised by local, regional, and national government
- Amend para 1.3 to make the plan policies retrospective so where work has not started on a site, the new island plan policies can be applied
- Amend para 1.11 adding a reference to preparing a Island Heritage and Cultural Plan.

Council Response

This section has been reviewed to update and clarify where needed.

Section 2 The Isle of Wight and the Issues we Face

Total number of comments 38

Object	21	Support	8	General comment	9
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Key issues

- The issues have not been prioritised nor addressed. Priority should be given to resilience in cross Solent travel, food production and provision of jobs
- The plan should take account of increased staycations and the impact of working from home in para 2.29. Improved broadband connectivity is needed.
- There are insufficient services for an increasing population. There should be no further development until current demand can be safely managed – dumping sewage into the sea and waterways is unacceptable.
- Proposals will worsen existing traffic problems, impacting on productivity and tourism. Rural Service Centres and Sustainable Rural Settlements should expand to provide jobs and services
- The section does not acknowledge the failure to significantly boost housing supply and no plan for growth. Failure to address viability and provide affordable housing
- The figure should be `Almost 2000 listed buildings`
- More housing is sought without improving employment, amenities, or affordability. There are no proposals to improve transport links or infrastructure. Large homes increase the pressure
- The Plan does not seek to retain young Islanders, families and attract skilled incomers leading to an ageing population

- The Island's economic strategy must address the island's economic underperformance
- The sea level rises are special circumstances of the Island and is understated
- The Plan should protect the environment and landscape. Clarify how development in Freshwater within risk zones of SSSI sites and the SAC at Afton Marshes, impacts on habitats?
- Add references to reducing the use of energy, waste and other resources
- Add the need for a thriving digital sector to provide work opportunities for younger people
- Support the contribution of holiday homes to the local economy
- Add encouraging a unique economy and the world class businesses already on the island
- The plan should provide housing to reduce the outflow of working age people, with further allocations in East Cowes to help conserve heritage assets
- There is no vision for East Cowes or explanation on why it is a primary settlement and allocated a low share of housing growth
- Add a reference to the contribution of retired people to community building
- Encourage environmental improvement and enhancement across the island not just the AONB. Add more references to the coast
- Add to Section 2.2, Wootton Creek, Newtown and Kings Quay
- Plan for growth to take account of in migration from retirees and greater working flexibility
- Add reference to the Island's special biodiversity, with key species, such as: Red squirrels; bats; Dormice; Glanville Fritillary butterfly; Field Cow Wheat; Early Gentian and Wood Calamint
- Support paras 2.0, 2.3, 2.9, 2.10, 2.11-2.24, 2.37, 2.42, 2.46, 2.51, 2.54 and 2.55 and the proposed housing number as a maximum number
- Para 2.12 – European designated sites. Amend to 'internationally designated sites' or 'designated sites'. For Solent coastal sites use Solent Marine Sites (with the SAC, SPA Ramsar)
- Amend para 2.18 to amend the contradiction with para 2.49
- Paras 2.25-38 add a reference to market purchase to supply new social housing
- Paras 2.39-49 should reflect the negatives of tourism in increasing demand for health services, transport and pollution, together with poor pay and seasonal work
- Amend para 2.30 to acknowledge that housing supply depends on commercial choices
- Object to para 2.32 as the Council is not positive about development
- Amend para 2.34 as it does not correctly reflect the brownfield land supply
- Amend para 2.35 as it underplays the need for greenfield land. Add the percentage of the island's land mass proposed as greenfield allocations and the percentage protected by the AONB and other protections.
- Add reference to para 2.37 on ringfencing the housing mix to meet island needs
- Object to para 2.41 as it is not supported with evidence
- Amend para 2.42 adding reference to the arts and creative industry as a growth sector
- Clarify if para 2.50 is correct
- Address problems caused by second homes, Airbnb, holiday and short term lets to allow housing for local people

Council Response

The text has been updated and includes minor wording changes and clarification on the approach to housing issues and the island's circumstances. Examples of the key species on the island have been added. The description of the main plan topic areas and issues and questions within each of these has been improved. A new policy has been added on short term holiday lets in the Economy chapter.

Total number of comments 84

Object	65	Support	8	General comment	11
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Key issues

- Support the Plan, the reduction in housing numbers and the vision and objectives. Support redevelopment and the reuse of previously developed land and buildings
- Support paras 3.0 and 3.1
- Object to the lack of a clear Plan vision which should be at the front of the Plan
- Para 3.5 – add text on `Future generations`. Ensure a biodiversity net gain of 10% is enforced. Add reference to the Solent Freeport
- Object to para 3.8b reference to designating areas outside the current settlement boundary and prioritising public sector land
- Object to para 3.19 reference to Bembridge as a secondary settlement
- Add to paras 3.14/5 promotion of local employment and enabling truly affordable housing
- Para 3.18 – correct table showing 42 new homes at Arreton.
- Para 3.15 – The local infrastructure in west Wight for employment, communications, water and drainage are all deficient yet not mentioned. The shared path has no local support. Policy on commercial property and businesses on the high street should be as flexible as possible
- Figure 3.5 remove the “village green” west of the Harry Cheek Gardens development as area is a mineral reserves area. Correct the Cowes settlement diagram and Figure 3.9 which shows the whole of the Harrison site/ the Red Funnel marshalling area as housing
- Fig 3.7 Newport Harbour. The Quay is a valuable public amenity
- Fig 3.10 Wootton. Development on the north side of Lushington Hill - CPO powers ensure a sustainable road network giving safe routes to school. The area north of Wootton is created from a Forestry Commission grant and should not be threatened by deforestation
- Retain Crossways field as agricultural land or public open space and Settlement Gap
- Page 19 add evidence of detailed site studies associated with the proposed SHLAA sites
- Amend the transport text box, page 20 to include reference to buses and the transport text box, page 30 to include reference to bus service improvements separate to those in Policy T1
- Increase focus on delivering housing with planning consent
- There is sufficient aspirational housing the need is for affordable housing
- Amend regeneration zones. Should be North Medina, comprising Cowes, E Cowes, Northwood and Whippingham, with Gurnard. Expand the Bay area to include Newchurch area. The Bay should not be combined with Ventnor or rural areas such as Chale Green. Rookley should not be combined with East Cowes. The three areas should be Medina Valley, Ryde and The Bay
- The prime focus should be on brownfield sites in Cowes, Newport, Ryde and Sandown.
- Support limited development in west Wight in urban areas, within the development boundary
- Support hard settlement boundaries, protection of the environment, promotion of employment opportunities and `in perpetuity` affordable housing
- There is conflict between improving residents’ quality of life and the proposed level of housing
- More recognition should be given to Neighbourhood Plans
- Reassess sites close to ancient woodland. Including Parkhurst Forest; figure 3.5 – Cowes (including Gurnard and Northwood) settlement diagram; Ward’s Copse by the southernmost

housing allocation, south-west of Northwood, and Bottom Copse, directly south of Northwood Cemetery; Figure 3.10 – Wootton settlement diagram; The more southerly development area, abutting Lushington Copse to the west; Figure 3.12 – Ryde settlement diagram; to the east of Ryde. Remove areas or reduce away from the ancient woodlands.

- Newport Road, Northwood, is not within the area nor is the land to the south of No 403 Newport Road, Northwood. Cowes Medical Centre is not included as a Health Hub and there is no Place Road development shown.
- Support the recognition in the Plan for job creation including opportunities outside employment land and the high street
- Add definition of a `sustainable rural settlement`
- Revise Plan to take account of NPPF, July 2021
- Amend the `Environment` box to include reference to the historic landscape
- Shalfleet Parish Council support a site allocation in Wellow
- Include removal of barriers to inequality in key objectives and priorities
- Give less weight to Covid issues. Future employment forecasts should include social care, health, admin and support services but place more emphasis on highly skilled jobs e.g. manufacturing, communications, IT, financial services, composites and renewables
- `60 per cent of the homes allocated are on brownfield land` is not the case in West Wight
- Support protection provided by the AONB, open space and dark skies in West Wight
- Add a primary residence policy to the Plan

Council Response

This section of the Plan has been rewritten to provide three strategic policies on Climate Change, Affordable Housing and Infrastructure. Development coming forward is expected to align with their principles. Text has been added to explain how the different parts of the plan will help to achieve these principles. A new policy on the Solent Freeport has been added to the `Economy` section.

Settlement Map

Total number of comments 2

Object	1	Support	0	General comment	1
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Key issues

- Remove `supported` and add "To reinforce the other polices of the draft plan and the polices of the Freshwater Neighbourhood Plan we wish the development envelope to remain unchanged as a hard boundary"
- Para 5.19 mentions bridleways and these should be shown on the maps earlier in the strategy

Council Response

The policy map has been updated to reflect the site allocations included in the Regulation 19 Plan.

Section 4 General comments

Total number of comments 20

Object	10	Support	5	General comment	5
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Key issues

- Reorder the Plan putting the environment section first
- Clarify if the planned level of development can be offset by tree planting to achieve net zero emissions by 2030. There should be a focus on climate change and its impacts. No space has been allocated to absorb CO2. Is this feasible?
- More should be done to protect the island's Biosphere status
- Natural England support methodology for assessing functionally linked land; Nutrient Position Statement; conclusion of no AEOI in relation to air quality. No further assessment is required
- Amend Page 1, section 4, line five to "The IWC's carbon neutral target date for the Island is 2040 not 2050.
- Add reference to Solent Wader and Brent Goose Mitigation Guidance
- Welcome the reference to food production on the island
- Protect the Island's natural assets and expand the Area of Outstanding Natural Beauty (AONB)
- Support the protecting the natural environment and architectural heritage. Housing should not increase flood risk, be designed appropriately and not threaten Biosphere status

New Policies

- Add a policy supporting new viable uses for heritage assets that are deteriorating and re-use for the public, for housing, tourism or commercial use.
- Add a policy on legally protected species
- Add a policy on delivery of net gain
- Add a policy on eco system services to protect and improve natural capital and harness the role of nature based solutions

Council Response

A new policy has been added on Climate Change in Section 3 of the Plan reflecting the Council's Climate and Environment Strategy and action plan and the Council's aspirations to be net-carbon zero on the island by 2040. Text in the Plan has been updated to reflect the addition of the new policy.

Policy EV1

Total number of comments 41

Object	17	Support	10	General comment	14
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Key issues

- Support policy

- Amend to ‘nine registered historic parks and gardens’. There are more Local List and non-designated examples of parks, gardens and designed landscapes
- Add a definition of "substantial public benefits" which "would outweigh the substantial harm or total loss of significance"
- A full archaeological survey of the island is needed to identify SSSIs
- Add requirement for development to demonstrate incorporation of local historic themes and heritage
- A robust approach is needed in dealing with historic buildings falling into disrepair.
- Amend Policy EV1 to follow NPPF paragraphs 194 to 208 to establish how development proposals of the Island’s heritage assets (either designated or non-designated) and development which may impact their settings are considered. It should be indicated at the outset of the need for conservation and enhancement of heritage assets
- The wording that substantial harm to or loss of grade 2 listed buildings or registered parks or gardens will only be permitted in exceptional circumstances does not go far enough, nor does the wording “wholly exceptional circumstances in the case of scheduled monuments, scheduled wreck sites and Grade 1 and Grade 2* buildings and parks
- The need to bring heritage to life should be reflected in the Plan to align with national policy
- Paragraph 4.14 ‘or the suitable re-use of heritage assets’ add ‘and reinstatement’
- Paragraph 4.20 ‘through discussions with owners ‘ add ‘related charities and local community groups’ and add ‘reinstatement’ to ‘ensure the repair and maintenance of the asset’
- Add a presumption against harm to heritage assets, landscapes and conservation areas

Council Response

A key document section has been added at the end of policy. The policy wording has been revised to more closely reflect the NPPF. Minor amendments have been made to supporting paragraphs to include `reinstatement` as an option.

Policy EV2 Ecological assets and opportunities for enhancement

Total number of comments 48

Object	18	Support	14	General comment	16
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Key issues

- Support policy
- Add to para 4.26 mention of the migration of salmon up the Eastern Yar for spawning
- Para 4.26 - The requirement to demonstrate exceptional circumstances or overriding need should only apply to European Species.
- Para 4.26b - Developments in Bembridge Harbour are not appropriate. Any mitigation by Nitrate credit schemes further “upstream” of the Eastern Yar should not be considered
- Amend para 4.26c – there is no alternative habitat for an ancient river.
- Amend para 4.27e – ecological network should not mean moving the problem between areas
- Amend para 4.32 – work with farmers to enhance catchment fields
- Designate the area of land off Perone Way, Eastern Yar Valley as a SINC
- Amend para 4.29 – judgement on the width of buffers need to consider local topography, existing biodiversity and measures to attenuate and divert waste water drainage

- Amend para 4.30 to “...buffers should prioritise protection and enhancement of nature conservation assets including existing trees and hedgerows.”
- Para 3.30, bullet point 9 - bank sides and riverbeds should not be modified with piling, jetties or other structures but replaced with natural features. Removal will not damage the historic environment
- Remove requirement for onsite SANGs for >75 units and consider on a case by case basis
- Add a reference to joining up biodiversity areas and corridors
- Clarify “suitable compensation strategy” to replace the environmental value of ancient woodland. No mitigation or compensation can replace unique biodiverse habitats
- Clarify the impact of climate change
- Explain the significance of Biosphere designation
- Add policy zones, designations and geographical areas that could 'receive' offsite compensation and BNG where it cannot be delivered wholly within a project area
- Add a reference to importance of agricultural areas on the island
- Delete 'away from'
- Allow developers to contribute to a local or regional initiative to bring greater overall gains than minimal on-site improvements. A similar approach should be used for off-site compensation when not achievable on site for local or national habitats and/or species
- Amend policy to: “Applications for development should include adequate and proportionate information to enable a proper assessment of ecological considerations by:
 - a) completing and submitting protected habitat and species surveys where required.
 - b) biodiversity mitigation plan setting out avoidance, mitigation and compensatory measures.
 - c) Using Defra’s biodiversity metric calculator (where appropriate) to demonstrate how a minimum net gain of 10 per cent for biodiversity net gain will be achieved”. Is 10% biodiversity net gain enforceable? Amend criteria c) to set a target greater than/at least 10% net gain. Amend policy and text to reflect the challenge of achieving a 10% biodiversity net gain, on development capacity and viability. Support 10% net gain. Amend policy to achieving at least 20% biodiversity net gain. Add approach to onsite and offsite biodiversity net gain delivery
- Add a metric for urban/brownfield sites as such sites can have a very low level of biodiversity
- Clarify if 'off-site' compensatory measures can be secured by a contribution. The costs should be known in this case, and the viability of the approach tested for site allocations
- Encourage intertidal restoration work
- Clarify exemptions for domestic extensions, garages and ancillary buildings
- Protect habitats for red squirrels and sea eagles
- Add an explanation for considering locally designated sites through planning decisions
- Update to DEFRA metric 3.0
- Require developments to not impact nearby designations reducing enforcement
- Clarify if the Sustainability Appraisal uses priority habitat and ecological network information
- Add greater emphasis on Local Nature Recovery Strategy and Nature Recovery Network
- Publish an SPD on strategic nature recovery plan linking to human health improvements
- Amend policy to reflect paras 179 a) and b) in the NPPF requiring opportunities for biodiversity improvements in and around development
- Amend policy deleting the word 'minimum'
- Add the Island is home to a rich variety of important habitats and species, some unique to the Island or thriving due to the protection given to them by the Solent. Protect bat habitats
- Rigorously protect our natural assets including marine conservation zones

- Add presumption against the loss of species rich environments or mature and veteran trees unless in exceptional circumstances

Council Response

The comments made are noted. Biodiversity Net Gain (BNG) is a changing issue as the Environment Bill and transition arrangements evolve. The revisions to policy wording better align with national policy reflecting the BNG calculator, hierarchy of sites and the importance of Local Nature Recovery Strategies (LNRS) and the potential for this to be an SPD. The supporting text is amended to clarify the requirement for appropriate assessment.

Policy EV3 Recreation Impact on the Solent European Sites

Total number of comments 11

Object	3	Support	3	General comment	5
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Key issues

- Amend para 4.34 as during storms these birds come inland
- Amend para 4.35. Birds are affected by farming practice and development may not be appropriate near designated sites. Bioenergy crops & anaerobic digestors will impact on the islands rural landscape.
- Update Solent European sites with Solent Marine Sites
- Support the Position Statement on nitrogen neutral housing development which states "land on the Isle of Wight can be used to provide nitrogen credits for housing development on the mainland. The IWC is willing to engage with landowners and planning authorities on providing monitoring that cannot logistically be performed by mainland local planning authorities."
- The policy only relates to housing when the issue is recreation and disturbance
- Add presumption against development damaging Solent protected sites. Exclude financial only mitigation

Council Response

Solent European Sites have been changed to Solent Marine Sites to reflect latest terminology, to refer to the Solent Waders and Brent Goose Strategy and to align supporting text more closely with Bird Aware Solent. SANGs text has been brought forward from EV7 and it is clarified that this is not a requirement but judged on a case by case basis.

Policy EV4 Water Quality Impact on Solent European Sites (Nitrates)

Total number of comments 19

Object	7	Support	4	General comment	8
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Key issues

- Support policy
- Para 4.29 - buffer sizes should be 'a minimum of'

- Add to para 4.30 that non-native invasive species should not be planted in the river buffer
- Add to policy and para 4.33 that Parkhurst Prison housing allocation includes headwaters for Gunville Stream and Parkhurst Stream which feeds into the Dodnor Creek RAMSAR site.
- Para 4.39 - add reference that coastal lichens and the shoreline areas are a useful tool in monitoring pollution of the Solent
- Para 4.40 – add the Solent international site will be affected by daily tidal movements
- Para 4.44 – mitigation and monitoring does not address overdevelopment
- Amend policy to “For all planning applications that involve a net increase of residential units or a net increase in guests at tourist accommodation (including tourist accommodation), it must be demonstrated that the development would not cause harm to the Solent European Sites as a result of drainage that would result in a net increase in nutrients”
- Identify site allocations not draining to Sandown. Waste outfall from Sandown should not be excluded and exempt
- Update Solent European sites with Solent Marine Sites
- Add to supporting text that a private package treatment solution (PTP) is unlikely to be acceptable to the Environment Agency in a sewered area
- A policy should be added for storm/surface water removal
- Clarify the work undertaken to protect nitrate neutrality and delivery rates
- Add a key focus is to secure the necessary improvements to waste water treatment works

Council Response

The policy and supporting text wording have been revised to change Solent European Sites to Solent Marine Sites to reflect latest terminology. Policy wording changes have been added to provide clarity and additional supporting paragraphs on Package Treatment Plants, nitrate budget and position statement changes.

Policy EV5 Trees, Woodland and Hedgerows

Total number of comments 20

Object	7	Support	6	General comment	7
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Key issues

- Support policy and para 4.50
- The destruction of ancient woodland should not be allowed
- Replace `Appropriate species should be used at all times` not `wherever possible`
- Para 4.50 add that replacements should be with mature trees and hedges. Clarify if it is monetary or environmental value
- Add the woodland uses which might be compatible with ancient woodland
- Development in areas close to woodland, and AONB should be discouraged. Further work is needed on cumulative air pollution from industrial plant emissions.
- Amend supporting text to highlight tree felling not determined by planning permission may require a felling licence from the Forestry Commission.
- Amend policy to reflect Government policy that development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland will be refused unless “there are wholly exceptional reasons, and a suitable compensation strategy exists”

- Amend policy to acknowledge the wider benefits of trees and woodland
- Where there is unavoidable residual damage or loss to ancient woodland, the measures taken to compensate for this must be of a scale and quality commensurate with loss of irreplaceable habitat. Where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost.
- Set a target of 30% of tree canopy cover for development sites
- Amend policy to stop the removal of trees and hedgerows prior to an application. Add a clause preventing an application being made for example, for 5 years after a clearance is made.
- Add to policy a presumption that all trees and hedges should be protected and only removed after mitigation has been agreed with the council
- Add the benefits of wildflower verges should be added to the policy
- Amend policy so any trees removed are replaced with a native species and maintained
- Strengthen replacing with those of a commensurate value and add a definition
- A 15m buffer is insufficient. Clarify the 15m buffer and what should be included. A 50m buffer should be the minimum buffer between a development and ancient woodland, including in construction unless it is clear how a smaller buffer would suffice. The preferred approach is to create new habitat, including native woodland, around existing ancient woodland
- Add farm or rural development is conditional on replacing grubbed out hedges adjacent to public rights of way before development

Council Response

The policy wording is revised to strengthen role of trees and to recognise their role in biodiversity net gain. A reference to the LNRS has been added. The ambiguity on native species replanting has been removed. It is clarified that buffers with ancient woodland must be at least 15m, more where required. Wording has been added that where there is unavoidable damage or loss to ancient woodland the scale and quality must reflect the loss of irreplaceable habitat, creating 30 hectares of new woodland for every hectare lost.

Policy EV6 Protecting and providing green and open spaces

Total number of comments 23

Object	6	Support	12	General comment	5
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Key issues

- Support policy
- Add criterion for development proposals to support the management or improved accessibility of open spaces, where other relevant policies are complied with
- Amend para 4.57 adding a reference to the origin of public parks, open and green spaces is often in historic designed landscapes
- Define `designed landscapes` in the Glossary
- Add reference to the council's role in managing parks, open and green spaces and gardens
- Replace `where relevant` and replace with developments over 25 units are required to undertake a play space audit
- Add reference to providing allotments in Bembridge

- Add reference to Natural England’s Accessible Natural Green Space Standard, and the Woodland Trust’s Woodland Access Standard. This recommends that:
 - That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.
 - That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people’s homes.
- Clarify if parks, gardens and open space standards have been tested against proposed development levels
- The effect of onsite SANGs for development of 75 dwellings has not been considered. The 75 dwelling threshold is too high. It should be 20 dwellings
- Support references to the Local Nature Recovery Strategy
- Add enhancing green spaces with micro forests and ecosystem developments

Council Response

The policy has been strengthened to require the provision and enhancement of green and open space in line with the Open Space Assessment and Playing Pitch Strategy. The limited occasions where works may be needed to manage open spaces is set out. A justification of the Open Space Assessment outcomes is set out. The reference to SANGS is now set out within policy EV3.

