

Summary of responses to Island Planning Strategy Regulation 19 period of representation

Representations on Section 1 Introduction			
Rep number	Name of respondent	Paragraph or policy	Summary of issue raised
S11.1	Mrs Madeline Groombridge	Section 1 general	<p>Are there any allowances made for living on an Island ? As surely building that amount of houses until 2037 is going to have a tremendous impact on traffic alone as we can't expand, where are all these extra people going to get Doctors & Dentists.</p> <p>A Typical example is the Parish Boundary in Bembridge which has been breached.</p> <p>On the policy map - I am staggered by the amount it's not sustainable.</p>
S11.2	Tim Brayford	1.4	Connect directly to the national road network. Feasibility of link has not been progressed.
S11.3	Chani Courtney	1.13	Add to "screen effects on" a reference to sewage pollution or wider pollution sources.
S11.4	Mike Davies Shorwell Parish Council	Whole Plan	Support the plan. Implement without delay.

S11.5	Sustainable Freshwater Community Group	Section 1 Introduction	<p>Para 2.9 add reference to protecting the environment and landscape.</p> <p>No strategy to retain young Islanders and attract the skilled with good employment. Provide schools, sporting and leisure facilities. Is a strategy of managed decline. Lack of provision for social and affordable housing does not address these needs.</p> <p>Lack of consultation on settlement boundary changes. Allocation of large sites outside existing settlement boundary. Lack of infrastructure, sacrifices green fields and grade 2 agricultural land.</p> <p>Disproportionate housing number in relation to brown field capacity, social, medical and utility infrastructure.</p> <p>Re-designation of the settlement boundary gets round the protection of their current designation as “Greenfield Sites” of agricultural and ecological value. Not subject to public consultation.</p> <p>Should factor in ‘Exceptional Circumstances’ for housing numbers.</p> <p>National Park status and other options which would lead to a lower, more realistic and achievable target for housing growth.</p> <p>Flawed consultation.</p>
S11.6	Sara Mason		No comment just answered questions of compliance and soundness.
S11.7	Phillip Spencer Guy	Section 1	<p>Lack of consultation on proposed settlement boundary changes.</p> <p>Lack of provision for social and affordable housing. Flawed consultation.</p>
S11.8	Christopher Jarman	Section 1 General	<p>Consultation process did not support community engagement. Should return to Regulation 18.</p> <p>Flawed consultation.</p>
S11.9	Mandy Pearce	Section 1 General	Flawed consultation.

			<p>Freshwater does not have capability for more housing without further infrastructure.</p> <p>Insufficient public consultation on the settlement boundary change and its change on the policies map and the SHLAA process.</p>
S11.10	Nora Galley	1.6	<p>Amend para 1.6 to refer to the policies of the plan "read as a whole".</p> <p>Revisit opportunities to meet local housing need and carry out actions recommended by the University of Plymouth and Three Dragons report. Have more frequent call for sites and engage with landowners to address need.</p>
S11.11	Nora Galley	1.12-1.13	<p>The ISA does not set out reasonable alternatives for the spatial and housing strategies, or reasons for departing from Core Strategy SP1. IPS provision and not meeting the island's objectively assessed housing need is not evidenced. Add implications of failing to provide for the island's housing needs.</p> <p>Revisit opportunities to meet local housing need and carry out actions recommended by the University of Plymouth and Three Dragons report. Have more frequent call for sites and engage with landowners to address need.</p>
S11.12	Nora Galley	Section 1 Whole plan and ISA	<p>Support ambitions for environmental sustainability and net zero but the plan falls short in meeting tests of soundness in respect of the plan's housing strategy and spatial strategy.</p> <p>ISA approach is difficult to follow, and does not comply with SA regulations or guidance. Unlikely to be legally compliant.</p> <p>ISA does not set out reasonable alternatives to the spatial strategy or housing strategy. Housing target is not justified and no evidence more housing cannot be delivered. Add consequences for failing to meet island housing needs.</p>
S11.13	Nora Galley	Section 1-3 and whole plan	<p>Sections 1-3 and whole Plan are not sound. Not positively prepared. The strategy fails to meet island needs over the plan period and to address challenges other than protecting the environment. This is not explored in</p>

			<p>the ISA. Not justified as the ISA does not provide reasons for the spatial strategy. Not effective as limited evidence on deliverability of housing sites.</p> <p>Fails to meet objectively assessed housing need over the plan period and conflicts with national policy. Insufficient evidence to justify the trend- based housing target. Viability Assessment shows housing delivery is viable but not if the Plan is sound and justified in requirements in policies AFF1, G3 and C11.</p>
S11.14	Charlotte Stadden Marine Management Organisation MMO		No comments.
S11.15	David Long BCM	General	<p>Lack of allocations or local plan causes instability. Does not look forward over a minimum period of 15 years from adoption, defers some obligations to a future plan and does not correlate economic and housing growth. Not consistent with NPPF. Housing delivery is below the Standard Method.</p> <p>No allocations in Rural Service Centres, approach to windfall is unsound, and additional contributions in the Viability assessment make the Plan undeliverable and unsound.</p> <p>Delay of policy for provision of SANGS, Section 106 contributions, infrastructure provision, waste and minerals and Gypsy, Travel and Travelling show people allocations.</p> <p>Check Plan for consistency and cross referencing.</p>
S11.16	David Long BCM	1.3	The IPS is pre-meditated on the Council's Corporate Plan, Regeneration Strategy and Climate and Environment Strategy. The Regeneration Strategy should not be used to promote regeneration on the Island.
S11.17	David Long BCM	1.4	The Plan does not allocate smaller sites across the Island in line with the settlement hierarchy. No allocations in Rural Service Centres and inconsistent with the NPPF.

S1.18	David Long BCM	Para 27 and 70	<p>Strategic policies fail to provide a clear strategy and insufficient sites at a sufficient rate, to address objectively assessed needs over the plan period which is contrary to sustainable development.</p> <p>Small sites are not dealt with and there is a reliance on windfall sites. Unsound.</p>
S11.19	David Long BCM	Para 1.5	The Plan does not reflect a lack of commitment to S106 housing, that affordable housing is mainly delivered by the private sector, policy does not reflect challenges to the development industry or economic conditions and turbulence in viability assessment.
S11.20	David Long BCM	Para 1.9	The Gypsy, Travel and Travelling show people allocations and Waste and Minerals have not been produced. Plan is therefore unsound.
S11.21	Tetlow King Planning on behalf of Sovereign Network Group	Glossary	A definition of affordable housing in the glossary is not needed.
S11.22	Jonathan Shavelar on behalf of natural England		Not objecting to the Plan or recommending the Plan is found unsound but offer detailed comments on aspects of the Habitats Regulations Assessment.
S11.23	Jonathan Shavelar on behalf of Natural England		<p>No formal objection to HRA conclusions but raise points of procedure and clarification to ensure supporting evidence is robust.</p> <p>HA120 considers impacts in section 5.10 of the HRA. This has been incorrectly included as an assessment of impacts on the Solent and Southampton Water SPA. The allocation does not propose direct loss to the Solent and Southampton Water SPA.</p> <p>Briddlesford Copses SAC - policies T1, T2 and are unlikely to meet required criteria for mitigation in line with the Conservation of Species and Habitats Regulations 2017. Previously agreed that the impacts are minor and unlikely to impact the qualifying features. This advice should be incorporated into</p>

			<p>the Screening stage of the HRA, or more certain mitigation measures provided.</p> <p>Isle of Wight Downs SAC - The low level of proposed new dwellings in the SAC Zone of Influence means significant effects risks are low. Suggestion that current management practices from the National Trust can act as mitigation is not appropriate. Either ongoing current management is secured and the site has capacity for new visitor pressure, and the site screened out of appropriate assessment or specific funding/developer contributions provided to deliver access management projects to mitigate or avoid additional visitor pressure.</p> <p>An additional proposed mitigation measure is Policy EV6. Provision of Suitable Alternative Natural Greenspace (SANG) is valuable to avoid visitor pressure on designated sites. However, as part of this HRA there is little information provided about the delivery of SANG. Project-level HRA with EV2 offers the opportunity to examine this in more detail.</p> <p>Proposed mitigation measures are uncertain to succeed, but risks are low and compliance with the over-arching Policy EV2 at a project level would prevent recreational impacts on the SAC, so do not disagree with conclusion in 5.93 of the HRA.</p> <p>Recreational Pressure – Solent SPAs The Plan HRA and Policy EV3 adequately consider potential in-combination effects arising from recreational pressure. Recommend that the policy summary is tweaked to refer to potential alone impacts. Summary refers to Bird Aware Strategy requirements, but this strategy is focused on dealing only with in-combination impacts.</p>
S11.24	Jonathan Shavelar on behalf of natural England	SEA/SA	Identify areas of tranquillity and provide policy protection to such areas as identified in paragraph 106 and 191 of the NPPF. Important in National Parks/ AONBs/National Landscapes, where this is identified as a special quality. CPRE areas of tranquillity are a helpful source of evidence for the Local Plan and SEA/SA.

S11.25	Jonathan Shavelar on behalf of natural England	Section 1 general	Agri-environment schemes Minerals sites may be under Higher Level Stewardship agreements before minerals are extracted and may return to agricultural use following landfilling. Advise early contact by agreement holders with Rural Payments Agency so any payments can be amended accordingly.
S11.26	Isle of Wight Council Public Health	General	Creating healthy environments requires a strong health focused policy approach. Encouraged health forms a golden thread throughout the plan and is considered in many of the policies. Reference to the Health and Wellbeing Strategy needs updating. Would welcome a reference to the Public Health Strategy being developed due in 2025. Healthy Places links are not clear and this would be an important place focused link to make within the Plan.
S11.27	Isle of Wight Council Public Health	General on whole plan	Support the health focused policies in the Plan. Health outcomes are important consideration in the social, economic and environmental delivery of the plan. There are areas that could be enhanced, clarified and strengthened but the emerging Local Plan represents a positive and highly influential tool in improving the health and wellbeing opportunities for the local population of the Isle of Wight.
S11.28	Justin Gentleman - Foreland Homes	General comment on whole plan	The lack of an appropriate planning strategy has weakened the supply of housing sites, created uncertainty and damaged housing delivery. Political approach frustrates delivery and limits housing provision with claims of special circumstances. Has led to lack of developer confidence and delayed planning determinations. The Plan is for 15 years from 2022 to 2027. Already two years in and it is unclear what has been delivered and what remains. Plan should be forward-looking and ambitious, but the approach does not gel with that.
S11.29	Tom Bell - Portsmouth City Council	Duty to cooperate / Statement	Portsmouth City Council (PCC) is committed to discuss and work on cross boundary strategic planning matters and continue dialogue in the run up to submission and examination of the two LPA's Local Plans.

		of common ground	Will continue to work collaboratively after the national changes are finalised and secondary legislation enacted.
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Representations on Section 2 Issues we face

Rep number	Name of respondent	Paragraph or policy	Summary of issue raised
S2.1	Tim Brayford	2.41	No study into a fixed link study and economic impact has been undertaken.
S2.2	Tim Brayford	2.5	A direct road link could have substantial benefit to the island.
S2.3	Chani Courtney	2.3	Add mention of marine species and habitats.
S2.3	Chani Courtney	2.15	Add reference to sewage and agricultural pollution.
S2.4	Northwood Parish Council	2.17	<p>Population density figures are misleading. The island is not underpopulated. The plan is not sustainable or consistent with national planning policy. The Plan is ambiguous and contradictory, the figures don't add up and is not fit for purpose.</p> <p>Northwood is a semi-rural, a parish in its own right, and not part of Cowes. The designation should be changed.</p>
S2.5	Northwood Parish Council	2.18 and 2.22	More focus needed on creating family homes and encouraging growth in the working age population rather than older people.
S2.6	Northwood Parish Council	2.30	The reasons restricting delivery include a lack of construction skills, higher risks on return, and inability to secure funding, all have been seen locally with large developments.
S2.7	Northwood Parish Council	2.34	Query the figures and need a better breakdown.
S2.8	Northwood Parish Council		Why are only sites yielding 10 or more units included?
S2.9	Isle of Wight National Landscape (AONB)		Sound. The focus for development is clear, taking account of constraints and designations. Support CC1, AFF1 and INF1.

S2.10	Northwood Parish Council		Duplicate comment.
S2.11	Miss Penelope Baker		Allocate land for renewable energy installations in areas near large energy consumption, and areas unsuitable for high volume traffic.
S2.12	Mark Emmett		Consultation period does not meet legal requirements. Process designed to ignore constructive comments.
S2.13	Kerry Fosbury		Consultation period does not adhere to policy invalidating the process. Freshwater settlement gap does not align with Freshwater NP boundary, has not been subject to public consultation and is grade 2 agricultural land.
S2.14	Sustainable Freshwater Community Group		West Wight housing targets, a lack of infrastructure, sacrifice of green fields and grade 2 agricultural land, lack of consultation on settlement boundary changes, lack of provision for social and affordable housing do not address needs. Plan seeks to provide more homes without improving employment, amenities or affordable transport links and infrastructure which is not sustainable. No strategy to retain young Islanders and attract the skilled with good employment. Provide schools, sporting and leisure facilities. Is a strategy of managed decline. Need improvement to secondary education and transport on and off the island. Freshwater is a rural village, not a main or secondary settlement. Insufficient and complex consultation.
S2.16	Sara Mason	Section 2 General	The lack of brown or 'grey' land means that Camp Road is the most sustainable land in Freshwater for building much needed homes.
S2.17	FRESHWATER BAY RESIDENTS ASSOCIATION	Section 2 General	West Wight housing targets, a lack of infrastructure, sacrifice of green fields and grade 2 agricultural land, lack of consultation on settlement boundary changes, lack of provision for social and affordable housing do not address needs.

			<p>Plan seeks to provide more homes without improving employment, amenities or affordable transport links and infrastructure which is not sustainable.</p> <p>No strategy to retain young Islanders and attract the skilled with good employment. Provide schools, sporting and leisure facilities. Is a strategy of managed decline. Need improvement to secondary education and transport on and off the island.</p> <p>Freshwater is a rural village, not a main or secondary settlement. Insufficient and complex consultation.</p> <p>West Wight allocated a disproportionate number of houses, particularly outside the settlement boundary, in relation to available brown field capacity, social, medical and utility infrastructure.</p> <p>Re-designation of the settlement boundary gets round the protection of their current designation as “Greenfield Sites” of agricultural and ecological value. Not subject to public consultation.</p> <p>Should factor in ‘Exceptional Circumstances’ for housing numbers.</p> <p>National Park status and other options which would lead to a lower, more realistic and achievable target for housing growth.</p>
S2.18	FBRA - FRESHWATER BAY RESIDENTS ASSOCIATION	Section 2 as a whole	<p>West Wight housing targets, a lack of infrastructure, sacrifice of green fields and grade 2 agricultural land, lack of consultation on settlement boundary changes, lack of provision for social and affordable housing do not address needs.</p> <p>Plan seeks to provide more homes without improving employment, amenities or affordable transport links and infrastructure which is not sustainable.</p>

			<p>No strategy to retain young Islanders and attract the skilled with good employment. Provide schools, sporting and leisure facilities. Is a strategy of managed decline. Need improvement to secondary education and transport on and off the island.</p> <p>Freshwater is a rural village, not a main or secondary settlement. Insufficient and complex consultation.</p> <p>West Wight allocated a disproportionate number of houses, particularly outside the settlement boundary, in relation to available brown field capacity, social, medical and utility infrastructure.</p> <p>Re-designation of the settlement boundary gets round the protection of their current designation as “Greenfield Sites” of agricultural and ecological value. Not subject to public consultation.</p> <p>Should factor in ‘Exceptional Circumstances’ for housing numbers.</p> <p>National Park status and other options which would lead to a lower, more realistic and achievable target for housing growth.</p>
S2.19	Jane Wolley-Dodd	Section 2 General	<p>Unsustainable over development with houses that do not address housing needs. No protection for green fields and high quality agricultural land e.g. Camp Road.</p> <p>No infrastructure provision for future needs including transport, sewage, health facilities.</p> <p>Failure to recognise an aging population and need for social / affordable housing.</p> <p>Unachievable housing target will damage the tourist trade / economy of the Island by destroying natural habitats, nature. There are exceptional circumstances.</p> <p>Plan ignores local neighbourhood plans. Flawed consultation process.</p>

S2.20	Dr Sheard	Section 2 General	<p>Unsustainable large scale development which does not address local needs. Plan ignores the independent demographic survey and opposes input from parishes, town and community councils.</p> <p>Fails to provide infrastructure to meet the needs of proposed housing and protect agricultural land like Camp Road which impacts on the environment and agricultural industries.</p> <p>Flawed consultation process.</p>
S2.21	Julia Sheard	Section 2 General	<p>No solutions to sewage and other infrastructure issues risking UNESCO status; the environmental and ecological impacts ;destroying tourism; loss of farmland; use of greenfield sites over brownfield and renovating closed hotels. Need smaller, lower cost, rentals.</p> <p>Prioritise enforcing approved developments which have not delivered, then renovations, then brownfield sites only.</p> <p>Flawed consultation process.</p>
S2.22	Mary Emmett	S2.22	Flawed consultation process.
S2.23	Christopher Jarman		<p>Use of inaccurate population datasets and figures for extant permissions, the housing registered and associated housing needs data and ignoring and minimising alternative positions, including data from the Office of National Statistics meaning the Plan is fundamentally flawed.</p> <p>The 2014-based population and household projections likely to overestimated future growth. Population growth around 200 per year is an irrational basis for 453 dwellings per year.</p>
S2.24	Christopher Jarman	Section 2 general	Including in bound retirees in housing needs calculations is not sound as it skews demographics and amplifies societal stresses. Plan should have argued exceptional circumstances.
S2.25	Dominic Hicklin/Freshwater Parish Council	Section 2 General	West Wight housing targets, a lack of infrastructure, sacrifice of green fields and grade 2 agricultural land, lack of consultation on settlement boundary changes, lack of provision for social and affordable housing do not address needs.

			<p>Plan seeks to provide more homes without improving employment, amenities or affordable transport links and infrastructure which is not sustainable.</p> <p>No strategy to retain young Islanders and attract the skilled with good employment. Provide schools, sporting and leisure facilities. Is a strategy of managed decline. Need improvement to secondary education and transport on and off the island.</p> <p>Freshwater is a rural village, not a main or secondary settlement.</p>
S2.26	Elizabeth Keay	Section 2 General	Flawed consultation process.
S2.27	Bob Seely	Section 2 General	<p>West Wight housing targets, a lack of infrastructure, sacrifice of green fields and grade 2 agricultural land, lack of consultation on settlement boundary changes, lack of provision for social and affordable housing do not address these needs.</p> <p>Re-designation of the settlement boundary provides more homes without improving employment prospects, amenities or affordability, transport links or infrastructure. Is unsustainable. No attempt to rebalance the population. No strategy to retain young Islanders and attract the skilled with good employment. Provide schools, sporting and leisure facilities. Is a strategy of managed decline.</p> <p>Freshwater is a rural village, not a main or secondary settlement. Flawed consultation designed to discourage people.</p>
S2.28	Dom Hicklin/ Freshwater Parish Council	Section 2 general	West Wight housing targets, a lack of infrastructure, sacrifice of green fields and grade 2 agricultural land, lack of consultation on settlement boundary changes, lack of provision for social and affordable housing do not address these needs.

			<p>Re-designation of the settlement boundary provides more homes without improving employment prospects, amenities or affordability, transport links or infrastructure. Is unsustainable. No attempt to rebalance the population No strategy to retain young Islanders and attract the skilled with good employment. Provide schools, sporting and leisure facilities. Is a strategy of managed decline.</p> <p>Unachievable to increase density at Golden Hill industrial site as no transport or educational infrastructure to support it.</p> <p>West Wight allocated a disproportionate number of houses, particularly outside the settlement boundary, in relation to available brown field capacity, social, medical and utility infrastructure.</p> <p>Re-designation of the settlement boundary gets round the protection of their current designation as “Greenfield Sites” of agricultural and ecological value. Not subject to public consultation.</p> <p>Should factor in ‘Exceptional Circumstances’ for housing numbers. National Park status and other options would lead to a lower, more realistic and achievable target for housing growth.</p>
S2.29	Nora Galley	Para 2.1	<p>Figure 2.1: does not make clear 520 dpa housing target dates from the RSS, nor the Core Strategy does not allocate housing sites. Therefore a housing delivery boost will be a benefit of a plan-led approach to meeting needs.</p>
S2.30	Nora Galley	Para 2.17-2.20 and 2.40	<p>Paragraphs 2.17 and 2.18 contradict.</p> <p>The relationship between economic challenges and a constrained housing supply are not acknowledged.</p>
S2.31	FRESHWATER BAY RESIDENTS ASSOCIATION	Section 2 para 2.9	<p>Does not recognise "exceptional circumstances" of the Island. Flawed consultation process.</p> <p>No consultation on settlement boundary changes which are not supported.</p>

			Freshwater and Totland are rural villages not primary settlements. Site allocations should not be granted planning permission.
S2.32	Guy Robinson Historic England	Section 2	Support the approach integrating the historic environment with the natural environment.
S2.33	Paul Townsend	IPS 2.9	<p>West Wight housing targets, a lack of infrastructure, sacrifice of green fields and grade 2 agricultural land, lack of consultation on settlement boundary changes, lack of provision for social and affordable housing do not address these needs. No consultation on settlement boundary changes. These are not supported around Freshwater.</p> <p>No proposals to improve transport links or infrastructure or strategy to retain young Islanders and attract the skilled with good employment. Provide schools, sporting and leisure facilities with firm proposals.</p>
S2.34	Paul Townsend	IPS 2.5	Freshwater is a rural village, not a main settlement.
S2.35	Paul Townsend	IPS 2.52	Freshwater is not a major settlement.
S2.36	Bob Seely	Section 2 general	<p>Need to address West Wight housing targets, lack of infrastructure, sacrifice of green fields and grade 2 agricultural land, lack of consultation on proposed settlement boundary changes, lack of provision for social and affordable housing.</p> <p>More homes without facilities and amenities is unsustainable, leading to an ageing population, No strategies to retain younger Islanders and attract skilled incomers. Need provision for younger people - schools, sporting and leisure facilities.</p> <p>West Wight is allocated a disproportionate number of houses in relation to brown field capacity, social, medical and utility infrastructure.</p> <p>The SHLAA process allocates large sites outside existing settlement boundary. Re-designating greenfield land reduces protection of their current designation of agricultural and ecological value.</p>

S2.37	David Long - BCM	Para 2.18 and 2.20	Unclear how the plan deals with accommodation for older population and migration of younger educated people moving from the island.
S2.38	David Long - BCM	Paragraph 2.25-2.30:	The Plan does not cover the barriers affecting housing delivery and growth and the island's history in development.
S2.39	David Long - BCM	Para 2.31	The political instability caused by a lack of allocations and the cross- political party resistance to development has created an environment where it is difficult to invest and plan. Perception the Island is not investible, economically struggling and has no clear planned strategy.
S2.40	David Long - BCM	Para 2.49	No strategy to encourage manufacturing or agriculture.
S2.41	Iain Delaney – Captiva Homes	Section 2 General	The Plan is unsound centred around: 1) The Councils rationale for the ceiling to housing delivery 2) The viability of the Plan, as a whole. 3) Deferred decisions on SANG's, S.106 Contributions and/or infrastructure projects as no stable baseline to calculate development costs.
S2.42	Justin Gentleman - Foreland Homes	Section 2 – Demographics	No reference to growth in households. Has this been considered? Action unclear on addressing the 'brain drain' and meeting ageing demographic needs and in changing the demographic to achieve more balance?
S2.43	Justin Gentleman - Foreland Homes	Section 2 0 Growth and Housing	Disagree there is a ceiling to delivery. Need to take account of a whole market cycle and para 2.25 does not do this. What factors allowed higher delivery levels historically? A lack of clear allocations of all sizes causes a lack of delivery. Para 2.30 does not mention a lack of allocations and planning policy, which drives confidence to invest, train, grow and reduces funding risks. Historic lack of allocations has had a drastic effect on the delivery of housing. Several years of allocations needed to increase delivery.
S2.44	Justin Gentleman - Foreland Homes	Para 2.26	Without clear allocations driving stability, that will drive down the supply of affordable homes.

S2.45	Justin Gentleman - Foreland Homes	Para 2.35	<p>Limited brownfield land is available, and the largest sites are flawed. Uncertain if Camp Hill land is available for housing. Prison expansion would boost employment on the Island.</p> <p>Unclear if the 600 homes on brownfield land with permission, are being built, if they are deliverable or viable. Larger sites non delivery impacts wider housing delivery. Greenfield development is needed to address affordable housing issues.</p> <p>Newport Harbour requires expensive infrastructure, but the development economics do not work. Unclear how long it would take to sell the volume of homes proposed. Located in a flood risk zone compounding viability issues.</p>
S2.46	Justin Gentleman - Foreland Homes	Section 2 Para 2.36 & 2.37	No allocations to support delivery of aspirational homes.
S2.47	Justin Gentleman - Foreland Homes	Section 2 Para 2.38	Needs to plan for demographic change and household growth meeting the Island needs.
S2.48	Justin Gentleman - Foreland Homes	Section 2 Para 2.46	Unclear what the Plan does to encourage and support changing working patterns.
S2.49	Tom Bell - Portsmouth City Council	General and Para 2.31	Support para 2.31 which is set out in the SoCG. Committed to ongoing dialogue and happy to engage further.

Representations on Section 3 How the Island Planning Strategy reflects corporate priorities

Rep number	Name of respondent	Paragraph or policy	Summary of issue raised
S3.1	David Long - BCM	Para 3.4	<p>The strategic policy priorities are unrealistic:</p> <p>The Plan does not identify regeneration projects to drive forward employment skills or inward investment.</p> <p>It is dubious if there is enough PDL available to deliver the quantum required.</p>
S3.2	David Long - BCM	Para 3.15	<p>The latest housing needs assessment identifies that 489 affordable dwellings per annum should be provided to meet the (affordable) housing needs on the Island – the IPS does not set out how it will achieve this goal.</p>
S3.3	David Long - BCM	Para 3.35	<p>The Plan does not say what infrastructure is required for the allocations and it premediates itself on future decisions to be made.</p> <p>This leads to uncertainty and will lead to delays. The infrastructure should be defined now.</p>
S3.4	David Long - BCM	Para 3.46	<p>HM do not want to sell Camp Hill and so is unsound. Newport Harbour has little capability of being delivered. No sequential testing against sites outside of the flood zone and is therefore unsound.</p>
S3.5	David Long - BCM	Para 3.48	<p>Major growth in the Newport Regeneration Area, close to one another. It will be extremely slow to build out and so land supply is over optimistic.</p>
S3.6	Jonathan Shavelar - Natural England		<p>Recommended inclusion of a policy for biodiversity net gain using Natural England's statutory metric, to measure gains and losses to biodiversity resulting from development. Should include a map within the plan to map biodiversity assets and opportunity areas; a biodiversity net gain target; thresholds for different development types, locations or scales of development proposals and the</p>

			<p>justification for this. The scope and scale of expected biodiversity net gains should be set out in the Infrastructure Delivery Plan.</p> <p>Include how biodiversity net gain will be delivered and managed and priorities for habitat creation or enhancement in different parts of the plan area and the approach to onsite and offsite delivery. Add links to strategies or objectives in the plan, such as green infrastructure and Local Nature Recovery Strategies.</p> <p>Consider seeking opportunities for wider environmental net gain where possible for consistency with the NPPF for contributions to wider environment enhancement, adaptation to climate change impacts and/or taking forward elements of existing green infrastructure, open space of biodiversity strategies. Include opportunities for environmental gains.</p> <p>Add reference is made to the Hampshire Ecological Network Mapping dataset. Use biodiversity data from all available sources.</p> <p>The plan's approach to biodiversity net gain should be compliant with the mitigation hierarchy, as outlined in the NPPF.</p> <p>Work with local partners, including the Local Environmental Record Centre and wildlife trusts, to share data and consider requirements for long term habitat monitoring. Monitoring requirements should be clear on what is expected from landowners who may be delivering biodiversity net gains on behalf of developers. Providing up-front information on monitoring will help to streamline the project stage.</p>
S3.7	Justin Gentleman - Foreland Homes	Para 3.21	The lack of a clear stable policy approach does not assist in providing confidence to invest.

S3.8	Justin Gentleman - Foreland Homes	Para 3.22, 3.23 & 3.24	If the plan had sufficient allocations, small and large, the concerns in these paras would not arise. Adds to uncertainty and ambiguity of housing provision, leading to a lack of investor confidence.
S3.9	Justin Gentleman - Foreland Homes	Para 3.25, 3.37	No allocations to support independent living. If water and wastewater infrastructure is required, it should be part of the building control process and the sale or use of the property.
S3.10	Justin Gentleman - Foreland Homes	3.42	Text does not feel forward looking and positive and it feels like the imposition of limit or ceiling. Housing Difficult to define the `right places` or `being closer to what they need` in a digital age. The focus is wrong as there is a need for all types pf homes not just affordable ones. The emphasis away from reliance on private transport is unclear given the advent of electric vehicles. What is the solution to transport?
S3.11	Justin Gentleman - Foreland Homes	3.45	Support using land within the settlement boundary and brownfield first, but unclear why the use of public sector land should be prioritised and not the best available land for use?
S3.12	Justin Gentleman - Foreland Homes	3.46	What happens if these brownfield sites at Camp Hill and Newport Harbour are not delivered?
S3.13	Justin Gentleman - Foreland Homes	3.48	What is judged to be an acceptable fall out rate? If completions continue at the 30% conversation rate, should expect 105.9 completions PA. Provision of SANG, Biodiversity net gain of 10% & protecting and providing green and open spaces have potential to provide positive outcomes, but create a burden on development land within an allocation. Has the effect in land use terms and on yield of homes

			<p>been considered with the allocated sites in this plan?</p> <p>Water Quality Impact on the Solent Marine Sites – it is not clear why this issue falls to house building to resolve. A simple policy on how we treat water could resolve this.</p>
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Representations on Policy CC1 Climate Change

Rep number	Name of respondent	Paragraph or policy	Summary of issue raised
CC1.1	Martin Shoebridge	CC1	Include solar power and battery for each new build.
CC1.2	Chani Courtney	CC1	Add "The council will actively use these assets to shape a better, healthier, more resilient and more sustainable Island life."
CC1.3	Chani Courtney	CC1 supporting text	3.31 Add after "currently known".
CC1.4	Sustainable Freshwater Community Group	CC1	Oppose building on green field sites. Building contributes to additional CO2 contrary to the council's goal to become carbon neutral. No offsetting is planned for. Insufficient complex consultation,
CC1.5	Sarah Sims	CC1	Oppose building on green field sites. Building contributes to additional CO2 contrary to the council's goal to become carbon neutral. No offsetting is planned for. Insufficient complex consultation,
CC1.6	FBRA - FRESHWATER	CC1 General	Oppose building on green field sites.

	BAY RESIDENTS ASSOCIATION		<p>Building contributes to additional CO2 contrary to the council's goal to become carbon neutral.</p> <p>No offsetting is planned for.</p> <p>Insufficient complex consultation,</p>
CC1.7	Dominic Hicklin	CC1 General	<p>Oppose building on green field sites.</p> <p>Building contributes to additional CO2 contrary to the council's goal to become carbon neutral.</p> <p>No offsetting is planned for.</p> <p>Insufficient complex consultation,</p>
CC1.8	Nora Galley	General	<p>Support principle of Policy CC1 but wording is too vague and lacks specific criteria to be effective. Add cross-references to policies with these criteria.</p>
CC1.9	Martha James, Plan Research for East Cowes Town Council	CC1	<p>This policy is aspirational and wording needs to be improved.</p>
CC1.10	Guy Robinson Historic England	CC1	<p>Support but add retrofit of the existing building stock.</p> <p>Add to supporting text the role of heritage in climate change mitigation and adaptation.</p>
CC1.11	Isle of Wight Council Public Health	CC1 General	<p>This policy clearly makes the link to health and wellbeing and we welcome this inclusion.</p> <p>There are key impacts on public health from climate change and in mitigating these impacts the co-benefits to health are well established.</p>

			<p>These impacts tend to fall upon those communities in greatest need and we would support the aims of this policy and encourage any strengthening of its wording through the Regulation 19 stage.</p> <p>How does climate change threaten our health? From flooding to wildfires – UK Health Security Agency (blog.gov.uk)</p> <p>We would highlight the evidence set out within the UK Climate Change Risk Assessment (CCRA3) which although national has particular relevance to the Island. This report assesses 61 risks and opportunities from climate change to England,</p> <p>including to business, infrastructure, housing, the natural environment, our health and risks from the impacts of climate change. Summary for England (CCRA3-IA) - UK Climate Risk</p>
CC1.12	Isle of Wight Council Public Health	3.42	Point 3.42. This section summarises the 6 key areas: Environment, Community, Growth, Housing, Economy and Transport. We would suggest that links to health being clearly articulated within these paragraphs, particularly in sections on Environment, Housing and Transport where it is currently not mentioned.
CC1.13	Chani Courtney	CC1 para 3.32	3.32 Update to OFWAT draft proposal
CC1.14	Chani Courtney	CC1 Para 3.36	3.36 Support.
CC1.15	Chani Courtney	CC1 para 3.37	3.37 Add applicants need to meet surface water management polices set by Southern Water.
CC1.16	Chani Courtney	CC1 para 3.38-39	3.38 and 3.39 refer to SuDs supplement.

Representations on Policy AFF1 Isle of Wight Affordable Housing

Rep number	Name of respondent	Paragraph or policy	Summary of issue raised
AFF1.1	Northwood Parish Council	AFF1 Supporting text	Poor levels of affordable housing have been achieved and 35% overestimates what can be achieved.
AFF1.2	Northwood Parish Council	AFF1 Supporting text	3.22 - 3.24 take into account the poor response on the Local Housing Needs Assessment.
AFF1.3	Wootton Bridge Parish	AFF1 supporting text	<p>Paras 3.22-.23 support preparing parish Housing Needs Survey but previous Housing Needs Survey have not been considered in the past.</p> <p>Para 3.4 Develop empty and derelict properties for affordable housing and the homeless.</p>
AFF1.4	Northwood Parish Council	AFF1	<p>Para 3.33 The Infrastructure Delivery Plan should address local infrastructure issues.</p> <p>Appendix 2, table 2: shows 351 of the proposed 388 new homes without planning permission are in Northwood, compared to just 12 in Gurnard and 25 in Cowes.</p> <p>351 new homes (plus 72 approved) added to 1200 homes already represents a 35% increase in a rural village without the necessary infrastructure.</p>
AFF1.5	David Long - BCM	AFF general	Isle of Wight Affordable Housing. The Council have not viability tested how the discounts effect delivery. Developers funding surveys by agreeing

			with stakeholders including parish, town or community Council groups is unlikely to be achievable and is unrealistic.
AFF1.6	Tetlow King Planning on behalf of Sovereign Network Group	AFF main policy	<p>SNG recognises the importance of ensuring that all affordable housing tenures, as defined in Annex 2 of the NPPF, are genuinely accessible and affordable for local residents.</p> <p>We do, however, consider that the current wording of Policy AFF1 conflates defining affordability with defining affordable housing tenures. For example, the policy begins by stating that “The Isle of Wight Council recognises that affordable housing as defined in the NPPF is not affordable on the island”, however the glossary of the IPS clarifies that the Council “will use the definition of affordable housing set out in policy AFF1 (in relation to discounts from market value) in conjunction with the NPPF definition.”</p> <p>As such it is clear that the purpose of the policy is not to define affordable housing tenures but rather to define the level of discount to be applied to NPPF Annex 2 tenures in order for them to be considered to be affordable to IoW residents.</p> <p>It is considered that the policy should be reworded to reflect this position.</p> <p>Following informal discussions with the Council, we are grateful for the clarification that the market sale discounts specified in the policy pertain to the sale price rather than the shares sold, and that the rental discounts represent the stated percentage of market rent, capped at local housing allowance.</p> <p>To ensure consistent interpretation and application of the policy, we have set out some recommended amendments to the policy wording below:</p> <p>“The Isle of Wight Council recognises that affordable housing as defined in the discounts referred to in the NPPF is are not affordable on the island. To address this, the council will use the following definition of affordable housing affordability in conjunction with the affordable housing tenures defined in the NPPF:</p> <ul style="list-style-type: none"> • For one and two bedroom homes: For sale at a price equivalent to at least 30 per cent below local market value Up to 70 per cent of market sale,; for rent up to 70 per cent of market rent or the capped at local housing allowance, whichever is the lowest. • For three bedroom homes: For sale at a price equivalent to at least 35 per cent below local market value Up to 65 per cent of market sale,; for rent up to 65 per cent of market rent or the capped at local housing allowance, whichever is the lowest. • For homes with four or more bedrooms: For sale at a price equivalent to at least 40 per cent below local market value Up to 60 per cent of market sale,; for rent up to 60 per cent of market rent or the capped at local housing allowance, whichever is the lowest.

		<p>Policy AFF1 follows the approach of the Affordable Housing SPD (September 2023) in varying affordability thresholds in relation to bedroom numbers. SNG is concerned that this may prejudice the mix of affordable housing that comes forward. Complex multi-tenure discounts may increase a perception of risk and may increase pressure to deliver smaller unit sizes in response to the thresholds set rather than local needs. The IPS Housing evidence Paper D – Barriers to Delivery May 2024 identifies the perception that development on the loW is complex and risky with lower operating margins as barrier to delivery.</p> <p>It is suggested that a fixed discount from market value be considered across property sizes. Rent should continue to be capped at the lower of the discount from the market value or the Local Housing Allowance.</p> <p>SNG supports the need for locally defined discounts in principle; however, we ask the Council to be wary of the ways in which such policies could impact development viability which may restrict the provision of affordable housing.</p> <p>It is SNG’s view that these requirements should be introduced alongside robust analysis and consideration of the effects on viability so that the application of such policies does not frustrate the delivery of critical affordable housing.</p> <p>It is considered that the policy wording relating to the type and mix of affordable homes to provided does not wholly align with the policy direction set out in Policy H5.</p> <p>The policy wording of AFF1 implies that all developments which provide onsite affordable housing should be informed by a Parish Level Housing Needs Survey. In contrast Policy H5 expects a target mix of 80% social / affordable rented tenures with the remaining 20% to be other affordable home ownership tenures.</p> <p>Policy H5 is clear that a Parish Level Housing Needs Survey (completed after 2018) is one of a range of sources that could be used to justify an alternative mix of affordable homes on site. It is recommended that this element of Policy AFF1 be reworded to ensure consistency with Policy H5.</p>
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			<p>SNG recognises the value of a diversified approach to affordable housing, particularly in the context of ensuring that housing is genuinely affordable to those most in need. As such, we recommend that the Council consider incorporating a policy prioritising the provision of social rent, as outlined in the 2024 NPPF consultation.</p> <p>Social rent, typically set significantly below market rent and directly linked to local incomes, provides an essential safety net for low- income households, ensuring that they are not priced out of the housing market. Given the unique challenges faced by loW residents, including lower-than average incomes and high housing costs, the prioritisation of social rent within the affordable housing mix could significantly enhance housing accessibility for the most vulnerable populations.</p> <p>SNG would appreciate the opportunity to discuss the relationship between different affordable housing products and grant funding. There may be opportunities to support the delivery of social rent under Homes England’s Strategic Partnership programme. However, as noted at the outset, a conversation in relation to wider constraints to the delivery and adoption of affordable housing may be beyond the scope of the Regulation 19 Consultation.</p> <p>We welcome and support the expectation that all new build affordable housing secured through Policy H5 (Delivering affordable housing) will be consistent with Part M4(2) of the Building Regulations. However, we note that requiring only affordable homes to be fully M4(2) compliant risks jeopardising the viability and deliverability of affordable housing on the Island. We therefore suggest that Policy H3 (Housing Development General Requirements) be amended to require M4(2) compliance across all new housing developments. This approach would ensure fairness and maintain the overall viability of affordable housing projects on the Island, while also ensuring that market properties deliver homes that can easily be adapted to accommodate the Islands ageing population</p>
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AFF1.7	Justin Gentleman - Foreland Homes	3.39	3.39 feels rather backward. Surely if making allocations correctly (both small and large) infrastructure and highways plans could be formed by the LPA? Looking for joined up solutions from developers engaging with third parties does not provide the confidence to invest and will not aid delivery.
AFF1.8	Northwood Parish Council	Supporting text	<p>Paras 3.43 and 3.47 reword West Medina – Cowes, Gurnard and Northwood and settlements in and to the west of Newport</p> <p>No consultation with Northwood Parish Council on the adjusted settlement boundaries.</p> <p>Extending designation of Northwood as a primary settlement does not reflect its rural nature contradicting section 4.5.</p> <p>The plan is not sustainable or consistent with national planning policy. The Plan is ambiguous and contradictory, the figures don't add up and is not fit for purpose.</p> <p>Northwood is a semi-rural, a parish in its own right, and not part of Cowes. The designation should be changed.</p>

Representations on Policy INF1 Infrastructure

Rep number	Name of respondent	Paragraph or policy	Summary of issue raised
INF1.1	Penelope Baker	Diagram 3.1	<p>No designations for renewable energy infrastructure. Limit energy consumption and carbon emissions in growth areas.</p> <p>Add the settlement gap between Lake south and Newchurch to Fig 3.1.</p> <p>Add areas for renewable energy infrastructure.</p>
INF1.2	Penelope Baker	3.44	Para 3.44 add renewable infrastructure.
INF1.3	Bob Seely		<p>Lack of infrastructure to cope with housing requirements.</p> <p>The island has exceptional circumstances.</p> <p>The consultation form is too complex and puts off respondents.</p> <p>Unclear what the policies map is.</p>
INF1.4	Nora Galley	General	Policy INF1 is imprecise and should cross- reference the policies providing criteria.
INF1.5	Northwood Parish Council	General	<p>Amended comment</p> <p>No consultation on the adjusted settlement boundaries and designation of Northwood as a primary settlement.</p>

			<p>Appendix 2, table 2: shows 351 of the proposed 388 new homes without planning permission are in Northwood, compared to just 12 in Gurnard and 25 in Cowes.</p> <p>351 new homes (plus 72 approved) added to 1025 homes already existing represents a 41.2% increase in a rural village without the necessary infrastructure.</p>
INF1.6	David Long BCM	General	<p>The Council seek planning conditions for connections to the adopted infrastructure network prior to development commencing. Southern Water or utility companies provide infrastructure via separate legislation.</p>

Representations on Section 4: Environment			
Rep number	Name of respondent	Paragraph or policy	Summary of issue raised
General			
EVG.1	Chani Courtney	General	4.4 Great to see the wording “Protecting our landscapes and seascapes.”
EVG.2	Hampshire & Isle of Wight Wildlife Trust	EVG.2	Welcome nutrient neutrality in EV4 but should include developments connecting to Sandown. The buffers of 8 metres and 16 metres are insufficient and should be replaced with a minimum of 20 metres.
EVG.3	Jonathan Shavelar on behalf of Natural England	General	The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity and consider geodiversity conservation. A strategic approach for biodiversity should support a similar approach for green infrastructure. Plans should set out the approach to delivering net gains for biodiversity and be considered for all aspects of the plan and development types, including transport proposals, housing and community infrastructure
EVG.4	Jonathan Shavelar on behalf of Natural England	General	The Local Plan should be underpinned by up-to-date environmental evidence, including an assessment of existing and potential components of local ecological networks and inform the Sustainability Appraisal, ensure that land of least environment value is chosen for development, and that the mitigation hierarchy is followed and informs opportunities for enhancement and development requirements for sites.

			<p>Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife. Where development is proposed, opportunities should be explored to contribute to the enhancement of ecological networks. Planning positively for ecological networks contributes towards a strategic approach for the creation, protection, enhancement and management of green infrastructure, as identified in para 181 of the NPPF.</p>
EVG.5	Jonathan Shavelar on behalf of Natural England	General	<p>Soil, Agricultural Land Quality and Reclamation</p> <p>The Minerals and Waste Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver</p> <p>The conservation and sustainable management of soils is reflected in NPPF, para 180. When considering land use change, the permanency of the impact on soils is important.</p> <p>Policies should take account of the impact on land and soil resources and the range of vital functions(ecosystem services) they provide in line with paragraph 180 of the NPPF.</p> <p>To assist in understanding agricultural land quality and safeguard 'best and most versatile' agricultural land, strategic scale Agricultural Land Classification (ALC) Maps are available. Where no reliable information is available, developers should commission a new ALC survey, for any sites they put forward for consideration. Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites should be referred to in the plan.</p>

			<p>All allocated sites contain BMV agricultural land. In line with the Planning Practice Guidance (PPG) to support the NPPF; we welcome that the allocated sites are all accompanied by a detailed ALC Survey (Post-1988), available on the magic website. Where minerals underlie BMV agricultural land, restoration and aftercare will preserve the long- term potential of the land as a national, high-quality resource.</p> <p>Alternative after-uses (such as forestry and some forms of amenity, including nature conservation) on BMV agricultural land, the methods used in restoration and aftercare should enable the land to retain its longer-term agricultural capability as a future resource.</p> <p>Reclamation to non-agricultural uses does not reduce commitment to high standards in reclamation. Requires equal commitment by mineral operators, mineral planning authorities and other parties involved.</p> <p>Sustainable soil management should aim to minimise risks to the ecosystem services which soils provide, through suitable soil handling and management advice. Sufficient site-specific soil survey data needs to be available to inform decision making. To include, for example, assessment of soil properties to inform appropriate soil management, restoration and drainage, where required.</p>
EVG.6	Isle of Wight Council Public Health	General on EV	Acknowledge the Plans ambition around environment but welcomes references in policy which enhance key links to climate and health.
EVG.7	Chani Courtney	General	4.6 SUDS supplementary planning document should be mentioned.
Policy EV1			
EV1.1	Isle of Wight Gardens Trust	EV1	<p>In para 4.11 the registered historic parks and gardens should be broken down and listed by grade.</p> <p>Confirmation of Local List sites (now the Local Heritage List) being considered to be designated heritage assets is needed.</p>

EV1.2	Huw Jenkins	EV1	<p>Para 4.15 HA005 in Freshwater conflicts with Policy EV1</p> <p>New development should retain historic reference points for a sense of local identity and distinctiveness including ancient roads, green lanes and byways and settlement patterns. The spaces between and within these assets are important. Historic Landscape Characterisation is an important tool for managing the historic environment and conserving important landscapes.H005 is important to avoid coalescence as shown in the LUC study.</p> <p>Should defend and maintain gaps for community, biodiversity, landscape and historical character.</p> <p>Unclear how the Freshwater settlement boundary has been redrawn.</p>
EV1.3	MR ANDREW S MOSCOFF ('BORIS')	EV1	<p>No consultation on site allocation changes. The settlement boundary for Freshwater should be re-established and needs agreement between the parish councils. Prevent the erosion of 'gaps' to retain views into the outstanding countryside. Avoid large-scale buildings and keep the sense of separation between settlement areas.</p>
EV1.4	Rebecca Loader/Isle of Wight Council Archaeology & Historic Environment Service	EV1	<p>Policy EV1, part c</p> <p>Add 'historic environment:</p> <p>Demonstrate how they have been informed by sufficient evidence to assess impacts on the significance of the historic environment and heritage assets including their settings (including any heritage assets that have yet to be identified). Proposals should demonstrate how they have avoided, minimised and mitigated any harm to heritage assets.</p>
EV1.5	Rebecca Loader/Isle	EV1	<p>Paragraph 4.11 update figures:</p>

	of Wight Council Archaeology & Historic Environment Service		
EV1.6	Rebecca Loader/Isle of Wight Council Archaeology & Historic Environment Service	EV1	Amend paragraph 4,13, ii to: Demonstrate as a minimum consultation with the Isle of Wight Historic Environment Record, and review other available sources including Conservation Area Appraisals, and if appropriate, original survey.
EV1.7	Rebecca Loader/Isle of Wight Council Archaeology & Historic Environment Service	EV1	Paragraph 4.14 The Local List is now referred to as the Local Heritage List.
EV1.8	Rebecca Loader/Isle of Wight Council Archaeology & Historic Environment Service	EV1	Paragraph 4.16 Change to 'The council welcomes pre-application with applicants that can help identify opportunities and constraints prior to submission of an application, including specific consultation with the Isle of Wight Council Archaeology and Historic Environment Service'. Final sentence should refer to the national Heritage at Risk Register, or Historic England's Heritage at Risk Register.

EV1.9	Rebecca Loader/Isle of Wight Council Archaeology & Historic Environment Service	EV1	Other relevant documents and information Include the Historic Environment and the Historic Environment Action Plan
EV1.10	Guy Robinson Historic England	EV1	Broadly support policy, Add detail on strategic commitments beyond development management. Add scope for heritage-led regeneration and the approach to heritage at risk. Delete `positively` in the opening sentence. Clarify criterion b) Where there is retrofitting of traditionally constructed buildings where there are impacts on heritage significance these must be considered alongside carbon and this is currently missing. Add reference to the supporting text to a “whole building approach” to the retrofit of traditionally constructed buildings, informed by heritage expertise.
EV1.11	Guy Robinson Historic England	EV1, para 4.8	Reword end of paragraph 4.8 to:- “The historic environment encompasses all aspects resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped with planted or managed flora. These surviving physical remains are referred to as heritage assets where they have a degree of significance meriting consideration in planning decisions.”
EV1.12	Guy Robinson	EV1, para 411	The sentence beginning “The Isle of Wight benefits ... does not make sense.

	Historic England		Clarify if there are 13,501 non-designated sites on the HER, or 13,501 entries on the HER.
EV1.13	Guy Robinson Historic England	EV1, para 412	Add more information on the island's archaeological to delivering a positive strategy for the historic environment. It would also provide an opportunity to acknowledge the need to notify Historic England in cases where Scheduled Monument Consent (SMC) will be required and encourage early engagement with Historic England where SMC is going to be required.
EV1.14	Guy Robinson Historic England	EV1, para 4.14	Add additional resource on building stone on the Isle of Wight, to the main text. "Buildings which are constructed in a traditional vernacular style and of traditional materials (for example natural stone) should be retained and restored wherever possible. For more information on the use of building stone on the Isle of Wight, refer to https://historicengland.org.uk/images-books/publications/building-stones-england-isle-of-wight/ "
EV1.15	Guy Robinson Historic England	EV1, para 4.16	<p>Para 4.16 more detail needed on heritage at risk either through linking to the Regeneration Strategy or the Cultural Strategy. Add a commitment to develop a local buildings-at-risk register. Use of good practice guidance and advice notes will help assess development proposals.</p> <p>Consideration of the Island's heritage at risk should also form part of early engagement and assessment of proposals.</p> <p>A strategic approach to heritage, including heritage at risk, offers scope to support regeneration and distinctive place-shaping.</p> <p>Heritage assets not on the national register are of heritage interest and are at risk from harm to significance due to neglect or other pressures.</p> <p>A strategic approach offers scope to support regeneration and distinctive place-shaping.</p>

EV1.16	Guy Robinson Historic England	EV1 4.18	Paragraph 4.18 As mentioned above, we are concerned by the outlook for heritage at risk on the island. While the commitments in paragraph 4.18 are welcome, we encourage the Council to go further in committing also to prepare a local “buildings-at-risk” register, informed by a survey of such assets. Add to the end of 4.18 - The council will develop a local buildings-at-risk register to support this endeavour.”
EV1.17	Guy Robinson Historic England	EV1 - Other relevant documents and information	We strongly recommend adding the IoW Historic Environment Record to this bulleted list.
Policy EV2			
EV2.1	Mrs Madeline Groombridge	EV2 General	No this is too complicated & it’s deliberately meant to be. We are overcrowded on the Island as it is ! Look at Horsebridge Hill on rubbish day on a Monday Morning it can’t cope now let alone more houses, let’s have a more realistic number we are an Island, do you want to concrete it over & spoil it
EV2.2	Laura Lax Environment Agency	EV2	Support policy.
EV2.3	Julie Sims RSPB	EV2	Add tests for developments which might impact non-NSN sites, including SSSIs and SNCIs.
EV2.4	Julie Sims RSPB	EV2	OBJECT. Add a reference to the Reg 64 derogation tests in full and in sequence, including alternative solutions and reference Reg 64 (2), which requires a more stringent test for adverse impacts on priority national habitats.
EV2.5	Julie Sims RSPB	EV2, para 4.2	Para 4.2 object to ‘steered away’ as not clear. Develop local development strategies for clusters of key nature conservation sites such as Bembridge Harbour. A lack of strategic direction risks

			piecemeal development, inadequate implementation of mitigation measures and deterioration of non-National Site Network sites.
EV2.6	Julie Sims RSPB	EV2	<p>Para 4.21 should refer to 'plans and projects' for consistency with Habitat Regulations.</p> <p>Add capitals to 'Appropriate Assessment', 'Habitat Regulations Assessment' and 'The Habitats Regulations'.</p> <p>Object. Amend text to reflect the requirements of Regs 63 and 64 of The Habitats Regulations. Add a strategic approach to mitigation frameworks.</p> <p>Delete 'plans and development' and replace with 'plans and projects' .</p> <p>Add reference to the Reg 63 (1) test for Likely Significant Effect only if a plan or project is not directly connected to the management of a European site.</p> <p>Amend text to `IOWC as a Competent Authority may consent a plan or project only having ascertained that it will not adversely affect the integrity of a European site or European offshore marine site` .</p> <p>Delete 'For the avoidance of doubt, project level HRA will not be required for issues relating solely to recreational disturbance that are covered by policy EV3 and the Solent Recreation Mitigation Strategy.'</p>
EV2.7	Katie Ewers	EV2	The Isle of Wight Council holds a Great Crested Newt Organisational (or "District") Licence granted by Natural England and is administered by NatureSpace Partnership. This enables developers to pay for new habitat creation based on impact from their proposed development.

EV2.8	Sarah Sims	EV2	<p>The plans are contrary to UNESCO Biosphere status. 60% of the area is within an AONB and 80% of the coastline is Heritage Coast. Urbanising a rural landscape will impact on tourism.</p> <p>Prioritise sensitive small developments on brownfield sites needing improvement.</p> <p>Para 2.11 should reflect the UNESCO Biosphere, with nationally and locally important heritage assets, sites of internationally important geology, and important habitats and species. . Impact on Barbastelle Bats.</p> <p>Freshwater is a rich and highly diverse rural area which must be protected.</p>
EV2.9	Southampton City Council	EV2	<p>Support.</p> <p>In relation to BNG – 10% may result in developers having to purchase off-site credits in other local authority areas so to assist this SCC and Isle of Wight Council (IoWC) have agreed to perform a monitoring role for BNG credit sites within their respective boundaries as per the SCC & IoWC Statement of Common Ground.</p>
EV2.10	FBRA	EV2	<p>The plans are contrary to UNESCO Biosphere status. 60% of the area is within an AONB and 80% of the coastline is Heritage Coast. Urbanising a rural landscape will impact on tourism.</p> <p>Prioritise sensitive small developments on brownfield sites needing improvement.</p> <p>Para 2.11 should reflect the UNESCO Biosphere, with nationally and locally important heritage assets, sites of internationally important geology, and important habitats and species including key species.</p> <p>Impact on Barbastelle Bats.</p> <p>Freshwater is a rich and highly diverse rural area which must be protected.</p>

EV2.11	Phillip Guy	EV2	<p>Freshwater is a rich and highly diverse rural area which must be protected.</p> <p>Insufficient complex consultation,</p>
EV2.12	Dawn Collins	EV2	<p>The plans are contrary to UNESCO Biosphere status and the AONB and Heritage Coast status. Impact on Barbastelle Bats habitats. Need to maintain biodiversity.</p> <p>Reflect neighbourhood plans. Protect AONB SSSI's.</p>
EV2.13	Dominic Hicklin	EV2	<p>The plans are contrary to UNESCO Biosphere status. 60% of the area is within an AONB and 80% of the coastline is Heritage Coast. Urbanising a rural landscape will impact on tourism.</p> <p>Prioritise sensitive small developments on brownfield sites needing improvement.</p> <p>Para 2.11 should reflect the UNESCO Biosphere, with nationally and locally important heritage assets, sites of internationally important geology, and important habitats and species including key species.</p> <p>Impact on Barbastelle Bats</p> <p>Freshwater is a rich and highly diverse rural area which must be protected.</p>
EV2.14	Nick Stuart	EV2	<p>Concern on the reference of possibility of accepting damage through wholly exceptional circumstances with a suitable compensation strategy. It impossible to mitigate or replace ancient woodland and associated ecosystems and stronger wording is needed to not to include housing or economic policies.</p>
EV2.15	Hampshire & Isle of Wight	EV2	<p>Amend policy and set a target above 10% Biodiversity Net Gain, aiming for at least 20% Biodiversity Net Gain.</p>

	Wildlife Trust		<p>To allow biodiversity to thrive on the Island, the re-introduction of beavers will support the natural functions of the local ecosystem.</p> <p>Nature is good for the island economy, attracts visitors, and with UNIESCO biosphere reserve designation should increase Biodiversity Bet Gain target to comply with the Environment Act 2021 and to enhance the natural environment.</p>
EV2.16	Sustainable Freshwater Community Group	EV2	<p>Plan is contrary to maintaining UNESCO Biosphere status, 60% of the area is within an AONB and 80% of the coastline is Heritage Coast.</p> <p>Urbanising a rural landscape will impact on tourism.</p> <p>Prioritise sensitive small developments on brownfield sites needing improvement.</p> <p>Para 2.11 should reflect the UNESCO Biosphere, with nationally and locally important heritage assets, sites of internationally important geology, and important habitats and species including key species . Impact on Barbastelle Bats</p> <p>Freshwater is a rich and highly diverse rural area which must be protected.</p> <p>Insufficient complex consultation,</p>
EV2.17	Richard Holmes BCM for Sam Biles	EV2	<p>EV2 in para 4.29, the exact extent of buffering should be considered at design stage and informed by surveys and detailed mitigation and enhancement packages. Setting prescriptive measurements is unnecessary and unreasonable with no evidence to support the buffers in the policy.</p>

EV2.18	Guy Robinson Historic England	EV2	Add to supporting text that the natural environment and the historic environment are integral to each other. There is scope for an integrated approach to land management, which delivers multiple benefits.
EV2.19	Lucy Charman Country Land & Business Association (CLA)	EV2	Imposing buffer requirements could lead to prohibitive conditions to affect development which is otherwise and does not comply with National Planning Policy.
EV2.20	Richard Holmes BCM for perry Properties Ltd	EV2	EV2 in para 4.29, the exact extent of buffering should be considered at design stage and informed by surveys and detailed mitigation and enhancement packages. Setting prescriptive measurements is unnecessary and unreasonable with no evidence to support the buffers in the policy.
EV2.21	Richard Holmes BCM for Susan Rann	EV2	EV2 in para 4.29, the exact extent of buffering should be considered at design stage and informed by surveys and detailed mitigation and enhancement packages. Setting prescriptive measurements is unnecessary and unreasonable with no evidence to support the buffers in the policy.
EV2.22	Richard Holmes BCM for West Oak Homes and Billings Group	EV2	EV2 in para 4.29, the exact extent of buffering should be considered at design stage and informed by surveys and detailed mitigation and enhancement packages. Setting prescriptive measurements is unnecessary and unreasonable with no evidence to support the buffers in the policy.
EV2.23	David Long	EV2 General	Policy EV2 does not factor in any BNG exemptions The BNG exemptions should be included within EV2.