Policy EV7 Local Green Spaces

Total number of comments 10

Object	2	Support	6	General comment	2
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Key issues

- Support policy
- Add Brown’s golf course as a Local Green Space
- Support Moorgreen Road allotments and adjoining reservoir as Local Green Space
- Add enhancing green spaces with micro forests and ecosystem developments

Council Response

A minor wording change is made to Policy EV7 deleting the duplication of the reference to community requests to designate Local Green Space.

Policy EV8 Protecting high grade agricultural land

Total number of comments 9

Object	3	Support	1	General comment	5
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Key issues

- Support policy
- Policy should include all agricultural land

- Policy should accommodate the uncertainties of ELMS
- Define `unnecessary`. High grade agricultural land should be protected from all development except food and farming
- Clarification is needed as to whether the policy undermines policies E2, E4, C10 and G2
- Agricultural land use should also be supported by an environmental enhancement approach

Council Response

Minor changes have been made to the policy text to protect against losses of Grade 1,2 and 3a agricultural land. An additional policy allows development supporting farm diversification and the rural economy where it is in line with Policy E4.

Policy EV9 Protecting our landscapes and seascapes

Total number of comments 20

Object	7	Support	6	General comment	7
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Key issues

- The Island's historic landscape is amongst England's most varied and accessible. The Island depends on tourism. To protect this unique landscape an "Island park" designation is needed
- Support policy
- Seascape Character Assessments should be identified within the supporting text.
- Para 4.81 Add link to the HEAP documents
- Para 4.82 – remove reference to `in some cases`. Add reference to the emerging Local Nature Recovery Strategy
- Add reference to seascapes and seas around the island
- Add further protection and enhancement of the water sources & catchment areas is required
- The local biodiversity action plan and local geodiversity action plans should be made available
- Add a policy on climate change, mitigation and resilience incorporating the aims of the IOW Climate and Environment Strategy
- Clarify whether EV11 overrides EV9 when development is in the AONB
- Add references to Heritage Coast and AONB
- Criteria a) – the Policy is too open-ended and wide ranging. Needs clarity on what are considered 'direct' or 'indirect' impacts from development
- Criteria b) – Policy should identify 'important vistas' and 'character' to and from the land and sea. These should be identified on the proposal map.
- Criteria d) – Policy should include the 'aims and objectives' of West Wight and East Wight landscape character assessments.
- Criteria e) add the aims and objectives of the Isle of Wight's local biodiversity action plan and local geodiversity action plan; e: add reference to Historic Environment Actions Plans (HEAP). Add reference to the emerging Local Nature Recovery Strategy
- Add reference to enhancing biodiversity

Council Response

Minor wording changes add reference to the Historic Environment Action Plan, Local Nature Recovery Strategy and the Marine Management Organisation Seascape Assessment for the South Marine Plan Area. The policy wording has been strengthened to require development proposals to meet the policy criteria. Additional wording to the supporting text is added on the documents needed to support Landscape Visual Impact Assessments. New policy on Climate Change has been added.

Policy EV10 Preserving settlement identity

Total number of comments 38			
Object	21	Support	12
			General comment 5

Key issues

- Support policy
- Add settlement gaps i. between Ryde and Fishbourne ii. between Apse Heath and Lake iii. between Newport and Northwood iv) Shalfleet v) Calbourne vi) East Cowes vii) Wootton vii) Fairlee ix) other localised gaps
- Settlement gaps should not be changed once they are established
- Support the role of roadside gaps in development in separating settlements
- Object to changing the settlement boundary in Freshwater, Totland and Bembridge
- Extend the settlement gap to include site allocation HA005
- Remove land owned by Southern Water from the Brading, Sandown and Yaverland gap
- Amend Ryde settlement gap to remove land to the north of Calthorpe Road, including existing residential development along Woodland Close and the Puckpool Hill site
- Exclude Folly Works from the settlement gap designation
- the `exceptional development` test should be applied to ribbon development
- Add settlement gaps to Havenstreet and Ashe, south and west of Ryde and east of Newport
- Add settlement boundaries to Havenstreet and Ashley
- Exclude industrial complexes from settlement gaps
- Exclude the sites at Freshwater from the settlement gap
- Object to the threats to the gap between St Helens and Brading

Council Response

Minor wording changes have been made to the policy and supporting text. A Northwood - Newport gap has been added to the policy to align with the evidence base.

Policy EV11 Isle of Wight AONB

Total number of comments 22			
Object	6	Support	5
			General comment 11

Key issues

- Support policy
- Extend the AONB to include the whole island

- Add reference in the supporting text to the Government's review of National Parks and AONB's and the subsequent report - The Glover Landscapes Review 2019.
- Add `The Council may consider strengthening policies regarding the AONB to include proactive measures in respect of landscape, nature, recreation and AONB boundary review and extension to policy`
- Extend the AONB in the Nettlestone and Seaview parish boundary; and to include Newtown and the coast between Yarmouth and Thorness
- Add a commitment to review AONB boundaries within 2 years
- Amend policy to add `Planning permission will be refused for major development within the Isle of Wight AONB except in exceptional circumstances and where it can be demonstrated to be in the public interest`
- Remove requirement for farmers to fund remedial projects to compensate for loss of features
- Amend para 4.95 to prevent further development where harm has already been caused by industrial activity
- All trees in the AONB should have TPOs attached to them
- Amend para 4.94 to state that the AONB Management Plan is statutorily produced by the AONB Partnership on behalf of the Isle of Wight Council. The Council then adopts the plan.
- Clarify that agricultural developments would not fall foul of this policy
- The policy focus should be on improvement

Council Response

The policy has been amended to clarify that major development in the AONB will be refused except in exceptional circumstances or for overriding public interest to better reflect the national guidance. Reference has been added to the Landscape Review (The Glover Report). Other minor wording changes have been made for clarification.

Policy EV12 Dark Skies

Total number of comments 19

Object	5	Support	7	General comment	7
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Key issues

- Support policy
- Dark skies should be promoted and extended to other parts of the island
- Connections should be made to the Local Transport Plan as some over illumination has occurred with LEDs
- Caravan and holiday parks, industrial areas, lorry parks and ferry transport need to take into account the Dark Skies policy
- The proposed area overlaps some urban fringes and rural centres. These are places where people live or may be visiting during the hours of twilight / darkness and require adequate street lighting for loading / unloading, walking / cycling as well as porch lighting for entering / exiting buildings. The policy should permit an appropriate level of lighting for these purposes
- Add 'and be downlit' to the last sentence to prevent unnecessary upward light spillage.
- Policy should consider AONB and UNESCO Biosphere designations
- Add `improving current developments and enforcing requirements`

Council Response

A minor wording change has been added to the policy requiring external lighting to be downlit.

Policy EV13 Managing our water resources

Total number of comments 24

Object	12	Support	6	General comment	6
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Key issues

- Criteria a) to h) do not accord with national guidance eg) restriction of 100 litres per person per day or a 20% reduction in run off from greenfield rates. Amend policy to enable the site and context to be taken into account
- Amend a) adding 'implementing measures to restrict predicted internal potable water consumption to 100 litres per person per day (restriction should not apply to disabled persons with specific needs for bathing, changing etc)'
- Amend d) to say "ensuring no risk to the Island's aquifers"
- Clarify e) where reducing run off rates to at least 20% below the greenfield run off rate applies
- Amend criteria e) and f) to include more on the type of subsoil and the effect on run-off
- Amend criteria g) to reflect that a flat rate new infrastructure charge is paid to Southern Water and that the developer is no longer required to connect to the nearest point of capacity
- Restrict new development until confirmed that no work is required to the sewer to accommodate new developments or the work has been carried out
- Replace "expect" with 'required to'. Add requirement for rainwater harvesting
- Policy is supported by the Environment Agency
- Bullet point 3 replace 'relevant' with 'possible'
- Need a long term plan for loss of water from the mainland, saltwater ingress of groundwater and greater leakage control
- Define 'most sustainable options' and its delivery. Policy is not effective or justified
- Amend criteria g). Where sewers have limited capacity, site promoters should work with Southern Water to ensure network reinforcement aligns with occupation of the development. Add h) when planning site layout, taking into account any existing water and/or sewerage infrastructure, to safeguard future access for maintenance and upsizing purposes
- Delete policy as it is already controlled by building regulations
- Consider new infrastructure to reduce the need to import water e.g. urban reservoir
- New dwellings should be the most water efficient homes possible
- Strengthen policy wording to clarify development must adhere to requirements for water use
- Replace 'should' with 'must'
- Add reference to the damage that run-off from roads and land does to quality of river and sea water. Preventing run-off particularly in storm events should also sit within EV13
- Delete 'where appropriate' and add a requirement for best practice only and for enforcement

Council Response

The policy requirements have been strengthened amending criteria g) and adding new criteria h) to reflect the need to align delivery of the network with occupation and safeguarding future access for

maintenance and upsizing. The policy wording has been amended to require development proposals to meet the policy criteria and clarify infrastructure requirements for new development.

Policy EV14 Managing flood risk in new development

Total number of comments 15

Object 5 Support 5 General comment 5

Key issues

- Support policy
- Amend para 4.8 which suggests flooding is a localised occurrence
- Require on site sustainable drainage for new development and meet the tests of Strategic Flood Risk Assessment and Local Flood Risk Management Strategy and for no residual risk
- Replace “expect” with “not permitted”
- Managing flood risk should apply to all development not just major development
- Criteria d) should include tree planting to slow water flow and reduce surface water runoff
- Surface water should be separated from waste water
- New development should include roads and alternatives to drainage pipes such as green areas, meadows and soakaways
- No building should be permitted on floodplains
- include reduced mobility/other access needs to flood warning and evacuation plans
- Add reference to on site drainage systems taking account of increased rainfall intensity
- Better strategies are needed to address flooding

Council Response

The policy has been amended to require development proposals meet the policy criteria. The supporting text has added that Flood Warning and Evacuation Plans should take account of those with reduced mobility or other access needs.

Policy EV15 Monkton Mead catchment area

Total number of comments 5

Object 2 Support 0 General comment 3

Key issues

- Add new developments that have an impact on flood risk within the catchment boundary may be required to make a financial contribution towards flood risk alleviation projects. Clarification is needed on these contributions and how will they be applied
- Amend criteria e) - on site drainage systems to take account of intensity of rainfall
- Other areas should also be covered given the increased risk of high intensity rainfall and storms in a changing climate

Council Response

The policy has been amended to require development proposals to meet the policy criteria and that financial contributions may be required towards identified flood alleviation projects. A reference has been added to the evidence base.

Policy EV16 Managing our coast

Total number of comments 9

Object	2	Support	3	General comment	4
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Key issues

- Support policy
- Should seek to protect the marine conservation zones
- Policy should actively encourage coastal defence schemes to include biodiversity rather than just as mitigation or compensation to reach the net gain target
- Add reference to heritage coast and its policy status
- Add consideration to rolling back existing development and whether this is sustainable or appropriate?
- Clarify economic and social benefits. Should be no new development in these areas

Council Response

Minor wording changes have been added to the policy and supporting text.

Policy EV17 Facilitating relocation from coastal change management areas (CCMAs)

Total number of comments 7

Object	3	Support	2	General comment	2
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Key issues

- Support policy
- New location should be for the same use, remain close to the coastal community and not have significant adverse impacts or create major damage to existing landscapes and ecosystems
- Policy should rule out holiday and caravan parks inland within the AONB.
- Providing suitable accommodation (in consideration of any disability already identified or created by the enforced move) is essential and policy should reflect this
- Clarify how this will be delivered in areas where there may be significant adverse impacts

Council Response

Minor policy wording changes include new reference to the AONB and Heritage Coast.

Policy EV18 Improving resilience from coastal flooding and coastal risks

Total number of comments 11

Object 5 Support 2 General comment 4

Key issues

- Support policy
- Policy needs clarification on which schemes might fall into this criterion?
- Clarify EV18 contributions toward coastal flood risk so viability of sites can be assessed
- Policy should not allow surface water/storm water to enter a public sewer
- All development must ensure resilience from coastal flooding but must also avoid contributing to coastal flooding from carbon emissions
- Should it be “resilience to flooding” rather than “resilience from flooding”
- There should be specific recognition of increasing flood and storm risks due to climate change

Council Response

The clarity of the policy wording has been improved adding contributions may be required from major development on a case by case basis to improve resilience to coastal flooding and coastal risks. A reference is added to the supporting text on the role of development in the management of sustainable flood and coastal risk.

Policy EV19 Managing ground instability in new development

Total number of comments 8

Object 1 Support 4 General comment 3

Key issues

- Policy EV19 needs expanding and to be used in conjunction with EV14(d)
- Support policy
- Paras 4.135, 4.136, 4.138. The area on the South ridge of the Downs in Arreton parish extending beyond that designated as Mineral Safeguarding has the potential and has already caused flood damage to roads and property. Any development under the ridge of the Downs in Arreton would pose potential risks from ground movement, floods and contamination of water resources.
- Add a reference to the Marine Plan
- There should be specific recognition of increasing flood and storm risks due to climate change

Council Response

A reference to the South Marine Plan is added to the supporting text.

Section 5 General

Total number of comments 3

Object 2 Support 0 General comment 1

Key issues

- There is insufficient infrastructure with poor roads and water, gas and electricity provision and a reliance on the mainland. The hospital is too small and access to health services and schools need improving.
- Give more weight to local plans

Council Response

No change.

Community Foreword

Total number of comments 13

Object 3 Support 5 General comment 5

Key issues

- Development in Brading should take account of limited infrastructure available, the wellbeing of the local community and full weight given to the neighbourhood plan
- A health study should be carried out on living in already congested areas to examine the effect on residents
- There is insufficient infrastructure for the quantity of development proposed, particularly health, schools and roads
- Support policies if the necessary education and medical facilities are provided
- Support the emphasis on building for future health and well being
- Island needs to be more resilient through low carbon energy, water supplies, drainage and energy costs

New Policy

- Add a primary residence policy to the plan

Council Response

No changes to the Foreword. A new policy is added in the Economy section on short term let holiday accommodation.

Policy C1 High quality design for new development

Total number of comments 35

Object	16	Support	12	General comment	7
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Key issues

- Add to policy `Creating a safe environment depends on defensible space, natural surveillance, permeability, connectivity and lighting` and `the design and layout of the development shall incorporate the principles of crime prevention through environmental design`
- Amend policy to allow access by sustainable transport modes
- Add housing should be attractive, in keeping with the island style and include distinctive Island vernacular architecture. Add celebrating the historic sense of place and pattern of design
- Add to policy and supporting text `active design` and principles
- Add to supporting text `high quality design will demonstrate how green infrastructure, surface water attenuation, ecological gains, public access and recreational opportunity can be designed and delivered in the same place at the same time, reducing unnecessary sprawl, improving the efficiency of land use, and concentrating social and environmental performance`
- Protect the quality of Ryde's historic buildings
- Encourage renewable energy and local elements of design such as brickwork of different colours around windows and doorways. Do not allow gas heating in new build development
- Add to policy `Every effort must be made to support energy saving methods: water, wind and solar. All development should enhance and improve biodiversity`
- Add to policy that garages and parking should be large enough to accommodate cars
- Add to policy the need to provide adequate bin storage via a flat access route
- Add justification and evidence to support optional space standards
- Assess the adverse impacts of space standards on first time buyers including First Homes and potential impact on delivery rates
- Add a requirement for very low environmental impact buildings and biodiversity gains
- Promote off-road parking which is hidden, underground and concealed with multi-habitational developments
- Add reference in criteria a) to trees and hedgerows and to `well designed` development
- Add to criteria d) and e), a reference to space or amenity standards in SPDs or nationally described space standards? In criteria i) include `within the AONB`
- Amend criteria c) adding a need to enhance these features and afford the highest level of protection for their landscape or heritage value. Amend wording to `respect the character of the area, particularly in conservation areas. AONB development proposals should conserve and enhance the scenic beauty of the landscape and value of heritage significance`. Amend criteria c) adding key ways development must protect the character of the AONB and conservation areas, through the use of natural and local materials respecting the vernacular and traditional architecture
- Amend criteria e) as there are many examples of great design of basements without outlook
- Amend criteria h) as it is too hard a line to take
- Amend criteria k) to protect farmland and consult with farmers if enhancements are diverted near productive and active farmland

- Where soft landscaping cannot be accommodated could they comply with the other criteria?
- Re-order policy criteria to reflect the National Design Guide. Add a reference to the National Model Design Guide and provide a framework for how these will be applied locally
- Add reference to environmental sustainability, renewable space and water heating, planting native and insect friendly landscaping and include, for example bee/bat/barn owl habitation
- Creation of open space creates ongoing management and budget issues and ensuring larger family sized gardens is a better option
- Amend policy adding `universal design principles where appropriate early in the design of development`
- Add a requirement for waste bin storage without infringing on the street scene. Small, cramped sites can lead to overcrowding and neighbourhood disputes
- Amend para 5.5 to read "...housing developments comprising of buildings which..."
- Add wording to paras 5.21-22 and 5.4 to frame settlements in their parishes and emphasise `cultural capital`
- Amend para 5.18 as Access Statements` are required in the planning application process
- Amend para 5.19 - review unused and existing rights of way which could benefit the farming community by the public engaging with countryside to help protect new rights of way in productive farmland

New Policy

- Add new policy promoting quality development and attractive quality bus provision with improved access to main corridors, less deviations off route with carriageway widths within new development a minimum of 6.5metres where appropriate and high quality bus stops

Council Response

Amend policy to require high quality design including soft landscaping, wildlife corridors, measures to reduce crime and disorder, protecting high grade agricultural land and sustainable management of water to limit development impacts and maximise environmental performance. Add a reference on preparing an Isle of Wight Model Design Code.

Policy C2 Improving Our Public Realm

Total number of comments 13

Object	4	Support	4	General comment	5
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Key issues

- Support policy
- Amend wording to "clear and legible bus, pedestrian and cycle connections"
- More weight should be given to Neighbourhood plans and applicants directed to Town and Parish Councils before pre app discussions
- Applications should not proceed until reports from utilities companies are received
- Add a requirement in visually sensitive areas to provide visually appropriate screening of buildings / sites and sites should not remain undeveloped for more than 2 years
- Add an emphasis on effective enforcement

- Add a requirement for streets to be tree lined and in the second paragraph `well designed` for pedestrians and cyclists
- Add reference to trees and hedgerows for net gain and nature recovery
- New public realm should be encouraged in medium/large developments and include green space, footpaths, cycleways and seating areas
- Amend policy to `All proposals for major development must ensure that existing and new public realm is well integrated into the design, with street layouts and public spaces allowing for easy, clear and legible pedestrian and cycle connections, compliant with Local Transport Note 1/20, high quality public spaces and green infrastructure or access to it.`
- More emphasis is needed on high quality private garden space
- For Rights of Way add BS 5709 (2018) which calls for Least Restrictive Access
- Standards for living space are too low with inadequate garden/recreation space, inadequate parking and do not promote new building materials
- Guidelines in heritage conservation areas are not adhered to and there is no commitment to seeking contributions for art. Design of public seating/shelters is poor and there is no policy for greening areas and planting trees
- A series of case studies of good practice and design would encourage good design
- Add a requirement to include biodiverse green spaces in developments

Council Response

No change.

Policy C3 Health and Wellbeing

Total number of comments 20

Object	9	Support	4	General comment	7
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Key issues

- Support policy
- Object to a standards based approach. The PPS should be used to inform on-site sports provision or secure off site contributions for new or improved provision
- Strengthen paras 5.27/28 to have the same status as preliminary ecological assessment
- Add requirement for Health Impact Assessments
- Amend text to ensure open spaces and walking routes are safe, well-maintained and link to the surrounding area
- Amend criteria a) to explain community – is it the wider community or 25 or more houses
- Amend criteria c) to include `well designed`
- Policy will not overcome current shortfalls in infrastructure and services nor cater for additional demand. Add space for public health
- Developer contributions should be used towards provision of doctor and dental services
- Add guidelines to assist applicants
- The policy threshold is not justified. Threshold should be reduced to 10 dwellings
- Amend policy to require larger gardens except larger developments with open space

- Add reference to the value of green infrastructure for health and well being
- A second hospital is required
- Add requirement for high quality design promoting new and innovative materials and design, meet guidelines for heritage conservation zones and seek contributions for art.
- Add reference to other environmental and transport criteria
- Insufficient care home capacity needs to be addressed

Council Response

The threshold for requiring a Health Impact Assessment has been removed and wording amended for major developments to prepare such an assessment in proportion to the scale of development. A reference is added to community open space being accessible to all.

Policy C4 Health Hub at St Mary's

Total number of comments 9

Object 1 Support 3 General comment 5

Key issues

- Support policy
- Amend para 5.30 adding `where` to the start
- Add reference to KPS1 and KPS2
- Support the development of the extra care village and affordable housing for key workers and for rent
- Add supporting information to identify the deliverability assessment of this site against other SHLAA sites
- Clarify healthcare remains the same when the ageing population is putting a greater strain on services

Council Response

No change.

Policy C5 Independent Living

Total number of comments 12

Object 8 Support 3 General comment 1

Key issues

- Support policy
- Add a locality hub in Bembridge
- Add plan allocations for this type of housing

- 20% should be a requirement and apply to medium sized developments
- Amend policy to a) Commit to providing a proportion of wheelchair-accessible dwellings (defined in Part M4(3)) as well as 'adaptable (Part M4(2)) b) Change 'expectation' to 'stipulation' c) Define the threshold of what constitutes a 'major' development d) Extend the requirement for accessible / adaptable dwellings to medium sites with a suitable threshold)
- Properties for the elderly should be built where access is easy and external and internal environment is appropriate, especially for residents with disabilities
- Add threshold to policy of 25 or more dwellings
- Policy wording provides no guidance or standards which can be assessed against the Policy requirements. The policy should refer to Part M4(2) of the building regulations
- Amend policy to address mobility scooters, their external storage and charging points
- Add to policy an annual target for the delivery of homes for older people and if not met in a year allow a presumption in favour of such development
- Add reference to shared living and supported care developments

Council Response

A requirement is added to the policy to include provision for the safe storage and charging of mobility aids and for 20% of private market housing to meet Part M4" (2) of the Building Regulations.