EV2.24	David Long – BCM	EV2 para 4.20	The IPS refers to core areas identified in the Solent Waders and Brent Goose Strategy 2020. The surveys were undertaken in 2016/17 are these out of date and is the evidence sound?
EV2.25	David Long – BCM	EV2 para 4.29	EV2 in para 4.29, the exact extent of buffering should be considered at design stage and informed by surveys and detailed mitigation and enhancement packages. Setting prescriptive measurements is unnecessary and unreasonable with no evidence to support the buffers in the policy.
EV2.26	David Long – BCM	EV2 para 4.21	The Council suggest that “development may be required to demonstrate no adverse effect on integrity through a project level habitat regulations assessment”. Setting the bar at ‘no adverse effect’ would be unsound when the relevant test is ‘a likely significant effect’.
EV2.27	Chani Courtney	EV2 General	EV2 Your map does not show marine or water based designations. Water ones can be found on MAGIC (defra.gov.uk) and Launch of THE WATERSHED POLLUTION MAP - Watershed Investigations EV2 This wording didn’t cover about water flow from CSO’s to environmentally sensitive areas where that CSO is outside the boundary but the onward flow affects the sensitive area.
EV2.28	Chani Courtney	EV 2 Para 4.23	4.23 YES!! Well done.
EV2.29	Chani Courtney	EV2 Para 4.29-4.30	4.29 and 4.30 need refer to SUDS document. Good 4.30 shows pollution, but too broad a term base.
EV2.30	Chani Courtney	EV2 Para 4.31	4.31 There is no link on how and where to find guidance. Community science and sampling should be mentioned to be inline with the requests of the sewage motion passed through full council in May 2024.
Policy EV3			
EV3.1	Julie Sims RSPB	EV3	Welcome reference to the Solent Recreation Mitigation Strategy (SRMS) in the draft. However, policy text EV3 (b) and (c) do not

			<p>provide an adequate strategic approach to mitigation and risk poorly designed, implemented and monitored bespoke mitigation schemes. OBJECT to EV3 (b) and (c) and recommend their omission.</p> <p>Delete draft policies draft policy text EV3 (b) and (c).</p>
EV3.2	Caroline Dudley	EV3	<p>Creating Suitable Alternative Natural Greenspaces (SANGs) and visitor engagement by Bird Aware Solent will not sufficiently alleviate increasing pressures on coastal wildfowl and waders during the winter in certain parts of the Island. EV3 strategy is not sound or sustainable.</p> <p>Need greater dialogue with conservation bodies when sensitive areas for wildlife need greater protection from increased levels of recreational use. Site-specific plans and the setting up of refuges need to be considered.</p> <p>Measures should put in place before sites and wildlife are affected. Financial contributions from developers in accordance with the Bird Aware Solent Recreation Mitigation Strategy could be used to set up, enhance and maintain these refuges and this should be added to the Plan in para 4.36.</p>
EV3.3	Guy Robinson Historic England	EV3	<p>Paragraph 4.43</p> <p>This paragraph provides an opportunity to reinforce that the natural environment and the historic environment are integral to each other i.e. take account of the historic environment when considering the provision of alternative natural greenspace.</p>
EV3.4	Lucy Charman Country Land & Business	EV3	<p>Para 4.42 refers to a SANG "generally agreed minimum size of 2.2Ha" but no evidence or reference supports this.</p> <p>Further reference and/or evidence is needed to justify the minimum size of 2.2ha at Paragraph 4.42 or an alternative provided.</p>

	Association (CLA)		
EV3.5	David Long	EV3 General	The policy approach is unsound. It should be determined before allocation which sites requires SANG or whether a financial contribution provides the mitigation. Need to answer: - (1) Do the contributions mitigate the impacts? (2) If not, why not? (3) If SANG's are required, which allocations require a SANG and why? (4) If sites require an allocation but cannot deliver them on site, where is the strategic SANG on the Island to mitigate the effect? Without a change this will delay development and create extra resource burdens. Specific concerns on site allocations, should be identified now.
EV3.6	Tom Bell - Portsmouth City Council	EV3 General	Support EV3. Approach reflects the emerging Portsmouth Local Plan. PCC will continue to work with the IoWC and other partners in the South Hampshire region to develop and enhance the strategies for recreational disturbance across the region.
EV3.7	Chani Courtney	EV3 Para 4.35	4.35 Please add "and potential for water pollution through use of CSO's."
EV3.8	Chani Courtney	EV3 Para 4.43	4.43 SANG also benefit by adding SUDS please.
Policy EV4			
EV4.1	Keith Herbert	EV4, paras 4.4-4.5	EV4 only references continuous discharge from treatment works. Add how the strategy can be implemented without increasing the frequency of Combined Sewer Overflows. No reference to intermittent discharges from Combined Sewer Overflows and the impact on water quality, bathing waters or nutrients. The planning strategy does not meet commitments made by the IOWC to ensure the Island plan and Sustainable Drainage Systems (SuDS) SPD fully consider the cumulative impact of surface water runoff and sewage discharge and take a lead to

			ensure sewage releases into the sea surrounding the Isle of Wight are zero by 2030.
EV4.2	Laura Lax Environment Agency	EV4	Pleased that previous comments on this policy and its supporting text have been taken into account. Support paragraph 4.50 which makes clear there is a presumption against private sewage treatment plants in sewerred areas and a connection to the mains sewer will be sought where possible and practicable. An Environmental permit from the Environment Agency maybe required and nitrate neutrality is not a justification for gaining a permit.
EV4.3	Sarah Sims	EV4	Contrary to maintaining UNESCO Biosphere status. Development on sites in Freshwater within risk zones of SSSI sites and the SAC at Afton Marshes, may impact on these habitats. Contrary to NPPF. Our estuary and streams flow into the Solent and Southampton Water special protection area (SPA) protected by law under the Conservation of Habitats and Species Regulations 2017. A recent report by Natural England stated that “domestic and industrial sewage contribute to the emission of nitrogen oxides and ammonia and accelerate green algae growth in protected areas of the Solent.”
EV4.4	Southampton City Council	EV4	Support policy’s proposed approach. A consistent approach is needed by affected local authorities to ensure the Solent Marine Sites return to a favourable condition. As impacts and mitigation are considered on a catchment basis which cross local authority boundaries, SCC will work with Isle of Wight Council (IoWC) on monitoring of strategic mitigation schemes on the Island that can provide offset credits for developments in either authority, as per the SCC & IoWC Statement of Common Ground. SCC will also work with IoWC on the coordination of new mitigation schemes alongside other local authority members of the Partnership for South Hampshire.
EV4.5	MR ANDREW S MOSCOFF ('BORIS')	EV4	Contrary to maintaining UNESCO Biosphere status. Development on sites in Freshwater within risk zones of SSSI sites and the SAC at Afton Marshes, may impact on these habitats.

			<p>The sewage system is overloaded and contributes to nitrates in rivers and coastline, as well as the Solent. The island has a unique mix of landscape types. Various bodies warn of the danger of inappropriate housing development on our island landscape.</p> <p>Need open consultation with Parish Councils and environmental bodies.</p>
EV4.6	FRESHWATER BAY RESIDENTS ASSOCIATION	EV4	<p>Contrary to maintaining UNESCO Biosphere status. Development on sites in Freshwater within risk zones of SSSI sites and the SAC at Afton Marshes, may impact on these habitats. Contrary to NPPF.</p>
EV4.7	Christopher Jarman	EV4	<p>Contrary to maintaining UNESCO Biosphere status. Development on sites in Freshwater within risk zones of SSSI sites and the SAC at Afton Marshes, may impact on these habitats. Contrary to NPPF. The sewage system is overloaded and contributes to nitrates in rivers and coastline, as well as the Solent. The island has a unique mix of landscape types. Various bodies warn of the danger of inappropriate housing development on our island landscape.</p> <p>Our estuary and streams flow into the Solent and Southampton Water special protection area (SPA) protected by law under the Conservation of Habitats and Species Regulations 2017. A recent report by Natural England stated that “domestic and industrial sewage contribute to the emission of nitrogen oxides and ammonia and accelerate green algae growth in protected areas of the Solent.” Nitrogen in the water is accelerating green algae growth in protected areas of the Solent.”</p>
EV4.8	Penelope Baker	EV4	<p>EV13 relies on waste water treatment works. Southern Water have a record of failure to supply in Hampshire and have been reduced to handing out bottled water. Build reservoirs and do not build over them - we need more water storage now.</p>

EV4.9	Sustainable Freshwater Community Group	EV4	<p>Contrary to maintaining UNESCO Biosphere status. Development on sites in Freshwater within risk zones of SSSI sites and the SAC at Afton Marshes, may impact on these habitats. Contrary to NPPF.</p> <p>The Solent and Southampton Water special protection area (SPA), which includes estuaries, mud-flats, coastal habitats, saline lagoons and shingle beaches is protected by law under the Conservation of Habitats and Species Regulations 2017.</p> <p>A recent report by Natural England stated that “domestic and industrial sewage contribute to the emission of nitrogen oxides and ammonia and accelerate green algae growth in protected areas of the Solent.” Nitrogen in the water is accelerating green algae growth in protected areas of the Solent.” Flawed consultation process</p>
EV4.10	Miss Penelope Baker	EV4	<p>EV4 should be broader and include where the water waste treatment works outfall (discharge) into the English Channel. The English Channel should have the same protection as the solent. Nutrient neutrality should be applied to the discharges into the English Channel as marine life and bathing water are compromised by the current exclusion. The Tourist economy public health and marine life are harmed by such exclusion.</p> <p>Sound - just reckless with the environment and public health.</p>
EV4.11	David Long	EV4	<p>The policy should make clear that the net increase in guests at tourism accommodation solely pertains to new tourism bed stock/sleeping accommodation rather than tourism and leisure destinations.</p>
EV4.12	David Long	EV4 – Para 4.51	<p>The subtext refers to cess pits. Cess pits are invariably connected to soakaways meaning the resultant water leaches into the ground via a drainage field. The installation of a cess pit is not permissible by the</p>

			Environment Agency. It is presumed that when the Council refer to a cess pit, they actually mean a sealed tank (without soakaway).
EV4.13	Peter McGowan on behalf of New Forest District Council	EV4 General	<p>On nutrient neutrality, NFDC appreciates the constructive manner that IoW Council has engaged, and continues to engage co-operatively, with the nutrient neutrality issue affected the wider Solent and the contribution IoW Council has made towards facilitating housebuilding on the mainland and the Island through the creation of nitrate credit projects.</p> <p>Supports EV4.</p>
EV4.14	Jonathan Shavelar on behalf of Natural England	EV4 General	<p>Water Quality and Resources and Flood Risk Management</p> <p>Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 180 of the NPPF. We would also expect the plan to address flood risk management in line with the paragraphs 166 and 167 of the NPPF.</p> <p>The Plan should be based on an up-to-date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Plan. These Plans implement the EU Water Framework Directive and outline the main issues for the water environment and the actions needed to tackle them. Competent Authorities must in exercising their functions, have regard to these plans.</p> <p>The Local Plan should contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on European sites, SSSIs and local sites which contribute to a wider ecological network. Plans should positively contribute to reducing flood risk by working with natural processes and</p>

EV4.15	Tom Bell - Portsmouth City Council	EV4 general	PCC supports policy EV4 of the Island Strategy, the approach taken reflects that in the emerging Portsmouth Local Plan. PCC currently uses nutrient credits from the Hampshire and Isle of Wight Wildlife Trust site at Nunwell on the Isle of Wight to enable the delivery of development within Portsmouth. PCC will work closely with the IoWC and other partners to identify and bring forward further mitigation sites.
EV4.16	Chani Courtney	EV4	EV4: Great! The wording about the connect to the public sewer would be better if “Will connect to the public foul only when all surface water from the site is captured in alternative means especially when the downstream CSO spills more than 10 times per year or spills into an environment designated site, bathing water or shellfish area. Where this is not possible the developer should contribute to impermeable area offsetting and/or network reinforcement.
EV4.17	Chani Courtney	EV4 Para 4.44	4.44 Give the solutions too please. So SUDS.
EV4.18	Chani Courtney	EV4 Para 4.46	4.46 Please provide links to watershed map so these sites can be seen.
EV4.19	Chani Courtney	EV4 4.48	4.48 Please mention the suds document again, small treatment works and septic tank law.
Policy EV5			
EV5.1	Bell Cornwell	EV5	<p>2.1 The approach to ENV5 is not sound, the approach is not justified and does not provide an effective solution that is consistent with national guidance and policy. What is more, given the significant housing need on the Island, the restrictive approach will further stifle much needed growth and delivery of new homes.</p> <p>2.2 Part c requires development proposals to avoid direct and indirect harmful impact on any trees, woodlands and hedges and where it is not possible provide adequate mitigation. This is unnecessarily onerous, referring to all trees rather than just protected trees, woodland or</p>

			<p>hedgerows. There may be circumstances where loss of certain features is unavoidable (or entirely justified), and mitigation not necessarily required. To provide flexibility, in circumstances where it might not be possible to provide 'adequate mitigation' the wording of c) should start 'where possible'.</p> <p>2.3 Part d requires a 50m buffer to Ancient Woodland, if not greater. This is an onerous requirement for which there is no clear justification and is not in accordance with the approach set out in Government Guidance.</p> <p>2.4 Government Guidance, 'Ancient Woodland, ancient trees and veteran trees: advice for making planning decisions' (January 2022) requires at least a 15m buffer noting that "where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone". As such 15m should be the starting point and it should depend on the circumstances of the case as to whether the buffer zone needs to be extended. Placing a blanket buffer of 50m on Ancient Woodland potentially sterilises a further 35m of land that could be used for development without harm or impact on the Ancient Woodland.</p> <p>2.5 Each application needs to be judged on its own merits at this point starting from the buffer set out in Government Guidance, for instance, on-going work on the Pennyfeathers site confirms a 50m buffer would not be warranted, artificially setting such a buffer in the Island Plan would therefore unduly restrict the development of the site. This would be an inefficient use of land, especially where the evidence indicates a larger buffer than 15 meters is not required.</p> <p>2.6 The approach to d is not in accordance with the NPPF in this regard, as it will mean proposals will fail to make the most effective use of land and, considering the substantial housing need on the Island, will unnecessarily sterilise areas of land that could be used to deliver sustainable new homes or infrastructure associated with those new homes.</p> <p>2.7 ENV5 should be reworded to remove the reference to the 50m buffer and instead should reflect the Government Guidance on buffer zones, requiring a minimum of 15m buffer set out above, allowing individual assessment to determine the extent of the buffer zone, as opposed to providing a blanket ban on development within a 50m zone. Alternatively, amend the wording to reflect the Government's standing advice to allow for flexibility for any changes during the plan period</p>
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			<p>In conclusion, to ensure a sound approach, criterion c and d should be re-worded as follows:</p> <p>c where possible avoid direct and indirect harmful impacts on trees, woodlands and hedges, and where this is not possible adequate mitigation must be provided</p> <p>d provide at least a 15 metre buffer between new development and ancient woodland. Where assessment shows impacts will extend beyond 15 metres, larger buffers will be required as justified by the evidence, and ideally any buffers should contribute to wide ecological networks and become part of the green infrastructure for the area.</p>
EV5.2	Nora Galley, Now Planning	EV5	<p>The 50m buffer between new development and ancient woodland is inconsistent with the Natural England standing guidance. The policy should instead refer to a 15m unless a greater buffer is justified by the circumstances of the site and the proposed development.</p> <p>The reference to the 50m buffer needs to be brought into line with Natural England's standing guidance.</p>
EV5.3	Bridget Fox Woodland Trust	EV5	<p>We strongly support this robust policy which is highly effective in protecting trees and woodland in line with sections 136, 180b) and 186c) of the NPPF. In particular, we welcome the requirement for 50m buffers to ancient woodland in point d). We also welcome the policy wording in support of appropriate native species, which will contribute to protecting the Island's biodiversity, in line with NPPF sections 180d) and 185b).</p>

EV5.4	Andrew Garratt	EV5	<p>Paragraphs 4.54, 4.58</p> <p>These policies are welcome and particularly so in relation to Parkhurst Forest and Dickson's Copse, which are both close to areas which are allocated for a high level of housing and other development. Subsection (d) relating to a minimum buffer zone of 50m from development to ancient woodland is essential as ecology necessities do not stop at woodland boundaries. Policy should be clear that the point of measurement to a development boundary is where the ground is dug up or built on or otherwise changed as part of the development and not simply a measurement to the nearest "bricks and mortar". Wording at HA022 and "land at Horsebridge Hill" have weaker statements regarding buffer zones and should be amended to the stronger requirement of EV5.</p> <p>The boundary of the area relating to KPS1 should be drawn further away from Parkhurst Forest to maximise the protection of the multiple environmentally important and sensitive sites within and near it.</p>
EV5.5	Northwood Parish Council	EV5	<p>The 50-metre buffer between new development and ancient woodland is welcomed and noted that this is a site-specific requirement for Housing allocation: HA022 Somerton Farm.</p> <p>Planting should always come from Isle of Wight indigenous stock.</p> <p>Housing allocation: HA025 Land rear of 84 Wyatts Lane, Northwood - This site cannot be developed due to the value of the land containing ancient woodland and a 50 metre buffer zone required around it. The plan is not sustainable or consistent with national planning policy. The Plan is ambiguous and contradictory, the figures don't add up and is not fit for purpose.</p> <p>Northwood is not part of Cowes but a semi-rural village, a parish in its own right. The designation should be changed.</p>

EV5.6	Martha James for East Cowes Town Council	EV5	To include the requirement for tree lined streets in major applications - in line with NPPF paragraph 136.
EV5.7	Richard Holmes BCM for Sam Biles	EV5	Policy EV5 (Trees, Woodland and Hedgerows) requires at least 50m buffering between new development and ancient woodland. This buffering is excessive and unreasonable when standing guidance from Natural England and the Forestry Commission recommends 15m. This specific request for buffering of 50m was presented to the House of Lords on 21st October 2021 and was voted down. Disbarring the buffering at Somerton Farm, this general policy approach would unreasonably stifle development: Imposing a 50m buffer on ancient woodland may ultimately lead to a significant reduction in housing delivery for the island especially those delivering affordable and starter homes, as such the existing National Policy supporting 15m buffers should remain and be referenced in the IPS. Furthermore, the inappropriate imposition of the proposed mandatory 50m buffer would inevitably result in inefficient land use by having the effect of requiring additional green field sites to be utilised to deliver equivalent housing numbers.
EV5.8	Guy Robinson Historic England	EV5	We recommend adding reference to the connection between trees, woodland and hedgerows and the historic environment. We suggest wording for consideration. “This policy seeks to protect the landscape character and amenity value afforded by trees, woodlands and hedges on the Island. Trees, woodland and hedges provide an important green infrastructure

			function; they connect with historic landscape character and contribute significantly to the health of the environment and people.”
EV5.9	Lucy Charman Country Land & Business Association (CLA)	EV5	National Planning policy and advisory services from Natural England and Forestry Commission already makes provision to protect ancient woodland. This specific request for buffering of 50m was presented to the House of Lords on 21st October 2021 and was voted down. The NPPF protects Ancient woodland Para 186. c) "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;" Imposing a 50m buffer on ancient woodland may ultimately lead to a significant reduction in housing delivery for the island especially those delivering affordable and starter homes. This would impact previously allocated sites at Pennyfeathers, Camphill, Wyatts Lane and may jeopardise the overall scheme and as such the existing National Policy supporting 15m buffers should remain. https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions
EV5.10	Richard Holmes BCM for Susan Rann	EV5	Policy EV5 (Trees, Woodland and Hedgerows) requires at least 50m buffering between new development and ancient woodland. This buffering is excessive and unreasonable when standing guidance from Natural England and the Woodland Trust recommends 15m. This general policy approach would unreasonably stifle development.
EV5.11	David Long - BCM	EV5 General	The Council refers to the Council’s tree planting and management strategy – this does not feature within the Council’s evidence library.
EV5.12	David Long - BCM	EV5 point D	Part D of Policy EV5 requires at least 50m buffers between new development and ancient woodland. This is unsound and unreasonable because guidance from Natural England and the Woodland Trust requires a minimum of 15m
EV5.13	David Long BCM	EV5 para 4.60	Paragraph 4.60 provides a prescriptive metric for the compensation and loss of irreplaceable habitats such as ancient woodland. The Council require 30 hectares of new woodland to be created for every lost hectare

			of irreplaceable habitat. This metric has not been set out in the Council's evidence.
EV5.14	Isle of Wight Council Public Health	EV5 General	EV5: Trees, woodlands and hedgerows: We would welcome inclusion in this policy underpinning the climate resilience and health benefits this policy brings. Such environments will help mitigate climate impacts, which in turn reduces the negative impacts on the population's physical health. The benefit of such environments will also positively impact on people's mental wellbeing.
EV5.15	Chani Courtney	EV5 Para 4.56	4.56 Please add use of SUDS tree pits.
Policy EV6			
EV6.1	Owen Neal Sport England	EV6	Sport England notes that policy EV6 - Protecting and providing green and open spaces will covers outdoor sports facilities and pitches. While Sport England welcomes reference to the Playing Pitch Strategy in the policy and supporting reasoned justification, Sport England does not consider that the policy is consistent with the relevant paragraph (para. 103) of the NPPF which provides for exceptional circumstances to permit development on playing field land. The policy should be modified to better reflect the circumstances set out in para. 103 of the NPPF.
EV6.2	Mandy Pearce	EV6	<p>IPS 2.5 IPS 2.9 CC1 Climate change</p> <p>IPS 2.5 Freshwater and Totland are rural villages, not a main settlement. The facilities in this area are stretched beyond belief. There is not enough infrastructure to allow for this</p> <p>IPS 2.9 You state we need to protect our precious environment and landscape. However the IPS is in favour of sacrificing greenfields and agricultural land. There is still not enough infrastructure to allow for this</p> <p>CC1 Building on greenfields opposes the protecting of our UNESCO status, the Solent from sewage, our Carbon neutral plan and many other factors. All from over development</p>

			<p>The Climate Environment Strategy 2021-2030 states 'The IOW aims to achieve Net Zero by 2030' Development on these proportions will remove greenfield forever and increase CO2 emissions.</p> <p>The Queens Green Canopy was to plant trees, not to tear everything down and build</p>
EV6.3	Fort Victoria Pier Company	EV6	<p>Fort Victoria Pier Company objects to the inclusion of the site under EV6: Protecting and providing green and open spaces due to the use of factually incorrect and flawed evidence. We would like the inspector to evaluate the soundness of the Isle of Wight Council's evidence in this regard.</p> <p>3. Conclusion</p> <p>3.1 The Land Adjacent to Fort Victoria has been subject to a number of uses since its development by the military during 1850s and is currently defined for use as boat storage, slipway, sewage treatment plant and large boat shed.</p> <p>3.2 It is privately owned, previously development land, with no defined public access.</p> <p>3.3 Based on the 2022 Open Space Assessment there is no inclusion of Fort Victoria and thus no justification to define the Land Adjacent to Fort Victoria as a 'Green and Open Space' under EV6 in the IPS.</p> <p>3.4 The 2020 Assessment solely references Fort Victoria when citing Freshwater NP, which clearly omits the Land Adjacent to Fort Victoria from its 'local green space' definition of Fort Victoria Country Park.</p> <p>3.5 In regard to the 2010 Assessment there is no evidence to support the policy and the Land Adjacent to Fort Victoria clearly falls outside of what is defined as a 'multifunctional Green Space'.</p> <p>3.6 Fort Victoria Pier Company believes that in regard to the Land Adjacent to Fort Victoria as set out in this submission, the application of EV6 is based on incorrect and flawed data and thus the IPS is not sound.</p> <p>3.7 Fort Victoria Pier Company requests that the EV6 green and open space designation be removed from within the Land Adjacent to Fort Victoria site boundary.</p> <p>See attachment for location plan.</p>

EV6.4	Christopher Jarman	EV6	Building on green fields opposes the policy of protecting our UNESCO status, the Solent from sewage, our Carbon neutral plan and other key environmental factors directly impacted through exponential property development. Stronger protection for greenfield sites is required and such should only be an absolute last resort and then only to the lowest quality of agricultural lands.
EV6.5	Guy Robinson Historic England	EV6	We recommend adding reference to the historic environment and suggest wording for consideration. "Open space typologies include parks and gardens, natural and semi-natural areas, green corridors, amenity green space, provision for children and young people, outdoor sports facilities, allotments, cemeteries and churchyards and civic spaces. Many are of heritage interest, including those that are designated or known principally for their natural environment. It is accepted that..."
EV6.6	Isle of Wight Council Public Health	EV6 general	EV6: Protecting and providing green and open spaces. We would welcome some additional wording within this policy to reference space that is inclusive, safe, accessible and designed for all ages (in particular older children and younger adults) and meets the needs of all people in the community.