Policy C6 Providing annexe accommodation

Total number of comments				7	
Object	2	Support	5	General comment	0

Key issues

- Support policy
- Clarify wording in para 5.41 to explain why garden buildings cannot be used as annexes
- Amend policy to allow long term use of annexes for private rental
- Add definition of 'dependant relatives'
- Add reference to the Equalities Act
- Amend the policy to allow an exception for rural workers and farm employees to support 24 hour operation with livestock and where an annex would be the most economical option

Council Response

Minor wording changes have been made to the supporting text to clarify the type of information required to support a planning application.

Policy C7 Delivering locality hubs

Total number of comments				6	
Object	2	Support	2	General comment	2

Key issues

- Support policy
- Add definition of a `locality hub`
- Amend paras 5.43/5.44 adding the need to have early consultation with the Archaeology & Historic Environment Service as both locations are archaeologically sensitive
- Local hubs need to be built close to users and have public transport connections
- Add a reference to shared living and supported care developments

Council Response

No change.

Policy C8 Facilitating a blue light hub

Total number of comments 9

Object 0 Support 4 General comment 5

Key issues

- Support policy
- A control room for all emergency calls (Police, Fire, Ambulance, Coastguard and Lifeboat) should be located on the island
- Developer contributions should be sought for social and community infrastructure
- The policy is not required

Council Response

No change.

Policy C9 Education Provision

Total number of comments 11

Object 5 Support 4 General comment 2

Key issues

- Support policy
- Amend para 5.46 `The community feels safe...` to improve clarity
- Amend para 5.47 which seeks adequate educational infrastructure which contradicts the push to cut primary school places
- The policy does not address a lack of education provision in Bembridge
- Add plan allocations for education provision
- Amend plan to keep rural schools open
- Amend policy to refer to `education sites`
- Add requirement for accessibility for pedestrians, cyclists and public transport

- Delete reference to `studio school` as this has closed
- Education provision for post 16 years needs and annex facilities. Add to policy the intention to retain and extend local access to education through digital opportunities and hubs

Council Response

The policy has been amended to reflect all education facilities instead of just schools.

Policy C10 Supporting renewable energy and low carbon technologies

Total number of comments 19

Object	11	Support	4	General comment	4
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Key issues

- Support policy
- Amend policy to “Proposals outside the settlement boundaries or site allocations must demonstrate that they have taken account of:
 - a) any unacceptable adverse impacts on the visual impact on the character of the area can be satisfactorily assimilated
 - b) the proposal has no unacceptable adverse impacts upon residential amenity and other sensitive neighbouring uses (including visitor accommodation, camping and caravan sites) that cannot be mitigated by virtue of noise, vibration, overshadowing, flicker, or other detrimental emissions, during construction, operation, and decommissioning; and,
 - c) the consistency of the proposal with nature conservation and heritage asset objectives”
- Add requirement for electric charging of buses and allocate a site for a commercial charging hub
- The level of housing proposed makes it impossible to achieve net zero emissions by 2030. Clarify if the amount of carbon offset provision been considered?
- Add the Council’s proposed zero carbon strategy into the Plan
- Add reference for new houses to minimise power consumption and aim to be carbon neutral or contributors to the national grid
- Amend policy to ensure no impact on the amenity of neighbouring uses or the local economy
- Amend policy to protect the amenity of visitor accommodation, camping and caravan sites, from the adverse impacts of low carbon development, particularly noise
- Add research into the tidal flow around the island to the supporting text
- Add all new and at least 60% of existing homes to meet net zero emissions; housing developers to include offsetting within planning applications; New housing developments to achieve net zero emissions by 2030; all new housing to use renewable and/or community heating and energy e.g. CHP, heat pumps, bio gas, solar, wind, tidal
- Add definition of `large scale`
- Amend bullet point 2 to `historic environment objectives`
- Amend para 5.65 final sentence to `nature conservation interests or the historic environment`
- Amend policy as a 10% renewable target for new development is too low
- The AONB could sustain a limited number of wind turbines

- Amend policy wording deleting the compensation part of the AONB policy which is repeated for renewable energy proposals that harm the AONB
- The housing target will not allow net zero by 2030 to be met and would require radical changes beyond the policy. No areas have been allocated for offsetting
- Add references to support wind, tidal and solar technologies

Council Response

The policy targets have been amended to align with those in the Isle of Wight Climate and Environment Strategy and the supporting text has been updated.

Policy C11 Lowering carbon and Lowering Energy Consumption in New Development

Total number of comments 20

Object	16	Support	1	General comment	3
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Key issues

- Support policy
- Amend policy to seek domestic and industrial buildings which generate the power they need
- Amend policy and supporting text to reflect the goals of the Council's Climate and Environment Strategy which states that all new and at least 60% of existing homes to meet net zero emissions. 2030 is the deadline to achieve net zero. A 10% requirement for renewables is inconsistent with para 5.58 to achieve net zero by 2030
- Policy should require new housing proposals to be subject to generating a power surplus, ground source heat pumps and tidal power
- Amend policy "Unless it is unfeasible, proposals for non-residential development should exceed the minimum required level of 'very good' standard for BREEAM or equivalent. Proposals for major development should incorporate renewable energy systems to provide at least 10 per cent of the predicted energy requirements"
- The 10% requirement for renewable energy is insufficient. Developers should be forced to exceed national requirements. Development should be required to be fitted with renewable energy sources and have cabling for EV charging.
- Add the Island should aim for self-sufficiency and support developments which encourage this
- There is no evidence to support a threshold of 250 housing units for district heating. District heating systems are not costed in the viability study. This should be considered on both site-specific viability and its feasibility
- Add 40% renewable energy requirements which increases with further government targets. Seek 100% renewable energy requirements for space and water heating
- Replace `climate change` with climate emergency`
- Delete reference to BREEAM as it is to be scrapped
- Replace `where appropriate` with `utilise in every appropriate place decentralised ...`
- Add solar water heating to the supporting text and install as standard in new properties
- Amend policy to require solar infrastructure in all non-affordable or social housing where appropriate/productive
- Amend para 5.70 the primary greenhouse gas is water vapour not carbon dioxide
- Amend criteria a) requiring developers to implement the highest possible standards of energy efficiency as it is unsound

- Clarify the level of performance required. Changes to the Building Regulations will require developers to deliver a 31% improvement rendering such an approach unnecessary
- Housing must be built to the highest standards to reduce use of resources. The presumption should be onsite reduction and energy capture rather than any mitigation or offset

Council Response

The policy and supporting text are amended to clarify reaching and achieving net zero.

Policy C12 Utility Infrastructure

Total number of comments 14

Object	9	Support	1	General comment	4
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Key issues

- Support policy
- New houses should have sufficient infrastructure and services met within the development
- Healthcare and community infrastructure, electricity supply, water supply, sewerage and conservation of marine and river environments are all underfunded and insufficient to support proposed levels of development
- Object to removal of the Medina Bridge from the plan
- Amend para 5.92 to ` In specific relation to water and wastewater infrastructure, the council will generally condition planning permission approvals so that no development will occur until the applicant can demonstrate that a strategy is in place following discussion with Southern Water to provide connections to public utilities infrastructure and/or deliver the required infrastructure to support development. Where Southern Water has identified that network reinforcements are required, there will be a need to ensure that the occupation of development does not occur ahead of the delivery of such reinforcements`
- Amend paras 5.99 and 5.100 to clarify how water supply can be maintained with growth in new homes
- Prevent new development until infrastructure meets existing and future needs
- Policy should seek self-sufficiency in water, sewage and electricity and enable tidal energy
- Stronger enforcement is needed and extra capacity to be built in beyond what is required
- Iterative infrastructure delivery is not sustainable. A desalination plant may be needed and a reduction of sewage discharges into the Solent

Council Response

The policy has been amended to refer to applicants making a financial contribution which as a minimum makes the development acceptable in planning terms, including any contributions to strategic infrastructure to align with new policy INF1. A requirement has been added for applicants to demonstrate that due consideration has been given to all infrastructure needs arising from the development and its cumulative impacts to improve clarity.

Policy C13 Maintaining key utility infrastructure

Total number of comments 11

Object	5	Support	2	General comment	4
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Key issues

- Amend paras 5.96 -5.101 to reflect that the island's sewage system is not working, and new housing will make this worse. Infrastructure within developments will not address this and will increase pollution in the Solent
- Amend policy to encourage farmers to install their own reservoirs for irrigation
- Add consideration of a reservoir, having regard to climate change predictions and 30% of the water supply is provided by the mainland. A desalination plant could be considered
- Support policy
- Amend policy to read 1. Waste Water Treatment Works, Sandown 2. Water Supply Works, Sandown
- Development should not be permitted until the electricity, gas, water and sewage systems are upgraded
- 'Maintaining' must include functional utility infrastructure, and not harm the local environment, streams, rivers, coast, beaches, lakes, aquifers and natural water sources
- Should not gas provision in new development
- Add reference to reliance on the cross Solent utility pipelines and the implications on the Island's resilience when it comes to the provision of utilities
- Concern on the link between policy and Policy C14

Council Response

Minor wording changes have been made to the supporting text to improve clarity of policy intent.

Policy C14 Providing social and community infrastructure

Total number of comments 11

Object	4	Support	4	General comment	3
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Key issues

- Support policy
- Amend para 5.105 adding 'cultural facilities'
- The policy does not address the difficulties in getting doctor or dentists appointments or deficiencies in drainage, sewers, pavements, hospital, schooling, transport links. Inadequate attention is given to maintaining and improving social infrastructure
- Amend policy to better protect sports facilities from being lost to provide for alternative community facilities or use. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless an assessment has been undertaken which clearly shows the open space, buildings or land to be surplus to requirements

- Amend criteria a) to `the facility is no longer needed for its original purpose and is no longer viable for any other community use; b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- Amend criteria a) from “the facility is no longer needed for its original purpose....” to “the facility is no longer needed by the community for its original purpose ...”
- The plan should include site allocations if there is an identified deficiency
- Clarification is needed on “development proposals will be expected to meet policy objectives” – presumably new community-led development (and not ‘all development’)
- Amend policy to allow alternative owners/uses to come forward

Council Response

No change.

Policy C15 Community-led planning

Total number of comments 12

Object	4	Support	5	General comment	3
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Key issues

- Support policy
- Add reference to the Place Plans - Newport (Shaping Newport), Ryde (A Place Plan for Ryde), and Cowes and Northwood (The Cowes and Northwood Place Plan)
- Correct typo `unnecessarily`
- No requirement for major developments to demonstrate evidence of public consultation. It is unreasonable and impractical and could result in unnecessary delay and expenditure.
- Encouraging community engagement should be added to the supporting text of the policy.
- Add to paras 5.116-118 that to be given weight in the decision making process these plans must be properly prepared and consulted upon; they should not bypass the Neighbourhood Planning process and scrutiny of the planning policy process.
- Amend policy to `Where town and parish councils have undertaken place plans (including Neighbourhood Plans, Local Cycling and Walking Infrastructure Plans) and/ or master planning work that has been endorsed by the council, development proposals should demonstrate how they contribute to achieving the aims of the community-led plan`
- Clarify how this will be enforced in areas where town and parish councils oppose development
- Amend text to specify the public consultation required at a community level

Council Response

The policy has been amended to add further guidance on issues to include in Neighbourhood Plans and require major development proposals to demonstrate how proposals have been shaped by local community views.

Section 6 Growth General and Foreword

Total number of comments 5

Object	2	Support	1	General comment	2
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Key issues

- Support policies
- Support removal of the garden settlement from Wellow
- Use brownfield sites, redevelop poor housing areas and deteriorating unoccupied properties
- Growth should come from green initiatives
- Para 6.1-6.34 ring hollow when taking account of the level of development and the need to move settlement boundaries to accommodate it. Local need must be dealt with first

Council Response

The proposed level of housing reflects an island realistic housing requirement which is considered can be delivered but this is less than the Government's standard method. The Plan strategy is to deliver development focused on sustainable settlements with existing services and facilities. In some cases, proposed allocations adjoin settlement boundaries. In these cases, the boundaries have been amended to help control future development outside of settlement boundaries. No change.

Policy G1 Our approach towards sustainable development and growth

Total number of comments 29

Object	14	Support	7	General comment	8
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Key issues

- Support policy
- Support building the majority of homes on previously developed land not greenfield sites
- Support development of previously developed land on the edge of settlements as it supports sustainable transport
- Delete presumption in favour of development. Permission will be granted in line with NPPF
- The island is overcrowded with insufficient infrastructure. No future development should be permitted if it fails to provide affordable housing, infrastructure and services.
- Evenly spread development across the island not focused it to the east. Allow some growth in smaller villages to support growth in larger settlements
- The plan is unsustainable. It is not possible to build 486dpa
- The revised housing requirement may not be accepted. The development of previously developed land conflicts with the aim to intensify and expand industrial sites.
- Key priority sites are greenfield, include employment, are risky and would increase East Cowes ferry traffic
- Delete last part of policy as it repeats NPPF para 11d)
- Amend text to "...new development will be of a high the highest possible design quality that contributes to a strong sense of place"
- Amend by removing reference to the delivery of an "island realistic housing requirement"

- Amend policy to `To facilitate travel on the Island, improvements to the existing road network, particularly in Newport are planned and a crossing over the River Medina is being investigated. The provision of cycling and walking infrastructure set out in Local Cycling and Walking Infrastructure Plans will facilitate more journeys by sustainable modes of transport`
- Amend policy to include `low carbon` and `environmental development`
- Access to medical facilities is beyond planning control
- Housing to attract professional people should focus on locations with jobs and services
- Development should only be for local needs
- Robust enforcement of planning decisions is needed
- Place a moratorium on the previously allocated sites
- Add reference on the need to improve life chances for young people and future generations
- Prevent repeat applications for 9 units to avoid planning requirements

Council Response

The Plan has been amended to delete the last paragraph of the policy as it repeats NPPF para 11d). A crossing over the River Medina is no longer being investigated to support the Plan and has been deleted. Policy G3 has been amended adding `Development capacity of sites is expected to be optimised. Where additional phases are deemed likely but are not part of the current planning application, development contributions and affordable housing provision must take this into account`.

Policy G2 Priority locations for development and growth

Total number of comments 147

Object	129	Support	11	General comment	7
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Key issues

- Support policy and settlement boundaries
- Support designation of Seaview as a `Rural Service Centre` in para 3.19 but this conflicts with policy G2 where it is designated as a Sustainable Rural Settlement
- Support preventing development outside or adjacent to settlement boundaries and removal of previously allocated sites. Object to development outside a defined settlement boundary
- Support paras 6.17 and 6.20
- Object to growth in sustainable rural settlements with no defined settlement boundary
- Settlement boundaries should be permanent and not changed without regard to neighbourhood plans or in exceptional circumstances. Object to extending settlement boundaries as it undermines Plan objectives.
- Object to extending village boundaries to create new sites for development contrary to Freshwater Neighbourhood Plan. The need is for affordable housing not second homes
- Object to extension of Bembridge, Freshwater and Totland settlement boundaries
- Object to extending village boundaries to create new development sites contrary to Freshwater Neighbourhood Plan
- Add priority for development in settlement boundaries on existing and future brownfield sites
- Clarify the delineation of settlement boundaries as there are inconsistencies
- Object to Bembridge, Wootton and Freshwater being designated as secondary settlements.
- Proposed development should only be located in primary and secondary settlements

- Delete `sustainable rural settlements` from the plan and references to Wellow/Calbourne/Shalfleet which are unsuitable for further development
- Amend `revised settlement boundary` to `proposed`
- Add reference in policy to Policy H9. Policy conflicts with Policy H9
- Object to development of greenfield sites. These have ecological and agricultural value
- Development in west Wight is inconsistent with protecting high quality environment and natural resources. The number is disproportionate given its facilities, infrastructure and amount of brownfield land. Settlements in west Wight should not be defined as towns. Development of greenfield land affects the landscape, biodiversity and tourism
- Object to insufficient planned growth at and around rural service centres
- Give Newport to its own level in the hierarchy, for a higher percentage of the island's growth
- Object to allocations at settlements with insufficient infrastructure by moving the settlement boundary
- Designate Shorwell and Ashley as sustainable rural settlements
- The policy does not recognise that rural settlements can deliver sustainable development
- Policy requirements are unjustified and may stifle development on non-allocated sites
- Hard settlement boundaries restrict growth, and this may impact on windfall development
- Significant developments at Cowes/Northwood ignore the impact on doctors, dentists, schools, traffic, parking, shops and social wellbeing
- Object to para 6.16. Non allocated sites should not be considered, and the housing figure should be a target or ceiling not a minimum
- Object to including Westridge Farm within Ryde settlement boundary leading to coalescence
- Para 6.17 - object to sustainable rural settlements not having a settlement boundary
- Amend para 6.18 final sentence to add a need should be proven for new dwellings
- Delete para 6.19 as there is no need for aspirational housing which is widely available.
- There is a conflict between Cowes and East Cowes being Primary Settlements and Policy EV10
- Settlement boundaries should only be expanded in collaboration with local councils
- Policy does not create a clear growth pattern for pdl sites outside the settlement boundary
- Extend Bembridge settlement boundary to include Bourne Leisure's Bembridge Coast Hotel
- Most non allocated sites within East Cowes boundary are employment sites
- Locate new development in the middle of the island, to preserve the coastline and tourism
- Amend reference to Cowes to include Northwood and Gurnard
- Exclude secondary settlements without the necessary infrastructure to support development

Council Response

The approach directs new development to sustainable settlements where there are services, facilities, homes, jobs and sustainable modes of transport or where planned growth will enable them to become more sustainable. Where proposed allocations adjoin settlement boundaries settlement boundaries have been amended to help control future development outside of settlement boundaries.

Para 3.19 has been corrected to reflect Seaview's designation as a Sustainable Rural Settlement. Inconsistencies between the Policy Map and the housing allocations map booklet and the area maps have been corrected. The policies map has changed Bembridge and Wootton Bridge to Tier 2 settlements. Sustainable Rural Settlements have been added to the Policies Map.

The supporting text has been expanded on the factors behind the settlement hierarchy. References in the plan to Sandown and Shanklin have been amended to make clear they are part of `The Bay`. Corrections have been made to improve consistency of references to third tier Rural Service Centres.

Policy G3 Developer contributions

Total number of comments 23

Object	16	Support	2	General comment	5
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Key issues

- Support policy. Support bullet point 6
- Amend criteria 1) to “Affordable housing including but not limited to a mixture of buying, shared ownership, rentals, social housing and sheltered projects for families and individuals.”
- Amend criteria 2) to read “Highway infrastructure, including the provision of bus and other sustainable transport routes and facilities. Where relevant, contributions or provision shall relate to projects that have been identified through the council’s infrastructure delivery plan and detailed junction design work related to it.”
- Amend criteria 2) to `Transport infrastructure, including the provision of sustainable transport routes and facilities. Where relevant, contributions or provision shall relate to projects that have been identified through the council’s Infrastructure Delivery Plan and Local Cycling and Walking Infrastructure Plans`
- Policy does not recognise extra costs are passed to home buyers and can prevent housing delivery. Little evidence of delivery on affordable housing. Solent recreation mitigation payments are collected. Seeking contributions outside flood zones would not meet relevant tests. Add education/healthcare development are normally met through taxation
- Add developer contributions should be spent in the immediate area of the development
- Clarify what is required for each allocation. A lack of clear structured contributions leads to uncertainty. An overall view is needed on developer contributions for new infrastructure. The policy should include all financial contributions not added to SPD guidance
- Add to policy if land values are inflated then the council will use compulsory purchase powers
- The elements listed in G3 must be paid for up-front by the developer
- Financial contributions in lieu of affordable housing should be a last resort
- Amend para 6.22 replacing the 2nd sentence with `In order to meet the net zero targets set to achieve minimised emissions by 2030 on the Island, the following infrastructure should be expected from the developers of all new housing developments of 20 units or more.
 - i. Insulate to maximum standards to minimise heat loss and maximise ambient temperatures
 - ii. All energy infrastructure should be electrically powered, and minimal street lighting
 - iii. Solar panels on roofs and external, fireproofed smart battery storage areas should be incorporated into properties. The development plan layout should maximise property exposure for sunlight to an appropriate section and size of roof space by predominant direction to the South, South East or South West.
 - iv. Install heat pumps for individual houses or multiple pumps centralised for small units of flats. Infrastructure be able to transmit excess energy from all units to a community central hub for backup storage in the development and smart technology to transfer excess to the national grid. Central hubs could have additional solar panels

- Amend 6.26 to read “the completion of a biodiversity metric to be submitted ...”
- Add new housing should have a high proportion reserved for residents and all housing should be built to the highest environmental standards
- Developments below 10 dwellings should provide the development requirements
- The affordable housing levy should not apply to single unit self-build projects

Council Response

The policy wording is clarified to make explicit infrastructure is provided or contributions made and that site capacity should be optimised. Minor changes are made to para 6.26 and text deleted on SANGs and BNG to avoid repetition. Links to other relevant policies and new Plan policies are added. Biodiversity net gain is updated to at least 10%. New reference added on a Developers Contributions SPD. Reference is added to the Local Transport Plan and Local Cycling and Walking Infrastructure Plan.

Policy G4 Managing viability

Total number of comments 12

Object 10 Support 0 General comment 2

Key issues

- Policy is worded to imply the policy requirements are not achievable
- Add an improved, more productive working practice is needed
- Object to the calculations used for land values as developers have too much influence
- Object to implication that the policies in the plan can be watered down to ensure viability
- Add evidence to show under delivery is partly caused by unrealistic land values and how this links to constraints to development
- Securing public subsidy is not a judgement that can be made through the planning process
- Add viability reviews and single-phase issues as recommended by RICS Guide Assessing Financial Viability under the Planning Framework, 2019
- Viability could be used to avoid key requirements, and this should be avoided
- Clarification is needed on who administers this if the council is the landowner
- Concern there are no changes to policy

Council Response

Minor wording changes are added to improve clarity and refer to a Developer Contributions SPD. Where an independent viability assessment is required the applicant shall meet the costs, or the application will be refused.