EV6.7	Chani Courtney	EV6 Para4.64	4.64 Please add. Could also be met by SUDS in urban areas creating green spaces that also slow the flow of water.
EV6.8	Chani Courtney	EV6 Para4.66	4.66 water about the loss of playing fields where additional surface water run offs makes them unusable due to flooding.
EV6.9	Chani Courtney	EV6 Para 4.67	4.67 mention suds document again
EV6.10	Chani Courtney	EV6.70	4.70 Water storage is mentioned but not the suds document or in the additional information please change
Policy EV7			
EV7.1	Fort Victoria Pier Company	EV7	<p>Fort Victoria Pier Company objects to the inclusion of the site under EV7: Local green spaces due to the use of factually incorrect and flawed evidence. We would like the inspector to evaluate the soundness of the Isle of Wight Council's evidence in this regard.</p> <p>2.1 The allocation of 'Local green spaces' (EV7) in the draft Island Planning Strategy (IPS) is based on sites identified on the policies map as local green space that have either already been designated through neighbourhood development plans or identified to the council through consultation responses from the public and representative bodies from other planning and community supplementary planning documents.</p> <p>2.2 Fort Victoria Country Park is referenced in Freshwater Neighbourhood Plan (2017-2027) as a 'Local Green Space' under policy FNP13. It is believed that this is the justification used by the Isle of Wight Council to allocate the site under policy EV7.</p> <p>2.3 However, on page 20 of the Freshwater Neighbourhood Plan, map number 8, the Fort Victoria Country Park 'Local Green Space', importantly, does not include the Land Adjacent to Fort Victoria, which is outside of the red boundary line. The designation only includes the built form of Fort Victoria, its car park and the Country Park (spanning west).</p> <p>2.4 Furthermore the justification of FNP13 (FNP, page 17) clearly states that sites with 'extant planning permission' would not meet the justification criteria. The Land Adjacent to Fort Victoria retains extant planning permission for use as boat storage, boat shed, slipway, pier access road and sewage treatment plant from the approved 1999 planning application TCP/19356/R/P/134/99. Even if it had been included it would have been an invalid justification.</p>

			<p>3. Conclusion</p> <p>3.1 The Land Adjacent to Fort Victoria has been subject to a number of uses since its development by the military during 1850s and is currently defined for use as boat storage, slipway, sewage treatment plant and large boat shed.</p> <p>3.2 It is privately owned, previously development land, with no defined public access.</p> <p>3.3 The Land Adjacent to Fort Victoria is excluded from the 'Local Green Space' designation in the Freshwater Neighbourhood Plan (2017-2027) and could not be justified due to extant planning permission on the land.</p> <p>3.4 Based on the 2022 Open Space Assessment there is no inclusion of Fort Victoria and thus no justification.</p> <p>3.4 The 2020 Open Space Assessment solely references Fort Victoria when citing Freshwater NP, which clearly omits the Land Adjacent to Fort Victoria from its 'open space' definition of Fort Victoria Country Park.</p> <p>3.5 In regard to the 2010 Assessment there is no evidence to support the policy and the Land Adjacent to Fort Victoria clearly falls outside of what is defined as a 'multifunctional Green Space'.</p> <p>3.6 Fort Victoria Pier Company believes that in regard to the Land Adjacent to Fort Victoria as set out in this submission, the application of EV7 is based on incorrect and flawed data and thus the IPS is not sound.</p> <p>3.7 Fort Victoria Pier Company requests that the EV7 local green space designation be removed from within the Land Adjacent to Fort Victoria site boundary</p> <p>See attachment for location plan.</p>
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EV7.2	Troy Planning + Design Planning Agent on behalf of Nettlestone and Seaview Parish Council	EV7	<p>The Policy needs to make clear that Neighbourhood Plans can designate Local Green Spaces and these have the same weight as those in the Local Plan.</p> <p>However, the policy text only refers to Local Green Spaces identified on the Local Plan Policies Map. Supporting text (at para 4.74) notes however that Local Green Spaces can be designated through both the Local Plan and Neighbourhood Plans. Policy EV7 should thus be expanded to make clear that the policy will also apply to Local Green Spaces designated through the Neighbourhood Plan process. The supporting text should express support for communities who wish to identify and designate Local Green Spaces through the Neighbourhood Plan process. Equally, Policy C15 (Community led planning) lists those policy areas which Neighbourhood Plans may wish to consider. This should be extended to include reference to Local Green Space designations.</p> <p>Although potential local green spaces have been assessed for designation through the Local Plan, some of these were discounted by IoW Council because it was unclear what value they have for the community. This does not mean they do not hold value. Indeed, this represents an important area where the community itself can present that information and support designation of other locally important spaces. IoW Council should support this through amendment of Policy C15 and EV7.</p> <p>Policies EV7 and C15 are ineffective as they do not recognise that Neighbourhood Plans may include Local Green Space designations, that they have the ability to do this as conferred through the NPPF, and that they will have the same policy weight as the Local Green Spaces designated in the Local Plan.</p> <p>See attached representations for more information.</p>
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EV7.3	Martha James Plan Research for East Cowes Town Council	EV7	<p>Whilst the supporting text in paragraph 4.74 states what the special circumstances might be in paragraph EV7, the actual policy itself should have the wording in. NPPF advice relating to Green Belt (advise in the NPPF is to protect Local Green Spaces in the same way as Green Belt) is much stronger than in the IPS. EV7 states "Sites shown as local green space on the policies map are designated as such and development involving the loss of a local green space will not be permitted, other than in very special circumstances." We note this wording is similar to NPPF 152, but in paragraph 153 of the NPPF, there is a clearer description of what the "very special circumstances" might be. To resolve this, we suggest moving the text from 4.74 into the wording for EV7, so that it reads: Sites shown as local green space on the policies map are designated as such and development involving the loss of a local green space will not be permitted, other than in very special circumstances. Very special circumstances, are likely only to be where proposals result in a significant Island-wide economic benefit.</p>
EV7.4	Isle of Wight Council Public Health	EV7 General	<p>EV7: Local green spaces: Public Health would like to see clarification around loss of green space and as such would seek clarification on what is meant by 'special circumstances'. If a green space is lost, it should ideally be replaced with an improved green space which benefits the community. This is of particular importance within areas where the JSNA or local needs indicate there is a deficiency of accessible quality green space. This could also benefit in having some recognition and specific focus on the more deprived LSOA's</p>

Policy EV8			
EV8.1	Katy Wiseman National Trust	EV8	The National Trust supports proposed Policy E8.
EV8.2	Sarah Sims	EV8	<p>EV8 Protecting High Quality Agricultural Land</p> <ul style="list-style-type: none"> • One of the allocated sites within Freshwater (Camp Road), currently outside of the existing boundary (see FNP), is a high grade, in-use agricultural field in the centre of the village • IPS 4.75: 'Grade 2 agricultural land is rare on the Island: 'The highest grades of agricultural land are a scarce resource on the island with most land classed as grade 3....an important contributor to the Island's economy and food security'. By moving the boundary (without consultation), IPS sacrifices one of our rare land assets which seems to oppose the spirit of IPS. • DIPS states that '51 per cent of the homes allocated are on sites that contain brownfield land'. This wording has changed since the previous DIPS, where there was a 60% allocation of home on brownfield sites, not on 'sites that contain brownfield land'. Regardless, this is not the case for West Wight, where the majority of proposed land is greenfield sites, one of which is grade 2 agricultural land. There are a number of undeveloped sites on the Brownfield Register which should be considered for allocation for housing ahead of sensitive greenfield sites.
EV8.3	Bell Cornwell	EV8	<p>No specific comments but they relate to the policy and may require updates to supporting text, please see section 8 below for details.</p> <p>3.1 Policy ENV8 is not sound as it does not accord with national policy and does not present a positive and effective approach to Best and Most Versatile (BMV) agricultural land.</p>

			<p>3.2 Policy ENV8's drafting is confusing. The first part of the policy suggests development on BMV would be very restricted to two scenarios, whereas the second section of the policy allows for a balancing exercise that is required. We would suggest removing the paragraph starting "development which is likely to affect" from its position between criterion b and c and placing it at the end of the bullet points.</p> <p>3.3 Policy ENV8 should also provide clarity in regard to the approach to allocated sites to ensure allocated sites are deliverable. So, where a site is allocated for development, it should be clear that the decision has already been made in regard to the potential loss of BMV agricultural land. This could be achieved by adding a criterion to the list as follows:</p> <p>"f the development is on a site allocated in this plan"</p>
EV8.4	Dominic Hicklin	EV8	<p>Camp Road, is outside of the existing boundary (see FNP), is a high grade, in-use agricultural field in the centre of the village Grade 2 agricultural land is a rare land asset and opposes the spirit of IPS. Wording change to "sites that contain brownfield land". In West Wight, most proposed land is greenfield, one of which is grade 2 agricultural land. Undeveloped sites on the Brownfield Register should be considered for allocation first.</p> <p>Preserve green field sites and build on council owned land.</p>
EV8.5	Northwood Parish Council	EV8	<p>Protecting high grade agricultural land isn't necessarily good for the environment. Low grade land with wildlife corridors can be more worthy of protection.</p> <p>The plan is not sustainable or consistent with national planning policy. The Plan is ambiguous and contradictory, the figures don't add up and is not fit for purpose.</p>

			Northwood is not part of Cowes but a semi-rural village, a parish in its own right. The designation should be changed.
EV8.6	Sustainable Freshwater Community Group	EV8	<p>Camp Road, is outside of the existing boundary (see FNP), is a high grade, in-use agricultural field in the centre of the village.</p> <p>Grade 2 agricultural land is a rare land asset and opposes the spirit of IPS.</p> <p>Wording change to “sites that contain brownfield land”. In West Wight, most proposed land is greenfield, one of which is grade 2 agricultural land. Undeveloped sites on the Brownfield Register should be considered for allocation first.</p> <p>Preserve green field sites and build on council owned land.</p> <p>Unfair and improper consultation process.</p>
EV8.7	Richard Holmes BCM for Sam Biles	EV8	Amend policy to factor in that development which is ‘in need’) can outweigh Policy EV8.
EV8.8	Lucy Charman Country Land & Business Association (CLA)	EV8	<p>The best and most versatile land is already protected from development through the Environmental Improvement Plan, and the NPPF.</p> <p>Agricultural businesses must be able to expand and diversify in order to continue farming sustainably.</p>
EV8.9	Richard Holmes BCM for Perry Properties Ltd	EV8	Policy EV8 (Protecting High Grade Agricultural Land) is not particularly applicable to our client’s application site because the land is not ‘best or most versatile’, but for the purposes of policy, if there is a desire to protect agricultural land, the policy and its subtext should factor in that development (which is identified to be ‘in need’) can act as an overriding material consideration to outweigh Policy EV8.
EV8.10	Richard Holmes BCM for Susan Rann	EV8	Amend policy to factor in that development which is ‘in need’) can outweigh Policy EV8.

EV8.11	Richard Holmes BCM for West Oak Homes and Billings Group	EV8	Amend policy to factor in that development which is 'in need') can outweigh Policy EV8.
Policy EV9			
EV9.1	Katy Wiseman National Trust	EV9	Support policy.
EV9.2	Bell Cornwell	EV9	Not sound as provides no flexibility and could restrict housing delivery. Treats all landscapes the same contrary to NPPF. Part a) seems virtually impossible to meet. Not always possible to avoid direct and indirect adverse effects on landscape or seascape. Add "where possible" to the policy.
EV9.3	Hampshire & Isle of Wight Wildlife Trust	EV9	Welcome reference to the Local Nature Recovery Strategy. Commit to the creating and maintaining a functioning LNRS to protect and enhance biodiversity. Therefore, we strongly recommend that the Isle of Wight Council prepare and use the Nature Recovery Network as a foundational tool for the Local Plan.
EV9.4	Rebecca Loader/Isle of Wight Council Archaeology & Historic	EV9	Paragraph 4.83 - include the historic landscape characterisation.

	Environment Service		
EV9.5	Rebecca Loader/Isle of Wight Council Archaeology & Historic Environment Service	EV9	Include Historic Seascape Characterisation.
EV9.6	Martha James Plan Research for East Cowes Town Council	EV9	Add policy bullet point relating to tranquil areas. Required by NPPF 191b. Add reference to lorry parking required by NPPF para 113.
EV9.7	Guy Robinson Historic England	EV9	Policy is sound
EV9.8	Chani Courtney	EV9 Para 4.76 to 4.84	Ensure new development avoids both direct and indirect adverse effects or cumulative impacts upon the integrity of landscapes and seascapes. Clarity please would this include sewage pollution? 4.76 to 4.84 please add “connectivity of water course to coast and damaging effect of waste water”.
Policy EV10			
EV10.1	Huw Jenkins	EV10	HA005 is at odds with EV10 and not compatible with IPS 4.15. Urbanisation will damage the iconic / historic landscape with its rich literary / artistic significance. Historic Landscape Characterisation is an important tool for managing the historic environment and conserving important landscapes.

			<p>Gaps should be maintained for the sake of the community, biodiversity, landscape and historical character. The Freshwater settlement boundary has been redrawn. Contrary to the Isle of Wight Settlement Coalescence Study.</p> <p>Complex consultation process.</p>
EV10.2	Sarah Sims	EV10	<p>Moving the settlement boundary ignores the Freshwater Neighbourhood Plan. The allocation of sites has been changed without consultation and does not serve local community needs. Re-establish the original settlement boundary for Freshwater and take account of the Settlement Coalescence Study.</p>
EV10.3	Julie Newell	EV10	<p>The allocation of development sites had no consultation and ignores the Freshwater Neighbourhood plan. Object to the revised settlement boundary.</p> <p>The Council has not complied with its Duty to cooperate and has not demonstrated effective joint working nor is it consistent with National policy. Public consultation process was flawed.</p>
EV10.4	FBRA	EV10	<p>The allocation of development sites had no consultation and ignores the Freshwater Neighbourhood plan. Object to the revised settlement boundary. Ignores the Settlement Coalescence Study and needs agreement of the community.</p> <p>Freshwater and Totland's green spaces and biodiversity are vital to its rural attraction and consequential economic benefits of tourism.</p>
EV10.5	Penelope Baker	EV10	<p>Unclear where the settlement gap between Lake and Shanklin is located.</p> <p>The gap between Lake and Newchurch should be indicated.</p>
EV10.6	Christopher Jarman	EV10	<p>Moving the settlement boundary ignores the Freshwater Neighbourhood Plan. The allocation of sites has been changed without consultation and does not serve local community needs. Object to the revised settlement boundary. Ignores the Settlement Coalescence Study and needs agreement of the community.</p>

EV10.7	Dominic Hicklin	EV10	Moving the settlement boundary ignores the Freshwater Neighbourhood Plan. The allocation of sites has been changed without consultation and does not serve local community needs. Object to the revised settlement boundary – it should be reinstated. Ignores the Settlement Coalescence Study and needs agreement of the community.
EV10.8	Northwood Parish Council	EV10	<p>Northwood is not in West Medina as it contradicts EV10.</p> <p>The plan is not sustainable or consistent with national planning policy. The Plan is ambiguous and contradictory, the figures don't add up and is not fit for purpose.</p> <p>Northwood is not part of Cowes but a semi-rural village, a parish in its own right. The designation should be changed.</p>
EV10.9	Sustainable Freshwater Community Group	EV10	<p>Moving the settlement boundary ignores the Freshwater Neighbourhood Plan. The allocation of sites has been changed without consultation and does not serve local community needs. Object to the revised settlement boundary – it should be reinstated. Ignores the Settlement Coalescence Study and needs agreement of the community.</p> <p>Flawed public consultation process.</p>
EV10.10	Angela Brooks – Fisher German LLP	EV10	<p>No objection in principle to settlement gap areas but do not support the gap between Cowes and Newport in its current form as it excludes development in a way not consistent with the NPPF.</p> <p>There is no clear explanation of the boundaries i.e. why land within the area functions as part of the gap, but other land is excluded. The gap between Cowes and Newport is expansive and dilutes the impact of the designation in the most sensitive areas. No justification for including HA040 within the gap. Land north of Newport has limited threat of coalescence and designation is not necessary and effects could be mitigated.</p> <p>The evidence does not justify the policy.</p>

EV10.11	BNP Paribas Real Estate, on behalf of BAE Systems, Cowes	EV10	Support EV10 but strengthen adding reference to the 2018 Coalescence Study and reference to important views in the supporting text. The view from Place Road to the west of BAE offers unspoilt views towards the coastline and development location would erode the rural character.
EV10.12	Martha James Plan Research for Mr and Mrs R Osman	EV10	Support a settlement boundary but not the location. The boundary should fall east of Green Meadows.
EV10.13	Richard Holmes BCM for Sam Biles	EV10	The policy is too restrictive. the Isle of Wight Settlement Coalescence Study, suggests that there remains little separation between Cowes and Northwood and where limited physical gaps are present, they are visually influenced by adjacent development.
EV10.14	Lucy Charman Country Land & Business Association (CLA)	EV10	Should not prevent beneficial development for the rural economy or rural communities. There is a negative consequence of restricting all development in these locations, which could result in a barrier to growth and profitability in the rural economy. The layering of a designated settlement gap further prevents development that could be seen as sustainable and support the vitality of a settlement. Settlement gaps should not be drawn tightly to settlement boundaries and Policy EV10 must reflect this. Protected landscape already prevents development outside settlement envelopes.
EV10.15	Peter Canavan Carter Jonas for Wadham College	EV10	Policy role is fulfilled by proposed policy EV9. A separate policy is not needed. The policy is aimed at preventing development at the edge of settlements in the same way as designated Green Belt. The “gaps” are not positive, properly justified, and or consistent with national policy. Delete EV10.

Policy EV11			
EV11.1	Nora Galley	EV11	Inconsistent with NPPF paragraph 183.
EV11.2	Isle of Wight National Landscape (AONB)	EV11	Support policy.
EV11.3	Guy Robinson Historic England	EV11	Support policy. Add to supporting text the connections between the natural and historic environment from text in the AONB Management Plan.
EV11.4	Jonathan Shavelar Natural England	-	Should seek to further the statutory purposes of the area. It is an active duty, not a passive one. A relevant authority must be able to demonstrate what measures can be taken to further the statutory purpose. It should explore what is possible in addition to avoiding and mitigating the effects of the development, and should be appropriate, proportionate to the type and scale of the development and its implications for the area and effectively secured. The proposed measures should align with and help deliver the aims and objectives of the designated landscape's statutory management plan.
Policy EV12			
EV12.1	Isle of Wight National Landscape (AONB)	EV12	Support policy.

Policy EV13			
EV13.1	Laura Lax Environment Agency	EV13	Support policy.
EV13.2	Southampton City Council	EV13	Support policy.
EV13.3	Bell Cornwell	EV13	<p>ENV13 is unsound because the approach is not justified and is too stringent in its requirements. Rainwater harvesting is not always technically feasible, particularly on smaller dwellings and flexibility is required.</p> <p>Ensuring no net increase in surface water run-off is very onerous and the wording should be amended.</p>
EV13.4	Hampshire & Isle of Wight Wildlife Trust	EV13	<p>EV13 does not go far enough. Amend policy text to prohibit new development within or adjacent to river corridors and their tributaries. Add a water quality policy to protect and restore rivers.</p> <p>Support requirement for a water efficiency standard of 100 litres per person per day. This could be taken further, and the draft policy amended to 90 litres or less per person per day.</p> <p>Add chalk streams and their protection to Plan. Developers should make water-company developer contributions to help cover the costs of addressing such impacts”.</p>
EV13.5	Northwood Parish Council	EV13	<p>Previous comments remain valid.</p> <p>There is no plan to address losing mainland water connection or the saltwater ingress to groundwater due to over-exploitation. Need for greater leakage control should be emphasised. Add reference to maintaining key utility infrastructure, possible need for a reservoir. Consider a desalination plant and fresh water draining into the River Medina from Shide and Lukely Brook.</p>

			<p>Enforcing the requirement for planning permission for non-draining surfaces greater than 5 square meters is vital.</p> <p>The plan is not sustainable or consistent with national planning policy. The Plan is ambiguous and contradictory, the figures don't add up and is not fit for purpose.</p> <p>Northwood is not part of Cowes but a semi-rural village, a parish in its own right. The designation should be changed.</p>
EV13.6	Mark Behrendt HBF	EV13	<p>Clarify why it is necessary to go below the 110 l/p/d standard set out in Planning Practice Guidance.</p> <p>Agree using the 110 l/p/d standard, but water scarcity does not seem to be inhibiting the granting planning permission or bringing the local plan forward and so the 100 l/p/d is unjustified.</p>
EV13.7	Chani Courtney	General comment	EV13: This is epic, well done to whoever wrote it. Made me very excited to see.
EV13.8	Chani Courtney	EV13 Para 4.102	<p>4.102 Another brilliant piece of writing.</p> <p>Section 4.102 Please under other relevant document please add the SUDS planning document.</p>
Policy EV14			
EV14.1	Lisa Scovell- Strickland	Para 4.108	Update para 4.108 as the FWEP Guidance is no longer co- authored by the Fire and Rescue Service.
EV14.2	Laura Lax Environmen t Agency	EV14	<p>Support policy.</p> <p>Support definition of 'safe' (in terms of flood risk). Do the site allocations meet this definition and therefore is the Plan compliant with its policy requirements.</p>
EV14.3	Bell Cornwell	EV14	Clarify ENV14 to qualify what type of flooding or type of flood event development needs to be safe from. Is it being safe from flooding from the 1 in 100 years (plus climate change) flood event?
EV14.4	Nora Galley	EV14	Add reference to NPPF para 167 in EV14 in respect to the sequential and exception tests.

EV14.5.	Christine Tout	EV14	The Strategic Flood Risk Assessment is nearly 15 years old. All East Wight new development with existing permission should be revisited. The flood risk assessments for East Wight should be based on the flooding suffered by Monktonmead and Springvale in 2023 and 2024. There is not adequate infrastructure.
EV14.6	Mark Behrendt HBF	EV14	Part b) is inconsistent with national policy as it requires all development proposals to apply sequential test. PPG para 7-027 sets out a number of circumstances where the Sequential Test will not be required. Should be set out in policy not para 4.109 to ensure clarity.
EV14.7	Chani Courtney	EV14 Para 4.107	4.107 Good!
Policy EV15			
EV15.1	Bell Cornwell	EV15	<p>ENV15 is unsound and not an appropriate strategy to the Monkton Mead Catchment area. This could affect delivery of site allocations.</p> <p>Criterion a) contradicts EV13 e). Make clear reducing runoff rates by the greatest percentage is an aim not a requirement.</p> <p>Criterion b) is unclear. Rerword to make clear runoff from large impermeable surfaces can be discharged into the catchment, just not directly.</p> <p>Criterion f) to reduce risk of sewer flooding is largely out of a developers control if there are already issues. Amend wording to refer to not increasing and aiming for a reduction.</p> <p>A flexibility to criterion h) and clarify that attenuation requirements should consider fluvial and tidal flood events.</p>
EV15.2	Chani Courtney	EV15 Para 4.115	4.115 Also means use of CSO's.
EV15.3	Chani Courtney	EV15 Para 4.116	4.116 Great wording.

Policy EV16			
EV16.1	Fort Victoria Pier Company	EV16	<p>Object to inclusion of Fort Victoria Pier in the Coastal Change Management Area under EV16. Evidence is flawed and unsound. Remove the designation from the shoreline of the Land Adjacent to Fort Victoria and shingle beach to the east.</p> <p>Monitoring evidence of the rate of coastal change since 2003, has been nil. The presence of natural and man-made coastal defences and the natural supply of coastal sediments through longshore drift the status- quo could continue without further intervention such as upgrading coastal defences.</p> <p>Long-term monitoring since 2003 demonstrates this is a depositional shingle beach frontage, virtually unchanged over the last twenty years.</p> <p>EV16 is based on incorrect and flawed data and thus the IPS is not sound.</p>
EV16.2	Chani Courtney	EV16 Para 4.125	4.125 If impermeable area increased SUDS document recommendation would need to be applied.
EV16.3	Chani Courtney	EV16 Para 4.126	4.126. 4.116 would still need to be applied so that the large roofs would not load into the foul line.
EV16.4	Chani Courtney	EV16 Para 128	4.128 Is risk to life for just human or all life? Exacerbating erosion or pollution.
Policy EV17			
EV17.1	Guy Robinson Historic England	EV17	The criterion on exceptions should refer to heritage assets more widely, not just the Heritage Coast.
Policy EV18			
EV18.1	Laura Lax Environment Agency	EV18	Supportive policy.
EV18.2	Savills for Red Funnel	EV18	Amend first para of EV18. Red Funnel consider that the policy wording should include specific reference to ensuring the continued efficient and effective operation of cross-Solent transport infrastructure.

EV18.3	Guy Robinson Historic England	EV18	Add reference to the role of flood defences in protecting heritage assets from harm or loss and that flood defence measures need to take account of potential impacts on heritage significance to avoid unintentional harm, either directly or via the setting of a heritage asset.
EV18.4	Justin Gentleman - Foreland Homes	EV18 General	This policy provides no confidence to invest. There is no structure and no clear calculation method, which indicates long and protracted negotiations. Contributions should be clearly defined, or they will preclude development.
Policy EV19			
EV19.1	Penelope Baker	EV19	Add reference measures that would help to reduce harm to existing roads and properties such as weight restrictions with smaller service vehicles community bus services. Consider a new road take traffic off the B3327.
EV19.2	Lucy Charman Country Land & Business Association (CLA)	EV19	Add reference to improving or supporting development to mitigate issues for infrastructure that has already been impacted through instability. The Local Transport Plan should address these issues.
EV19.3	Chani Courtney	EV19 Para 4.141	4.141. Water retention is still expected in forms of grey water storage solutions like sunken and on the surface tanks for that can still slow the flow preventing use of local CSO's and reducing water consumption.

Representations on Section 5: Community

Rep number	Name of respondent	Paragraph or policy	Summary of issue raised
General			
CG.1	Chani Courtney	General	5.7 Permeable layouts and also add this on C 3 b 5.27
CG.2	Northwood Parish Council	Community general	<p>3.42</p> <p>It was commented that every large development should include health facilities and that IPS policies must (not can) allow more health facilities to be built where they are needed.</p> <p>3.43 and 3.47</p> <ul style="list-style-type: none"> • West Medina – Cowes, Gurnard and Northwood and settlements in and to the west of Newport <p>It is queried why NPC weren't consulted over the adjusted settlement boundaries and that the extended designation of Northwood being in a primary settlement does not reflect the rural nature of the village. This contradicts section 4.5 citing the importance of settlement identity and preserving settlement identity.</p>
CG.3	Sustainable Freshwater Community Group	Community General	<p>Freshwater developed the Freshwater Neighbourhood Plan - FNP (2017 - 2027) in consultation with the community outlining their desire for the future of Freshwater including housing needs. IPS disregards FNP.</p> <p>"The Community wishes to see development prioritised to</p>

			<p>brownfield sites...Future developments should co-exist with the green open spaces." "The Parish values all rural landscapes as they form an important part of the character and definition of the Parish." (Freshwater Neighbourhood Plan)</p> <ul style="list-style-type: none"> • Conserve the sense of a rural, small-scale landscape of winding lanes and small settlements as set out in West Wight Landscape Character Assessment • DIPS states that '51 per cent of the homes allocated are on sites that contain brownfield land'. This wording has changed since the previous DIPS, where there was a 60% allocation of home on brownfield site. This is not the case for West Wight where our precious green fields have been 'allocated' for housing • Island-wide there are many abandoned buildings/sites and areas which require regeneration, these have not been incorporated in IPS. • Preserve Freshwater for the future generations as set out in The West Wight Landscape Character Survey (2005) <p>Lack proper and fair consultation:</p> <p>Freshwater is not a secondary settlement; it is a rural village</p>
CG.4	Sustainable Freshwater Community Group	Community general	<ul style="list-style-type: none"> • West Wight has been allocated a disproportionate number of houses in relation to available brown field capacity, social, medical and utility infrastructure facilitated allocating outside the existing settlement boundary. • The Council must consider the implications of urbanising a treasured rural landscape and the impacts this will have on the tourism economy as these are intrinsically linked. Large scale

			<p>developments will have the greatest of impacts and the greatest risk Sensitive and small developments should be prioritised on brownfield sites, that are in need of improvement, and have the least risk of detrimental impacts.</p> <ul style="list-style-type: none"> • "Freshwater is a rich and highly diverse rural area, offering considerable potential for growth with regards to landscape and eco-tourism. As set out in the Freshwater Neighbourhood Plan (2017 - 2027) <p>Lack of proper and fair consultation. Freshwater is not a secondary settlement but a rural village</p>
CG.5	FBRA FRESHWATER BAY RESIDENTS ASSOCIATION	Community general	<ul style="list-style-type: none"> • West Wight has been allocated a disproportionate number of houses in relation to available brown field capacity, social, medical and utility infrastructure facilitated allocating outside the existing settlement boundary. •The Council must consider the implications of urbanising a treasured rural landscape and the impacts this will have on the tourism economy as these are intrinsically linked. Large scale developments will have the greatest of impacts and the greatest risk Sensitive and small developments should be prioritised on brownfield sites, that are in need of improvement, and have the least risk of detrimental impacts. • Freshwater is a rich and highly diverse rural area, offering considerable potential for growth with regards to landscape and eco-tourism. As set out in the Freshwater Neighbourhood Plan (2017 - 2027) •Freshwater developed the Freshwater Neighbourhood Plan - FNP (2017 - 2027) in consultation with the community outlining their desire for the future of Freshwater including housing needs. IPS disregards FNP. • "The Community wishes to see development prioritised to brownfield sites...Future developments should co-exist with the green open spaces." "The Parish values all rural landscapes as they form an important part of the character and definition of the Parish." (Freshwater Neighbourhood Plan)

			<ul style="list-style-type: none">• Conserve the sense of a rural, small-scale landscape of winding lanes and small settlements as set out in West Wight Landscape Character Assessment• West Wight Landscape Character Assessment: “No development in the parish should have a jarring effect from the iconic viewpoint the Down’s” [...] “Consultation with the local community highlighted concerns over suburbanisation of the area, loss of rural and village character, decline in farming, loss of hedgerows and increase in horse paddocks Conserve the sense of a rural, small-scale landscape of winding lanes and small settlements.”• DIPS states that ‘51 per cent of the homes allocated are on sites that contain brownfield land’. This wording has changed since the previous DIPS, where there was a 60% allocation of home on brownfield site. This is not the case for West Wight where our precious green fields have been 'allocated' for housing• Island-wide there are many abandoned buildings/sites and areas which require regeneration, these have not been incorporated in IPS and Greenfields should not be used.• Conserve the sense of a rural, small-scale landscape of winding lanes and small settlements as set out in West Wight Landscape Character Assessment.
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CG.8	Isle of Wight Council Public Health	Community general	General comment. One of the key areas we outlined in the previous response was that around food and food insecurity but note that this hasn't yet become a policy area. Considering the JSNA evidence base we would welcome some reference made to food environments with this section. We would reiterate that good quality retail options and possible limits on hot food takeaways, this is important especially for more deprived LSOA's. The Public Health Team recognises that this is a more complex policy area so there may be other food environment opportunities to seek some consideration around the use of allotments, allocation for food hubs, growing spaces and possibly community orchards as part of some developments. enabling-healthy-placemaking.pdf (rtpi.org.uk)
CG.9	Chani Courtney	Community general	5.6 Support
CG.10	Chani Courtney	Community general	5.13 Amend to Biodiversity enhancements and surface water management.
CG.11	Chani Courtney	Community general	5.20 Add install suitable SUDS to slow the flow of water.
CG.12	Chani Courtney	Community general	5.27 Include blue spaces
CG.13	Chani Courtney	Community general	5.77 Sustainable urban drainage systems, including rainwater and waste water collection and recycling. page 94 other relevant docs add SUDS.