Policy G5 Ensuring planning permissions are delivered

Total number of comments 30

Object 18 Support 8 General comment 4

Key issues

- Support policy. Should be extended to all sites
- Object no longer considering applicant's track record to ensure delivery
- Add where no building work commences for a long time period following approval, it should be followed up. Add a requirement for a penalty payment when land stands dormant
- Amend policy to `pool` smaller sites to give sustainable transport contributions
- Add a strict timeframe for development to be built and limit time and reasons for extensions
- Amend para 6.35 - landowners should be discouraged from holding onto land not in farming or agricultural use and monitor and review re-wilding land every 10 years
- Amend para 6.37 - The condition should be clarified to state that housing should be delivered and ready for occupation at the end of a 3 year period.
- Clarify in para 6.39 the evidence to be used to monitor an applicants or agents track record
- Amend para 6.39 add landowners to the list of those whose track record might be considered
- Amend para 6.42 – add that major development proposals should be subject to meaningful pre-application public consultation
- CPO may be subject to legal challenge. Weak enforcement so the policy is ineffective
- Enforce action on dilapidated, abandoned sites which affect tourism and present a hazard
- Add there should be pro-active engagement to ensure delivery
- Add to policy a fuller reflection of the reasons why development can legitimately lapse
- Delete policy. Criteria d) and e) do not acknowledge that major development can be for education facilities or health facilities. It is onerous and unjustified for major applications to be accompanied by a masterplan or evidence of public consultation. There is no requirement for major development to demonstrate public consultation and is not feasible.
- Conditions requiring the whole development to be completed are difficult to enforce. Conditions requiring the completion of the whole of a development should not be imposed
- The additional requirements on sites with an expired permission within this policy are onerous and inconsistent with the NPPF
- The policy onus is on developers to speed up the process when a significant issue has been the lack of s106 agreements, and the length of time taken to determine planning applications
- The current wording does not consider a site's complex background, viability issues, changes in market conditions or the transfer of land to new owners / developers seeking to implement an alternative proposal from that previously permitted
- Object to restricting future planning permissions where previous planning permissions have recently expired or are due to expire
- There is no evidence that a Local Housing Company will take positive action
- The policy is not required as the council already has powers to revoke planning consent

Council Response

Wording is added to provide context for the island housing market and other minor wording changes have been made. The preparation of a masterplan has been replaced with provision of evidence and the submission of a public consultation statement deleted. It is acknowledged that S106 agreements where required can slow delivery and para 6.40 has been amended to reflect this.

Section 7 General Housing and Foreword

Total number of comments 38

Object 20 Support 1 General comment 17

Key issues

- Lack of transparency on new home occupation by local people. Add targets for local need to ensure residents' needs are prioritised over those retiring/moving to the island or second homes. Proof of island residency/connection should be required to purchase/rent new island houses. Increasing the retired population is unsustainable. Second homes add nothing to the community and lead to streets of dead unused houses. Affordable housing is being sold as second homes not meeting island needs. Housing developments should allocate 75% to buyers with local links
- The plan should make clear the distribution of new housing stock on brownfield and greenfield through colour coding and separately aggregated statistics
- Infrastructure issues are not being addressed and ignore the existing population
- Poor quality build housing is shoe-horned in to achieve the greatest density, with micro small outside space, detrimental to mental health
- Only permit one largescale development in an area which must be completed before further large scale development commences. A key obstacle to new housing provision is the number of sites with planning permission left undeveloped.
- Infrastructure should be developed first. Reduce the number of dwellings over the Plan period until services are provided
- Brading lacks homes for first time buyers, and affordable rental accommodation, and any such development proposals within the settlement boundary, would be welcomed.
- Support removing sites from the plan which are away from settlements and in garden villages
- Weigh up evidence for housing need, demand and constraints and have a flexible housing target subject to regular review and distinguish between different types of requirements
- Support references to 'improving our health and wellbeing' but no linkages are made to infrastructure around health services and the lack of GP and dental services on the Island
- Add predicted sea level change and areas susceptible to flooding due to climate change
- On large sites developers will build the profitable bits and the rest will take 15 years to develop. Smaller sites no longer in the plan are those that could be built out quickly by local companies
- Creating homes where there are no jobs does not help achieve net zero carbon emissions
- Viable greenfield sites should be maximised to meet growing island needs
- Meet needs using empty property, storage containers, or modular buildings and surplus council parking space. Focus on long term rented housing for local people through Housing Associations using modular construction
- High density should be considered including properties with between 3 and 6 storeys
- Development contributions provided through section 106 agreements should be used in the local area, their use transparent, and local councils consulted in negotiations
- New development encourages in migration rather than meeting local needs
- Housing standards to reduce use of resources needs dramatic improvement. An ambitious island approach is needed building on Biosphere status, AONB and SSSIs

- The major driver should be meeting local housing needs for the working population, local families, and older residents.
- Development at Blanchards will be for mainland retirees putting pressure on medical facilities
- The key priority sites are greenfield, employment sites, are risky and would increase East Cowes ferry traffic

Council Response

There are minor wording changes to reflect the latest housing figures.

Evidence papers

Total number of comments 42

Object	0	Support	42	General comment	0
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Key issues

- Support Evidence paper B paragraphs 4.3, 4.6 and 4.8iv
- Support Evidence paper B paragraphs 3.1a-c
- Support Evidence paper B paragraphs 2.9 and 2.10

Council Response

Noted.

Exceptional Circumstances

Total number of comments 203

Object	189	Support	3	General comment	11
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Key issues

- The case should be made for exceptional circumstances.
 - To protect the unique island features
 - Setting a target that is unattainable would result in the Island Plan failing the housing delivery test with a resulting free for all for developers instead of planned growth
 - To enable issues to be effectively addressed at the earliest opportunity
 - Due to loopholes through `exception sites`; inaccurate housing needs surveys, dubious shortfalls in 5 year housing land supply, random percentages of affordable housing numbers; that the methodology and data in section 7 does not stand up to close scrutiny and provides little protection against speculative housing development and little assurance the rural character and heritage of the island will be protected
 - As the island is unique and the only one in England with a large population. As an Island we must have the best case to argue for exceptional circumstances

- There is a need to develop a bespoke approach to meet island needs. House prices are below average for the south east attracting incomers from the mainland which feeds the demand for new housing, but does not align with local needs
- To stem unsustainable growth which is not matched by economic growth
- Challenge the government-set standard assessment of housing need to better protect the undeveloped landscape; protect green spaces and prioritise the development of brownfield sites; and ensure that affordable and social housing is situated in existing towns - near shops, schools, and transport amenities
- The local population is reducing so there is no need for more housing. All new housing will be for those moving to the island and for second homes. The island should not be treated in the same way as the mainland.
- The economy is heavily dependent on tourism and agriculture and to preserve this the attractive countryside, wildlife and outdoor sports and activities need protection
- To protect house prices for islanders
- To recognise the landscape as a UNESCO biosphere
- As many protected landscapes are wetland areas around the river basins
- Sea level rises are predicted and with finite areas of retreat on the island is an understated special circumstance
- To prioritise long standing island residents, in existing communities built in an island style not second home owners and retirees
- Demonstrated through an Island housing needs assessment alongside the Council's study on the Island's availability of building materials and delivery constraints
- Justified because of the lack of infrastructure, public services, or investment to support the proposed housing targets
- Concentrating development on pdl and to conserve the island's landscape
- Current housing targets are unachievable and should not be included in the plan
- The strategy should be redesigned to reflect local needs. Freshwater does not have the jobs or infrastructure to support the number of proposed houses
- The Government number of houses is unrealistic and undesirable for the Island. Unique circumstances regarding island demography and housing market allowing a lower target than 486dpa
- The annual target is based on average past delivery rates over a 20 year period, but including 3 very high years (2006/7, 2007/8 and 2008/9), the average is heavily skewed. The last 10 years have seen housing completions close to 350 dpa, more representative of long term need. The annual housing need estimate takes no account of vacant homes. The reduction in the housing target does not go far enough. The annual target is rough and ready exceeding the current level of delivery of dwellings. Should seek an annual target of 300
- The housing delivery figure remains below the government target for the Island of 668 dpa. Clear reasons are needed to promote a housing figure 179 per annum less than the government target. Given this will lead to failure of the local plan at examination, exceptional circumstances should be argued
- Enables delivery of affordable and sustainable housing for Islanders, protects the rural environment and reduce speculative and inappropriate housing development
- The push to reduce carbon emissions conflicts with building homes where there is little employment or supporting infrastructure and good travel links
- The island is a special case because of its geography, remoteness, cost and timing of the ferry journey

- Amend para 2.4. “Given these geographical special circumstances of the Island we recommend that the IWC investigates the NPPF option of seeking ‘exceptional circumstances within the current draft Island Plan consultation framework”
- There should be island park status or the AONB expanded
- The annual requirement includes a significant proportion of migration from the mainland. There is no evidence to support providing for internal migration
- The IOW should be preserved as a special place
- Only build on greenfield sites in small numbers in exceptional circumstances
- Provide the required services - water supply, sewage treatment, drainage, medical, transport, schooling etc before development and ensure employment close by
- The low target puts the island at risk of failing the housing delivery test leading to a loss of planning control, and fuel speculative development in greenfield locations
- The number and nature of housing on the island should be specific to the Isle of Wight and not decided by a national housing algorithm
- Need to protect the rural character of the island and make use of brownfield sites
- There is no evidence to support reduced housing numbers and cannot be justified. It will decrease the supply of homes, increase housing costs and decrease affordability. Setting a ceiling will not solve the island’s housing crisis. A lack of allocations has led to a lack of investor appetite. Under delivery is nothing to do with lack of allocations. There is no regular testing of the market or engagement with developers off the island. Removing 75 sites from the plan is not consistent with arguing for exceptional circumstances as these would boost supply. A buffer of 25% is insufficient

Council Response

The proposed level of housing reflects an island realistic housing requirement which is considered can be delivered but this is less than the Government’s standard method. The plan does not argue exceptional circumstances but that housing at a higher level will simply not be delivered due to island specific factors. No change.

Policy H1 Planning for housing delivery

Total number of comments 188

Object	138	Support	30	General comment	20
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Key issues

- Support the reduction in the housing numbers
- Support paragraph 7.9
- Support criteria c) but amend to promote increased density and alternative unit mixes
- The plan is not sound, positively prepared, effective, justified or consistent with national policy. Amend Plan to provide 668 homes per year to meet Government housing targets
- Object to 486dpa because
 - the island population is decreasing
 - the number does not reflect local need

- the method used to calculate the Plan housing target is not statistically correct, not robust, does not take account of housing need. and is based on an average of past delivery rates over 20 years. Past data is insufficient evidence to support delivery of 486dpa. 7,290 homes is higher than average delivery on the island from the last 20 years and places an undeliverable, unrealistic and unsustainable demand on the island
- setting an unachievable target risks failing the housing delivery test, a loss of planning control and fuelling of speculative development
- windfall rates will decline over the Plan period,
- it is not aspirational as it reflects previous delivery rates and is unsustainable
- there is no upper limit on the number of new homes the Plan would allow to be built
- Impacts on water quality
- increased strain on schools and doctors, the overloaded drainage system and roads and insufficient jobs. The island should be an area of natural beauty or an island park. Protect undeveloped landscape for tourism to support the economy. Build fewer homes to protect the UNESCO site and dark skies.
- infrastructure should be built alongside development to support 20,000 more people. There is insufficient evidence on infrastructure requirements
- house building is prioritised over quality of the environment and should be reduced
- Ineffective forward planning having a negative housing delivery strategy
- Amend plan to provide between 300 and 350 homes per year/no more than 300 homes per year/around 400 homes per year/around 350 homes per year with 50 for social housing and 150 for those with an island connection/increase to deliver economic growth/take account of proven construction capability on the island
- The housing figure should be a target or ceiling not a minimum
- Prepare a housing needs assessment and a survey of future business and employment opportunities
- Add evidence to demonstrate deliverability assumptions are realistic
- Evidence does not recognise the failure of the spatial plan to significantly boost housing supply
- The plan understates the amount of development to be undertaken
- Add housing requirements for designated neighbourhood areas to meet NPPF requirements
- Assess other options including building on brownfield sites; undelivered approvals; empty buildings; the regeneration of Sandown, Newport and struggling town centres; and only build to meet local needs in the next 5 - 15 years
- Cap windfall development to prevent infrastructural and environmental pressure
- Use brownfield sites and vacant properties first, avoiding use of greenfield sites. Where greenfield is used provide mitigation e.g. hedgerows and trees
- Housing should meet local needs, prioritise young people and be built in an island style.
- Clarify
 - delivery of development for sustainable growth. Many site allocations are unachievable – e.g. Camp Hill and Newport Harbour
 - the low numbers of homes planned for in years 11-15
 - how higher development costs could be addressed
 - why sites close to smaller settlements with good public transport are not considered and why additional benefits e.g. provision of a shop are ignored
 - why Housing Needs Surveys are given disproportionate weight but are inaccurate
 - the effect of hard settlement boundaries on availability of windfall sites
 - why submitted sites are not included in the Plan and if constraints could be overcome

- why the policy reduces the housing requirement when the Viability Study does not consider the development costs on the Island to be higher than the mainland and concludes most development typologies are viable. The profit margins on First Homes and the cost of electric vehicle charging on improving the electricity network should be revisited in the viability study
- Provide certainty and choice of development sites
- Amend text as there is sufficient aspirational housing
- Add a requirement to build 10% of all homes on small sites.
- Add a reference to the constraints on developers and provide flexibility in the policy
- There are unrealistic assumptions made on delivery of large sites. Add further large sites to the end of the plan period to deliver higher completions.
- Add that greenfield sites can provide a greater housing mix and affordable housing
- A requirement for 5% self-build plots is impractical for site safety and management and the implementation of planning conditions
- Rural Service centres have only one allocation and narrowing the scope of development to a narrower range of sites is not realistic or achievable
- Policy should align with social, economic and well-being objectives, not just house building
- Disagree there is a perceived low return on housing investment on the island. Smaller builders fill the gap of larger housebuilders. There is no evidence houses cannot be bought or sold at the full housing requirement level
- Disagree with the barriers identified to development
- If the housing requirement can be justified, agreements with neighbouring authorities relating to unmet needs will be needed. What discussions have taken place with neighbouring authorities under the Duty to Cooperate
- Amend para 7.6 to include an incentive to bring additional sites forward
- Ryde and Newport are over-developed, and housing should be spread out across the island
- Provide evidence to identify how the housing stock is allocated between permanent residents/second homes/holiday lets/empty properties

New Policy

- Add policy to reduce the number of second homes/holiday lets/Air BnB to increase housing stock, reduce greenfield development and pressure on infrastructure and services. Include a requirement for a change of use to be applied for houses not in permanent occupation

Council Response

Policy H1 is amended to reflect latest housing number calculation. Housing requirements for designated neighbourhood areas have been added. A criterion has been added to the policy to reflect support for infill development outside of settlement boundaries. The updated figures for 5 year housing supply have also been added. Minor wording changes to the supporting text. A new policy has been added to the Economy section on short term holiday let accommodation.

Policy H2 Sites allocated for housing

Total number of comments 112

Object	94	Support	10	General comment	8
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Key issues

- Support the removal of site allocations outside rural settlement boundaries
- Support policy reference to affordable housing contributions
- Support provision of infrastructure alongside development and the proximity of sites to services, facilities and public transport
- Concern on the cumulative impact of housing allocations in Freshwater and Godshill on tourism; local employment opportunities; infrastructure and services; attracting more retirees, second and holiday homes; 255 homes is unsustainable, contrary to the Neighbourhood Plan and takes no account of AONB or Heritage Coast designations. The figure does not reflect local need and contradicts with improving the quality of life. Focus development on small brownfield sites for young people and sheltered accommodation
- Add an approximate nutrient budget for allocations, identify allocations resulting in increased phosphorous in the Medina catchment and set mitigation options. Assess in more detail impacts to Solent Maritime SAC resulting from increased recreation pressure
- Object to urban sprawl and impacts on the UNESCO World Heritage status to provide housing for those moving to the island
- Amend policy to take account of Ventnor and its potential for small higher density housing. Limit holiday and second homes in the town. Separate Ventnor from the `Bay area`
- Only develop brownfield sites
- No further development of greenfield sites in Newport Regeneration Area until brownfield sites and those with existing permissions have been used. Development of greenfield sites contradicts paras 4.1 and 4.4 and does not take account of outstanding planning permissions
- Add to policy that smaller sites should be pooled to give sustainable transport contributions
- Amend policy to add `proof of need` for applications in rural areas
- Object to disproportionate distribution of sites in West Wight compared to Sandown. Ignores available infrastructure. Focus regeneration at Newport and restore hotel sites in Ryde, Sandown, Shanklin and Ventnor. Ryde should contribute more than the proposed 27% of housing in the plan as it is a primary settlement.
- Add more small and medium sized sites across the island
- Many allocated sites are not viable
- Policy seeks to control development when there is no 5 year housing land supply
- Clarify
 - the revision of settlement boundaries and reclassification of settlements
 - why some sites have site specific requirements in Appendix 2 and others do not
 - if SANGs will be provided via contributions and whether SANG provision for sites over 75 units are considered in site capacity

- small villages have been classed as `sustainable rural villages` but are not sustainable locations
 - the role of smaller sites. Build smaller energy saving developments
 - how it can be demonstrated that there is a lack of appropriate land for development
- Add `services` to the statement on infrastructure
- Amend para 7.22 to make clear if there are shortfalls in housing delivery early in the plan, applications will not be approved just to meet the target
- Concern that more development increases flood risk
- Support the provision of the flood risk information but
 - the site summary tables do not provide clear and robust assessment of flood risk. The documents should identify the estimated type, depth, velocity, duration, and speed of onset of flooding to inform on mitigation measures
 - the key, critical, development requirements identified in the site summary tables are carried through into the Plan so that they form part of the Plan documentation. This will provide clarity on the actions the Council and developers need to take, a clear level of risk for each site and how it can be managed
 - The proportion of the sites at risk in Flood Zones is only estimated to include up to 70 years of climate change. For flood risk management planning this should be a 100 year minimum development lifetime. It is not sufficient to refer to the site summary tables without considering and acting on the conclusions and in some cases they do not go far enough in assessing flood risk in sufficient detail to demonstrate deliverability in terms of compliance with the NPPF
- Sites removed from the plan should not be developed for first homes or rural exception sites
- Setting thresholds and density targets delays bringing sites forward
- The level of development at Northwood is excessive and unsustainable, will affect its village identity and exceeds current stretched services
- Object to reliance on a small number of large developments with questionable deliverability
- The policy and supporting evidence do not consider the increase in house prices, reduction in rental housing stock, post pandemic living trends, the Solent Freeport, the buffer sites needed, delivery record of developers, deliverability of sites in Newport, positive actions of the local housing company and the environmental policies impact on site layout and housing capacities
- The number of site allocations should be increased to deliver the standard methodology
- Add evidence to:
 - justify site selection and why some previous allocations are excluded
 - to demonstrate that sites are deliverable
 - show that lowering affordable housing values will not be detrimental to values and prevent the release of land. Clarification is needed on whether viability testing is taken into account and if this will improve delivery of affordable housing
 - the sequential test has been used in the selection of site allocations
- Sites allocated should not affect deep water frontages in Cowes and East Cowes
- Object to the impacts of development at Ryde to the Brading boundary
- Plan is positive towards publicly owned sites not considering job location and promotes undeliverable or economically blighted areas but constrains previously identified SHLAA sites
- Greater consistency needed in settlement tables - some include sites with permission and others do not
- Consider sites for extra care development
- The densities proposed are too low
- Policy does not take account of SANGs/Nitrates/Biodiversity net gain within allocations

- Road safety issues should be considered by developments

Council Response

The policy has been updated to reflect site requirements set out in Appendix 2, including SFRA level 2 information and to clarify that non allocated sites will be expected to meet requirements in Policy H3. Reference has been added to a sequential risk based approach to identifying site allocations.

Policy H3 Housing development general requirements

Total number of comments 37

Object	24	Support	6	General comment	7
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Key issues

- Support policy
- Add criteria to:
 - ensure new buildings are carbon neutral and where possible using solar & wind energy. The aim should be net zero carbon. New builds should be capable of generating power surpluses to feed the grid and equipped with sustainable heating
 - ensure new buildings and developments retain rainwater within their boundaries and re-use where possible using soakaways and minimising non-porous surfaces
 - encourage higher densities where it doesn't compromise the nature of villages
 - preserve hedgerows wherever possible and include new hedgerows to development
 - require development to assess how much carbon is released per acre, apply a carbon capture calculation to greenfield development and how losses will be replaced on site
 - require that greenfield sites are close to existing shops, doctors, schools, work place, regular bus service and /or within walking distance
 - require brownfield site development to be carbon capture positive
 - ensure all development incorporates measures to tackle climate change
 - state that "Consideration of the significance of designated and non-designated heritage assets and their settings should be undertaken to inform the siting, scale and design of development and opportunities taken to enhance and better reveal the significance of them"
 - ensure a sequential approach is taken on individual sites to ensure that risk is not increased either on site or to others downstream
 - provide cycling infrastructure
 - build in areas for children in development
- Amend criteria d) to "proportionate contributions to improvements to off-site junctions identified in Tables 9.1 and 9.2, if required as well as contributions to improved services where required"
- Clarify criteria c)
- Amend criteria e) and f) to ensure access to sites is suitable for all users, including mobility aids and adapted cycles
- Support criteria h)
- Increase density of development to reduce use of greenfield sites
- Add clarification on children's services facilities

- Amend numbering of the criteria in policy
- Add reference to importance of health and wellbeing to support for future generations
- Affordable housing should apply to all developments and go to local families
- Amend para 7.39 to take a robust approach and guarantee all documentation is valid and meets legal requirements. Delete “where relevant”
- Add clarification on the tables relating to 3d). Amend criteria to where it is large sites a contribution to sustainable travel options will be needed
- Rural footpaths should reflect the location and not be of urban design
- Affordable housing in rural areas should reflect village character
- Housing in rural areas should only take place where there is a viable village shop
- Amend to “proportionate contributions to off-site transport infrastructure (T1 and T2)”
- Driveways should be permeable
- Add reference to Policy C3 and the IDP
- Increase the biodiversity target following studies prior to development
- Add habitat creation should occur during development not left until the end

Council Response

Amendments have been made to policy criteria to reflect the sequential approach to flood risk, the Right of Way network, multi-use paths and clarification on social and community infrastructure. Other minor wording changes have been made.

Policy H4 Infill opportunities outside settlement boundaries

Total number of comments	11
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Object	2	Support	5	General comment	4
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Key issues

- Support policy
- Only allow single plot affordable dwellings and re-use of redundant buildings outside settlement boundaries
- A three dwellings limit is arbitrary
- Add reference to not developing greenfield sites
- Support infill development in Bembridge which was included in the 2012 plan
- There is a conflict between H4 “a small gap in a row of houses, or an otherwise built-up frontage “and para 7.44 which states “Infill sites are a small gap in an otherwise built-up frontage “with no reference to ‘a row of houses’ i.e., not necessarily ‘built-up frontage’
- Add a definition of `a small gap`
- Add new homes should be in keeping with the style and quality of neighbouring properties
- Clarify development should be on garden land not agricultural land, where the gap between existing dwellings is less than 150m, reflects the scale, design and spacing of existing dwellings

Council Response

Minor wording changes clarify the definition of infill development. Reference to loss of an important area of open space has been deleted.

Policy H5 Delivering affordable housing

Total number of comments 145

Object	125	Support	8	General comment	12
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Key issues

- Support policy
- Affordable homes for island people in perpetuity. Ban second home ownership
- Small units for older island people are needed to free up larger properties
- Add more emphasis on social housing
- Support provision made to retain younger people on the island. Provide small units
- Object to constraint of housing delivery. It does not enable truly affordable housing
- Object to target of 35% affordable housing. Amend to 40% or 50%
- The only type of housing that is needed on the island is affordable rented properties
- Some developments should only provide affordable housing
- Support affordable housing contributions for sites of 1-9 dwellings in the AONB
- Object to financial contributions for developments up to 9 dwellings. It should be 3 dwellings
- Support 35% target. Increase discount to 40% for local and key workers. Increase to 70% in secondary and rural settlement areas, 75% on public land and 100% in sustainable rural areas. Support a tenure mix for affordable housing.
- 35% not 25% should be available for first home buyers and only resold to island residents. A 30% reduction in cost of starter homes is insufficient
- A 20% discount is unaffordable to local people
- Seek improvements to short term lets rather than new building
- The Government's housing target is closer to the housing need on the Island and only limited affordable housing has been built even with a presumption in favour of development. Reducing the housing number will push up land values
- Add an example of an `exceptional circumstance`
- Recognise most affordable housing is out of reach for young people and those on low wages
- Need live/work units, rental and social housing for key workers and other employees
- Affordable housing should be built on brownfield land and is unlikely due to clean up costs
- Land should be compulsory purchased to provide affordable housing. The council should buy long term empty buildings and set up a housing company to build affordable housing
- Define `affordability` and base affordable housing criteria on local salaries. Mortgage or rent should cost no more than 30% of average Island gross household income (~£635 per month)
- Ban extensions to affordable and first homes to keep them affordable
- Add accessible/adaptable dwellings to the definition of affordable housing
- Houses provided in Wootton Bridge should meet needs identified in the Housing Needs Survey
- Clarify if a 30 or 40% discount applies when IWC isn't providing the discount directly.
- The policy approach must be viability led and recognise constraints inhibiting delivery. Using `must` prevents delivery of alternative affordable housing products. Add more flexibility
- Amend policy to make affordable housing and local needs the cornerstone of the Planning Strategy. Only provide affordable housing for island residents, in locations they are needed
- Restrict planning permissions to 1 or 2 bed semi-detached houses for local people to afford
- Address second homes and holiday lets. Set a percentage of housing stock for holiday lets

- Affordable housing should not be for retirees from the mainland
- Increase density in Cowes, East Cowes, Sandown and Newport
- Amend para 7.53 as it provides a loophole to provide allocated numbers of affordable housing. Remove any exceptions in policy and text
- Permit holiday rentals to be open all year to provide cheap rental property out of season
- Add social housing prioritising initially, Islanders most in need, then key workers
- Undertake a full housing needs survey on the island
- 40% discount rate for rental and properties for sale is achievable but existing sites may be unviable or have slow delivery. Requires testing against other policy requirements in a plan wide viability assessment. Add evidence that the increase in first homes discount is viable
- Bembridge wants affordable homes for young families not large or holiday homes or AirBnB
- Affordable housing in Bembridge would not be affordable and should be built elsewhere on unused sites, brownfield and sites needing improvement
- Add reference to new build or conversions for co-ownership or mutual housing trust affordable housing and community led housing
- Provide affordable housing at Camp Hill and East Cowes Factory site for first time buyers
- Add reference to modular based construction to provide affordable quick provision
- Clarify why contributions cannot be collected for affordable housing on developments of 9 units or less outside the AONB
- Provide information on how much ex key worker housing is recycled for key workers
- Only rental housing is needed in rural locations
- No exceptions should be permitted in the AONB
- Provide evidence to understand declining affordable housing provision, the effect on affordability in settlements with no development and whether the market wants shared ownership first homes
- A shortage of housing for seasonal workers is not addressed
- Policy should address developers applying for 8/9 units to avoid affordable housing provision

Council Response

The policy wording has been amended to define island affordable housing alongside new policy AFF1. Affordable housing is expected to be provided on site in most cases. Some flexibility has been added in the proportion of affordable housing for rent and starter homes and First Homes. Minor wording changes and updates have been made to the supporting text.

Policy H6 Housing in the countryside

Total number of comments 14

Object	6	Support	6	General comment	2
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Key issues

- Support policy
- Independent accommodation is often needed to support farming enterprises
- Add to policy `exceptional quality designed properties`

- Amend para 7.57. Temporary dwellings no longer need to demonstrate essential need
- Should retain agricultural restrictions which protect property
- Strict enforcement is required
- Amend to criteria b) the need to protect traditional or vernacular architecture
- Amend criteria c) to say the structure should be capable of conversion with only minor external modification, limited to buildings over 50 years old, substantially constructed of brick or stone and require few external modifications to materials or openings
- Concern criteria d) gives a vague definition of `heritage asset`. The wording should be strengthened to “secure the optimal use of a heritage asset, or secure the future of a heritage asset, but only where the development is entirely heritage asset, and where development is entirely sympathetic to the asset itself, its surroundings and complies with the asset itself, its surroundings and its benefits outweigh any costs of the development.”
- Amend criteria d) to require appropriate recording or other mitigation
- Add to para 7.61 that in the case of conversion of buildings which are heritage assets, appropriate recording may be required
- Add to para 7.69 that compliance with other policies of the plan needs to be demonstrated
- Amend policy to avoid preventing an existing occupant of a rural dwelling from having major adaptation / reconstruction work undertaken to fulfil a health, care or access need
- Amend policy to add reference to the viability and feasibility requirements of policy G4 and amend to state ‘...the Council will support proposals that provide 35% affordable housing, or an alternative provision as demonstrated and supported by a suitable viability appraisal and in accordance with Policy G4
- Extend policy to cover small developments for local needs and affordability

Council Response

The policy has been amended clarifying where new non-infill homes in the countryside may be permitted. An additional criterion is added allowing for development of an exceptional design quality. The supporting text is amended to clarify the circumstances for rural workers dwellings. A requirement has been added to the supporting text for the recording of heritage assets prior to conversion.

Policy H7 Rural and First Homes exception sites

Total number of comments 26

Object	13	Support	8	General comment	5
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Key issues

- Support policy and support rural affordable housing in-perpetuity
- No market homes should be built on rural exception sites. Rural exception schemes should be 100% rental and reflect local design. Town and parish councils should set criteria for who is local and this should be added to the policy
- Amend para 7.65 to ensure housing sites on council land is 100% affordable in perpetuity and preferably social housing

- Amend para 7.68 – 20 dwellings is too high for small villages. It should only be 5 dwellings in Calbourne. The number of dwellings should be proportionate to the size of the settlement. Make clear that 20 dwellings are not appropriate in the AONB as it is `major development`
- Amend para 7.71 as first homes and open market homes should not be sold to non-residents or become second homes
- The policy could be mis-used to develop rural greenfield sites outside settlement boundaries. These are important for the character and identity of a settlement. Sites should be sustainable
- Amend policy limit to not more than 20 dwellings. Define `local need` as in or returning to the parish. First home exception sites should only be in rural areas with a local need in the parish
- Policy should be strictly enforced
- Development should be exceptional, providing only one scheme in each area
- No evidence exception sites would be viable or meet the target for new affordable homes. Removing greenfield sites from the plan makes delivery of affordable housing less likely
- First Homes on exception sites relies on small unallocated sites coming forward
- Amend policy so it does not prevent an existing occupant of a rural dwelling from having any major adaptation / reconstruction work undertaken to fulfil a health, care or access need
- Clarification is needed whether First Homes exception sites means the Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2019

Council Response

The policy has been amended adding that rural exception sites should be proportionate to the scale of development of the settlement or rural area they are meeting the needs for. The supporting text reflects that First Homes Exception Sites cannot be bought forward in the AONB.

Policy H8 Ensuring the right mix of housing

Total number of comments 15

Object	11	Support	2	General comment	2
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Key issues

- Support the approach to avoid creating imbalanced communities and unviable developments”
- Add criteria reflecting Policy H9 to deliver new housing on previously developed land
- Clarify why developments can’t be all affordable
- Half of new properties should be sold to island residents and an emphasis on renting property
- Para 7.74 - add a definition of affordable one bed properties to exclude HMOs but includes properties for professionals and young people
- Amend para 7.76 to add provision for some Part M4(3) (fully wheelchair accessible) homes
- The mix is not targeted at young island families but holiday/second homes
- Object to the target of 1 bed private flats and 4 bed properties being as low as 5%
- Add evidence to justify housing mix should be based on an Identifiable housing need for Island residents in a specific area
- Policy should be strictly enforced
- The percentages are snapshots in time. Add flexibility to respond to local market demand and ensure viability.

- Add to supporting text to support the creation and maintenance of a register of the various types of accessible rented accommodation on the Island
- Amend policy reflecting that some sites cannot deliver larger sized units eg. Medina Yard.
- Object to using the register as the determinant of the mix for affordable rent when it excludes residents who are not accepted on the register
- The housing mix does not take account of delivering insufficient homes to meet growth
- Object to the proposed mix for private development for 1 bed (5%) and 3 bed (40%) units as it is unviable in flatted developments and contradicts policy H9
- Amend policy to set larger regeneration sites an alternative housing mix or increase flexibility
- Setting a prescribed housing mix is unsound. Delete the final paragraph and table
- Add such developments should be subject of local links in perpetuity

Council Response

The policy wording and supporting text has been amended to reflect that the current register is a snapshot in time. A reference is added that where a Housing Needs Survey demonstrates a parish has a requirement for a particular size of property then this may need to be the focus of a scheme.

Policy H9 New housing on previously developed land

Total number of comments	15		
Object	5	Support	7
			General comment
			3

Key issues

- Support policy
- No recognition is given to the impact of the policy on the land available for employment
- Add that house building on pdl should be sustainable
- Amend para 7.7 – if a brownfield site is unavailable, this should not be a reason to allow building on greenfield sites to meet housing targets
- Amend para 7.79 - adequate for the Island identified housing need for Island residents
- Clarification is needed what happens if up-to-date housing needs surveys are not available and the means of identifying locally identified housing need
- Policy should be strictly enforced
- The council should re-develop brownfield sites into development ready sites
- Clarification is needed on the definition of previously developed land and brownfield sites as currently it could include any commercial buildings
- Apply this to derelict hotel buildings, disused holiday camps and large empty properties
- Add proposals should make the most efficient use of sites in their urban context and significant weight given to housing development on previously developed land
- Brownfield development should focus on local not open market housing

Council Response

A reference to the island wide Housing Needs Assessment has been added to the supporting text for clarification. Minor wording changes.

Policy H10 Self and custom build

Total number of comments 13

Object 6 Support 4 General comment 3

Key issues

- Locate self build on individual plots not larger housing sites as it slows housing delivery
- Support policy
- Add to policy that development must include features to combat climate change
- Object to the 25 dwellings threshold
- Delivery of self build plots on housing developments can lead to issues of access to the site and site management. Some flexibility is needed and this should be added to the policy
- Restrict self build plots to those who have lived on the island for at least 15 years
- Object as the policy does not ensure the same quality standards are met for self-build on major sites. The policy is too onerous for a small number of units
- Add exemption to policy for strategic sites allocated under policy H2
- Policy is not justified or consistent with national policy
- Other approaches should be considered to support self builders including council owned land
- Self build registers rarely provide an accurate assessment of the demand for self-build homes
- Allow unsold plots to revert to the developer if unsold after 6 months
- Support policy where it meets high environmental standards and a local link priority

Council Response

The policy has been amended, removing the threshold and encouraging infill development to deliver self-build as well as encouraging the developer to make such provision.

Policy H11 Planning for Gypsy, traveller and travelling showpeople provision

Total number of comments 5

Object 3 Support 0 General comment 2

Key issues

- Sites should be allocated in the plan
- Para 7.96 – in final sentence replace heritage assets with the historic environment
- Add reference that people in the gypsy and traveller communities may have access needs

Council Response

No change.

Policy KPS1 Key priority site 1: HA39 Camp Hill

Total number of comments 61

Object 41 Support 11 General comment 9

Key issues

- Support policy, allocation and preparation of a masterplan
- High rise development should be considered
- The development would have adverse environmental impact on green spaces. Huge impact on the hospital, schools, local infrastructure, sewage and drainage. Insufficient amenities and jobs, gridlock and pollution at St Mary's junction and serious impacts on the adjoining forest, trees, protected species and unique habitat on the fields
- Concern on public transport connectivity which should be addressed through masterplanning. Need a better understanding of the build out rate of the development
- Add highway improvements required to minimise impacts on the highway network
- Good site for affordable housing not second/holiday homes or high cost rentals
- Object to the proximity to the Parkhurst Forest.
- Reduce housing by 30% and add a visitor centre and country park. A new primary school and village centre should be included. All houses should have a minimum of 2 spaces
- The map should be adjusted to exclude the Camphill estate which is private housing
- The development is too large and will have traffic implications.
- The development will do nothing to protect the environment, put money into tourism, entertainment or employment or improve the island's infrastructure
- The unique beauty of the island should be preserved
- Flooding on and near the site is an issue as water floods down from the field
- Need parking for cars on Camp Road
- Development will lead to a loss of dark skies
- The highway network and should contribute to the highway schemes in Policy T1
- Amend policy and text to take account of Forestry England's Principles for Development Sites Adjacent to the Nation's Public Forests and to enable sustainable management of the area
- New development should be located only on brownfield land not the surrounding green fields
- Add an ecological buffer of 50m around Parkhurst Forest to take account of sensitivities of site specific location. The buffer area must be wide enough to protect existing, future ecological features and absorb additional recreational pressure. Create new habitat, including native woodland, around existing ancient woodland and link to nearby woodland sites to help reverse historic fragmentation of this important habitat. The increase in ecological connectivity between areas of ancient woodland will enable resilient landscapes and help mitigate climate change
- The fields around Camp Hill prison should be replanted with trees and given back to the Forestry Commission or designated a natural park.
- Object to the number of dwellings and question delivery by the local authority
- Availability of the site is uncertain. It risks coalescence with Northwood
- Two hectares of employment land is insufficient
- Object to use of greenfield part of site. Only build on the old prison site and carpark use for affordable and rental homes for local people
- Rare species depend on this habitat

- Unclear how access will be achieved. Congestion along Forest Road and Standen Avenue
- Insufficient local services and facilities. There is regular traffic congestion
- Is also renowned for its rare lepidoptera assemblage, populations of dormice, red squirrels, as well as supporting 16 species of bats for both foraging and nursery roosts. The Forest also shows evidence of remnants of ancient wood pasture. Parkhurst Forest also includes a SSSI
- Clarification is needed on provision of buffers and SANGs and where it will be to comply with Biodiversity Net Gain requirements
- Change references from Forestry Commission to Forestry England
- Support a Statement of Common Ground with Forestry England, potentially in partnership with Natural England to ensure the protection of the Parkhurst Forest SSSI
- Align properties to face the gardens away from ancient woodland, not backing onto it
- The hydrology of the site should also be considered to avoid impacts on the ancient woodland. Sustainable Urban Drainage (SUDs), should not be sited within any buffer zones
- District heating system should use wood fired district heating using woodchip or pellets alongside Forest Road energy from waste. Should use locally-sourced timber
- Object to housing site allocation
- Is this a viable and deliverable scheme? Are at least 1,200 homes the right quantum and 35% affordable housing viable? Is there enough demand for the proposed employment use? What assumptions are made for demolition costs, site remediation and abnormal costs? Delivery of all the requirements is 'a big ask' without subsidy
- Services must be provided upfront
- A 15m landscape buffer is insufficient. A minimum of 50m should be maintained between development and ancient woodland, including construction. A larger buffer may be needed for significant engineering operations or after uses that generate significant disturbance
- Reliance on this site is a high risk as it is still a prison and the farmland has not yet been released by the current owner. It is not a prime location for housing. A higher level of allocations is needed to achieve delivery targets
- Biodiversity in the fields surrounding Parkhurst Forest is not being recognised
- Rooke Street is not suitable for more traffic or pedestrians
- Opportunity for sustainable development connected by walking, cycling, public transport and active travel. High density to maximise viability of public transport with open space retained
- Retain the Camp Hill social club/community centre and the existing memorial
- Impact on Parkhurst Forest SSSI including loss of supporting habitat for bats and significant visitor pressure on the ancient woodland. Need engagement with Forestry England
- Development of part of the Island's ecological network could lead to fragmentation and loss of potential restoration sites and should be avoided. Developer contributions should ensure long-term mitigation and management can be delivered. A high level of on-site green infrastructure is required to minimise recreational impact
- Loss of informal play areas will have a detrimental impact
- Concern on the impact of residents in the area around the site during and after development

Council Response

The policy has been amended to reduce the site capacity to 750 homes and to require enhanced landscaping and biodiversity improvements as buffers to the ancient woodland and SINC. A reference to conserving the significance of the heritage assets has been added to criteria h). Additional policy wording is added seeking the co-ordination of community and social provision with KPS2 and Policy C4. These changes are also reflected in the supporting text.

Policy KPS2 Key priority site 2: HA44 Newport Harbour

Total number of comments 15

Object 8 Support 6 General comment 1

Key issues

- Support policy
- Too many dwellings are planned on the site and delivery by the local authority is questionable
- Development restricts further employment opportunities. It is questionable if marine uses are realistic and whether there is demand for offices
- The flood risk to the site has not been adequately considered so the policy is unsound. Previous concerns on this site still stand
- The site allocation is not evidence based and relies on incomplete future studies. No information is given on the flood characteristics likely to be experienced across the site. It cannot be concluded mitigation measures shown are deliverable or appropriate. Little information is available on potential flood characteristics at the site over the lifetime of the development (i.e. depth, velocity, duration, onset etc.) except there appears to be a significant risk of inundation both at present day and increasingly over the coming century. Further work is needed before allocation. It does not comply with the NPPF
- Object to progression of a masterplan despite concern on the lack of recognition given to the significant and complex flood risk issues on the site
- Add cross references to policies KPS1 and C4 to maximise benefit to Newport and the island
- A guarantee is needed that 35% affordable housing will be built and services for the development must be provided upfront
- Will add further pressure to traffic congestion, hospital and healthcare services
- Clarification is needed on employment opportunities for new residents
- High level of risk depending on a small number of large schemes with questionable delivery.
- Clarification is needed on the viability testing undertaken for this site as it is a key site
- Distant from the highway network and should contribute to the highway schemes in Policy T1
- Amend duplicate numbering of the criteria in policy

Council Response

Site specific Flood Risk Assessment has now been undertaken to address Environment Agency concerns. Policy and supporting text wording have been amended to reflect this. Additional policy wording is added seeking the co-ordination of community and social provision with KPS2 and Policy C4. These changes are also reflected in the supporting text.

Section 8 General

Total number of comments 5

Object 1 Support 1 General comment 3

Key issues

- Support employment policies. Will they generate sufficient employment to support the increase in dwellings
- Recognition must be given to the changing economic needs and former industries which are being modernised or becoming obsolete due to global economic and industrial pressures
- Policies should be flexible in future protection, relocation and change in employment uses and development; allowing opportunities for the Island's economy to adapt and plan ahead for future business opportunities and demands of tomorrow and to respond to local situations

New allocations

- The farm buildings at East Afton Farm should be allocated for employment and mixed use
- East Cowes waterfront should be a new employment allocation

Council Response

There are minor wording changes in this section of the Plan.

Policy E1 Supporting and Growing our Economy

Total number of comments 41

Object 25 Support 4 General comment 12

Key issues

- Support policy
- Economy and Employment should be the first section in the Plan
- Amend policy to
 - add references on the need to support agriculture
 - refer to Solent Freeport
 - refer to small businesses and encourage eco business
 - add references to developing local Skills and Innovation centres
 - add a job creation target
 - add reference to local employment or infrastructure to support remote working
 - allow commercial buildings of more than one storey
 - add reference to manufacturing on the island is a significant employer
- Add employment allocations to the Plan
 - Allocate employment land in west wight and rural area. Fort Victoria is a potential location for B1 units and the River Yar Boatyard and Golden Hill, Ice Rink in Ryde and Medina Yard and farm diversification. Land in Afton Road is used and in a flood area

- Add employment sites close to the Bay, Pan, Camphill, Ventnor or Freshwater and to support the Freeport and Solent Gateway
- Land at Horsebridge Hill should be allocated with housing as enabling development
- Allocate redundant hotels, petrol stations, car showrooms and farm buildings for employment not housing as a first option.
- There is no assessment of the need for employment. Too much employment is focussed on Newport. Sufficient housing allocation ensures delivery of employment development. Overemphasis on publicly owned employment allocations
- Inadequate infrastructure, education, services, housing and a poor quality environment.
- Clarify the industrial employment sites in Cowes
- Amend policy to `... commercial uses that may be located within them and ensuring any new development outside these areas has no detrimental impact on them:...'`
- Deep water frontages should be retained for employment not housing
- Browns Golf course should be left for the community
- Plan should seek adjacent employment and housing to reduce travel need
- Housing sites of more than 25 units should include employment space
- Amend para 8.1 first sentence as the IOW is not growing as an island
- Amend para 8.4 to read “The Council will insist on the provision of the infrastructure required to deliver development”
- Para 8.7 add `will also need to demonstrate compliance with other plan policies`

Council Response

The policy and supporting text have been amended to add reference to the Solent Freeport. Additional reference is added to the supporting text on the housing allocations which also have potential for commercial floorspace.