CG.14	Chani Courtney	Community general	5.83 Great to see the importance of water emphasised
CG.15	Chani Courtney	Community general	5.85 Great to see the suds explained in context. - Support
CG.16	Chani Courtney	Community general	5.94 Seems to be the only mention of cumulative effects, but very well worded.
Policy C1			
C1.1	Katy Wiseman National Trust	C1	<p>C1: criterion c) Support the policy wording of criterion (b).</p> <p>To better align with paragraph 212 of the NPPF, the policy wording to criterion (c) should be amended to '(c) respect and enhance the character of the area, particularly in historic places (such as conservation areas) and the National Landscape'.</p>
C1.2	Hampshire and Isle of Wight Wildlife Trust	C1	<p>Recommend that a commitment to the Building with Nature accreditation should be included in draft policy C1. This draft policy highlights plans to incorporate areas of green infrastructure into developments but falls short of laying out a detailed Green Infrastructure Framework for development on the Island.</p> <p>We recommend that all proposals for green infrastructure will be expected to be designed with the Building with Nature standards, or an equivalent standard set by the Council. This will ensure that all green infrastructure is delivering maximum benefits for the health and wellbeing of residents, and for nature's recovery, in line with legal requirements and targets including Mission 9 of the Levelling-up and Regeneration Act 2023 and the legal targets from the Environment Act 2021, notably on air quality.</p>

C1.3	Owen Neal Sport England	C1	<p>Sport England notes the requirements for design in respect of new development. Sport England would welcome the inclusion of the role design can play in promoting physical activity as well as health.</p> <p>Sport England considers that there is some synergy between the policy and our Active Design guidance. However, we would recommend reference to our Active Design guidance within the policy and reasoned justification.</p>
C1.4	Freshwater Parish Council	C1	<p>Having read sections 5.3 to 5.13 the conclusion is that focus is to build sustainable homes that enhance the Island ethos reflecting the character of the different areas of the Island.</p>
C1.5	Angela Brooks – Fisher German LLP	C1	<p>These representations have been prepared by Fisher German on behalf of Jacton Properties Ltd. in respect of their land interests at New Fairlee Farm, Newport, as illustrated in respect of Policy H2. Jacton Properties remain fully committed to bringing the land at New Fairlee Farm forward for development</p> <p>The land above forms part of a site known as ‘Land at and adjacent to New Fairlee Farm’ (Ref: HA040), The above site was included within the 2018 Draft Plan as a proposed allocation for a residential led mixed-use development, including a range of small-scale community uses (which could include a multi-purpose community building and a convenience shop) and an improved road network including a park and ride hub. Representations were in support . The allocation was however removed in the previous Regulation 18 Consultation (July 2021). Representations requesting the sites inclusion were made.</p> <p>These representations respond to the current Regulation 19 2024 which still has the site excluded from the Plan. As will be elaborated below, we believe that the allocation above should be reinstated within the Draft Island Planning Strategy.</p> <p>We generally support Policy C1 and its aims to create new attractive places. We do however have concern in relation to criterion K and believe that is should be amended.</p> <p>Criterion K - We have concern that the use of the term affecting is not sufficiently clear.</p>

			<p>It is assumed that the Policy intends to operate in scenarios where a PRoW runs through a proposed site. However, affects is a subjective term and therefore it is not clear whether it would be applicable if a site is adjacent or simply visible from the PRoW. The Policy should be amended to be clear as to what is intended. If the intention is that the policy applies in any of the aforementioned scenarios, then clearly, we would have significant concern as to the onerous nature of such a requirement and whether it is commensurate. Clearly diverting a PRoW is a process beyond strict planning control.</p> <p>The policy should allow for a pragmatic approach wherein the potential harm to any PRoW can be balanced against the benefits of development, and allow for harm to a PRoW's recreational and amenity value if outweighed by the benefits of development and if mitigated to an acceptable degree.</p> <p>Clearly routes will still be available to use, due to existing legal protections, and can in many cases be retained within green corridors or made more accessible through improvements to surfacing.</p> <p>As currently written the Policy could be read that even a slight adverse impact on a PRoW would be sufficient to refuse an application, as the Policy is clear that development should only be permitted where recreational and amenity value is protected</p> <p>The Policy should be amended as to retain the intention of the policy, but to allow for a pragmatic weighing up of the benefits of development against harms to the amenity or recreational value of the PRoW. As per the previous paragraph the policy should also be explicit as to what is considered to be development affecting a PRoW, and this should logically be confirmed as development through which a PRoW runs for clarity.</p> <p>K - development affecting existing public rights of way (PROW) will only be permitted where their recreational and amenity value is protected, or the route can be satisfactorily diverted, or where the harms to a PROW recreational and amenity value is outweighed by the benefits of development.</p>
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C1.6	Troy Planning + Design on behalf of Nettlestone & Seaview Parish Council	C1	<p>The policy needs to be expanded to provide clarity on what is meant by local character and how this should be reflected in development and used to inform decisions on applications.</p> <p>A Design Code should be used and the policy referencing this and supported and Neighbourhood Plan level design codes.</p> <p>The Policy also needs to explain what is meant by '20-minute neighbourhood' design principles and how these should be used to inform an approach to sustainable development. See attached representations for more information.</p>
C1.7	Guy Robinson Historic England	C1	<p>Criterion b needs to connect with the historic environment. We suggest wording for consideration.</p> <p>We assert that small or medium scale housing developments need still to respect the character of the area.</p> <p>Reference to traditional shop fronts is welcome. Importantly this is a matter of heritage significance, which needs to be made explicit. Also, it seems strange and counter-intuitive in the supporting text to avoid referring explicitly to Newport and Ryde Commercial Frontages Design Guide. We suggest wording for consideration.</p> <p>As a final point, we recommend adding a subsection at the end of this section on relevant other documents (as done for other sections in the local plan) which includes, among other entries, Conservation Area Appraisals and Management Plans and the relatively recent Design Guide for Newport and Ryde: https://iwhaz.uk/project/design-guide/.</p>

C1.8	Tetlow King Planning on behalf on Sovereign Network Group	C1	<p>SNG fully supports the aspirations of Policy C1 and the emphasis on high-quality design.</p> <p>Suggest that C1 explicitly state that it applies to all forms of new development, including redevelopment projects. Additionally, we recommend that the policy expressly acknowledge that maximising the density of development, particularly in redevelopment scenarios, can involve increasing both the number of bedspaces and the number of units. This principle should also be reflected in the site-specific regeneration policies to ensure a comprehensive approach to density optimisation`</p>
C1.9	Isle of Wight Council Public Health	C1 general	<p>We welcome the inclusion of health promotion in this policy.</p> <p>strongly suggest that measures are included to assist in the effective monitoring of the delivery of healthy places. The use of frameworks such as Building for Healthy Life (BHL) within policies creates a tool for all to achieve proactive healthy urbanism approaches.</p> <p>In alignment with the transport policy, we feel that links or reference to the Healthy Streets approach offers a street design approach and is referenced in the current IOW draft LTP4. Both BHL and the 10 Healthy Street indicators are a useful monitoring tool and inclusion of this provides an alignment with other Isle of Wight Council strategies, particularly transport. What is Healthy Streets? — Healthy Streets</p> <p>We also support the policy as it makes clear reference to environment, 20 minute neighbourhoods, SuDs, minimising pollution and improving air quality.</p> <p>Strengthen policy with - the consideration of the benefits of designing site layouts and buildings for climate change and climate resilience.</p>

C1.10	Justin Gentleman - Foreland Homes	C1	<p>We live in a changing world, and I am constantly amazed by how a good quality design can make small spaces, or those limited by natural light, work incredibly successfully</p> <p>High density can also work very well within the right setting, Proving that such things can co-exist and be beautiful places to live.</p> <p>We are pressured today by providing more housing effectively and things such density, small space design and those with limited light can provide great options to us. This policy as written precludes these entirely and, as such, I do not feel this is forward looking as this document should be.</p> <p>Our high streets have permanently changed in recent years. Not helped by continued drive for parking charges within town centres. This approach has killed off what remained, leaving only those with time limited free parking zones as active and in use. Given this, and that this situation is worsening, any policy which seeks to protect shop frontages or limit signage needs considered very carefully.</p>
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C1.11	Justin Gentleman - Foreland Homes	5.4	5.4 makes clear the LPA wish to move away from larger scale housing development, but I cannot find any smaller scale allocations within this plan.
C1.12	Guy Robinson Historic England	C1 Criteria C & F	Criteria c and f cover similar ground and should be integrated to avoid confusion. We suggest deleting criterion f and integrating any additional key points from criterion f into criterion c. c) suggestion to - respect the character of the area through their layout and design, particularly in historic places (such as conservation areas) and the National Landscape;
C1.13	Guy Robinson Historic England	Criteria H	h) preserve the integrity and heritage significance of traditional shop front or building detailing;...”
C1.14	Guy Robinson Historic England	Para 5.3	In the supporting text: “5.3... Many of the towns and villages on the island have an existing strong sense of place and cultural history. The island’s rich heritage contributes significantly, from iconic castles to with early twentieth century design being evident in many places. It is important that any new development within these respects these positive contributors this, many of which are undesignated, working with the existing character and constraints to enhance the identity of the communities living, working and visiting, for the lifetime of the development.”
C1.15	Guy Robinson Historic England	Para 5.14	“5.14 A number of the town centres across the Island contain listed buildings or are within conservation areas. In acknowledgement of this the council wish to preserve the character of these areas and historic shop fronts. The Newport and Ryde Commercial Frontages Design Guide is an invaluable resource in this regard, for the centres of both towns and other historic settlements across the island. It is therefore essential that the size, design and illumination of advertisements respect the form of the shop fronts, the general character of the building and wider street scene...”

C1.16	Chani Courtney	C1 General	C1 m Yes great to see.
Policy C2			
C2.1	Owen Neal Sport England	C2	These modifications are not required to ensure legal compliance or soundness. But Sport England would welcome the inclusion within the policy of how an improved public realm could promote physical activity.
C2.2	Guy Robinson Historic England	C2	Given the work done on public realm in Newport, might reference be made to this in the supporting text to exemplify a relevant programme that helps to underpin the policy: https://iwhaz.uk/project/people-first-zone/
C2.3	Isle of Wight Council Public Health	C2 general	It would be welcomed if reference to Healthy Streets as it contributes to key human health-focused improvement of the public realm.
Policy C3			
C3.1	Mrs Madeline Groombridge	C3	The whole plan is unsustainable with not enough doctors & nurses even now.
C3.2	Northwood Parish Council	C3	It is queried whether the Health Impact Assessment (HIA) is on the local community and whether it includes mental health? The plan is not consistent with national planning policy and is not sustainable. The whole document is ambiguous and contradictory, the figures don't add up and it is not fit for purpose. The plan is not sustainable or consistent with national planning policy. The Plan is ambiguous and contradictory, the figures don't add up and is not fit for purpose. Northwood is a semi-rural, a parish in its own right, and not part of Cowes. - The designation should be changed.
C3.3	Owen Neal Sport England	C3	No proposed modifications, Sport England welcomes the importance being attached to maximising the opportunities for

			physical activity which is in keeping with Sport England's strategy: "Uniting the Movement"
C3.4	MR ANDREW MOSCOFF ('BORIS')	C3	<p>'Health and Wellbeing' are intimately connected to our natural and community surroundings. Freshwater Village has developed within a rich and highly diverse rural area.</p> <p>The FNP (2017-27) makes it clear that any development must have this in mind. Any large scale development will change forever the unique sense of the natural balance of nature in this area with its Bio-diversity and tourism.</p> <p>A disproportionate number of houses has been allocated to Freshwater over the years, Sensitive and small appropriate developments should be prioritised on brownfield sites that are in need of improvement and general up-grading. The IPS disregards the FNP The wishes of the residents and community seem to be ignored.</p> <p>THE PARISH IS RURAL IN CHARACTER defined by its green spaces, views and mixed landscapes. Even Grade 2 Agricultural land seems to be allocated for housing and no longer sacrosanct., turning this incomparable landscape into a sprawling town with no barriers and distinctions between Freshwater, Totland, Colwell and Yarmouth.</p>
C3.5	Hyacinth Cabiles for NHS Property Services	C3	<p>NHSPS considers Draft Policy C3 to be sound as currently drafted.</p> <p>NHSPS welcomes and supports the inclusion of policies that support healthy lifestyles, and the requirement for Health Impact Assessment on major residential developments of 10 units or more.</p>

			<p>There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities.</p> <p>Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities. On this basis, we welcome the inclusion of a comprehensive policy on health and wellbeing in the Local Plan, and encourage the Council to continue to engage with the NHS on this matter ahead of the adoption of the Plan.</p>
C3.6	Guy Robinson Historic England	C3	<p>There is a heritage dimension to wellbeing; relevant resources are available on historic England’s website.</p> <p>We recommend adding an explicit acknowledgement of the connection between heritage and wellbeing. This could be in the form of a new criterion to the policy, such as that suggested.</p> <p>Also, we recommend integrating this consideration in the work being done by the Isle of Wight’s Health and Wellbeing Board to update its Strategy. “All development proposals should demonstrate how the outcomes of the HIA have been incorporated into the design of the development, which could include:d. improving access to and/or appreciation of the local historic environment, “</p>
C3.7	Mark Behrendt	C3	<p>Policy is unsound as it is unjustified.</p> <p>Part i. requires major development to undertake a Health Impact Assessment (HIA) proportionate to the scale of the development.</p> <p>Support objective of ensuring the creation of healthy places but this does not translate into the need for HIAs. If a</p>

			<p>development, meets plan policy requirements there is no need for an HIA.</p> <p>The emphasis for HIA should be on ensuring the plan itself supports development the secures positive health outcomes not considered application-by-application.</p> <p>The HIA should only be required on development over 100 units, not allocated in the local plan.</p>
C3.8	Isle of Wight Council Public Health	C3	<p>We welcome all links to health within this policy that support the needs of a diverse and ageing community. We are encouraged to see reference to the IW JSNA .</p> <p>Public Health supports Health Impact Assessments as part of new development and used proportionately to the application. The use of HIAs will allow a more comprehensive consideration of the human health aspects of a development and appropriate mitigation of any impacts. Health Impact Assessment in spatial planning (publishing.service.gov.uk)</p>
Policy C4			
C4.1	Northwood Parish Council	C4	<p>Recruiting doctors is a significant issue and the poor education system on the Island is thought to be the most significant barrier.</p> <p>The plan is not sustainable or consistent with national planning policy. The Plan is ambiguous and contradictory, the figures don't add up and is not fit for purpose.</p> <p>Northwood is a semi-rural, a parish in its own right, and not part of Cowes. - The designation should be changed.</p>
C4.2	Robert Graham Isle of Wight NHS Trust	C4	<p>The Isle of Wight NHS Trust has reviewed the Island Planning Strategy and can confirm that the current land allocation for the land to the north of St. Mary's Hospital site, as described under 'C4: Health Hub at St. Mary's Hospital', remains aligned with our current strategic direction of travel but we would like to amend the current allocation to include proposals that deliver the additional items listed below:</p>

			<ul style="list-style-type: none"> - We would like point A to read "the alignment of the estate with the future organisational / clinical strategy" - We would like to add two further points to the list as follows: "F: renewable energy sources that service the hospital site i.e. solar; G: premium economy / patient hotel." - We would also like to propose that we revise the description from C4: Health Hub at St. Mary's Hospital to C4: Health Hub and allied supporting development of the land to the North of St. Mary's Hospital site.
C4.3	Isle of Wight Council Public Health	C4 general and 5.30	We are encouraged to see within this policy, residential development for key workers is supported and that land is allocated for independent living provision. A masterplan for the site would be helpful in ensuring the long-term planning of a complex site delivers for climate, health, place and accessibility. We note reference is made in point 5.30 to Clinical Commissioning Group (CCG) which has now evolved into the formation of the integrated Care Service (ICS).
C4.4	Justin Gentleman - Foreland Homes	C4 General	C4 - this policy again pushes the IOWC land, and this feels like an entirely incorrect approach.
Policy C5			
C5.1	Northwood Parish Council	C5	<p>The requirement for 20% of dwellings to be built for older people or those with mobility problems should not come out of the 35% of dwellings already ringfenced for affordable housing.</p> <p>There needs to be more consideration about what constitutes a suitable dwelling for older people or those with mobility problems as bungalows are not necessarily the solution.</p>

			<p>The plan is not consistent with national planning policy and is not sustainable. The whole document is ambiguous and contradictory, the figures don't add up and it is not fit for purpose.</p> <p>The plan is not sustainable or consistent with national planning policy. The Plan is ambiguous and contradictory, the figures don't add up and is not fit for purpose.</p> <p>Northwood is a semi-rural, a parish in its own right, and not part of Cowes. - The designation should be changed.</p>
C5.2	Damien Lynch Planning Lynch	C5	<p>The emerging plan notes that the Island has an ageing population and draft Policy C5 promotes the provision of housing which enables independent living for older people. This policy is welcome, however, there is some confusion in relation to overlap with other policy requirements e.g. draft Policy H8 and the accessibility requirements of each policy. C5 states 20% M4(2) and H8 states 10% M4(3) as well as the generic affordable housing requirements set out within draft Policy H5 (Affordable Housing).</p> <p>The following sections of the response provide further comments and recommendations which seek to ensure that the draft plan addresses the requirements of paragraph 35 of the NPPF.</p>
C5.3	Isle of Wight Council Public Health	C5	<p>As noted in our response to C4, it is welcomed that the facilitation of independent living is supported.</p> <p>We are encouraged by the requirement of 20% of dwellings in major developments this ensures our communities can live in their homes for longer, which is particularly important given our ageing demographic. In light of the Islands increased ageing population it would be beneficial if policies outlined the use of standards such as Lifetime Homes and for older peoples care provision the best practice set out within the HAPPI</p>

			guidance. We feel that these provide some key design focused approaches around health and ageing which are supported at a national level through the NPPF.
C5.4	Justin Gentleman - Foreland Homes	C5 General	C5 seeks 20% of major development for private sale built to meet part M4(2) which is positive. Has it been considered what effect this approach might have on allocations? For example, a proportion of single storey homes would be a great solution, but will have the effect of reducing density. Flatted or apartment based schemes would be successful, but these really need to be located within walking distance to shops and amenities to enable sale on the open market.
Policy C6			
C6.1	Justin Gentleman - Foreland Homes	C6 General	<p>C6 is a positive step, but the following criteria causes a base problem. Point b - How would this policy encourage a householder to build an annex (at large cost) which would have no use beyond that specified?</p> <p>If we are prepared to accept the provision of an annex, then we should be prepared to make best use of it after its initial purpose becomes redundant. It could, for instance, become private rented accommodation or holiday accommodation if in the right location. We need both forms of accommodation and if it is not in a suitable location for holiday usage, then it will not be commercially successful so I would suggest it should revert to open market accommodation.</p> <p>I do not feel it is necessary to have an internal link to the main dwelling from the annex, as there are many different forms of care. It should be for the users to decide if this benefits their needs or not. Given the huge issue surrounding care need and provision for the elderly, we should embrace anything that assist this.</p>

Policy C7			
C7.1	Justin Gentleman - Foreland Homes	C7	C7 - feels rather vague. If this is particularly important, why it is not needed in other Island areas remains unclear. Is it simply to further IOWC land?
C7.2	Justin Gentleman - Foreland Homes	C7 para 5.44	5.44 specifies delivery of these hubs via developer contributions, but there is no clarity on what these might be. It is also noteworthy that NHS budgets are allocated via block grant which provides population-adjusted funding. So, more population will provide greater local service level.
Policy C8			
C8.1	Guy Robinson Historic England	C8	Historic England would be happy to comment in due course on the location of a blue light hub in the Newport area, when more detail is known about what is involved and assuming there is a heritage dimension.
Policy C9			
C9.1	Northwood Parish Council	Para 5.55	5.55 This contradicts the current primary school place planning issue in that there are more places in primary schools than children to fill them and some primary schools on the Island will need to close.
C9.2	Justin Gentleman - Foreland Homes	C9 para 5.56	5.56 mentions developer contributions for post 16 education may be required. This is vague and unclear as to what might be required and where. This does not provide the confidence to invest. Notwithstanding the national tests.
Policy C10			
C10.1	Katy Wiseman National Trust	C10	Policy C10 criterion (g) and (h) The Trust supports the principle of proposed Policy C10. We support the proposed policy, particularly requirements for

			<p>development to consider the impacts on the setting of designated areas, such as the National Landscape and Heritage Coast.</p> <p>Support criterion (g) and (h) within proposed Policy C10 but these considerations could be applied to all development, whether outside a settlement boundary or site allocation or not. Amend the policy wording to: 'Proposals should demonstrate they have taken account of: (g) the visual impact on the character of the area; and (h) the consistency of the proposal with nature conservation and heritage asset objectives'.</p>
C10.2	Rebecca Loader/Isle of Wight Council Archaeology & Historic Environment Service	C10	replace 'heritage asset' with 'historic environment'
C10.3	Rebecca Loader/Isle of Wight Council Archaeology & Historic Environment Service	C10	Para 5.64 Replace 'heritage assets' with 'the historic environment'
C10.4	Penelope Baker	C10	<p>subsection A - renewable energy schemes in appropriate locations - But there are no identifiable indications as to where this will happen. There is no mapping/designation for this.</p> <p>One appropriate location would be the site of application 19/01205/OUT - As there are no apparent actual areas designated renewable energy zones, suitable for new solar farms - if not here, where?</p>

C10.5	Guy Robinson Historic England	C10	<p>We broadly support the Council’s approach to renewable energy and low carbon technologies and only challenge the soundness of the policy in so far as certain phrasings create scope for confusion and thus may hamper the policy’s implementation.</p> <p>All six of the technological options need to be sited in appropriate locations. As an improved formulation, we suggest moving “in appropriate locations” to the opening paragraph.</p> <p>Clearly AONBs represent a type of designation – should “other” be added to the middle paragraph? Also, should reference be made to National Landscape instead of AONB?</p> <p>Policy H7 refers to “protected areas”. For consistency, I recommend amending “designated areas” in C10 to “protected areas” and use the supporting text to explain what is meant by “protected areas”. From a historic environment perspective, this would include Registered Parks and Gardens, Conservation Areas and Scheduled Monuments (i.e. don’t forget Scheduled Monuments within an area-based approach). This change also enables a further tweak to policy C10 in referencing the setting of designated heritage assets (without needing to repeat the word “designated”).</p> <p>Potential setting impacts include (but are not limited to) impacts on any highly significant (e.g. designed) views from heritage assets of the highest significance. Heritage impact assessment is the process through which impacts on significance are assessed.</p> <p>We recommend referring to the conservation of heritage significance in criterion h, rather than heritage asset objectives. A similar change would be merited in the supporting text (the final line of paragraph 5.64).</p> <p>Paragraph 5.65 merits at minimum minor alteration to add the word “assessments”, reflecting the above point about heritage impact assessment (and landscape and visual impact assessment).</p> <p>Finally, cumulative impacts may be relevant for certain assets, not solely in relation to landscape and local amenity. We suggest wording for consideration. “In line with the targets and objectives of the Isle of Wight Climate and Environment Strategy and to support local energy security and resilience on the island, the council will support proposals in appropriate locations for:</p> <ul style="list-style-type: none"> a major development of renewable energy schemes, in appropriate locations and where there is appropriate grid capacity and storage; b the provision of infrastructure for the connection of projects to electricity and heat networks (including, but not limited to sub-stations and heating mains); c smart grid infrastructure; d energy storage systems, such as battery storage and hydrogen production facilities; e energy centres for the provision of heat and power to local communities; f community led initiatives.
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			<p>Within areas of protected and sensitive landscapes and townscapes, development should generally be small scale or community based. It is expected that major wind and photovoltaic schemes will be located outside of the National Landscape AONB and other protected designated areas, and grade 1-3a agricultural land (for photovoltaics) and will be informed by consideration of any impacts on the setting of protected designated areas and designated heritage assets. Schemes within the National Landscape will be considered when there are no alternative sites outside of the National Landscape and where a considerable community benefit is demonstrated and considered to outweigh the landscape impact.</p> <p>Proposals outside the settlement boundaries or site allocations should demonstrate they have taken account of:</p> <ul style="list-style-type: none">g the visual impact on the character of the area;h the consistency of the proposal with nature conservation and the conservation of heritage significance asset objectives. <p>It is accepted that a range of new technologies, other than those above are likely to emerge and these will be considered on their own merits against the policies of the Island Planning Strategy.”</p> <p>In the supporting text:</p> <p>“5.64... Furthermore, they must not cause unacceptable harm to the area’s nature conservation interests or its heritage significance assets (including direct impacts on heritage assets and impacts on their setting).</p> <p>5.65 Applicants will be expected to undertake appropriate surveys, assessments and/ or site investigations as required</p> <p>taking account of site specific characteristics in relation to the technology being applied for... 5.66 Consideration will be given to any cumulative impacts on the landscape, and local amenity and any sensitive receptors in relation to renewable energy and low carbon technologies, particularly for wind turbines and large scale solar installations.”</p>
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C10.6	Lucy Charman Country Land & Business Association (CLA)	C10	We support this policy and would encourage policy makers and technology developers to engage with rural businesses and communities who may offer available sites for such schemes C10 Should be amended to include a policy to support energy production /low carbon tech for rural businesses and heritage assets rather than just for communities
C10.7	David Long – BCM	C10 General	The policy approach in principle is acceptable. Undoubtedly conflict will arise in the overall planning balance against such policies like EV2 where the subtext advocates (without evidenced) buffer strips off main rivers and ordinary watercourses. Conflicts with Policy EV5 which requires a minimum buffer of 50m from ancient woodlands. As per wider representations, ancient woodland buffers have been set by guidance from the Forestry Commission and Natural England at 15m.