Policy E2 Sustainable Economic Development

Total number of comments 5

Object	1	Support	2	General comment	2
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Key issues

- Support policy
- Amend criteria c) to “result in the re use of previously developed land and/or building for economic purposes suitable for and reflective of the location, building and land type, and relationship with surrounding landscape and built environment, in particular when the location is within the AONB”
- Amend policy to reflect that pedestrian, cycle and vehicular access / facilities to these sites must be suitable for all users, including those with mobility aids and adapted cycles
- Amend policy. resistance to the loss of ‘employment’ land due to ‘water access’ is unduly proscriptive and may prevent alternative viable uses of site to be considered (especially sites which do not utilise existing access to water currently or in the recent past).

- Amend supporting text. Should be flexibility in the marketing evidence recognising any factors which might hinder an applicant’s ability to offer alternative employment opportunities.

Council Response

The policy has been amended to include a reference to the Solent Freeport and mixed use allocations. Minor wording changes.

Policy EA1 Employment allocation land to the east of Pan Lane

Total number of comments 3			
Object	0	Support	0
		General comment	3

Key issues

- Add that bus service improvements would need to be funded by the developer
- Add a reference to the flood risk at this site. A FRIS will be needed together with avoidance of flood risk areas and flood plain compensation provided. Add this allocation could provide betterment for downstream communities
- Add a buffer zone policy within this allocation to ensure access to the river is maintained and ensuring the integrity of the river banks

Policy EA2 Employment allocation at Nicholson Road, Ryde

Total number of comments 3			
Object	1	Support	0
		General comment	2

Key issues

- Add developer contributions for the diversion of the service 2 bus between Newport and Ryde as such a diversion would not be commercially viable
- Development would cause increased water runoff into Monkton Meads Brook unless water capture features are provided. This development should be replaced by one at west Ryde
- Correct para 8.15 - the Council has not secured outline planning permission of 19/00922/out as stated in the document - it only has resolution to grant

Policy EA3 Employment allocation at Somerton Farm, Cowes

Total number of comments 7			
Object	1	Support	4
		General comment	2

Key issues

- Amend policy and text to include information in the Cowes and Northwood Place Plan
- Amend site boundary to wrap around the scrapyard as the sloping area suitable for housing and allows least visual impact and opportunities to limit and manage impacts from HGVs
- Support retention of existing trees and hedgerows. Add where removal of trees is unavoidable a proposed tree replacement ratio reflecting the Woodland Trusts guidance is expected
- Add additional criteria “j) have no detrimental impact BAE System’s Cowes site to the west.”
- Add reference to appropriate archaeological investigation/mitigation also being required

Policy EA4 Employment allocation at Kingston, East Cowes

Total number of comments 3

Object 1 Support 0 General comment 2

Key issues

- Site is not a new allocation and the reasons for non-implementation have not been addressed.

Policy EA5 Employment allocation at Lowtherville, Ventnor

Total number of comments 4

Object 0 Support 2 General comment 2

Key issues

- Support allocation
- Support para 8.34 to retain where possible existing trees and hedgerows or provide mitigation where this is not possible, but this should be reflected in policy EA3
- Removed trees should be replaced

Policy EA6 Employment allocation at Sandown Airport, Sandown

Total number of comments 8

Object 3 Support 1 General comment 4

Key issues

- Amend policy to require appropriate archaeological investigation/mitigation
- Site should be listed as suitable for F1c use to encourage heritage centre or museum uses

- Question deliverability because of access issues due to the site being too small. The site should be expanded to address this
- The option of creating a Sandown Airport Station should be left open
- Site is not suitable for B2 or B8 uses but may be suitable for office use and should not be detrimental to the recreational use of the airport or the adjacent caravan and camping site

EA1

Council Response

The policy wording has been amended to include new criteria f) requiring a site specific flood risk assessment and exploration of opportunities for betterment for downstream communities. New criteria g) seeks the maintenance of a buffer zone to preserve the integrity of the riverbanks.

EA2

Council Response

Minor wording change to reflect the resolution to grant outline planning permission.

EA3

Council Response

The policy wording has been amended to provide some flexibility on the location of employment across the housing and employment allocations to ensure the best use of the site. A reference has been added to the Cowes and Northwood Place Plan as a supporting document.

EA5

Council Response

A criterion is added to retain existing trees and hedgerows on site or provide alternative mitigation.

EA4 and EA6

Council Response

No change.

Policy E3 Upskilling the Island

Total number of comments		9
Object	4	Support 2
		General comment 3

Key issues

- Support policy
- Further supporting information needed to justify the threshold of 25 dwellings

- Clarify policy to make clear whether the employment and skills plan is required during the assessment of an application or whether it can be conditioned to a permission. This should be post submission to allow for changes in the construction phase.
- Policy is a brake on development; not a planning matter; and is not possible under planning powers. A condition would be needed but would the condition meet the required tests?
- Amend the supporting text to explain how this will be monitored

Council Response

An explanation is added that Employment and Skills Plans will be secured through planning conditions.

Policy E4 Supporting the Rural Economy

Total number of comments 14

Object	6	Support	4	General comment	4
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Key issues

- Support policy
- Amend policy to
 - encourage sustainable economic development in West Wight
 - resist loss of agricultural land to housing, commercial use or tourism
 - ensure that farming remains the principle use of the land
- Amend para 8.55
 - allow conversion for diversification to include holiday lets for tourism growth
 - add conversion must be sensitive and building recording prior to conversion will often be required as a planning condition
- Amend para 8.59 as it contradicts para 8.55 where only stone barn conversions are allowed for rural and agricultural workers
- Para 8.61. The plan discriminates against barns and modern structures which do not add to the rural or historic character and could lead to very few barns qualifying for re-use
- Amend criteria b) to clarify the built form of the farm should remain as farming use
- Amend criteria c) as it gives licence to aggressive expansion and industrialisation of rural areas and not all rural areas are suitable
- Amend criteria d) converting historic buildings can cost more than new builds. It is hard to imagine any conversion coming within the bracket of "affordable/low cost"
- Amend criteria e) to clarify whether this allows buildings to be constructed for any economic purpose including tourism if next to a village or employment site
- Amend criteria f) to
 - any features of architectural or historic interest are conserved or preserved by record
 - conversions will be subject to, in perpetuity, an agricultural workers restriction.
 - Delete criteria as it is covered by Policy H6
- Make clear if Policy E11 overrides economic development if it is considered to harm the AONB
- Add text prioritising employment and industrial proposals rather than residential conversions unless restricted to holiday accommodation

- Amend the supporting text to quantify and distinguish as not all rural economic projects (which use farm land) are diversification projects.
- Supporting text should reflect probable demand for more farm building following the Government new agricultural policies. Diversification should allow for uses which are good for the rural economy and lifestyle but not necessarily on strict landscape issues

Council Response

A reference is added to criteria e) that design should be sympathetic to the rural location and appropriate to the context. Criteria f) on the reuse of historic farm buildings has been deleted and moved to Policy H6. New wording has been added to seek opportunities with connections to the Rights of Way network to improve public access to the countryside.

Policy E5 Maintaining Employment Sites with Water Access

Total number of comments 8

Object	3	Support	2	General comment	3
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Key issues

- Amend policy to
 - maintain and protect the public's right of access to the water given the Island's reliance now and in the future on tourism
 - be flexible, consider future operations where development part retains employment opportunities and encourages alternative types of business which meets future needs or facilities for the Island (rather than past industries)
 - give recognition to, HA019 Medina Yard Cowes. Clarity is needed on how policies E5 and H2 interact
 - consider financial costs which may be required to maintain 'water access' to the river
 - address stopping all businesses uses changing where they have water access, even when the business is no longer needed in that location, or doesn't need a water access
- Correct para 8.75 to read Marine Management Organisation and amend to 'The historic environment (including palaeoenvironmental deposits) in the Medina Valley is significant, vulnerable to change, and development proposals should also take this into account'
- Add references to the Cowes and Northwood Place Plan. It is threatened by splitting the East and West Medina regeneration zones and should be replaced by North Medina
- Yarmouth Harbour area including Hayles Boatyard and the land/water south of the road could be improved for business purposes and is an opportunity for the West Wight
- Clarify 'net loss of employment use'. Is it floor space, number of employees, or number of businesses on site? Clarification is also needed on 'access point' – is this an existing or future access point? Does this include public or provide access?

Council Response

Minor wording changes.

Policy E6 Future Proofing Digital Infrastructure

Total number of comments 12

Object 6 Support 4 General comment 2

Key issues

- Support policy
- Amend policy to
 - delay development until infrastructure shortcomings in paras 5.96-5.103 are addressed
 - exclude self builds and extensions from these requirements
 - ensure that any infrastructure placed within the public realm (e) is designed so as not to cause a barrier to pedestrians with mobility or other access needs
 - prevent a change of use from retail to residential
- Widen beyond new development to support a strong reliable rural broadband
- Strong, reliable rural broadband is key to rural growth and its associated businesses
- Object to policy on broadband only covering new development and a strong reliable broadband is key for the growth of the rural sector
- Developments of all sizes should deliver town centre wifi hotspots and other community digital access measures including in rural areas

Council Response

The policy has been amended to require development to meet the policy criteria to future proof digital infrastructure and to protect pedestrians and those with access needs from adverse impacts.

Policy E7 Supporting and Improving Town Centres

Total number of comments 13

Object 9 Support 4 General comment 0

Key issues

- Support policy
- Amend policy to
 - allow for flexibility of spaces for commercial use
 - add requirements for retail provision required along with a given number of new houses. A local shop is needed for large developments
 - justify the restrictions in changing former retail shop fronts given planning changes
 - require new developments or improvements to town centre premises to improve access or otherwise be able to make reasonable adjustments as required under the Equality Act 2010. Appropriate design regulation and guidance (such as: Part M (volume 2) and BS 8300 (2018), and 'Inclusive Mobility' and 'Manual for Streets')

should be applied when planning, designing or reconfiguring public realm areas. Add the provision of toilet facilities and resting places (including seating) in town and village centres)

- include a presumption in favour of change of use to a different Use Class to attract people back into the town centre. This should be supplemented by the granting of permission for residential accommodation over, and removal/reduction of car parking charges within town centres
- Clarify car parking provision in the centre of Newport. Object to the loss of car parking
- Amend para 8.92 by
 - regeneration proposals in the core of Newport should consider the impact on below ground archaeology and the Archaeology & Historic Environment Service should be consulted at the earliest opportunity
 - removing the example given
- Add supporting evidence to underpin town centre boundaries and the primary shopping areas
- Clarify what is meant by “encourage and facilitate linked trips to the nearest town centre”
- How have the loss of traditional shop fronts been considered?
- Clarify the relationship between IOWC and Island Roads
- Brading high street should be protected

Council Response

Minor change to policy adding a reference to improving the public realm. Changes to the policy wording relating to the loss of traditional shop fronts or display windows where they are important to the character or retail function and support for proposals increasing evening economy activity.

Policy E8 Supporting the Evening Economy

Total number of comments				3	
Object	2	Support	1	General comment	0

Key issues

- Support policy
- Clarify resolution of conflict between evening economy and residential use of space over retail
- Add encouragement to the opportunities for developing and promoting accessible tourism

Council Response

The policy has been deleted and amalgamated with Policy E7.

Policy E9 Supporting High Quality Tourism

Total number of comments				33	
Object	21	Support	4	General comment	8

Key issues

- Support policy
- Add criteria to policy to establish viability of tourist accommodation by requiring:
 - Proof of marketing for sale at a reasonable market price (minimum of 12 months)
 - Evidence of attempts to save or reposition the business
 - Evidence of business performance when set against local and regional benchmarks, such as the levels of occupancy relevant to South East average
 - Evidence of professional and competent management
 - Amend criteria d) to `contribute to maintaining an overall mix of tourism accommodation across the Island that offers a range of styles; and`
 - Amend criteria e) to distinguish between an attraction which may encourage all-year tourism, and accommodation which in itself would not attract tourists
- Amend policy
 - Add clarification on what exceptional circumstances might include
 - Add criteria to the policy to protect the character of Sandown
 - Add a requirement for tourist related proposals to develop green and new niche tourism products
 - Add a requirement to prevent change of use from employment to residential
 - Deleting criteria c) and d)
 - Add proposals `should demonstrate how they: Promote and facilitate active travel and create no net gain in private car trips`
 - Actively encourage accessibility by promoting adaptations of existing tourism facilities and diverse forms of new developments of this type and encourage wheelchair accessible accommodation and access to the beach as other coastal areas
 - Add a presumption in favour for change of use to a different Use Class to attract people back into the town centre and allow for residential accommodation
 - Add the need to capitalise on the interest of the Island's natural and heritage endowments to attract a higher spending, less seasonal visitor market
 - Clarify if new tourist accommodation in sustainable locations (such as settlement boundaries, town centres, or close to tourist attractions) would be supported
- Object to "Within the core tourist accommodation areas, as shown on the policies map, the council will resist the loss of tourist accommodation" as it is weak
- Tourism puts unsustainable pressure on housing and healthcare provision
- Re-use derelict hotel sites
- The Plan should distinguish between purpose built accommodation and tourism in unrestricted residential accommodation. Tourism should not exacerbate the housing shortfall
- Co-ordinate planning strategy and Visit Isle of Wight to promote local homes friendly tourism
- Support reuse of existing tourism sites rather than new ones
- It is not possible to enforce a 52 week holiday use. A dated 2/3 month off season closure policy for each tourism accommodation development is needed
- Limit properties taken out of residential use and used as second homes or short term holiday lets. Use legal agreements to restrict this
- Exclude motorcycling from the definition of tourism. Add supporting evidence
- Supporting text should reflect the negatives associated with tourism
- Clarify if tourism overrides AONB policy
- Tourist accommodation should be rigorously protected by policy

New Policy

- Restrict Air BnB and require planning permission when a whole dwelling becomes a tourism/short let property

Council Response

Minor wording changes to the policy. A new requirement has been added for robust evidence to be provided for losses of tourist accommodation in Core Tourist Accommodation Areas.

A new policy (E9) has been added to the plan to control short term let holiday accommodation.

Policy E10 The Bay Tourism Opportunity Area

Total number of comments 10

Object	4	Support	4	General comment	2
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Key issues

- Support policy
- Add reference to Brown's Golf Course
- Add to policy any development should consider impacts on below ground archaeology and the Archaeology & Historic Environment Service should be consulted early on
- Amend para 8.105 to refer to early 20th century design influences in Sandham Gardens, Isle of Wight Zoo and Dinosaur Isle. This should be incorporated into aspirations to improve the gardens and open spaces in the area and applies to other key public open spaces in The Bay
- Former hotels should be quickly restored for visitor accommodation
- Support recognition in policy of development taking account of current and future flood risk. It will have to be demonstrated that any development is safe
- More council intervention is needed using a Local Development Order for Sandown
- Rename the section as the Sandown Bay Tourism Opportunity Area
- East Cowes should be designated an area for tourism opportunity area

Council Response

The policy has been retitled Sandown Bay Tourism Opportunity Area. Other minor wording changes have been made relating to Browns Golf, early 20th century design and public realm improvements.

Policy E11 Ryde Tourism Opportunity Area

Total number of comments 7

Object	3	Support	2	General comment	2
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Key issues

- Support policy

- Amend the named zones to reflect the Place Plan and reference the Place Plan not
- The Royal York Hotel should be used for visitor accommodation
- Amend policy to ensure that any development is appropriate in terms of flood risk
- Add to policy the need for a clear design strategy approach as a masterplan to inform planning applications adding a requirement to respect and add a reference to the late 19th century and early 20th century character of the local built and designed landscape environment of Ryde
- Designate East Cowes as a tourism opportunity area
- Add reference to encouraging opportunities to develop and promote accessible tourism
- The designation should have site allocations

Council Response

This policy builds on the aspirations and objectives set out in the community led Ryde Place Plan. The zones in the Ryde Place Plan have been added to the policy and supporting text for consistency. Additional wording has been added to the policy seeking that development proposals take account of current and future sea and fluvial flood risks.

Section 9 Transport General

Total number of comments 14

Object 3 Support 3 General comment 8

Key issues

- Add weight must be given to the traffic flows arising from development across the island
- Support sustainable transport and electric charging
- Legal agreements should include new public footpaths and cycle tracks. Include maintenance of public rights of way in planning applications. Historic rights of way should not be diverted
- Improvements are needed to public transport in rural areas
- Replace `A better connected island` with `a better safer and connected island`
- Add that developments should include a safety risk assessment for pedestrians and cyclists
- The island roads are insufficient to cope with current and future traffic
- Support new cycle tracks but needs a more comprehensive strategy to replace cars on roads
- Prepare Supplementary Planning Document to set out local urban and rural design standards
- Add policy to ensure protection and enhancement of Rights of Way and National Trails
- New roads should be wider than the legal minimum

Council Response

No change.

Transport Foreword

Total number of comments 4

Object 0 Support 4 General comment 0

Key issues

- Support the policies, key objectives and roles outlined
- Support the need to promote and develop sustainable transport and that a key policy performance indicator for enhancing cross Solent travel will be the number of applications that improve (or are permitted) cross Solent terminal per year
- Support links to the Local Transport Plan
- Add a sentence recognising the island's transport estate as the single biggest continuous land ownership we have, and a massively significant proportion of the land surface
- Add reference to a need to maintain and improve cross-Solent travel (including connectivity with mainland services), provide affordable parking in town centres in order to encourage their use, and facilitate sustainable travel by (among other things) providing electric charging points and ensuring that all parts of the Island have access to public bus services

Council Response

The wording is amended to promote sustainable means of travel as the first choice of travel.

Policy T1 A better connected island

Total number of comments 42

Object	26	Support	8	General comment	8
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Key issues

- Support policy
- Bus transport is over provided, expensive and operated by one company
- Amend policy to take account of the role the bus can play to meet climate change and air quality objectives. Include requirements to
 - i. Ensure a Prioritised network that assists modal share in favour of the bus including bus priority in appropriate locations
 - ii. include bus priority measures at the junctions highlighted within the policy
 - iii. Enable an excellent infrastructure and as well as good interchanges between transport modes on the Island
 - iv. Ensure that buses serve new developments as set out in the appropriate policies elsewhere in the document
 - v. Include the need for travel plan for the whole site to make contributions to implement sustainable transport initiatives, including minimising car usage and increasing use of public transport, walking and cycling
- Section 9 is car orientated. There are only 4 shared path schemes, no reference is made to bus services or the schemes listed in the Cycling and Walking Infrastructure Plan 2020-2030
- Support para 9.5 and seeking to enhance high quality connections through all modes including ferries and “The Council has a duty to promote sustainable transport”
- Amend para 9.7 adding a source for the list of infrastructure schemes and a reference to Local Cycling and Walking Infrastructure Plans. Add other schemes listed in the Council’s LCWIP and bus services to planned infrastructure improvements
- Amend wording in para 9.15 to: Because of the history, the ongoing instability and the core purpose of The National Trust, who own the majority of the most vulnerable land over which the Military Road passes, it is considered appropriate to investigate this issue once again to be able to provide a clear direction. A feasibility study for Military Road is needed to resolve the issue to comply with NPPF para 104. Concern on the possible closure of Military Road and seek commitment to resolving the issues on alternatives
- Amend para 9.18 to read “improve the efficient use of remaining vehicles”
- Amend para 9.21 The creation of new roads connecting urban and rural areas seems unnecessary. The second sentence should read “The maintenance and improvement of existing sustainable routes between urban and rural areas...”
- Amend table 9.1 removing focus on increasing traffic capacity and refocus on bus prioritisation, walking and cycling schemes and alternatives to mass car-ownership, such as building in car clubs into new developments. Delete unfeasible junctions set out in 9.1
- Delete Table 9.2
- Add road junctions at Branstone Cross and Sandown Airport to key infrastructure improvements

- Add a full cycle network, reinstatement of Undercliffe highway, local schemes in rural areas, highway measures to reduce bus travel times and delays and in locations with large bus movements bus priority measures such as bus lanes and signal priority
- Amend policy adding reference to the need for a fixed link to the mainland
- Update as St George's Way has recently been completed
- Amend policy. The justification for schemes should be revisited in light of current transport trends. Give priority to non-motorised users' needs in development planning and road design.
- Add reference on delivering accessibility, ongoing changes in travel behaviour and Government guidance in Gear Change -A bold vision for cycling and walking
- Large housing allocations should promote good road connections to ease public transport provision, distribute traffic and provide resilience to the network
- Clarify what is meant by `help create high quality places` and the role played by transport
- Support shared paths and new cycleways and new sustainable transport routes for cyclists, pedestrians and horses.
- Object to unsegregated `shared` routes unless the number of users is very low and proven to not cause a hazard to vulnerable users. Object to shared paths
- Support cycle track (including West Wight Greenway) and a multi-use route between West Wight and Newport. Replace shared path route between West Wight and Newport with an upgrade of the existing route between Thorley through Newchurch round Ningwood and Shalfleet. Upgrade cycle path surfaces from Sandown to Newport, Wootton to Fairlee
- Object to the Newport West Wight shared path
- Add pedestrian, cycle and vehicular access / facilities must be suitable for all users, including those using mobility aids and adapted cycles
- Add improvements to cycle/road junctions outlined in the East Cowes Town Plan
- A solution to the floating bridge is needed as it has an economic, and environmental cost
- Add to the list of infrastructure improvements the road junction between the A3056 Newport Road and Scotcells Brook Lane leading to Sandown Airport
- Improvements are needed to road and public transport links to Bembridge
- Add the junction of Newport Road/ Nodes Road in Northwood, the junction of Three Gates Road and Place Road, the junction at Smallbrook Lane/Great Preston Road, improvements to the junction between Station Road, High Street and Church Road in Wootton Bridge and improvements to Somerton roundabout. Improvements for pedestrians, cyclists and vehicles is needed at Pallance Road and Four Cross junctions (Cockleton Lane/ Pallance Road/ Nodes Road/Place Road). A footpath is needed along Wyatts Lane to Pallance Road and the western side of Place Road from Cockleton Lane towards the Range
- Add the provision of a Park and Ride Scheme on Fairlee Road, Newport
- Amend policy to make it clear that the list of schemes are examples
- Policy T1 should list, and cost junction and highway improvements required
- Upgrading the capacity of interconnectors should be resolved before development takes place
- "Better connected island" should include cross-Solent transport, and accessibility demands
- Reduce overlap between policies T1 and T2
- Remove references to Strategic Road Network
- Clarify the strategic objective of improving the junctions listed
- Clarify if the SRTM Modelling Report (2018) still valid evidence underpinning the Plan
- Give priority to planning obligations towards junction improvements. The focus on road junction improvements encourages use of motor vehicles
- Support proposals which reduce the impact on air quality and climate change

- Support the planned 'Greenway'; the priority given to cycling; and reducing traffic volumes
- No development east of Monkton Mead Brook to avoid an unsustainable road system in Ryde
- Add reference to a Medina Bridge and road safety issues
- Amend the transport text box on page 20 to include reference to buses and the transport text box on page 30 to include reference to bus service improvements linked to Policy T1
- Policy fails to address the lack of connectivity between the railway and hovercraft terminal

New Policy

- Add new policy to seek a partnership with a commercial operator to purchase all the old railway tracks and provide electric trams for links between the major communities

Council Response

There are minor wording changes to the policy and a reordering of policies T1 and T2. A new policy criterion seeks financial contributions for the proposals in the Local Cycling and Walking Infrastructure Plan. Additional wording considers public transport, cyclists and pedestrians needs where road junctions are improved. The wording relating to Military Road in the supporting text has been clarified.