Policy C11			
C11.1	Northwood Parish Council	C11	<p>There should also be a requirement within this policy for roof pitches to be aimed due south for energy efficiency.</p> <p>The plan is not sustainable or consistent with national planning policy. The Plan is ambiguous and contradictory, the figures don't add up and is not fit for purpose.</p> <p>Northwood is a semi-rural, a parish in its own right, and not part of Cowes - The designation should be changed.</p>
C11.2	James Tregoning, WightLife Homes	C11	<p>For consistency with paras 124 d) and e) of the NPPF (and also IWC policy E7), Policy C11 should exclude new residential homes created from the repurposing, conversion, extension or airspace development above under-utilised land and buildings. The retention and reuse of existing structures would be expected to have low carbon emissions impacts but would provide significant challenges in achieving net zero.</p>
C11.3	Damien Lynch Planning Issues	C11	<p>Policy C11 sets out that all new housing must achieve 'net zero'. This has not been shown to be viable in respect of housing for older persons and therefore the policy must be amended to allow for viability to be considered. It is considered that such a requirement which is a step change from the national requirement to achieve net zero will stop housing delivery as it is not viable to deliver at present. The council's own evidence base confirms this in respect of housing for older people.</p>

C11.4	Lyndsay Goodyear Bell Cornwell	C11	<p>8.1 Whilst this is an admirable aim for all new homes to achieve net zero carbon - Building Regulation provide the appropriate and most flexible approach to achieving this as they provide mandatory national standards. Therefore, it is not necessary to include this policy in the plan. Let the Building Regulations deliver what they are there to deliver.</p> <p>8.2 Policy C11 should be deleted as it is not the most appropriate strategy and could negatively impact delivery if the cost associated with achieving the plans aims render development proposal unviable.</p>
C11.5	Nora Galley Now Planning	C11	<p>The requirements are too onerous for small builders who probably do not have the tools even to assess compliance – small builders typify the island and in a context in which housing supply target is well below the evidenced need because, past delivery rates have been lower than need since 2012 because of island specific factors. The Aspinall Verdi Viability Appraisal (July 2022) already raises red flags on the risks that these higher than Bldg Regs requirements may not be affordable.</p> <p>The policy could still be ambitious - and refer to the most up- to-date national standards for energy efficiency and embodied carbon.</p>
C11.6	Hyacinth Cabiles for NHS Property Service	C11	<p>NHSPS considers Draft Policy C11 to be sound as currently drafted.</p> <p>Draft Policy C11 seeks to support the overarching carbon reduction strategy and target to achieve net zero for new homes. NHSPS fully support policies that promote carbon neutral development.</p> <p>In considering the implementation of policies related to net zero, we would highlight that NHS property could benefit from</p>

			carbon offset funds collected where on-site carbon mitigation requirements cannot be met. This would support the NHS to reach the goal of becoming the world's first net zero healthcare provider.
C11.7	Guy Robinson Historic England	C11	no rconcerns raised about policy C11; but as mentioned regarding policy CC1 and EV1 we strongly encourage the plan to cover the repair and retrofit of existing buildings and note that adaptive reuse of existing buildings, which balances mitigation and adaptation for climate resilience, helps carbon and energy efficiency. Given the support for building re-use in EV1 and its supporting text (as an incidental aside, look out for spelling reuse vs re-use) it could be that the supporting text to C11 need only highlight this issue and refer to EV1, especially if the supporting text for EV1 is expanded as outlined in our comments above.
C11.8	Mark Behrendt HBF	C11	<p>Policy is unsound as it is consistent with national policy There is a need to act to reduce carbon emissions but disagree this needs to be undertaken through the local plan as there is a national approach and the Future Homes Standard (FHS) achieves the same goal. The Future Homes Standard (FHS) achieves the same goal. Delivering improvements through building regulations has an advantage in that it provides a single approach that all developers understand and can be rolled out at scale.</p> <p>Going beyond current or future standards must be consistent with national policy and robustly assess consequences and consider how the requirements are consistent with the written ministerial statement (WMS) published on the 13th of December 2023. The High Court judgement from the 2nd of July 2024 ([2024]EWHC 1693 Admin). 9. The judgment made by Justice Lieven importantly notes the intention of the Government at the time with respect to section 1(1)c of the Planning and Energy Act 2008, which allowed Local Authorities to set standards above those in building regulations. Take note of Paragraph 65. 10. legislation was to ensure that energy efficiency standards within local plans were to be set within the scope of building regulation to avoid a multiplicity of standard coming forward. The judgment goes on to note in paragraph 66 that the WMS does not stray from this purpose.</p>

		<p>11 Local plan policies which seek to apply an alternative standard would not only be inconsistent with the WMS but also with the intentions of the legislation.</p> <p>12. After noting these concerns, in the 2023 WMS it goes on to state that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures:</p> <ul style="list-style-type: none">• That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.• The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP). <p>13. HBF do not consider the approach set out in C11 to be consistent with the WMS nor that the implications of such a policy have been properly assessed in the supporting evidence base. Our detailed points are set out below.</p> <p>Sections 1 and 2</p> <p>14. Sections 1 and 2 of policy C11 relate to energy use in operation – The policy requires development proposals to take a fabric first approach to minimising energy demand with the proposed policy requiring all new development to demonstrate Total Energy use Intensity (TEUI) of 35kwh/m2/year, space heating demand of 15 to kWh/m2/year. A standard of 20-30 kwh/m2/year for space heating and 40 kwh/m2/year for total energy use is being proposed for bungalows.</p> <p>15. Taking the second bullet point of the WMS first, the approach proposed by the Council based on energy use is inconsistent with the approach set out in the WMS and as such is unsound. If the Council are to require standards above those set out in building regulations they must be expressed as a percentage of the target emission rate and not as an energy use target.</p> <p>16. Turning to the first bullet point, the Council will need to ensure the costs and deliverability of this policy are fully and robustly tested. In preparing its viability assessment HBF suggest the Council consider costs published by the Future Homes Hub (FHH) as part of their work to support and inform the implementation of the Future Homes Standard. The costs for similar standards to those being proposed can be found in the FHH report “Ready for Zero”.</p>
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			<p>17. The various specifications and costs considered are summarised in Figure 8 of Ready for Zero and indicates that in order to deliver standards above the FHS on a three bedroomed end of terrace house (specifications CS3, CS4 and CS5 in the FHH report) would be around 15-19% higher than the 2021 Building Regs, around £17,000 to £22,000 more per unit. The council's evidence in the Zero Carbon Homes Analysis suggests the costs of achieving its proposed policy for a similar typology to be 6% with the viability evidence adding £3,000 to £5,000 per dwelling to build costs to take account of policy C11. While the study also examines the impact of these costs being higher at £10,000 per dwelling even this is lower than the costings of similar standards provided by the Future Homes Hub, and as such HBF believe the Council may be underestimating the impact of this policy on development.</p> <p>18. With regard to deliverability of zero carbon homes HBF would not disagree with the Council's evidence which suggests that the proposed standards are technically feasible. However, HBF are concerned as to the impact these requirements will have on the rates at which sites can deliver new homes on all types of sites. The FHH also notes in its report Ready for Zero that even if a short transition period between current standards and those similar to the Council are proposing that this would "... create a high risk of quality problems, inflated costs and, potentially, stalled build programmes."</p> <p>19. It will be particularly important for the Isle of Wight Council to consider the potential impact on deliverability given their stated concerns that sites are not being brought forward and that the requirement has already been reduced the basis of these concerns - Consider impact on delivery rates of development in the early years of the plan period. Without any consideration of delivery then the Council's decision to go beyond what is required by building regulations is clearly unjustified.</p> <p>20. The HBF would also consider the requirements to use CIBSE54 of Passivhaus Performance Package (PHPP) when assessing building performance to be inconsistent with national policy. It is clear that the PEA 2008 and the WMS require any technical standard with regard to energy efficiency to be framed in relation to TER and Building Regulations using Standard Assessment Procedure (SAP) and to require the use of an alternative assessment framework would be wholly inconsistent.</p> <p>21. While HBF understands the desire for LPAs to go further current policy recognises that even where development can viably implement higher standards this must be within a consistent technical framework and approach to assessing building performance against those technical standards.</p> <p>22. If the Council have the evidence to show that the policy is deliverable the Council will need to ensure that all other policies in the local plan are consistent with delivering the levels of embodied carbon being proposed. As the Council's evidence notes the most energy efficient design will inevitably lead to less variety in the built form in order to reduce the surface area of the building (see page 42 of council's zero carbon homes paper). This will need to be reflected in design policies and any design codes</p>
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			<p>23. HBF would also recommend that that if a net zero policy is to be included in the local plan it should require a development to be net zero rather than for individual homes.</p> <p>24. Finally, HBF would recommend that if the policy is taken forward that it is sufficiently flexible and provide detail as to how the applicant and decision maker should react in those situations where the policy cannot be achieved.</p> <p>Section 3 - Embodied carbon</p> <p>25. The Council are requiring embodied carbon standards based on the LETI C rating for embodied carbon emissions. HBF do not consider to be consistent with national policy The Council's Zero Carbon Homes Analysis provides this as a policy aspiration, but HBF could not find any evidence to suggest that this level of embodied carbon in a new home is an achievable one. As with other aspects of policy C11 the Council will need to show that meeting this standard will not impact on the viability of development or impact on the rate at which new homes come forward. Without the necessary justification the policy must be considered unsound.</p> <p>26. As with reducing carbon emissions from operational energy use HBF considers that the best approach to setting such standards is at a national level to avoid different approaches and standard being set in different areas. Given that the Council has concerns that the housing market on the Isle of Wight cannot deliver the homes needed it seems counter intuitive to place even more requirements that will have a disproportionate impact on the sector it relies on to build new homes.</p>
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C11.9	Tetlow King Planning on behalf on Sovereign Network Group	C11	<p>The draft targets set are higher than those required by the Government’s Future Homes Standard (FHS) to be achieved by 2025. FHS currently aims to achieve its net zero target by 2050. This was underlined in the December 2023 Written Ministerial Statement on energy efficiency and environmental standards¹</p> <p>. The WMS noted inter alia that: “The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well reasoned and robustly costed rationale ...” This should also be understood in the context of paragraph 194 of the NPPF</p> <p>Addressing climate change and improving energy efficiency is wholly supported but it is suggested that caution should be exercised before parallel sets of standards are introduced through planning policies.</p> <p>It is suggested that should C11 retain commitments to standards higher than those set nationally that the wording is reviewed to ensure sufficient flexibility is retained to ensure that it does not impede regeneration</p>
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C11.10	Justin Gentleman - Foreland Homes	C11 General	<p>C11– these are positive steps, but given the issues this strategy defines in terms of housing, should we be seeking to improve over national policy?</p> <p>Does the LPA have the resource, upstanding and ability to enforce any policy above a national standard? If we are simply running with national standards, then these policies are controlled elsewhere.</p> <p>Meeting the national policies we have in place at present, presents specifics in orientation and the need for roof space for PV that create design limitation and also limit density too. These should be considered with the land allocations and their yield.</p>
Policy C12			
C12.1	Northwood Parish Council	C12	<p>5.84 The word ‘generally’ needs removing. Development should never 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.</p>

C12.2	David Long – BCM	C12 General	The policy orientates itself around utility infrastructure -This policy is unnecessary. Developments and developers engage with statutory utility companies to deliver infrastructure suited for the development and its needs. All such requirements are covered via separate legislation and does not need to be duplicated in the IPS.
C12.3`	Justin Gentleman - Foreland Homes	C12 Whole policy	This policy again mentions contributions from developers without any specifics. This does not provide the confidence to invest. Reading 5.82 to 5.87 below, I am unclear what is required that is not already covered by building regulations (specifically waste water), warranty or the ability to sell a completed development. Therefore, I am not sure why this is required or is a planning matter.
C12.4	Northwood Parish Council		5.85 NPC wish to request a detailed copy of the plan for the proposed development at Somerton Farm. The plan is not sustainable or consistent with national planning policy. The Plan is ambiguous and contradictory, the figures don't add up and is not fit for purpose. Northwood is a semi-rural, a parish in its own right, and not part of Cowes - The designation should be changed.
Policy C14			
C14.1	National Theatres Trust	C14	Support the policy wording and the protection it provides for valued existing facilities, but for consistency with national policy the supporting text (paragraph 5.97) should be revised to include cultural facilities such as theatres. They are consistent with the nature of facilities already covered by the policy. It is important they are afforded the same level of protection and support.
C14.2	Owen Neal Sport England	C14	Sport England is primarily concerned that the proposed policy will weaken protections set out in national planning policy for the protection of sports facilities.

			<p>Sport England considers that paragraph 103 of the NPPF is relevant here. This sets out exceptional circumstances by which the loss of sports facilities and playing field land can be permitted. Sport England consider that the proposed policy wording under part f) goes beyond para 103(a) as it introduces a viability criteria. Sport England objects to this as it would permit loss of sports facilities or playing field on viability grounds which is not supported by national planning policy our own playing fields policy.</p> <p>Furthermore, the proposed policy wording under (g) and (h) are not consistent with parts (a) and (b) of para 103 of the NPPF.</p> <p>On that basis, Sport England objects to the policy.</p>
C14.3	Hyacynth Cabiles for NHS Property Services	C14	<p>Relates to Part F to H of Draft Policy C14</p> <p>NHSPS does not consider Draft Policy C14 to be sound as currently drafted. Draft Policy C14 focuses on the provision of new community facilities and improvement of existing community facilities, including healthcare facilities/centres and services. This includes the protection of existing social and community infrastructure through requiring the demonstration of one of three criteria (F to H) to permit the loss of such facilities, which is also referenced in supporting paragraph 5.100.</p> <p>NHSPS supports the provision of sufficient, quality community facilities but does not consider the proposed policy approach to be positively prepared or effective in its current form, particularly pertaining to the loss of existing social and community infrastructure.</p> <p>Where healthcare facilities are included within the Local's Plan definition of community facilities, policies aimed at preventing the loss or change of use of community facilities and assets can potentially have a harmful impact on the NHS's ability to ensure the delivery of essential facilities and services for the community.</p> <p>The NHS requires flexibility with regards to the use of its estate to deliver its core objective</p>

			<p>Disposing of NHS sites no longer fit for purpose must follow a rigorous process to ensure that levels of healthcare service provision in the locality of disposals are maintained or enhanced, and proceeds from land sales are re-invested in the provision of healthcare services locally and nationally. Where it can be demonstrated that health facilities are surplus to requirements or will be changed as part of wider NHS estate reorganisation, it should be accepted that a facility is neither needed nor viable for its current use, and policies within the Local Plan should support the principle of alternative uses for NHS sites with no requirement for retention of a community use on the land or submission of onerous information.</p> <p>To ensure the Plan is positively prepared and effective, NHSPS are seeking the following modification to Draft Policy C14.</p> <p>Proposed Modification to Draft Policy C14: “...h. or i. Where the existing facility is a healthcare facility, it has been declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan.”</p> <p>Proposed Modification to supporting paragraph 5.100</p> <p>Where healthcare facilities are declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, there will be no requirement to satisfy Part F to H of the Policy.”</p> <p>NHSPS considers this modification would ensure the Plan is positively prepared and effective, and therefore sound.</p>
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Policy C15			
C15.1	Northwood Parish Council	C15	<p>There needs to be special legislation restricting second home and short-term holiday let ownership as there is in Cornwall.</p> <p>The plan is not sustainable or consistent with national planning policy. The Plan is ambiguous and contradictory, the figures don't add up and is not fit for purpose.</p> <p>Northwood is a semi-rural, a parish in its own right, and not part of Cowes. The designation should be changed.</p>
C15.2	Troy Planning + Design on behalf of Nettlestone & Seaview Parish Council	C15	<p>The Policy should recognise that Neighbourhood Plans can designate Local Green Spaces. It should also make clear that proposals for development will need to accord with policies in made Neighbourhood Plans.</p> <p>Policies EV7 and C15 are ineffective as they do not recognise that Neighbourhood Plans may include Local Green Space designations, that they have the ability to do this as conferred through the NPPF, and that they will have the same policy weight as the Local Green Spaces designated in the Local Plan.</p> <p>Policy C15 should also make clear that proposals for development will need to demonstrate how they respond to policies within Neighbourhood Plans.</p> <p>See attached representations for more information.</p>

C15.3	David Long – BCM	C15 General	<p>The emphasis of the policy is to enable Town, Parish and Community Councils to bring forward development via Neighbourhood Plans. It would seem that Policy C15 needs to be integrated into Policy G2, particularly for Sustainable Rural Settlements (if that policy is not revised as a structural position).</p> <p>For example, if community-led planning via Neighbourhood Plans wanted a different form of development which fell outside of Policy H4, H6, H7, H9 or H10, then this should be facilitated by Policy C15.</p>
C15.4	David Long – BCM	C15 point B	<p>With respect to Policy C15, part B, it is appreciated that there is perceptual concern about second home and short-term holiday lets within the ownership of new build properties, but as per the Council’s evidence, this does not seem to be a constraint and so policy (or future policy) does not need to mitigate against an effect which does not exist. Therefore, the restriction of C15, Part B is unnecessary.</p>
C15.5	Isle of Wight Council Public Health	C15	<p>Public Health reiterates the importance of Community Engagement within the Plan to give that sense of control and influence. This policy would be strengthened with more detail around this.</p> <p>We encourage broad engagement throughout the planning process. This is of particular importance in the field of health and wellbeing. One of the biggest issues that disempowers communities is feeling unsafe and vulnerable. A sense of wellbeing comes from believing that there is something that communities can do to improve or shape their area and address local problems. This is particularly important when major change is planned within a local plan. It would be beneficial if this policy identified how and where local communities can be better involved through participation and engagement as part of new development proposals within the plan.</p>

C15.6	Justin Gentleman - Foreland Homes	C15 whole policy	<p>why are we encouraging town and parish council to consider restricting second home or short-term holiday lets?</p> <p>The Isle of Wight is a leading tourism destination, and second home and short-term holiday lets are critical within that tourism make up. Spend from tourism both direct and indirect is the lifeblood of many Island businesses.</p> <p>The Island's dire old hotel stock found largely (but not exclusively) within the Bay area, is no longer desirable holiday accommodation and we must move with the times. Seeking to preclude holiday accommodation is not the answer to increasing housing stock.</p> <p>The answer to increasing housing stock is to do just that. Community led planning is important, but too often in housing terms this is led by the privileged few with housing, that do not want to listen to the wider needs of society.</p>
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Representations on Section 6: Growth			
Rep number	Name of respondent	Paragraph or policy	Summary of issue raised
General comments			
GG.1	Rebecca Loader IOW Archaeological and Historic Environment Service	6.6	Include following addition to last sentence of paragraph 6.6 - 'and those undesignated heritage assets which are demonstrably of equivalent significance' - ...designated heritage assets and those undesignated heritage assets which are demonstrably of equivalent significance....
GG.2	Sustainable Freshwater Community Group	Growth general	<p>The IPS plan seems to want to turn Freshwater village into a sprawling town with residential homes and removing green spaces.</p> <p>Freshwater has potential for growth with regards to landscape and eco-tourism but tranquillity and views must be protected. Urbanisation impacts on landscape, biodiversity and tourism.</p> <p>Prioritise small developments on brownfield sites.</p>
GG.3	David long	Growth general	The Council places strong emphasis on development being viable as set out by Policy G4, paragraph 6.30 (via the whole plan viability assessment) which includes, for example, land values and development costs. The Council believe this sets realistic requirements for development contributions and expectations for infrastructure.

			<p>This is questionable:</p> <ol style="list-style-type: none"> 1. Last viability assessment was undertaken in 2022 and pre the Liz Truss 'mini budget'. 2. As a consequence, inflationary rises and market instability has created difficult economic conditions. 3. Several costs have now been factored into projects including BNG, updated Building Regulations and further S.106 contributions
GG.4	FBRA FRESHWATER BAY RESIDENTS ASSOCIATION	Growth General	<p>6 - Growth</p> <ul style="list-style-type: none"> • Freshwater and the surrounding SSSI, AONB and other breath taking beauty spots such as Tennyson Town and Freshwater Bay are major tourist attractions on the Island with recent investments in tourism magnets such as the beautiful renovation of the Albion Hotel, and Totland Pier. The IPS plan seems to want to turn the rural village of Freshwater into a sprawling town filled with residential homes and removing green spaces, - which will clearly damage tourism. • "Freshwater is a rich and highly diverse rural area, offering considerable potential for growth with regards to landscape and eco-tourism. The local environment, flora and fauna must be protected as it is this rural tranquillity that residents and visitors appreciate [...] Conserve and, where possible, enhance the views referred to in the evidence document "Most Valued Views". Any development within these areas must ensure that key features of these views can continue to be enjoyed' Freshwater Neighbourhood Plan (2017 - 2027) • The Council must consider the implications of urbanising a treasured rural landscape and the impacts this will have on the tourism economy as these are intrinsically linked. Large scale developments will have the greatest of impacts and the greatest risk of negative impacts on both the landscape, biodiversity and tourism. Sensitive and small developments should be prioritised on brownfield sites, that are in need of improvement, and have the least risk of detrimental impacts.

Policy G1			
G1.1	Mrs Madeline Groombridge	G1	Insufficient hospitals, doctors, nurses and dentists. Heavy traffic to Newport.
G1.2	Northwood Parish Council	G1, para 6.5	<p>Planning applications (especially those in public ownership) still not delivered 6 years from application. Why?</p> <p>Bring sites in IWC ownership forward in the plan period.</p> <p>The plan is not sustainable or consistent with national planning policy. The Plan is ambiguous and contradictory, the figures don't add up and is not fit for purpose.</p> <p>Northwood is a semi-rural, a parish in its own right, and not part of Cowes. The designation should be changed.</p>
G1.3	Nora Galley	G1	Object to the housing requirement as not justified by the evidence. The ISA ignores reasonable alternatives and the implications of failing to meet the island's housing need. Reasonable alternatives to the delivery trend-based housing target need to be justified by evidence or dropped.

			<p>Other, sustainable sites (on edge of East Cowes) acceptable under the Core Strategy but not under G2 and no reasons are given. No evidence to justify capping the housing target to average housing delivery rates.</p> <p>Using a monitoring trigger related to three years of above target delivery is not pragmatic or positive in soundness terms. Plans should be reviewed and adopted every five years, so the three-year trigger is ineffective.</p> <p>No understanding of the population profile if insufficient new homes delivered, relying on scenarios based on needs being met in full including in the Employment Land Review. Constraining housing delivery results in a different population profile of the population which has not been tested.</p> <p>The evidence does not confirm a ‘cap’ on delivery but suggests actions including new land allocations.</p> <p>No assessment of constraints in line with NPPF and footnote 7, or evidence that flexibility of other policies may boost housing supply.</p>
G1.4	Freshwater Parish Council	G1	There is a need for small starter units at Golden Hill industrial park to facilitate growth of local industry.
G1.5	Angela Brooks – Fisher German LLP	G1	Land at and adjacent to New Fairlee Farm’ (HA040), for a residential led mixed-use development and an improved road network including a park and ride hub. The allocation should be reinstated in the Plan.
G1.6	David Long – BCM	G1 general	Suggestion IPS focuses on smaller and medium-sized developments. Debatable given the allocations in IPS.

			Two key priority allocated sites at Camp Hill and Newport Harbour are questionable.
G1.7	Mark Behrendt HBF	G1	<p>In this policy recognises the need to apply the policies in the local plan flexibly to deliver the development in the most sustainable way possible.</p> <p>The plan period is unsound and should be extended to 2042 to ensure plan period is consistent with national policy. In extending plan period, also need to ensure evidence base is up to date.</p>
G1.8	Justin Gentleman - Foreland Homes	G1	Placing majority of development on public sector sites, without proper analysis is dangerous and potential delivery of these sites at the end of the plan period is foolish.
G1.9	Justin Gentleman - Foreland Homes	Para 6.8	6.8 is insular and not outward looking.
G1.10	Lucy Charman Country Land & Business Association (CLA)	G1	Policy G1 refers to improvements to the existing highways network but doesn't mention the severely affected A3055 at Ventnor, St Lawrence and Brook.
Policy G2			
G2.1	Northwood Parish Council	G2	Northwood is a semi-rural, a parish in its own right, and not part of Cowes. The designation should be changed.
G2.2	Isle of Wight National Landscape (AONB)	G2	Support the policy approach for the location of new housing. This ensures that housing and development is located in those areas already serviced by community facilities, infrastructure and transport links. This ensures that elements of the island that need protection continue to be protected.

			A really clear easy to use map system.
G2.3	Bell Cornwell	G2	<p>No specific comments but they relate to the policy and may require updates to supporting text.</p> <p>It is noted that the primary focus for housing growth is within settlement boundaries and the amendment to the settlement boundary to include the Pennyfeathers site is welcomed. As one of the primary settlements on the Island, Ryde is one of the most sustainable locations for growth and can support the allocation of the Pennyfeathers site.</p>
G2.4	Nora Galley	G2	<p>Policy is too restrictive given the absence of reasons given when there are sustainably located sites adjacent to the settlement boundary eg. East Cowes and where it is proposed to undersupply housing needs over the plan period.</p> <p>The proposed sites cause no significant harm to heritage, landscape, visual and the limited harm to Springhill Estate is offset by the benefit of the proposed housing mix, including affordable.</p> <p>Review settlement boundaries; hold a further call for sites; allocate additional, sustainably located, housing sites as omission sites through examination process. Reassess deliverability of the sites in Appendix 4 and the 'indicative trajectory'.</p>
G2.5	Angela Brooks – Fisher German LLP	G2	<p>Reinstate New Fairlee Farm as a site allocation.</p> <p>No objection to methodology of a settlement hierarchy but Newport's status as the largest and most sustainable settlement on the Island is not being fully recognised. Newport has higher order</p>

			<p>services, facilities and employment opportunities but is placed alongside other Primary Settlements, which play a different role and function to Newport. Newport should have its own tier in the hierarchy.</p>
G2.6	Phil Salmond Planning Ltd	G2	<p>Priority locations should include sites 'adjoining' the settlement boundary. Insufficient housing opportunities on land within settlement boundaries, in light of housing need. Consider windfall sites for meeting need.</p>
G2.7	Troy Planning + Design Planning Agent on behalf of Nettlestone and Seaview Parish Council	G2	<p>Define 'Sustainable Rural Settlements' and explain how the approach to development differs from proposals in other small settlements across the Island in the wider rural area.</p> <p>The identification of Sustainable Rural Settlements has no application in other sections of the Plan, for example the town centres hierarchy, or in how and where social and community infrastructure should be provided. Why are Sustainable Rural Settlements identified if there is no specific policy applicable to these? The Policy is thus ineffective.</p>
G2.8	Peter Spink (IW Councillor for Freshwater North and Yarmouth) and on behalf of the Steering Group of the West Wight Villages Residents' Association	Main text	<p>Calbourne, Shalfleet, and Wellow should not be included as 'sustainable rural settlements following outcomes of planning applications in these areas. Not sustainable locations.</p>

G2.9	Richard Holmes BCM for Sam Biles	G2	Cowes is identified as a Primary Settlement and a focus for sustainable housing growth within the settlement boundary. However, there are no allocations to support this.
G2.10	Paul Townsend	G2 General	Freshwater is a rural village not a secondary settlement.
G2.11	Richard Holmes for Perry Properties Ltd	G2	<p>No attempt to allocate smaller sites in accordance with the settlement hierarchy.</p> <p>The settlement hierarchy approach seems logical, but limit allocations in the Rural Service Centres and Sustainable Rural Settlements. Whitwell is identified as a Sustainable Rural Settlement in the Rural Sustainability Matrix Review. Niton and Whitwell combined score sufficiently to be a suitable location for additional growth.</p> <p>Site IPS117 in the Parish of Niton and Whitwell, were included in the SHLAA and though included in the 2018 version of the plan is no longer part of the Plan. The site should be an allocation in the Plan.</p> <p>The 2018 Regulation 18 Plan had a more positive approach to deliver development and included allocations across the Island including in Sustainable Rural Settlements.</p> <p>Removing the certainty of allocations causes delay, objection and lack of certainty. Giving certainty must be given high priority. The SHLAA identified deliverable sites within or adjacent to the Sustainable Rural Settlements so allocations should be made in Sustainable Rural Settlements. Should not rely solely on H9. The policy approach stifles and limits smaller builders and delivery.</p> <p>Whitwell is identified as a sustainable location, capable of providing new houses. Approach is not then consistent with NPPF. Lack of growth at Whitwell, will hamper ability to prosper and become economically and socially sustainable.</p> <p>Proposed NPPF revisions with mandatory housing targets together with Niton being a sustainable location for growth, means Niton can sustain more growth and site allocations previously seen as developable should be added.</p> <p>Policy and lack of site allocations are unsound.</p>