Policy T2 Supporting sustainable transport

Total number of comments 26

Object	13	Support	8	General comment	5
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Key issues

- Amend policy to support the IOW Restoring Your Railway bid
- Support policy; support criteria c); support para 9.20
- Add criteria f) enable access to local bus services
- Add reference to developer contributions; car clubs and Local Cycling and Walking Infrastructure Plan
- Policy does not support commuting by cycling. Shared paths do not work and are dangerous
- Policy should reflect local public transport schemes developed with parish councils
- Para 9.21 - add need to consider sustainable densities
- Amend para 9.22 adding that proposals should demonstrate ease of trips to get to school safely by walking or cycling and for other trips for shopping or leisure
- Clarify the supporting evidence used
- Support sustainable transport schemes but add reducing traffic flow into Newport, residents parking schemes and improvements to footpaths and bridleways
- New junctions should allow for cycle usage
- Strengthen requirement to demonstrate how a specific location is accessible where car use is less attractive. Some rural locations may be more suitable than edge of settlements.
- Prioritise electric vehicles and car shares
- Add Access Fund outcomes to the supporting text
- Cars, buses and lorries are causing air pollution and alternatives should be considered
- There should be no fixed crossing to the mainland

- Support more cycle paths across the island, including Brading to Sandown avoiding Brading High Street
- Providing sustainable transport access may reduce development density and viability

Council Response

Policy is renumbered T1. A new criterion has been added on enabling access to local bus services. The policy is amended to set out the development prejudicing infrastructure improvements in the Local Transport Plan and Local Cycling and Walking Infrastructure Plan will not be supported. More information on the Local Transport Plan the Local Cycling and Walking Infrastructure Plan and Rights of Way Improvement Plan, rail services, access to public transport services and walking and cycling links to schools is set out in the supporting text.

Policy T3 Cross-Solent Transport

Total number of comments 19

Object	8	Support	4	General comment	7
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Key issues

- A study should be undertaken to investigate a fixed link study and its viability
- More ferry routes and frequency of service is needed
- Support policy
- Add good access to the passenger ferry terminals by public transport
- Re-word policy to be less negative and supportive of the ferry links growth and efficiency
- Support criteria a) and b)
- Co-ordinate bus and train services with the ferries
- Add policy criteria to consider the impact on archaeology and for early consultation with the Archaeology & Historic Environment Service particularly where new terminals are proposed
- Add the need to improve facilities including car (including blue badge) and cycle parking, pedestrian routes to stations, drop-off points, bus / taxi facilities, waiting / seating / shelters and information points / provision
- Other solutions should be investigated to solving the chain ferry connection between East and West Cowes and for accessing the Hovercraft terminal to Ryde Esplanade Station

Council Response

Wording supporting enhanced passenger facilities and connections to other modes of transport has been added to the policy. Other minor wording changes to the policy and supporting text.

Policy T4 Supporting our railway network

Total number of comments 17

Object	7	Support	6	General comment	4
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Key issues

- Amend policy to support the IOW Restoring Your Railway bid
- Amend policy to “retaining current and former railway routes for future sustainable transport purposes where this would allow for the future extension of the line or support the development of other related transport improvements, including potential rapid bus scheme”
- Support a rail link or light tram from Sandown to Newport and Shanklin to Ventnor
- Support policy
- Amend policy to `improvements to ferry services and the service extended to Ryde Pier Head`
- Add text to support rural bus services, car sharing and innovative transport solutions
- Amend policy to add a reference to i. the ambition to reopen the Newport to Ryde railway and extend the Island Line to Ventnor ii. the expansion of the steam railway for tourism
- Amend criteria h) to give a commitment to a review of all former routes, and enforcement of any unauthorised development
- Amend policy to improve facilities around and at stations and other interchanges
- Add reference to creating more rail halts
- Clarify what retain former railway routes means if they are not brought back into use
- Add reference on the opportunity of creating a Sandown Airport Station

Council Response

New policy criteria have been added to retain former rail routes to allow for future extension or a potential rapid bus scheme, the extension of the Island Line service and provision of passenger services through Smallbrook.

Policy T5 Electric vehicle charging points

Total number of comments 23

Object	6	Support	8	General comment	9
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Key issues

- The policy approach does not take into account the rapid changes in technology
- Amend supporting text to add text on hydrogen and battery power
- Support policy and encourage in rural areas
- Public charging points should be added to each parish
- Add a definition of “active or passive parking spaces”
- Amend policy to read “Proposals for major development should ensure an adequate provision of charging infrastructure in new active or passive parking spaces”
- Add emphasis on generating our own power to supply these points
- Add to policy to seek electric charge points close to all ferry terminals
- Require developers to provide parking with a charging point for electric vehicles
- Amend para 9.33. Charging points should be installed on carriageway (on build-outs) not footways
- Support para 9.40
- Amend policy and text to support retrofitting EV charging points outside domestic properties

- Policy provides no standards on the number of EV charging points
- Amend policy to require all new dwellings provide as a minimum, adequate cabling to facilitate easy erection of (1 2 bed) an EV charge point (3+bed) 2 x EV charge points
- Amend policy to provide for electric vehicle ‘car club’ hubs in n new developments and provision of space for battery storage units in new builds
- Amend policy to locate EV charging points to enable disabled people to access them and that the feeder pillars and cables do not cause a hazard for users of the public realm
- Strengthen policy to require all new housing to have access to electric vehicle charging points

Council Response

The policy and supporting text have been updated to refer to the Isle of Wight Charge Point Infrastructure Strategy and require new development to provide charging infrastructure to charge electric vehicles in line with Building Regulation Requirements

Policy T6 Parking provision in new development

Total number of comments 9

Object	8	Support	0	General comment	1
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Key issues

- Policy perpetuates low density, car dependant estates in unsustainable locations.
- Take account of town centre properties with good public transport access which could have garden space rather than car parking
- Provision of additional car parking spaces, traffic and lack of updated long term modelling and lack of strategic infrastructure leads to questions whether net zero can be achieved by 2030
- The SPD should be explicit that parking and new development should not hold up the flow of public transport and highlight where payments may be triggered for public transport contributions and link to travel planning
- For larger properties 3 or 4 spaces is more realistic as garages are not used for parking
- Ensure policy seeks on site car parking for all new development because of safety issues
- Should promote transport, not storage of private cars in public space
- Provision of Blue Badge spaces is essential as is parking for visitors
- Add text to provide more safe parking / storage provision suitable for adapted and non-standard cycles and larger mobility devices
- Parking policy should be revised to take account of multi occupancy households, and most households have 2 cars at least. More parking provision on new developments

Council Response

Minor wording changes for clarification to the policy and supporting text relating to displacement of existing parking.

Section 10 Delivery, Monitoring and Review

Total number of comments 9

Object	1	Support	2	General comment	6
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Key issues

- Support section
- Include Town and Parish Councils in the review process
- Include monitoring of biodiversity net gain: total number and type of credits created, number of developments achieving net gain and size of sites, record of on and off site contributions.
- Set delivery targets for nature recovery/improvement as a result of the plan
- Protect safeguards for most versatile agricultural land (Grade 1,2 and 3a)
- Set standards for how ecological benefits will be measured and enforced
- Increase use of enforcement powers and use compulsory purchase where needed
- Undertake regular reviews of the Plan

Council Response

A biodiversity net gain of 10% is expected to be met by all qualifying planning applications following the adoption of the IPS. Monitoring will reflect the number of biodiversity net gain plans approved.

High grade agricultural land is protected through national policy and a new policy performance indicator is added to identify the number of planning applications permitted involving the loss of high grade agricultural land.

New plan policies have been added to the Plan on Climate Change, Affordable Housing, Infrastructure and Short Term Holiday Lets, together with performance indicators.

Total number of comments 522

Object	468	Support	38	General comment	16
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HA001

- No reference is made to real local need

Council response - No change

HA002

- Object
- Object to allocation because:
 - It erodes the rural nature of the community
 - The site should exclude the car park and school field which are used for sports
 - Will lead to a decline in birds and protected species
 - The increase in large homes has stretched drain and sewage infrastructure, and increased traffic and congestion along the main road into Alum and the Needles Park. Further development will increase the number of cars.
 - Bicycles are encouraged but there are no pavements along New Road Alum Bay and no cycle tracks in Totland.
 - Infrastructure cannot cope with the present overdevelopment of large homes and additional housing will worsen this. Camp Road/Queens Road junction is dangerous
 - Flooding on New Road Alum Bay, Church Hill, The Broadway and Middleton Roads.
 - Risk to protected wildlife and birds and animals.
 - Lack of health facilities and local facilities which will be overburdened
 - The site should be used for a community garden and as a learning hub
 - Should not develop greenfield sites
 - Development will increase CO2 emissions and no land is set for tree planting to offset
 - Impact on SSSIs, and SAC at Afton Marshes
 - coast and countryside are unique island features and to continue developing green spaces will detrimentally affect the tourist industry and damage the infrastructure
 - large, new detached houses will be used for second homes

Council response – Retain as allocation

HA003

- Object to the allocation because:
 - It erodes the rural nature of the community
 - Will lead to a decline in birds and protected species
 - Oppose the settlement boundary changes
 - Impact on existing infrastructure. Camp Road/Queens Road junction is dangerous and will be exacerbated by further development
 - Already struggling health services

- The land covers a car park, access driveways, drying area and open amenity space owned and maintained by 24 properties on Lanes End. Residents are unhappy their property is identified for development.
- To the rear of the allocation is an area of natural interest. The open space at the back of the car park contains many flora and fauna species, including rare species. It is a haven for wildlife, including nesting sites for birds, badgers, foxes, snakes, lizards, amongst others. The rare species found in One Horse Field could also be present
- The Wight We Want survey identified protection of the West Wight environment as a priority. This is an undeveloped greenfield site bordered by the AONB and protected coastline and untouched natural habitats should not be destroyed
- Lanes End is a narrow, quiet cul-de-sac with no capacity for increased traffic flow. Access is via two private driveways maintained by the current residents, unsuitable for large vehicles. Current access rights include access for properties bordering the shared driveways, who hold rights of way over the land to access their properties.
- 'One Horse Field' is a protected site, left to the community of Totland Bay to be used and kept as open space to be enjoyed by, and protected for, the community
- There is no evidence of need for additional greenfield housing in West Wight. The population of West Wight, including Totland, is declining.
- There is no justification for additional housing stock for local people and no facilities to access. Use the 'brownfield' sites and unused buildings first
- The new houses will be second homes, or for those moving to the island. There are already approximately 1 in 5 properties used as a second / holiday home in the area
- Development would cause local parking issues. Loss of well-used parking provision.
- Local facilities and infrastructure do not have the capacity to support additional housing e.g. healthcare facilities, bus services, congested roads
- Would increase CO2 emissions and no land is set aside for tree planting to offset this
- Impact on SSSIs, and SAC at Afton Marshes
- Loss of green space will be detrimental to tourism and damage infrastructure

Council response – Remove from plan as allocation

HA005

- Object to criteria b and c. SANGs may not be possible and open space should suffice
- Object to allocation because:
 - It does not preserve the environment
 - Is an important green lung
 - Site is a wildlife habitat and corridor, and the proposals will continue the decline in species. Will drive away red squirrels and badgers
 - Presence of rare breeding reptiles/rare bats
 - Site provides an important function in separating nearby settlements
 - The gap on Camp Road separates Pound Green and Easton and these would merge
 - Loss of settlement identity
 - Development would undermine the rural character of these settlements
 - Development at Freshwater is not sustainable development as there are inadequate services (including health services), infrastructure and jobs
 - There is no protection for existing biodiversity nor has an independent environmental impact study been undertaken

- Too many houses and concern on the impact on the Biosphere designation
- Contrary to the Freshwater Neighbourhood Plan
- There is no identified local need
- Concern on flooding and sewerage disposal. There are yearly flooding problems at the junction of Camp Road and Victoria Road which will be further aggravated
- The housing will be unaffordable for residents, and used for holiday homes/retirees
- Object to the settlement boundary changes
- Camp Road/Queens Road junction is dangerous, and this will worsen. No assessment has been made of road infrastructure around the site. Problems with access, poor quality footpaths, on street parking, poor bus services and safety
- Brownfield land should be developed first
- Minimal investment in water, gas, electricity, sewage and surface water and no assessment of infrastructure needs
- The site is grade 2 agricultural land
- Impact on a tourist asset. Will contribute to the destruction of a heritage asset
- The proposed development will be clearly visible from the Downs and the Tennyson Monument. The view is irreplaceable and should be protected
- How will the allocation to achieve carbon zero targets. Development will contribute to CO2 emissions
- Impact on the dark skies
- Full archaeological and ecological surveys must be undertaken.
- The density of development is not consistent with a rural area
- Impact on SSSIs, and SAC at Afton Marshes
- The site should be converted to woodland
- Damages the quality of life changing the charm and character of the villages
- Erosion of the unique qualities of the Isle of Wight and West Wight
- The only reason these fields are being considered is that they are for sale
- Threatens the Solent and Southampton Water SPA
- Dependence on water and energy supplies from the mainland
- Support site allocation to stop the village stagnating to boost the local economy and create new opportunities
- Support 90 dwellings but this should be flexible
- The site can meet policy criteria and the phasing delivery and infrastructure is acceptable.
- The site area shown could be enlarged
- The allocation as part of a total 255 dwellings in Freshwater is not sustainable
- Infrastructure improvements should be achieved before development commences

Retain and review site specific requirement relating to sewerage network reinforcement in Appendix 2

HA006

- Object to criteria b) and c). Amend capacity to 70-90 dwellings. SANGs may not be feasible
- Support flexible capacity. Infrastructure and site requirements can be achieved. The meadow will be considered in the design approach/ecology/biodiversity and open space requirements
- Support the boundary change to stop the area stagnating, to boost the local economy by attracting new people and providing affordable housing for local people and attract young people to the island. Infrastructure will adapt and new opportunities provided

- Reinforcement of the local sewerage network is required. Add criterion `Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider`
- Object to allocation because:
 - it is not sustainable development in an area which already has inadequate services
 - It does not protect existing biodiversity and an independent environmental impact survey has not been undertaken
 - It contravenes Biosphere Reserve designation
 - It will lead to a major loss of habitat and settlement identity
 - It is contrary to the Freshwater Neighbourhood Plan
 - Concern on flooding and sewerage disposal issues
 - it redefines the settlement boundary, including agricultural fields and green space
 - The island should be kept as wild and natural to support biodiversity, species and habitats and contribute towards combating global warming
 - Moving the settlement boundary expands onto greenfield sites which are important wildlife corridors. Rare breeding reptiles
 - Will create few extra jobs and the existing infrastructure is fully stretched
 - Need housing for local needs not holiday homes, second homes and cater for retirees
 - Will erode the rural community and lead to a decline in birds and protected species
 - Will increase traffic. Camp Road/Queens Road junction is already dangerous and will be exacerbated. No assessment has been made on the narrow road infrastructure around the site to accommodate the scale of development
 - No consideration of services. Existing pressure on health services. Infrastructure improvements should come first before development
 - Unclear how it will maintain and carbon zero targets when building on greenfield sites
 - There are more suitable sites and development will increase CO2 emissions
 - Impact on tourism with negative impacts on the landscape, biodiversity and through negative cultural and visual impact on the landscape. Impact on SSSI's and SAC
 - Should prioritise brownfield sites
 - Erodes the gap between settlements
 - Close to the Yar estuary which will feed sewage into already inadequate pipes
 - Damages the quality of life changing the charm and character of the villages and erodes unique Isle of Wight and West Wight qualities
 - In the risk assessment zone for the Afton Marshes SAC which feeds into the Solent and Southampton Water Special Protection Area
 - The site is considered only because it is for sale
 - Impact on phosphates and nitrates; dark skies; protected sites
 - already dependent on water and energy from the mainland

Retain and review site specific requirements relating to sewerage network reinforcement in Appendix 2

HA008

- The site is not available
- Object to allocation because:
 - There is no vehicle access to the site and the lane is jointly privately owned. Cope Lane is in poor condition and too narrow for passing traffic or construction vehicles,

with on street parking so the traffic can only flow one way. Camp Road/Queens Road junction and Pixley Hill are dangerous. No traffic assessment of the road impacts around the site. Kings Manor Road is overgrown, and ownership is unclear

- First time and affordable housing would not be built here. Focus on 1 and 2 bed units
 - No identified local need leading to more holiday and second homes and retirees
 - It reduces the special qualities of the island and impacts on the AONB
 - Loss of wildlife habitat and wildlife
 - Impact on local services, lack of infrastructure and potential run off/flooding. Serious lack of health services. No consideration of the areas' infrastructure needs. The island is dependent on water and energy from the mainland
 - Increase in light and noise pollution
 - Detrimental to views, the SSSI and Conservation Area and there are archaeological considerations. The land has been designated as a Saxon remains site
 - Prioritise brownfield sites
 - 255 houses in Freshwater Is not sustainable development
 - No independent environmental impact survey on biodiversity has been carried out
 - redefines the settlement boundary to include agricultural fields and green spaces
 - There are few additional jobs in the area
 - The arboretum in All Saints Churchyard and the Western Yar make Church Field part of a special wild environment enjoyed by villagers and visitors and its loss would reduce quality of life in a wide area
 - Proposal will lead to a continuing decline in birds and protected species
 - Does not reflect the Freshwater Neighbourhood Plan
 - Keep site wild and natural to contribute towards offsetting global warming
 - Erodes part of a "sensitive gap" between Freshwater Totland and Easton
 - Site is close to the Yar estuary and will feed sewage into already inadequate pipes
 - The development will contribute to CO2 emissions
 - Impact on tourism through negative cultural and visual impact on the landscape
 - Site is used by migratory birds to feed
 - Damages the local quality of life changing the charm and character of the villages
 - Adverse impacts for walkers on Freshwater way and the Robert Hooke Trail
 - Within the risk assessment zone for the Afton Marshes SAC which feeds into the Solent and Southampton Water special protection area
 - The site is only considered because it is for sale
 - Impact on phosphates and nitrates; dark skies; protected sites
- Support allocation and the boundary change will prevent stagnation. Attracting more people will boost the economy, provide affordable homes and attract young people to the island. Infrastructure will adapt to new needs
 - Church Field should be recognised as a community asset and part of the Freshwater Causeway panorama of natural beauty
 - It is unclear how the development will maintain and enhance the Island's biosphere status', and achieve carbon zero targets
 - Little detail on who the houses are for and the traffic impacts
 - Add definition of 'extremely high quality'

Council response - Remove as proposed allocation.

HA018

- Object due to flooding issues. 40% of the site is in flood zone 1. The primary source of flooding is from the River Medina. The guidance for site design and making development safe doesn't reflect the nature of the risk and focuses on management of fluvial and surface water flooding. Safe access and egress should be demonstrated in the 0.5% plus climate change event and not the 1% event as suggested
- The Summary Table does not provide an estimate of the predicted design tide level using current sea level rise allowances, and does not estimate likely depths, velocity, frequency and duration of flooding. Appropriate mitigation measures, and their deliverability cannot be identified on the basis of the current information. It is not therefore clear if the site can be developed safely in the context of flood risk

Council response - Retain as allocation. New site requirement added on site specific flood risk guidance to reflect the Level 2 SFRA and to confirm that development should take place on the Flood Zone 1 part of the site.

HA019

- Support allocation and requirements

Council response - Move site to list of those with planning permission

HA020

- Support allocation with amendments
 - Add contributions for bus service enhancements to be agreed with bus operators
 - Condition walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site should be funded by the developer
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
- Add correction as the site is in Northwood not Cowes
- Object greenfield sites being allocated until other sites have been delivered off Newport Road, Harry Cheek Gardens and Wyatts Lane
- Amend site criteria to include "Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider"

Council response - Comments noted on technical aspects. Site specific requirements for the site relating to sewerage network reinforcement are revised.

HA022

- Support allocation with amendments
 - Contributions for bus service enhancements to be agreed with bus operators
 - Condition walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be provided close to the site funded by the developer

- Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
- Object to development of farmland with stunning views across the Medina Valley. Area contains foxes, badgers and rabbits, is used by birds of prey and bats. Site contains large oak trees providing habitat for red squirrels and woodpeckers
- Impact on infrastructure increasing strain on health and education facilities and add to traffic, waste and pollution
- Contributes to coalescence of Northwood, Cowes and Gurnard
- Object to criteria b). Re word `improved road network to allow ease of movement to and through the site`. Delete criteria f)
- Delete SANG from criteria d) as there is insufficient space
- Delete `and along with the watercourse corridor` in criteria e)
- Correction needed as the site is in Northwood not Cowes
- Clarification is needed on the increase in site capacity to 130 units
- Delete `The site has an area of mineral safeguarding to the west and investigation should be undertaken to establish whether the minerals can be utilised within the development or extracted as appropriate`
- Amend site boundary to include the area to the southern boundary
- Object to Somerton Farm being part of the settlement gap between Newport and Cowes
- Site should be used for small or medium scale employment
- Amend criteria e) to include a minimum 50m buffer with ancient woodland including through construction unless it can be demonstrated a smaller buffer would suffice. A larger buffer may be required in some circumstances
- Add a requirement "The proposed development should also ensure have no detrimental impact on BAE System's Cowes site to the west."
- Amend site criteria to include "Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider"

Council response - Retain as allocation – site specific requirements have been revised to relating to sewerage network reinforcement

HA025

- Amend site capacity to 25-35 dwellings
- Note the woodland is in the landowner's ownership
- The track between the two sites is maintained by the landowner but is not a requirement
- Object to a large area for development outside the settlement boundary. It will have a detrimental effect on access to Wyatts Lane and neighbouring properties
- Object to development of greenfield site before developments off Newport Road, Harry Cheek Gardens and Wyatts lane have been delivered
- Amend site criteria to include "Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider"

Council response - Retain as allocation. Revise site specific requirements relating to sewerage network reinforcement and the site specific requirement on flood risk and output from the Level 2 SFRA.