G2.12	Richard Holmes for Susan Rann	G2	<p>The settlement hierarchy approach seems logical, but limited allocations in the Rural Service Centres and Sustainable Rural Settlements.</p> <p>Wootton is identified as a Secondary Settlement, but no sites are allocated. Site IPS318 in Wootton was included in the SHLAA and judged to be developable. Site was included the 2021 IPS version which was published but not progressed. The site is no longer included in the latest SHLAA report or Reg 19 Plan and there is no reason why it should not be allocated.</p> <p>Wootton scores highly and there is no reason why allocations should not be made. Approach is not consistent with NPPF given the Rural Sustainability Matrix clear rationale for growth.</p> <p>Proposed NPPF revisions with mandatory housing targets together with Wootton being a sustainable location for growth, means Wootton can sustain more growth and site allocations. Lack of growth at Wootton, will hamper ability to prosper and become economically and socially sustainable. Site allocations should be added.</p> <p>Policy and lack of site allocations are unsound.</p>
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G2.13	Richard Holmes BCM for West Oak Homes and Billings Group	G2	<p>No attempt to allocate smaller sites in accordance with the settlement hierarchy.</p> <p>The settlement hierarchy approach seems logical, but limit allocations in the Rural Service Centres and Sustainable Rural Settlements. No allocations in Rural Service Centres.</p> <p>Niton is identified as a Rural Service Centre a focus for sustainable housing growth but is not supported by site allocations.</p> <p>Site IPS114 and IPS263 in Niton were included in the SHLAA and judged to be developable. Sites are no longer included within the latest SHLAA report or Reg 19 Plan and there is no reason why it should not be Allocated</p> <p>No certainty through allocations means reliance on H4, H6, H7, H9 and H10 causing delay, objection and lack of certainty. Giving certainty must be given high priority. The SHLAA identified deliverable sites within or adjacent to the Sustainable Rural Settlements so allocations should be made in Sustainable Rural Settlements. Should not rely solely on H9.</p> <p>The Rural Sustainability Matrix defined a clear rational for accepting growth. Small scale site allocations should be made in the Smaller Rural Settlements.</p> <p>The policy and allocations approach will stifle and limit delivery from small housebuilders. Approach is not consistent with NPPF given the Rural Sustainability Matrix clear rational for growth. Lack of allocations hamper ability for rural villages to prosper and become economically and socially sustainable.</p> <p>Allocations only for large sites drive out small builders.</p> <p>Proposed NPPF revisions with mandatory housing targets together with Niton being a sustainable location for growth, means it can sustain more growth. Site allocations should be added for Niton.</p> <p>Policy and lack of site allocations are unsound..</p>
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G2.14	David Long – BCM	G2 General	<p>Logical approach to the settlement hierarchy but site allocations in the Rural Service Centres and Sustainable Rural Settlements should be added. To rely on H4, H6, H7, H9 and H10 for the Sustainable Rural Settlements will cause delay, objection and lack of certainty. Greater certainty should be a high priority.</p> <p>The SHLAA identified deliverable sites so allocations should be made. The Rural Sustainability Matrix defined a clear rational for growth.</p> <p>Errors to supporting text.</p>
G2.15	Christopher Scott The Planning and Development Hub	G2 -Merlins Farm Calbourne	<p>The recently approved site at Shalfleet is supported including 50% affordable housing.</p>
G2.16	Christopher Stott The Planning and Development Hub on behalf of Vectis Housing	G2	<p>Vectis Housing develop in both primary and secondary locations and have an interest in Rural Service Centre sites.</p> <p>Many developments Vectis have been involved in, abut or adjoin the settlement boundaries. Amend policy to allow development abutting and adjoining these areas.</p> <p>Rural exemption site policy should continue.</p> <p>Sustainable Rural Settlement at Wellow will provide a varied mix of size and tenure and a recent housing needs assessment recognised the need for affordable and family housing. Considerable demand in rural areas around West Wight.</p> <p>It is clear in the Housing strategy with the figures shown, there is a considerable amount of demand for older person, affordable and supported housing within rural areas around West Wight.</p> <p>Need a balance of open market units and affordable housing units with the feasibility and viability of sites needed to bring them forward. More flexibility needed on the delivery of different types of affordable housing.</p>

G2.17	Christopher Stott The Planning and Development Hub on behalf of Redmer Developments and Vectis Housing	G2	Proposed 16 residential units in Wellow to provide a mix of size and tenure. Recent housing needs assessment recognised the need for affordable housing and family housing. There is a large shortfall of supply of affordable housing. Wellow Fields provides an opportunity to deliver the right housing in the right place at the right price at the right time in a sustainable location and should be supported. Could deliver housing in the next 18 months of which 50% would be affordable, some of which could be for rent.
G2.18	Christopher Stott The Planning and Development Hub	West Wight Alpacas	Currently exploring a mixed use diversification development to secure the alpaca farming operation. Seeking a small tourism development to the north of the site providing further tourism accommodation to support the alpaca business. The development would be compatible with the emerging framework for rural development.
G2.19	Justin Gentleman - Foreland Homes	G2	Policy seeks to limit housing growth and prevent it where not allocated or within the settlement boundaries. This artificially limits housing delivery. To achieve sustainability all settlements should be expanded to some degree, irrespective of size. Policy tightens definition of a windfall site, and it follows that windfall yield will fall.

G2.20	Justin Gentleman - Foreland Homes	Para 6.16	Unclear how non-allocated sites can be delivered as the policy is very tight.
Policy G3			
G3.1	Laura Lax	G3	Support bullet point (f).
G3.2	Northwood Parish Council	G3	<p>Query consideration given to local infrastructure for proposed developments at Somerton Farm and Newport Road, particularly medical and education needs.</p> <p>Not consistent with national planning policy and not sustainable. The document is ambiguous and contradictory, the figures don't add up and is not fit for purpose.</p> <p>Northwood is identified as part of Cowes but is a rural village, a parish in its own right, and this should be changed.</p>
G3.3	Hyacynth Cabiles for NHS Property Services		<p>G3 is sound.</p> <p>Welcome the threshold of 20 or more dwellings where contributions will be sought for primary healthcare infrastructure.</p> <p>Effective implementation mechanisms are important to deliver healthcare infrastructure. Recommend a specific section setting out the process to determine the appropriate form of developer contributions to health infrastructure.</p> <p>Add emphasis for the NHS and partners to work with the Council for appropriate mitigation measures. Healthcare providers should have flexibility in determining the appropriate means of meeting healthcare needs arising from new development. In the Viability Study the assessment does not include an allowance for contributions towards healthcare. The S106 headroom as part of site- specific testing is generally sufficient to enable financial contributions to be secured for healthcare.</p> <p>So overall the assessment of plan-wide viability demonstrates that policy requirements in relation to healthcare infrastructure contributions are deliverable. Add mention of required healthcare mitigation in the viability assessment. Recommend the viability assessment includes a separate cost input for typologies where a healthcare contribution is expected to support implementation of G3.</p>

G3.4	Guy Robinson Historic England	G3	<p>Support policy approach. Encourage mention of heritage at risk in the context of cultural facilities in the supporting text.</p> <p>The approach should at least maintain existing levels of cultural assets and seek improvements to secure the long-term future of assets classed as 'at risk'. Consider use of Community Infrastructure Levy and S106 agreements.</p>
G3.5	David Long - BCM	G3 main policy	<p>Unclear why G3 includes bullet g). WightFibre have secured a network of broadband infrastructure.</p> <p>Bullet h) - it is dubious if SANG's are applicable when the Council have not decided which allocations need a SANG over and above the contributions applied by Bird Aware.</p> <p>'Strategic off-site solutions' should be defined and allocated to give certainty.</p>

G3.6	Iain Delaney – Captiva Homes	G3 general	Further clarity needed in the mechanisms for securing Developer Contributions. There is little evidence to support requests and no plan available to provide clarity on what is going to happen / or what costs are required - this has been significant challenge in current and previous applications.
G3.7	Mark Behrendt HBF	G3	Part g) refers to developer contributions to support provision of digital infrastructure. It is for private companies to provide infrastructure. Part R of the building regulations requires development to provide gigabit ready infrastructure on site and for internet providers to provide a gigabit ready internet service.
Policy G4			
G4.1	Northwood Parish Council	G4	<p>Bullet b) - This provides developers with the option to over promise and underdeliver. Affordable homes should always be built in proportion, at the same time or before other homes.</p> <p>The plan is not sustainable or consistent with national planning policy. The Plan is ambiguous and contradictory, the figures don't add up and is not fit for purpose.</p> <p>Northwood is categorised as part of Cowes but is a semi-rural village, a parish in its own right, and this designation should be changed.</p>
G4.2	Freshwater Parish Council	G4	Area replaces new social/rental housing for both families and single persons. Accommodation required to be energy efficient, well insulated and uses renewable energy.

G4.3	Martha James Plan Research for East Cowes Town Council	G4	NPPF para 58 does not require viability assessments to be carried out by an independent third party or fully funded by the applicant themselves.
G4.4	David Long BCM	G4 general	<p>The 'whole plan viability assessment' is questioned as it is old and not reflective (in any year) of real time live costs. Costs are subject to change and therefore difficult to continually update. However, there have been fundamental shifts since the assessment in 2022 meaning the viability assessment is unsound.</p> <p>Revisions to affordable housing tenures, levels of discount, a swath of developer contributions (G3) inclusive of Biodiversity Net Gain, Primary Healthcare Infrastructure, SANG's or off-site strategic schemes, mean it is impossible to confirm if the plan is viable when such costs are not factored in.</p> <p>Real and reasonable expectations that are deliverable need to be set. G4 purpose is to permit an open book viability assessment if proposals cannot provide the requirements of the IPS, but the bar is set so high as a 'rare circumstance'. This infers the principles of plan viability are sound and robust and this is not the case. On adoption of the Plan, for any development to proceed there will be significant challenges, barriers and delay.</p>
G4.5	Mark Behrendt HBF	G4	Policy is unsound and lacks the clarity required by paragraph 16 NPPF. Needs flexibility to make development viable but broadly support policy. Delete "In the rare circumstances" to ensure the policy is effective.

			Amend penultimate paragraph to provide more clarity to the decision maker and ensure decisions are made on the evidence. Replace “If none of the above are considered appropriate the Council will refuse the application” with “If the council does not consider there to be justification supporting any of the above the Council will refuse the application”.
G4.6	Justin Gentleman - Foreland Homes	G4	This can only be done by a competent person who has direct and current experience of the market.
G4.7	Justin Gentleman - Foreland Homes	G4 para 6.30	6.30 sets a dangerous approach. In the last two years (2022 to 2024) build costs have risen by 15%. Any assessment data pre-pandemic is drastically outdated.
Policy G5			
G5.1	Northwood Parish Council	G5	<p>This policy is supported but the term ‘unreasonably slow manner’ needs definition.</p> <p>The plan is not consistent with national planning policy and is not sustainable. The whole document is ambiguous and contradictory, the figures don’t add up and it is not fit for purpose.</p> <p>Northwood is categorised as part of Cowes but is a semi-rural village, a parish in its own right, and this designation should be changed.</p>
G5.2	Red Funnel	G5	<p>Supports the intention of G5, but it is not the place of local plans to duplicate legislation such as the Levelling Up and Regeneration Act 2023.</p> <p>Additionally, although Section 255(3)(a) of the Levelling Up and Regeneration Act relating to</p>

			<p>Sections 112, 113 and 114 of that Act have been signed into law and the power to make regulations has come into force, the regulations have not yet been made by the Secretary of State.</p> <p>Delete G5 from the Plan, as it duplicates legislation, is not currently consistent with national policy and may not be consistent with future national policy. As such, G5 is not effective or justified.</p>
G5.3	Bell Cornwell	G5	<p>G5 is not sound and does not provide a positive or flexible approach to delivery.</p> <p>The policy approach needs to provide greater flexibility for circumstances that are not straight forward. For instance, there could be reasons why development was not delivered in a timely manner in the past that may now have been overcome.</p> <p>It may not be possible to provide an explicit start date, and for outline applications it may not be possible to provide evidence of delivery, as delivery periods often extend over many years and may not be promoted by a developer so that information may simply not be available. Holding back a planning application on that basis will achieve the opposite of what the policy is trying to achieve.</p> <p>Refusing, or not considering applications that cannot provide this information will not help delivery. Consider on an individual basis. Onerous requirements might stifle housing delivery.</p> <p>Requirements for major residential development are imposing and restrictive. A delivery timetable at the start of a project is restrictive and many things can change over the delivery of that project.</p> <p>Requiring evidence about how different housing products can compete in the market will not speed up delivery. The requirements are likely to delay applications and ultimately delay or jeopardise delivery.</p> <p>Delete policy.</p>

G5.4	Richard Holmes for Perry Properties Ltd	G5	<p>G5 is seeking to ensure delivery of planning permissions. All housebuilders have seen considerable political resistance at all levels.</p> <p>If G5 is felt to be sound, there must be some reflection in G5 about how the council can perform in a suitable timetable themselves and have their actions and consequences held into account.</p>
G5.5	Richard Holmes for West Homes and Billings Group	G5	<p>Policy G5 - the Council expects to see residential development starting as soon as practically possible. Our clients are small housebuilders who have already delivered a number of schemes across the Island.</p> <p>There is no desire for our clients, or developers in general, to stall development once they have committed to the process of investing. The delay in obtaining timely planning permissions sterilises business and undermines their performance, ability to plan and ability to reduce risk and invest wisely.</p> <p>This is having and has had a debilitating effect on our clients and their potential schemes, along with a wide range of smaller builders, SMEs and larger house builders who have seen considerable political resistance at all levels.</p> <p>If G5 is felt to be sound, there must be some reflection in G5 about how the council can perform in a suitable timetable themselves and have their actions and consequences held into account.</p>

G5.6	David Long - BCM	G5 general	<p>The Council are a barrier to development. Delay in obtaining planning permission sterilises business and undermines their performance, ability to plan and ability to reduce risk and invest. Range of housebuilders have seen considerable political resistance at all levels.</p> <p>No desire for developers to stall development once committed to the process of investing. Development sites are taking 7+ years from conception to breaking ground. G5 wants development delivered but is a lack of council power, resources or political willingness to give a stable platform.</p> <p>G5 a) to d) do not reflect if the Council has the resources, knowledge or ability to understand development delivery timetables or resources to enforce them.</p> <p>If G5 is felt to be sound, there must be some reflection in G5 about how the council can perform in a suitable timetable themselves and have their actions and consequences held into account.</p>
G5.7	Richard Holmes for MK Assets	G5	<p>With regard to E1 and the site at Nicholson Road, the site was submitted as a planning application in 2019 and has not yet been determined by the Isle of Wight Council (landowner). Under G5 can the Council ask themselves (as landowner) whether this allocation can be delivered?</p>
G5.8	Justin Gentleman - Foreland Homes	G5	<p>G5 damages investor confidence. Local delivery of sites with consent follows a national picture. Adding policy to a national issue will not assist. Will result in developers investing elsewhere and lenders refusing to lend on the Island. Approach should be allocating enough land to meet the Island's needs, taking account of the conversation of consents to completions ratio.</p>

Representations on Section 7: Housing			
Rep number	Name of respondent	Paragraph or policy	Summary of issue raised
General comments			
HG.1	Chani Courtney	Housing General	Summarised under policies KPS1, KPS2, H3, H6, H9, EA1, EA2, EA3, EA4, EA5 and EA6.
HG.2	Sara Mason	Housing General	Support Camp Road, Freshwater to provide much needed housing and to bring much needed revenue to the area. The local economy in Freshwater has declined over decades, with new good quality homes that are sustainable for future energy and waste needs, the town could regenerate and thrive.
HG.3	Sarah Sims	Housing General	<p>Continued pursuit of nationally imposed housing numbers will perpetuate the decline of our young population and accelerate the ageing population.</p> <p>Social / affordable housing should be top priority to attract essential workers but track record for delivery is low.</p> <p>Should re-examine the case for 'Exceptional Circumstances', for a more realistic housing figure. 450 houses per year, or government's recent change to over 1100 per year are not based on the Objectively Assessed Housing Need and overestimate because, they do not reflect local need and is not matched by economic growth.</p> <p>West Wight has been allocated a disproportionate number of houses in relation to available brown field capacity, social, medical and utility infrastructure facilitated allocating outside the existing settlement boundary.</p>
HG.4	Shirley Briscoe	Housing General	<p>Not consist with national policy because the Plan was not available on the Council consultation page and required extensive legal knowledge of the NPPF.</p> <p>Not positively prepared because objectively assessed housing needs are not based on current accurate demographic data and should be based on local requirements.</p>

			<p>Development of very expensive housing encourages an influx of unsustainable numbers.</p> <p>Object to boundary changes in West Wight. Ignore local sentiment. All brownfield sites should be utilised and prime agricultural land protected.</p>
HG.5	Michael Briscoe	Housing General	<p>Not consistent with national policy because the Plan was not available on the Council consultation page and required extensive legal knowledge of the NPPF.</p> <p>Not positively prepared because objectively assessed housing needs are not based on current accurate demographic data and should be based on local requirements. Development of very expensive housing encourages an influx of unsustainable numbers.</p> <p>Object to boundary changes in West Wight. Ignore local sentiment. All brownfield sites should be utilised and prime agricultural land protected.</p>
HG.6	FRESHWATER BAY RESIDENTS ASSOCIATION (FBRA)	Housing general	<p>Nationally imposed housing numbers will perpetuate a declining young population and accelerate an ageing population.</p> <p>Social / affordable housing should be top priority to attract essential workers but track record for delivery is low.</p> <p>Should re-examine the case for 'Exceptional Circumstances', for a more realistic housing figure. 450 houses per year, or government's recent change to over 1100 per year are not based on the Objectively Assessed Housing Need and overestimate because, they do not reflect local need and is not matched by economic growth.</p> <p>West Wight has been allocated a disproportionate number of houses in relation to available brown field capacity, social, medical and utility infrastructure facilitated allocating outside the existing settlement boundary.</p>
HG.7	Paul Townsend	Housing general	<p>Not consistent with national policy or legally compliant because the Plan was not available on the Council consultation page and required extensive legal knowledge of the NPPF.</p>
HG.8	Elizabeth Keay	Housing general	<p>Not consistent with national policy or legally compliant because the Plan was not available on the Council consultation page and required extensive legal knowledge of the NPPF.</p>

HG.9	Paul Townsend	Housing general	Not consistent with national policy or legally compliant because the Plan was not available on the Council consultation page and required extensive legal knowledge of the NPPF.
HG.10	Dominic Hicklin	Housing general	<p>Continued pursuit of nationally imposed housing numbers will perpetuate the decline of our young population and accelerate our ageing population. Social / affordable housing should be top priority to attract essential workers but track record for delivery is low.</p> <p>Should re-examine the case for 'Exceptional Circumstances', for a more realistic housing figure. 450 houses per year, or government's recent change to over 1100 per year are not based on the Objectively Assessed Housing Need and overestimate because, they do not reflect local need and is not matched by economic growth.</p> <p>West Wight has been allocated a disproportionate number of houses in relation to available brown field capacity, social, medical and utility infrastructure facilitated allocating outside the existing settlement boundary.</p>
HG.11	Sustainable Freshwater Community Group	Housing general	<p>Continued pursuit of nationally imposed housing numbers will perpetuate the decline of our young population and accelerate our ageing population. Social / affordable housing should be top priority to attract essential workers but track record for delivery is low.</p> <p>Should re-examine the case for 'Exceptional Circumstances', for a more realistic housing figure. 450 houses per year, or government's recent change to over 1100 per year are not based on the Objectively Assessed Housing Need and overestimate because, they do not reflect local need and is not matched by economic growth.</p> <p>West Wight has been allocated a disproportionate number of houses in relation to available brown field capacity, social, medical and utility infrastructure facilitated allocating outside the existing settlement boundary.</p> <p>Lack of proper and fair consultation. Freshwater is not a secondary settlement but a rural village</p>

HG.12	Iain Delaney – Captiva Homes	Housing General	<p>The need for stability for the development community is not recognised in the Plan or for nearly two decades severely impacting housing delivery. Three key reasons preventing lack of housing:</p> <ol style="list-style-type: none"> 1. Lack of land allocations resulting in greater risks, costs and considerable time delay. This has created skills and employment gaps, lack of business continuity and instability in risk management and attracting positive investment. It is key in why housebuilding on the Island has declined. 2. Anti-development, ‘NIMBY’ Councillors 3. Under resourced Local Planning Authority
HG.13	Isle of Wight Council Public Health	Housing General	<p>Support the focus on addressing housing needs, especially affordable housing. Affordable housing provision has been identified as a key building block for health and wellbeing. This could usefully be included within the evidence and justification within the plan. Inequalities in housing affordability - The Health Foundation Public Health’s comments around housing have been covered in previous responses within this document particularly in regard to affordable and accessible housing, healthy homes and lifetime homes to promote independent living. We would reiterate and refer to those comments again.</p>
Policy H1			
H1.1	Home Consultancy Ltd	H1	Lack of evidence to demonstrate why the island is exceptional. Insufficient actions to demonstrate that they cannot deliver above this ceiling.
H1.2	Wootton Bridge Parish Council	H1	The last four large planning applications in Wootton are on land adjacent to the defined settlement boundary and did not adhere to the Housing Needs Survey. Any applications outside or adjacent to the defined settlement boundary need to meet local housing needs for the village with no further housing development until the next housing needs survey is undertaken.
H1.3	Amber Trueman Southampton City Council	H1	<p>A housing target below the level suggested by the standard method is justified.</p> <p>A Statement of Common Ground between Isle of Wight Council (IOWC) and Southampton City Council agrees that Southampton is currently unable to meet its own needs in full and therefore would not be able to take on unmet needs from the Island.</p>

			<p>The new standard method proposal has not been factored into the Statement of Common Ground as the Government consultation commenced after this was finalised. However, given the councils are in separate Housing Market Areas, there is unlikely to be any major change to the overall position if this new method is adopted.</p> <p>SCC will continue to work with IoWC on strategic issues, such as housing need and delivery, under the Duty to Cooperate. This may include review and update of the SCC & IoWC Statement of Common Ground, if required.</p>
H1.4	Bell Cornwell	H1	<p>The plan falls significantly short of the objectively assessed need. Delivering 453 dwellings per annum when the requirement is currently for 703 dwellings per annum and could rise to 1,104 if the changes to the standard method are confirmed. A step change in delivery is needed with more dwellings allocated / identified in the plan to meet housing needs.</p> <p>Should not place restrictions on delivery through onerous policy requirements that go beyond national standards.</p> <p>The implications of the emerging NPPF and recent Written Ministerial Statement on the draft planning strategy should be considered. The plan should make provision for adequate growth to meet housing need.</p> <p>Transitional arrangements will be in place a month after publication of the revised NPPF. The Council should consider implications for the draft plan as the Written Ministerial Statement has significant weight and makes clear the Government's intention to deliver 1.5 million homes in the next five years.</p> <p>The Isle of Wight Council should carefully consider its approach and where to focus resources to deliver a local plan that meets local needs, should that be through increasing densities on existing allocation, ensuring the plan does not fetter the delivery of these sites and allocating more land for development.</p>
H1.5	Christopher Jarman	H1	<p>Continued pursuit of nationally imposed housing numbers will perpetuate the decline of our young population and accelerate our ageing population.</p> <p>Social / affordable housing should be top priority to attract essential workers but track record for delivery is low.</p>

			<p>Should re-examine the case for 'Exceptional Circumstances', for a more realistic housing figure. 450 houses per year, or government's recent change to over 1100 per year are not based on the Objectively Assessed Housing Need and overestimate because, they do not reflect local need and is not matched by economic growth.</p> <p>West Wight has been allocated a disproportionate number of houses in relation to available brown field capacity, social, medical and utility infrastructure facilitated allocating outside the existing settlement boundary.</p>
H1.6	Bob Seely	H1	<p>Continued pursuit of nationally imposed housing numbers will perpetuate the decline of our young population and accelerate our ageing population. Social / affordable housing should be top priority to attract essential workers but track record for delivery is low.</p> <p>Should re-examine the case for 'Exceptional Circumstances', for a more realistic housing figure. 450 houses per year, or government's recent change to over 1100 per year are not based on the Objectively Assessed Housing Need and overestimate because, they do not reflect local need and is not matched by economic growth. West Wight has been allocated a disproportionate number of houses in relation to available brown field capacity, social, medical and utility infrastructure facilitated allocating outside the existing settlement boundary.</p>
H1.7	Northwood Parish Council	H1	<p>The focus of growth is on the primary settlements of Newport, Ryde and Cowes. For this purpose, Cowes should exclude the village of Northwood.</p> <p>The plan is not sustainable or consistent with national planning policy. The Plan is ambiguous and contradictory, the figures don't add up and is not fit for purpose..</p> <p>Northwood is a semi-rural, a parish in its own right, and not part of Cowes.</p>
H1.8	Isle of Wight National Landscape (AONB)	H1	<p>We wholly support the approach the Council has taken with regards to housing numbers. The island is in a unique situation with regards to housing construction and the market. The background documents clearly demonstrate why a higher housing delivery number would be unattainable and we consider the current figure sustainable and appropriate,</p>

			<p>continuing to protect those areas of the island that require protecting whilst providing housing in the most appropriate locations.</p> <p>A very clear and user friendly map.</p>
H1.9	Angela Brooks – Fisher German LLP	H1	<p>Land at and adjacent to New Fairlee Farm’ (Ref: HA040), was identified in the November 2018 Draft Island Planning Strategy as a proposed allocation site for residential led mixed- use development accommodating at least 880 dwellings, a green, open and recreational space, community uses and an improved road network including a park and ride hub.</p> <p>The allocation should be reinstated.</p> <p>NPPF para 61 states that strategic policies should be informed by a local housing need assessment, using the standard method as the starting point. An alternative can only be progressed where exceptional circumstances exist eg. a demographic justification. A demographic argument is not made by the Council, but instead based on an issue of housing delivery.</p> <p>Policy should be amended to remove reference to the delivery of an “island realistic housing requirement” over the plan period. Instead, we consider that the Council should deliver at least 703dpa (utilising the latest affordability ratio and 2024 as a base date in accordance with the PPG) (an increase from 668 since the last consultation), in line with the standard methodology for assessing housing need.</p>
H1.10	Phil Salmon Planning Ltd	H1	<p>The housing target is woefully short of what is needed.</p> <p>There has been a lack of housing allocations and a negative response to planning applications. The council have not been proactive or positive in determining of sustainable greenfield applications.</p> <p>Poor delivery has led to an increase in housing need figures, which will be mandatory under the new NPPF.</p> <p>H1 should reflect housing need and assist joint working between housing providers and the council.</p>
H1.11	Martha James Plan Research for East Cowes Town Council	H1	<p>Table columns do not add up to the totals for Year 3, Year 4, Year 5, Years 6-10 or Total. The row for Total does not add up to the total shown.</p>

H1.12	Troy Planning + Design Planning Agent on behalf of Nettlestone and Seaview Parish Council	H1	<p>Remove windfall housing targets for Neighbourhood Plan areas. Correct housing supply figures (large sites with planning permission), removing undeliverable sites and correctly assigning other sites to Nettlestone & Seaview Parish.</p> <p>Policy H1 is unsound. Windfall housing targets for Neighbourhood Plan areas is overly simplistic, not based on evidence and is unjustified. The approach does not follow NPPF or PPG guidance.</p> <p>Policy conflicts with G2. Should remove windfall housing targets for Neighbourhood Plan areas to make sound. Large sites with planning permission assigned to Nettlestone & Seaview Parish are incorrect and need updating. Clarify what this means for the windfall housing target for the Parish.</p>
H1.13	Richard Holmes BCM for Sam Biles	H1	<p>Parts of the Plan are inconsistent with the NPPF and not deliverable and unsound. It should be 'forward looking' to meet paras 15 & 16 of the NPPF. Questionable if it is positively prepared, or clearly written and unambiguous.</p> <p>Fails to meet para 22 of the NPPF. The Plan is based on a 2022 iteration which has not evolved. It now includes completions from 2022/23 and 2023/24. If completions for 2022/23 (357 dwellings) were removed, they would need to be replaced in subsequent years.</p> <p>The housing target is well below the current Standard Method of 703 dwellings or Proposed Method of 1104 dwellings per annum.</p> <p>The exceptional circumstances outlined is based on the fact the Island developed no clear strategy and allocations since the Unitary Development Plan (1996-2011). The 2012 Core Strategy defer allocations to Area Action Plans which have not been developed, leading to</p> <p>uncertainty, risk, considerable time delay and frustration. Agree the Island has practical challenges.</p> <p>The IPS does not deal with allocations in Rural Service Centres with a small number of polices for Sustainable Rural Settlements. This will not assist small-scale Island builders</p>