HA031

- Object to development of a greenfield site

- There is no demand from island residents and building more houses will increase in-migration and a greater pressure on infrastructure
- Support allocation with amendments
 - Contributions to bus service enhancements to be agreed with bus operators
 - Condition walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be funded by the developer
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
- Support allocation and level of housing proposed but significant highway infrastructure improvements are needed to address the increase in traffic

Council response - Retain as allocation – site specific requirement revised on development requirements relating to infrastructure provision.

HA032

- Amend site capacity to 150+
- Amend policy wording to reflect that SANG will be explored as will upgrading nearby facilities, improved pedestrian and cycle connectivity and community facilities
- Support allocation with amendments
 - Contribution to bus service enhancements to be agreed with bus operators
 - Condition walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be funded by the developer
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
 - Amend site boundary to include all land available in this ownership
- Confirm that policy criteria are achievable on this development
- Object as it is close to the SINC and ancient woodland and would impact on wildlife and fauna
- A 15m buffer is insufficient to protect Dodnor Creek and the adjoining ancient woodland
- Amend criteria to include a minimum 50m buffer with ancient woodland including through construction unless it can be demonstrated a smaller buffer would suffice. A larger buffer may be required in some circumstances
- Object due to excessive density and that it is unlikely that mitigation could ensure the retention of biodiversity let alone achieve a 10 per cent net gain
- The council should undertake the evidence studies and use this to allocate sites
- Object due to the increased impact on Horsebridge Hill (including from Noke Common and Hogan Road), Parkhurst Road, and Forest Road. Congestion around Coppins Bridge will worsen unless major changes are made
- Reduce the site capacity and redraw site boundaries to protect important green sites from development

Council response - Retain as allocation – site specific requirements revised to reflect the need for a co-ordinated development approach.

HA033

- Support allocation with amendments
 - Condition for walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be funded by the developer
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
 - Improvements to bus service 39 funded by the developer to improve sustainable travel access to the site
- Object to development of a greenfield site. The site is rich in biodiversity, provides food for wild birds and bats, is used as an educational site and by the primary school for nature walks
- Conflicts with policies EV5 and EV6
- Clarification is needed on whether the site includes or excludes the current Flood Zones 2 and 3 on the northern boundary of the site, the requirement for the Exception Test and scope of the Flood Risk Assessment.
- Amend text to make clear that development should avoid Flood Zones 2 and 3 and take account of flood extent due to climate change

Council response - Comments noted in relation to flood risk. Retain as an allocation adding wording on site specific requirements relating to flood risk, Level 2 SFRA and river corridors.

HA035

- Support summary table reference to avoidance of flood risk areas and further hydraulic modelling but add consideration to the impact of climate change on predicted flood extents which could constrain the site further. As site has been removed from Appendix 2 it is unclear where these requirements will be set out
- Add a watercourse crossing could be constructed on the site which will require a Flood Risk Activity Permit from the Environment Agency and will only be permitted for clear span structures which are of the minimum possible width required for essential access purposes, and only where it can be demonstrated that they will not have an adverse impact upon flood risk or the watercourse itself (and associated biodiversity interest)

Council response - Remove as allocation due to unsuitability.

HA036

- Site availability is confirmed
- Support the allocation with amendments
 - Contribution to bus service enhancements to be agreed with bus operators
 - Condition for walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be provided close to the site funded by the developer
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
- Object as it is close to the SINC and ancient woodland and would impact on wildlife and fauna
- Unlikely that mitigation could ensure the retention of biodiversity let alone achieve a 10 per cent net gain. Increase buffer from 15m to 45m plus

- Object due to the increased impact on Horsebridge Hill (including from Noke Common and Hogan Road), Parkhurst Road, and Forest Road. Congestion around Coppins Bridge will worsen unless major changes are made
- Reduce site capacity and redraw boundaries to protect green sites from development
- A masterplan is needed as the site has strong environmental quality as it is close to an SSSI and ancient woodland and synergy is needed between the two

Council response - Retain as allocation – site specific requirements revised to pick up some technical issues raised

HA037

- Support allocation
- It is unlikely that mitigation could ensure retention of biodiversity let alone achieve a 10 per cent net gain. Increase the buffer from 15m.
- Object due to the increased impact on Horsebridge Hill (including from Noke Common and Hogan Road), Parkhurst Road, and Forest Road. Congestion around Coppins Bridge will worsen unless major changes are made
- Reduce site capacity and redraw boundaries to protect green sites from development
- Object to site. It is unclear where vehicle and pedestrian access will be located. Concern over site levels and impacts on existing property
- The site could be accessed from Podnor Lane end and used for hospital use

Council response - Retain as allocation. Amend wording relating to the opportunity for shared access with the health hub allocation (C4).

HA038

- Support site with amendments
 - Contribution to bus service enhancements to be agreed with bus operators;
 - Condition for walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be funded by the developer;
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
- Object to site
- Initial phase has disturbed feeding area of buzzards
- Removes green areas used by wildlife
- Unsuitable site due to proximity to Parkhurst Forest and surrounding parkland
- No suitable road access and significant highway improvements are needed in the area
- Part of the site floods during winter months but building will reduce natural drainage and make the problem worse

Council response - Retain as allocation. Strengthen site specific requirements relating to highways

HA039

- Object to development of greenfield parts of the site and the concentration close to the SSSI and ancient woodland. Should use brownfield part of the site only including car parks

- Site capacity is too high and little regard is given to topography and the characteristics of the area eg. steeply sloping areas to the north of the prison
- Employment is needed
- Object to increased pressure on surrounding residential roads and St Mary's junction. Focus traffic movements on Clissold Road not Standen Avenue which is too narrow and congested with parking. Object to the increased impact on Horsebridge Hill (including from Noke Common and Hogan Road), Parkhurst Road, and Forest Road. Congestion around Coppins Bridge will worsen unless major changes are made
- Remove the area bounded by Clissold Road, Old Oak View, Albany Prison and the prison stores. The area has many mature and semi mature trees forming a wildlife habitat and protection safeguards should be put in place
- Add evidence to demonstrate site capacity and how development would affect heritage assets in a heritage impact assessment. If harm is demonstrated this should be justified
- The final sentence of the policy does not meet national policy and should give great weight to the conservation of the significance of heritage assets and that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification
- Site boundaries for Newport Harbour masterplan and the proposed policy do not match
- Clarify if Newport Harbour masterplan has been approved and add to the evidence base
- unlikely that mitigation could ensure the retention of biodiversity let alone achieve a 10 per cent net gain. Increase buffer from 15m. Increase buffer to 45m
- Reduce site capacity and redraw boundary to protect important green sites from development
- The lack of detail makes it difficult to assess impacts on the community and environment
- Concern on the impact of development on the drainage of surrounding properties

Council response - Retain as allocation but with reduced yield to reflect reduced site boundary and incorporation of landscape buffers

HA040

- Object to removal of site from the plan and require clarification on the reasons for removing the site as it was previously deemed an acceptable housing site
- The site forms a logical extension to the settlement boundary with a close relationship with the built form of Newport

Council response - Site removed from allocation due to overall reduction in housing number within plan by 25%.

HA044

- Object to the plan for office space. It should be re-assessed in light of needs from 2022-2040
- High risk to the economic viability of the site and the island plan depends on the site. Given this there is insufficient growth in the area
- Correct para 3.16 which refers to 332 affordable homes, yet Medina Yard does not provide any on-site provision. A financial contribution of £3m would buy 12 houses so there is a shortfall of affordable homes. It is unclear where these will be located
- Support allocation but reduce capacity to 200 dwellings. Development should retain the vibrant historic look of the area
- Site is a level 2 flood risk area and development needs future proofing

Council response - See change to site specific policy KPS2.

HA046

- Support site with amendments
 - Condition for walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be funded by the developer;
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
- Object to development of a greenfield site and agricultural land
- The site is important open space and used by migrating geese and other birds and mammals
- The proposed density is too high and would contribute to coalescence with Whippingham
- Object as the school is at capacity and there is no secondary school
- There is pressure on health services and other infrastructure
- Increased pressure on the roads
- Houses would overlook the school with potential to lose our `forest` school

Council response – Retain allocation. The site is within the settlement boundary of East Cowes in the Core Strategy and IPS.

HA053

- Amend criteria to include a minimum 50m buffer with the ancient woodland including through construction unless it can be demonstrated a smaller buffer would suffice. A larger buffer may be required in some circumstances
- The landscape and ecological buffers and SANGs, open and recreation space could be located to the west to act as a buffer to the woodland

Council response – Retain as allocation but revise site specific requirements.

HA058

- Object to removal of site from the plan as it was previously assessed as suitable and can be delivered as confirmed in the 2018 SHLAA
- Allocating the site would increase flexibility, improve affordability and help address under delivery, providing sustainable growth
- Puckpool Hill should be added back into the plan and its deletion contradicts the approach on HA060 and HA062 where the settlement boundary is redrawn to include them in the settlement boundary and the bulk of development is in the later years of the plan

Council response – No change.

HA059

- Object to the removal of the site from the plan given the significant housing shortfall highlighted in the last Housing Delivery Test and the previously acceptability of the site
- The site is in a sustainable location and can be developed with regard to landscape constraints, without altering how Ryde interacts with surrounding undeveloped areas

Council response – No change.

HA060

- Support site with amendments
 - Contribution to bus service enhancements to be agreed with bus operators
 - Condition walking routes that better connect to existing high frequency bus routes that add to overall viability of bus services and support modal shift
 - Add bus stop infrastructure on locations near to and on the site to be funded by the developer
 - Enable sustainable travel choices to be made from the start of a development through a travel pack provided for each dwelling to include a bus travel voucher
- Object to the approval of the planning application in advance of the Plan being finalised

Council response – Retain allocation – planning application has a resolution to grant.

HA061

- Object to deletion of the site from the plan. It is deliverable and achievable and can deliver at least 45 dwellings, contribute to plan objectives and significantly boost housing supply

Council response – No change.

HA064

- Support site
- Should not be executive homes for retirees or second homes increasing pressure on infrastructure and not meeting local or affordable housing needs
- Unsustainable due to hazardous road conditions in the High Street for cars and pedestrians which will be worse with increased traffic; additional flooding problems; inadequate medical facilities at St Helens; and insufficient infrastructure to support new development. Access will be onto busy single track road with no pavements. No reference to improving the transport infrastructure. The roads are in disrepair. Developer contributions towards highway infrastructure would be required due to a lack of pavement on Mill Road and High Street and single lane traffic in High Street with poor sight lines
- Object as site is outside the settlement boundary; undermines the Neighbourhood plan; the site is grazed has extensive hedgerows and trees providing wildlife habitat; provides a wildlife corridor with ancient woodland and Brading Marshes; will adversely affect quality of life for residents and place stress on facilities and services. Conserve biodiversity
- Good quality services should be in place before any development. Increased pressure on classroom sizes. There are frequent power cuts and housing development will not improve the situation. The internet is already extremely poor
- Will spoil the unique character and village feel
- Add reference to site requirements on a) Transport infrastructure & improvement b) Road improvement, including pavements & footpaths c) Drainage, water, sewerage d) Mitigation of existing flooding e) Gas, electricity supplies f) Renewable energy requirements g) Mitigation of Co2 h) Educational facility i) Medical facilities j) Green spaces k) Affordable housing l) Planning consultation and enforcement
- Impact on tourism
- Limited local employment and facilities increasing car commuting as limited public transport
- Contrary to guiding principles for location of development (para 3.8)
- There should be no development considered until after Southern Water has increased their capacity to stop outspills in Bembridge
- There are no detailed evidence studies on transport, landscape capacity impact, TPOs, local needs housing assessment for Bembridge

- Development is inconsistent with other plan policies
- Major flooding on Steyne Road, Hillway and Mill Road due to inadequate drainage. The existing drainage and sewage infrastructure is unable to cope and is over capacity. The site has flooded in the last 6 months. The site does not meet Policy EV4a as it is not safe from flooding and will increase the risk elsewhere.
- Concern on the proximity to the Grade one listed Bembridge Windmill. Takes away the open aspect of the fields nearby
- Too many homes proposed on the site. Island population is declining so little justification for 195 dwellings in Bembridge. Level of development should be commensurate with the distinctive character of the village
- Will take away the greenspace valued by residents and visitors. The land should be used to benefit Bembridge – a park for children and dog walking or tree planting to reduce flooding
- Will worsen the existing parking problems
- Will result in light pollution
- Is not a community led project
- Vital to retain the rural character of the village. Ancient oaks, unique rural boundary and vista contributes to wellbeing
- Will increase carbon emissions
- Other areas of the island have not taken their fair share of the housing requirement
- Use brownfield sites elsewhere
- Not in reasonable walking distance of the village centre where most facilities are located
- the top south west part is a mineral safeguarding area
- Limited bus services which are often full
- The site will not deliver the affordable housing requirement
- Design should reflect the existing character of the village development
- Does not align with protecting the natural environment
- Should support the rural economy. One site could be for a small development of industrial units and the other a solar farm
- The council should produce a masterplan with a layout and highway and other works and provisions required, set up a company to buy land and develop local needs housing

Council response - Retain with new site specific requirements.

HA065

- Support site
- Should not be executive homes for retirees or second homes increasing pressure on infrastructure and not meeting local or affordable housing needs
- Unsustainable due to hazardous road conditions in the High Street for cars and pedestrians which will be worsened with increased traffic; additional flooding problems; inadequate medical facilities at St Helens; and insufficient infrastructure to support new development. Access will be onto busy single track road with no pavements. No reference to improving the transport infrastructure. The roads are in disrepair. Require developer contributions towards highway infrastructure as lack of pavement on Mill Road and High Street and single lane traffic in High Street with poor sight lines
- The site is outside the settlement boundary and it is not clear why this is being revised; development undermines the Neighbourhood Plan; the site is grazed has extensive hedgerows and trees providing habitat for wildlife; provides a wildlife corridor with ancient

woodland and Brading Marshes; development will adversely affect quality of life for residents and place stress on facilities and services. Biodiversity must be conserved

- Good quality services should be in place before any development. Increased pressure on classroom sizes. There are frequent power cuts and housing development will not improve the situation. The internet is already poor
- Will spoil the unique character and village feel
- Add site requirements on a) transport infrastructure and improvements b) road improvement, including pavements & footpaths c) drainage, water, sewerage d) mitigation of existing flooding e) gas, electricity supplies f) renewable energy requirements g) mitigation of CO2 h) educational facility i) medical facilities j) green spaces k) affordable housing l) planning consultation and enforcement
- Good quality services should be in place before development
- Major flooding on Steyne Road, Hillway and Mill Road due to inadequate drainage. Existing drainage and sewage infrastructure is unable to cope and over capacity. The site has recently flooded. It does not meet Policy EV4a as it is not safe from flooding and increases risk elsewhere. There should be no development until Southern Water increase capacity
- Impact on tourism
- Limited local employment and facilities leading to car commuting as limited public transport
- Contrary to guiding principles for location of development (para 3.8)
- There are no detailed evidence studies on transport, landscape capacity impact, local needs housing assessment for Bembridge
- Development is inconsistent with other plan policies
- Concern on the proximity to the Grade 1 listed Bembridge Windmill. Removes the open aspect of the fields nearby
- Too many homes proposed on the site. The land should be used to benefit people in the village – a park for children and dog walking
- Will take away the greenspace valued by residents and visitors
- Will worsen the existing parking problems
- Will result in light pollution
- Island population is declining so little justification for 195 dwellings in Bembridge
- Is not a community led project
- Ancient oaks, unique rural boundary and vista contributes to wellbeing
- Vital to retain the rural character of the village
- Will increase carbon emissions
- Other areas of the island have not taken their fair share of the housing requirement
- Use brownfield sites elsewhere
- Level of development should be commensurate with the distinctive character of the village
- not within reasonable walking distance of the village centre where most facilities are located
- account must be taken of the TPOs
- The south west of the site is located in a mineral safeguarding area
- Limited bus services which are often full
- The site will not deliver the affordable housing requirement
- Design should reflect the existing character of the village development
- The existing drainage and sewage infrastructure is unable to cope and is over capacity
- Does not align with protecting the natural environment
- There should be a requirement to support the rural economy and one of the sites could be for a small development of industrial units and the other a solar farm

- Should not be executive homes
- Set out an illustrative layout, with the highway and other works and provisions required and set up a company to buy land and develop local needs housing

Council response – Retain with new site specific requirements.

HA073

- Support removal of site from the plan. It would not meet island needs, was outside the settlement boundary and is on a greenfield site separating Seaview from Nettlestone
- Object to removal of site from the plan as it is unjustified and is not for suitability, viability, accessibility or deliverability reasons. It remains in the latest SHLEAA and monitoring evidence and is within the settlement. Small and medium sites are supported by Government and consistent with the NPPF, other plan policies. Would bring benefits including biodiversity net gain and management of the green infrastructure on-site
- Object to the principle of access using the single vehicle width, unadopted, gravel access road to the Anells Farm, Seagrove Close, Seagrove Farm Road, and the adopted single car width residential road Seagrove Manor Road

Council response – No change.

HA079

- Add requirement that the building line of the new development is kept back from the northern extent of the site, to avoid harm to the setting of St John's

Council response – Move site to list of large sites with planning permission.

HA080

- Support allocation but add requirement for a full sized football pitch (with a 4G artificial surface) with changing rooms and a clubhouse to provide a home for Sandown Football Club

Council response – Retain as allocation and make a reference to recreation / allotments in site specific requirements.

HA081

- Object to site. There are no exceptional circumstances to justify harm to this Grade II listed building which has been allowed to deteriorate, closing its use for youths and senior citizens
- Should be restored and used for the above and as a service hub and heritage centre

Council response – Planning permission granted. No change.

HA084

- Add to policy the need to provide adequate car parking
- Housing is likely to be for visitors or second homes rather than those who need them
- The area at the base of the cliffs could provide small business units with parking at the front of the site

Council response - Retain as allocation and add parking in site specific requirements

HA096

- Object as it is not sustainable development, contradicts other aspects of the plan and adds to already strained infrastructure on the island

Council response - Retain allocation but the site specific requirements in relation to nitrates have been amended.

HA101

- Object to no housing allocations in Wellow. The site can deliver 18 dwellings (50% affordable), is free of constraints, can deliver the plan objectives and significantly boost housing supply

Council response - Not allocated. No change.

HA102

- Strong objection to proposed housing in Niton as it is greenfield and there is a lack of infrastructure especially road access

Council response – Not allocated. No change.

HA103

- Strong objection to proposed housing in Niton as it is greenfield and there is a lack of infrastructure especially road access

Council response – Not allocated. No change.

HA106

- Object to removal of the site from the plan due to it not being located in or adjoining a settlement boundary
- The site is deliverable and is sustainable due to good public transport links and provide benefits to the local community which has not been considered in the allocation process
- The site may be subject to development proposals. Increased housing numbers will impact on the hospital and the impact on infrastructure modifications proposed is not clear
- The site will increase run off and increase sewage issues. Run-off issues will worsen with climate change.

Council response – No change.

HA110

- Support site
- Support site with improvements to infrastructure

Council response – Retain allocation in plan. No change.

HA113

- The site has planning permission so is not a new allocation
- MAP 3.9 - The entire Red Funnel marshalling yard in East Cowes is scheduled for housing. This is not as per the planning permission granted. It would also negate the deep water berths presently available and expected to be retained under policy E5 a&b, and also T3 a&b – efficient use of the ferry terminal and, mitigating the traffic impact [on East Cowes.]

Council response – No change.

HA114

- 255 dwellings is not sustainable development in a settlement with inadequate services
- Support boundary change. Prevents stagnation, boosts the local economy and provides affordable housing for local people. Infrastructure will adapt and provide new opportunities
- Object to allocation because:
 - There is no protection for existing biodiversity nor any independent environmental impact survey and contravenes the Biosphere Reserve designation.
 - Contrary to the Freshwater Neighbourhood Plan
 - Flooding and sewage disposal are overloaded. Development could increase flooding in the area. Site is close to the Yar estuary and will feed sewage into inadequate pipes
 - The change to the settlement boundary includes agricultural fields and green spaces
 - No need for the type of housing. It will not lead to affordable housing for local people but more holiday homes, second homes and retirees. No identified local need
 - Few jobs will be created. Existing local services are overstretched. Infrastructure improvements first. Dependent on water and energy from the mainland
 - No assessment has been made of infrastructure needs for this part of the island nor the road infrastructure around the site to accommodate the scale of development
 - Shifting the settlement boundary to include greenfield sites expanding the village to greenfield sites which have important wildlife corridors. Rare breeding reptiles
 - Contrary to Freshwater Neighbourhood Plan
 - Should not build on greenfield sites and prioritise brownfield development
 - Need to keep the island as wild and natural as possible to support biodiversity, species, habitats and contribute to reducing global warming
 - Loss of habitats, wildlife and settlement identity. Impact on SSSI's and SAC
 - It is not clear how it will maintain and enhance the Island's biosphere status', and carbon zero targets when outlining plans to build on greenfield sites
 - There are more suitable sites to develop
 - Will increase CO2 emissions but no land is identified for tree planting to offset this
 - Impact on tourism through the negative cultural and visual impact on the landscape
 - Redefining settlement boundaries erodes gaps between settlements
 - Damages the quality of life for local people changing the charm and character of the villages and erodes the unique qualities of the island
 - within the risk assessment zone for the Afton Marshes SAC which feeds into the Solent and Southampton Water special protection area
 - The site is only considered as it is available for sale
 - Impact on phosphates, nitrates; dark skies; tourism; protected sites; attracting young people

Council response – Allocation moved to large sites with planning permission section.

HA115

- Support allocation

Council response – Retain as allocation.

Appendix 4

- Add policy EV11