			<p>who develop the large majority of windfall sites. Expectation of considerable delivery of windfall sites but hampered by marginalised policy structure and lack of small site allocations.</p> <p>The viability changes the preference toward affordable housing tenures and discount levels and introduces new S.106 contributions and doesn't recognise inflation and mortgage rate instability.</p>
H1.14	Richard Holmes BCM for Perry Properties Ltd	H1	<p>Parts of the Plan are inconsistent with the NPPF and not deliverable and unsound. It should be 'forward looking' to meet paras 15 & 16 of the NPPF. Questionable if it is positively prepared, or clearly written and unambiguous.</p> <p>Fails to meet para 22 of the NPPF. The Plan is based on a 2022 iteration which has not evolved. It now includes completions from 2022/23 and 2023/24. If completions for 2022/23 (357 dwellings) were removed, they would need to be replaced in subsequent years.</p> <p>The housing target is well below the current Standard Method of 703 dwellings or Proposed Method of 1104 dwellings per annum.</p> <p>The exceptional circumstances outlined is based on the fact the Island developed no clear strategy and allocations since the Unitary Development Plan (1996-2011). The 2012 Core Strategy defer allocations to Area Action Plans which have not been developed, leading to uncertainty, risk, considerable time delay and frustration. Agree the Island has practical challenges.</p> <p>The IPS does not deal with allocations in Rural Service Centres with a small number of polices for Sustainable Rural Settlements. This will not assist small-scale Island builders who develop the large majority of windfall sites.</p> <p>Expectation of considerable delivery of windfall sites but hampered by marginalised policy structure and lack of small site allocations.</p> <p>The viability changes the preference toward affordable housing tenures and discount levels and introduces new S.106 contributions and doesn't recognise inflation and mortgage rate instability.</p>

H1.15	Richard Holmes BCM for Susan Rann	H1	<p>Parts of the Plan are inconsistent with the NPPF and not deliverable and unsound. It should be 'forward looking' to meet paras 15 & 16 of the NPPF. Questionable if it is positively prepared, or clearly written and unambiguous.</p> <p>Fails to meet para 22 of the NPPF. The Plan is based on a 2022 iteration which has not evolved. It now includes completions from 2022/23 and 2023/24. If completions for 2022/23 (357 dwellings) were removed, they would need to be replaced in subsequent years.</p> <p>The housing target is well below the current Standard Method of 703 dwellings or Proposed Method of 1104 dwellings per annum.</p> <p>The exceptional circumstances outlined is based on the fact the Island developed no clear strategy and allocations since the Unitary Development Plan (1996-2011). The 2012 Core Strategy defer allocations to Area Action Plans which have not been developed, leading to uncertainty, risk, considerable time delay and frustration. Agree the Island has practical challenges.</p> <p>The IPS does not deal with allocations in Rural Service Centres with a small number of polices for Sustainable Rural Settlements. This will not assist small-scale Island builders who develop the large majority of windfall sites. Expectation of considerable delivery of windfall sites but hampered by marginalised policy structure and lack of small site allocations.</p> <p>The viability changes the preference toward affordable housing tenures and discount levels and introduces new S.106 contributions and doesn't recognise inflation and mortgage rate instability.</p>
H1.16	Richard Holmes BCM for West Oak Homes and Billings Group	H1	<p>The site between Chatfeild Road and Allotment Road, Niton should be allocated in the Plan.</p> <p>Parts of the Plan are inconsistent with the NPPF and not deliverable and unsound. It should be 'forward looking' to meet paras 15 & 16 of the NPPF. Questionable if it is positively prepared, or clearly written and unambiguous.</p> <p>Fails to meet para 22 of the NPPF. The Plan is based on a 2022 iteration which has not evolved. It now includes completions from 2022/23 and 2023/24. If completions for</p>

			<p>2022/23 (357 dwellings) were removed, they would need to be replaced in subsequent years.</p> <p>The housing target is well below the current Standard Method of 703 dwellings or Proposed Method of 1104 dwellings per annum.</p> <p>The exceptional circumstances outlined is based on the fact the Island developed no clear strategy and allocations since the Unitary Development Plan (1996-2011). The 2012 Core Strategy defer allocations to Area Action Plans which have not been developed, leading to uncertainty, risk, considerable time delay and frustration. Agree the Island has practical challenges.</p> <p>The IPS does not deal with allocations in Rural Service Centres with a small number of polices for Sustainable Rural Settlements. This will not assist small-scale Island builders who develop the large majority of windfall sites. Expectation of considerable delivery of windfall sites but hampered by marginalised policy structure and lack of small site allocations.</p> <p>The viability study changes the preference toward affordable housing tenures and discount levels, introduces new S.106 contributions and doesn't recognise inflation and mortgage rate instability.</p>
H1.17	David Long – BCM	H1 General	<p>The delivery of 453 dwellings per year is pre-meditated on the fact that since 2012 there have been no site allocations leading to a lack of certainty.</p> <p>Area Action Plans have not delivered housing allocations 12 years after the adoption of the Core Strategy. The instability has led to an unwillingness to accept growth.</p> <p>The Plan should recognise the instability caused by the Core Strategy.</p> <p>The 2018 IPS set a more ambitious and clearer policy objective has been watered down. Policy H1 has no planned contingency. The Plan should over allocate to compensate for some sites not being built.</p> <p>Unlikely 1,500 windfall dwellings will be built given the lack of policy for Sustainable Settlements. Unlikely Camp Hill, Newport Harbour and Medina Yard will be built. The</p>

			<p>policy and allocations approach will stifle and limit the ability of smaller builders, will have unintended consequences and stifle delivery.</p> <p>Add reference to H10 to policy and supporting text.</p> <p>The Plan should allocate smaller sites for four or less dwellings particularly in Smaller Rural Settlements. Only H4 and H9 provide a policy base for windfall sites as H6 and H10 are bespoke to individuals while Policy H7 is directed to for affordable housing provision.</p>
H1.18	Ben Campbell	H1	<p>Add Land on South Side of Bouldnor Road (A3054), Yarmouth as a housing allocation. It is a sustainable location on a major bus route.</p> <p>The Plan should be ‘forward looking’ plan meeting the goals set out in paragraphs 15 & 16 of the NPPF.</p> <p>The Plan delivers below the current Standard Method of 703 dwellings per annum and even further below the Proposed Method of 1104 dwellings per annum. There are too few allocated sites to deliver increased housing numbers. A mix of large and smaller sites are needed to deliver the housing numbers.</p> <p>The housing numbers depend on delivery of Cowes waterfront, Camp Hill and Newport Harbour which have questionable deliverability due to economic viability and other factors.</p>
H1.19	Phil Salmon – The Planning and Development Hub (Fort Warden Site A)	H1 – General	<p>The housing figure is based on what is believed to be deliverable not the nationally prescribed methodology for housing need and is far short.</p> <p>Take account of the new draft National Planning Policy Framework (NPPF) for consultation.</p> <p>The annual need rises to 1104 homes per year and the Plan is well short of planning for housing need whether it is 703 dwellings per year or 1104.</p>

			<p>Take account of The GL Hearn report. Since the adoption of the Core Strategy, delivery of new homes has been poor compared to need because of lack of allocated sites, insufficient planning permission granted; ongoing political debate; lack of certainty for developers; increasing demand for homes and increasing prices; lack of affordable homes; pricing out of younger working generations; the Island becoming a retirement destination. More sites need to be allocated to establish certainty of delivery.</p>
H1.20	Phil Salmon – The Planning and Development Hub	H1 General	<p>The housing figure is based on what is believed to be deliverable not the nationally prescribed methodology for housing need and is far short.</p> <p>Take account of the new draft National Planning Policy Framework (NPPF) for consultation.</p> <p>The annual need rises to 1104 homes per year and the Plan is well short of planning for housing need whether it is 703 dwellings per year or 1104.</p> <p>Take account of The GL Hearn report. Since the adoption of the Core Strategy, delivery of new homes has been poor compared to need because of lack of allocated sites, insufficient planning permission granted; ongoing political debate; lack of certainty for developers; increasing demand for homes and increasing prices; lack of affordable homes; pricing out of younger working generations; the Island becoming a retirement destination. More sites need to be allocated to establish certainty of delivery.</p>
H1.21	Phil Salmon – The Planning and Development Hub (Fort Warden Site B)	H1 General	<p>The housing figure is based on what is believed to be deliverable not the nationally prescribed methodology for housing need and is far short.</p> <p>Take account of the new draft National Planning Policy Framework (NPPF) for consultation.</p> <p>The annual need rises to 1104 homes per year and the Plan is well short of planning for housing need whether it is 703 dwellings per year or 1104.</p> <p>Take account of The GL Hearn report. Since the adoption of the Core Strategy, delivery of new homes has been poor compared to need because of lack of allocated sites, insufficient planning permission granted; ongoing political debate; lack of certainty for</p>

			<p>developers; increasing demand for homes and increasing prices; lack of affordable homes; pricing out of younger working generations; the Island becoming a retirement destination. More sites need to be allocated to establish certainty of delivery.</p>
H1.22	Christopher Stott The Planning and Development Hub		<p>The housing figure is based on what is believed to be deliverable not the nationally prescribed methodology for housing need and is far short.</p> <p>Take account of the new draft National Planning Policy Framework (NPPF) for consultation.</p> <p>The annual need rises to 1104 homes per year and the Plan is well short of planning for housing need whether it is 703 dwellings per year or 1104.</p> <p>Take account of The GL Hearn report. Since the adoption of the Core Strategy, delivery of new homes has been poor compared to need because of lack of allocated sites, insufficient planning permission granted; ongoing political debate; lack of certainty for developers; increasing demand for homes and increasing prices; lack of affordable homes; pricing out of younger working generations; the Island becoming a retirement destination. More sites need to be allocated to establish certainty of delivery.</p>
H1.23	Phil Salmon The Planning and Development Hub	H1 General	<p>The housing figure is based on what is believed to be deliverable not the nationally prescribed methodology for housing need and is far short.</p> <p>Take account of the new draft National Planning Policy Framework (NPPF) for consultation.</p> <p>The annual need rises to 1104 homes per year and the Plan is well short of planning for housing need whether it is 703 dwellings per year or 1104.</p> <p>Take account of The GL Hearn report. Since the adoption of the Core Strategy, delivery of new homes has been poor compared to need because of lack of allocated sites, insufficient planning permission granted; ongoing political debate; lack of certainty for developers; increasing demand for homes and increasing prices; lack of affordable homes; pricing out of younger working generations; the Island becoming a retirement destination. More sites need to be allocated to establish certainty of delivery.</p>

H1.24	Mark Behrendt HBF	H1	<p>The plan period is unsound and should be extended to 2042 meaning the housing requirement will need adjustment. Extending the plan period means delivering an additional 2,265 homes. The approach taken is not sound.</p> <p>Recognises the challenges that other housing markets may not face but does not prevent delivery of more homes than at present.</p> <p>Without more larger housebuilders operating, there is not the option of identifying large- scale developments to deliver homes at the end of the plan period, relying on small and medium sized sites. Identify more sites to support island house builders to encourage their growth and deliver more homes more quickly.</p> <p>Concern the council's approach will constrain the market to a lower rate of delivery but evidence shows 10 years prior to adoption of the core strategy the market can deliver more homes than is being proposed and the market should not be considered static.</p> <p>Table 1 of the Housing Evidence Paper 1 gives a skewed picture of conversion rates of applications. Removing the expired Pennyfeathers site from the total permissions in that table paints a different picture in terms of conversion rates. Between 2011/12 to 2021/22 the delivery rate excluding the Pennyfeather application was 70%. Leaving the European Union in 2019 and the pandemic in 2020, constrained delivery of new homes, and development levels have increased recently returning to trends in the 11/12 to 15/15 period.</p> <p>The council's evidence does not indicate the market cannot deliver but that large strategic sites cannot be used to increase housing supply in the short term. If land availability is increased the island housing market could respond and build more homes.</p> <p>The buffer level is insufficient to ensure the housing requirement will be met. A buffer of at least 10% is required.</p>
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			<p>Allocating land to deliver well beyond the proposed requirement would at least ensure delivery of the requirement and if more homes can be delivered it would help meet identified needs.</p> <p>The indicative trajectory in Table 7.1 and appendix 4 does not set out a trajectory setting out delivery from all expected sources of supply for each year of the proposed plan period. Without this it is not possible to comment if there is a five year housing land supply on adoption, a key consideration if the plan is sound. Available information from 2021 is out of date.</p> <p>An annualised trajectory setting out when each site in the plan will deliver new homes over the proposed plan period. With expected delivery rates for sites with planning permission and those allocated for development. It should show the expected windfall delivery rate expected in the plan period.</p>
H1.25	Phil Salmon The Planning and Development Hub for Upton Road Ryde	H1	<p>The housing figure is based on what is believed to be deliverable not the nationally prescribed methodology for housing need and is far short.</p> <p>Take account of the new draft National Planning Policy Framework (NPPF) for consultation.</p> <p>The annual need rises to 1104 homes per year and the Plan is well short of planning for housing need whether it is 703 dwellings per year or 1104.</p> <p>Take account of The GL Hearn report. Since the adoption of the Core Strategy, delivery of new homes has been poor compared to need because of a lack of allocated sites, insufficient planning permission granted; ongoing political debate; lack of certainty for developers; increasing demand for homes and increasing prices; lack of affordable homes; pricing out of younger working generations; the Island becoming a retirement destination. More sites need to be allocated to establish certainty of delivery and support the economy.</p> <p>Large demand in Ryde for affordable housing and homes for local people. Delivery of new homes poor compared to need since 2012, leading to social and economic problems. In Ryde this has led to deprivation, risks of anti-social behaviour, social breakdown and economic decline.</p>

H1.26	Phil Salmon The Planning and Development Hub on behalf of Newclose Cricket Ground Newport	H1	<p>The housing figure is based on what is believed to be deliverable not the nationally prescribed methodology for housing need and is far short.</p> <p>Take account of the new draft National Planning Policy Framework (NPPF) for consultation.</p> <p>The annual need rises to 1104 homes per year and the Plan is well short of planning for housing need whether it is 703 dwellings per year or 1104.</p> <p>Take account of The GL Hearn report. Since the adoption of the Core Strategy, delivery of new homes has been poor compared to need because of lack of allocated sites, insufficient planning permission granted; ongoing political debate; lack of certainty for developers; increasing demand for homes and increasing prices; lack of affordable homes; pricing out of younger working generations; the Island becoming a retirement destination. More sites need to be allocated to establish certainty of delivery.</p>
H1.27	Peter Canavan Cater Jonas for Wadham College	H1	<p>The Plan is unsound because of the omission of Land at Millhouse Farm, Upton Road, Ryde as a housing allocation; the housing requirement, and lack of strategic solution via the Duty to Cooperate; and the policy approach to green gaps / settlement gaps is inconsistent with national policy.</p> <p>Plan needs to take account of proposed reforms to the NPPF and the Secretary of State's written ministerial statement as these have material weight. The direction of travel is more positive than is currently set out in the Plan. The housing need, and spatial strategy should be reviewed.</p> <p>Policy H1 should include the Local Housing Need figure of 703 dwellings per year and allocate sufficient land to meet that need. The housing market will dictate delivery, but this should not constrain land allocation. This is not supported by evidence. It is not a positive way to plan and is unsound.</p>

			<p>Land at Mill house Farm, Upton Road, Ryde. has the potential to deliver additional homes in a suitable location to help meet island needs which the draft plan is currently not catering for.</p> <p>The Council should commit to an early review of its plan.</p> <p>More research needed collectively between authorities on where housing needs could be met on a regional basis perhaps in a cross border strategic plan to plan more positively and more strategically to meet the identified housing needs of the region.</p>
H1.28	Tetlow King Planning on behalf of Sovereign Network Group	H1	<p>The housing requirement is lower than the figure identified in the 2022 LHNA and the current Standard Method. The implications of the revised Standard Method for calculating local housing need, the 2024 NPPF consultation, and the Written Ministerial Statement from the Deputy Prime Minister should be taken into account. The policy should be reworded with the housing requirement as a minimum figure.</p> <p>Recognises significant constraints in meeting the housing need, including issues like nutrient neutrality and natural limits on land availability from being an island. Should recognise the principal method for securing affordable housing is through Section 106 contributions.</p>
H1.29	Peter McGowan on behalf of New Forest District Council	H1	<p>Both councils consider it inappropriate for either party to seek assistance in meeting the others housebuilding targets due to the respective housing markets being functionally as well as physically separated by the Solent. Whilst the current NPPF (December 2023) remains in force, and assuming IoW Council submit their Local Plan for the examination in time for it to be examined against the December 2023 version of the NPPF, then this would remain NFDC's position regarding housing needs.</p> <p>Under the NPPF update, housing need under the proposed standard method will increase and strategic planning have increased importance. Consideration should be given to if there is merit in including a policy committing to undertake an early review.</p>
H1.30	Justin Gentleman - Foreland Homes	H1	<p>Of the allocated and consented sites within there is very little to provide opportunities to the smaller developer builders. Given the tightening of policy generally of this strategy, I cannot see the opportunity to bring new sites forward for delivery. I do not believe windfall sites can continue to deliver even 75% of previous capacity with restrictions to</p>

			what is defined as windfall and H4, before also considering that we have already taken many opportunities forward that previously existed.
H1.31	Justin Gentleman - Foreland Homes	H1 para 7.10	Para 7.10 does not take account of changing policy, drastically restricting what is a windfall site. The strategy does not support smaller developers and builders. There are nine development sites with 25 or fewer units proposed over a 15-year plan period. Although 2 are council owned and one has a IOWC strategy attached. The Island is predicated by smaller developer builders, and there are insufficient allocations for us. Smaller developer builders become the larger developers of the future, meaning it is vital that the strategy seeks to grow its development sector.
Policy H2			
H2.1	Martha James Plan Research for Richard Osman	H2	Support HA005 but bring forward earlier.
H2.2	Laura Lax Environment Agency	H2	<p>Site Summary Sheets do not provide a clear, accurate and robust assessment of flood risk or provide understanding of flood risk to housing allocations or enable mitigation. Not updated since 2021 comments.</p> <p>Unclear approach to assessing climate change impact. Proportion of sites at risk for up to 70 years but not clear if based on UKCP09 or UKCP18 allowances.</p> <p>No consistent approach to assessing future flood risks using the appropriate climate change allowances for all sources of flooding. Insufficient consideration of potential climate change impacts could lead to potential development sites being omitted and inadequate assessment identified sites.</p> <p>Insufficient evidence to demonstrate compliance with the NPPF in relation to flood risk. HA018 – Green Gate Industrial Estate</p> <p>The Level 2 Site Summary Sheet and Summary Maps do not provide a suitable basis for concluding this site can be delivered safely in the context of flood risk. The Level 2 SFRA</p>

		<p>Detailed Site Summary Table suggests that development should sequentially be located in Flood Zone 1, estimated to currently cover 40% of the site. Confirm this is achievable, particularly for residential. No evidence to demonstrate this is achievable.</p> <p>Primary flood source is tidal flooding from the River Medina. The Summary Table doesn't reflect the nature of 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 doesn't estimate the predicted design tide level using current sea level rise allowances, so does not estimate the likely depths, velocity, frequency and duration of flooding. Mitigation measures, and their deliverability not identified. Unclear if the site can be developed safely in the context of flood risk.</p> <p>HA120 – Red Funnel</p> <p>No evidence demonstrating the site can be delivered safely in relation to flood risk. No Level 2 SFRA Site Summary Sheet. Site has significant flood risk issues, including lack of safe access and egress, unlikely to be mitigated sufficiently by the sea wall and coastal defence improvements required by the site-specific requirements due to outflanking and potential economic viability issues. Residual risk must also be considered.</p> <p>Medina Yard</p> <p>Site status is unclear as not listed in Appendix 2 included in Appendix 3 with site specific development requirements. If allocated, evidence is the site can be delivered safely in relation to flood risk.</p> <p>No Level 2 SFRA Site Summary Sheet. Previous consent for mixed-use development but, no flood risk advice provided since 2016. The flood risks may be greater than in 2016 with improvements in flood risk modelling and changes to climate change projections. Policy changes will also have been put in place. The flood risk evidence needs revisiting to demonstrate it remains deliverable.</p>
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H2.3	Katy Wiseman National Trust	H2	<p>HA005 is in the setting of the Isle of Wight National Landscape and the Tennyson Heritage Coast and development should be designed around the landscape and how it relates to the environmental systems and landscape beyond the site boundary reflecting NPPF para 135.</p> <p>Amend wording to 'Development proposals must be comprehensively masterplanned and should demonstrate how they conserve and enhance the natural beauty, reinforce and respond to locally distinctive features of the National Landscape'.</p> <p>Use a landscape-led approach to masterplanning to decide the dwelling capacity.</p> <p>Concern HA005 could increase recreational visitors to Headon Warren and West High Down SSSI and should include onsite SANG for mitigation.</p>
H2.4	Sarah Sims	H2	<p>West Wight has a disproportionate number of houses on greenfield sites. Freshwater is a rural village, close to the coast, and regular flooding of the Western Yar. Freshwater is a rural village, not a main settlement or a secondary settlement and the Plan should be amended.</p> <p>The revised settlement boundary has not been subject to public consultation to revise the Freshwater Neighbourhood Plan</p> <p>One of the 'allocated sites' is grade 2 agricultural land.</p>
H2.5	Bell Cornwell	H2	<p>Site allocations should be listed in H2 in a table with minimum site capacities.</p> <p>Unclear of the policy difference between site allocations in the Appendix and key priority sites.</p>
H2.6	Phillip Guy	H2	<p>West Wight has a disproportionate number of houses on greenfield sites. Freshwater is a rural village, close to the coast, and regular flooding of the Western Yar. Freshwater is a rural village, not a main settlement or a secondary settlement and the Plan should be amended.</p> <p>The revised settlement boundary has not been subject to public consultation to revise the Freshwater Neighbourhood Plan</p> <p>One of the 'allocated sites' is grade 2 agricultural land.</p> <p>Flawed consultation process.</p>

H2.7	FBRA FRESHWATER BAY RESIDENTS ASSOCIATION	H2	<p>West Wight has a disproportionate number of houses on greenfield sites. Freshwater is a rural village, close to the coast, and regular flooding of the Western Yar. Freshwater and Totland are rural villages, not a main settlement or a secondary settlement and the Plan should be amended.</p> <p>The revised settlement boundary has not been subject to public consultation to revise the Freshwater Neighbourhood Plan</p> <p>One of the 'allocated sites' is grade 2 agricultural land.</p>
H2.8	MR ANDREW S MOSCOFF ('BORIS')	H2	<p>West Wight has a disproportionate number of houses on greenfield sites. Freshwater is a rural village, close to the coast, and regular flooding of the Western Yar. Freshwater is a rural village, not a main settlement. Needs affordable housing to rent or own. Population growth is not matched by economic growth. Exceptional circumstances exist to counter this. Insufficient infrastructure.</p> <p>No account taken of the Neighbourhood Plan.</p>
H2.9	Dominic Hicklin	H2	<p>West Wight has a disproportionate number of houses on greenfield sites. Freshwater is a rural village, close to the coast, and regular flooding of the Western Yar. Freshwater is a rural village, not a main settlement or a secondary settlement and the Plan should be amended.</p> <p>The revised settlement boundary has not been subject to public consultation to revise the Freshwater Neighbourhood Plan</p> <p>One of the 'allocated sites' is grade 2 agricultural land.</p> <p>Delete Camp Road site as poor access and nitrate issues for the SSSI.</p>
H2.10	Northwood Parish Council	H2	<p>HA022 - capacity is 160 shown in the planning application not 130.</p> <p>HA025 - 50m buffer zone from adjoining ancient woodland rules out development of the site.</p> <p>HA121 – lapsed planning permission and issues with road access. Object to requirement that ‘Proposals should not prevent adjacent sites coming forward’.</p> <p>Should be consistency as to if the sites are in Cowes or Northwood.</p>

H2.11	Deana Turnbull	H2	<p>Concern over development of new housing, use of green field sites and pressure on the fragile services and infrastructure. Unclear where the demand is coming from, the type of housing and where people will work. Loss of open spaces and green fields affects appeal for tourists.</p> <p>Existing traffic issues into and out of Newport and Ryde especially in summer. Three sites In Freshwater/Totland will be difficult to absorb.</p>
H2.12	Sustainable Freshwater Community Group	H2	<p>West Wight has a disproportionate number of houses on greenfield sites. Freshwater is a rural village, close to the coast, and regular flooding of the Western Yar. Freshwater is a rural village, not a main settlement or a secondary settlement and the Plan should be amended.</p> <p>The revised settlement boundary has not been subject to public consultation to revise the Freshwater Neighbourhood Plan</p> <p>One of the 'allocated sites' is grade 2 agricultural land.</p>
H2.13	Angela Brooks – Fisher German LLP	H2	<p>Land at and adjacent to New Fairlee Farm was identified in the November 2018 Draft Island Planning Strategy as a proposed allocation site. The allocation should be reinstated.</p> <p>A clearer rationale is needed for selecting allocation sites. The current reasoning for removing the site is not clearly expressed in any published documents or explained why this conclusion was reached.</p> <p>The site forms a logical extension to the settlement boundary and the built form of Newport evidenced by a Landscape and Visual Appraisal. An Illustrative Masterplan shows the site is capable of delivering a logical extension to Newport, with open space and new planting to buffer it from the countryside.</p>
H2.14	Alister Henderson - Carter Jonas for SGN	H2	<p>Add brownfield site at Princes Esplanade as a site allocation. Site is located within the primary settlement boundary and supported by H9.</p> <p>Plan relies on a significant number of windfall sites and allocating this site would reduce the reliance.</p> <p>The site has redundant equipment associated with previous uses, an existing vehicular access and hardstanding to the north. The site is covered by a woodland TPO and some designated as a SINC, excluding the previously developed land. It is within the Cowes settlement boundary, brownfield land, can contribute to housing need, aligns with the NPPF and has no land use designation preventing development.</p>

H2.15	BNP Paribas Real Estate, on behalf of BAE Systems, Cowes	H2	<p>Considered HA022 and EA3 together.</p> <p>Land north, west and east of BAE site is an important transmission zone. Development may result in detrimental impacts on developing and testing radar and could prevent it.</p> <p>The loss of BAE systems would make it a less attractive place to live and result in 280 direct job losses. Would like both allocations removed but failing this propose new wording for EA3 and site requirements for HA022 adding reference to no detrimental impact on BAE operations.</p>
H2.16	Richard Holmes BCM for Sam Biles	H2	<p>Growth in the Plan does not meet the current or proposed method of calculating local housing need.</p> <p>Development on the island has been marred by a lack of allocations and political instability.</p> <p>Somerton Farm is adjacent to the current settlement boundary and is sustainable. There is no issue of settlement coalescence, and no landscape, visual or environmental issues and can be delivered.</p>
H2.17	Richard Holmes for Perry Properties Ltd	H2	<p>With no allocations development is uncertain, risky and has time delay and frustration. This is not exceptional circumstance though the island has practical challenges.</p> <p>The IPS does not deal with allocations in Rural Service Centres with a small number of polices for Sustainable Rural Settlements. This will not assist small-scale Island builders who develop the large majority of windfall sites. Expectation of considerable delivery of windfall sites but hampered by marginalised policy structure and lack of small site allocations.</p> <p>The viability study changes the preference toward affordable housing tenures and discount levels, introduces new S.106 contributions and doesn't recognise inflation and mortgage rate instability.</p>
H2.18	Richard Holmes for Susan Rann	H2	<p>With no allocations development is uncertain, risky and has time delay and frustration. This is not exceptional circumstance though the island has practical challenges.</p>

			<p>The IPS does not deal with allocations in Rural Service Centres with a small number of polices for Sustainable Rural Settlements. This will not assist small-scale Island builders who develop the large majority of windfall sites. Expectation of considerable delivery of windfall sites but hampered by marginalised policy structure and lack of small site allocations.</p> <p>The viability study changes the preference toward affordable housing tenures and discount levels, introduces new S.106 contributions and doesn't recognise inflation and mortgage rate instability.</p>
H2.19	Richard Holmes BCM for West Oak Homes and Billings Group	H2	<p>With no allocations development is uncertain, risky and has time delay and frustration. This is not exceptional circumstance though the island has practical challenges.</p> <p>The IPS does not deal with allocations in Rural Service Centres with a small number of polices for Sustainable Rural Settlements. This will not assist small-scale Island builders who develop the large majority of windfall sites. Expectation of considerable delivery of windfall sites but hampered by marginalised policy structure and lack of small site allocations.</p> <p>The viability study changes the preference toward affordable housing tenures and discount levels, introduces new S.106 contributions and doesn't recognise inflation and mortgage rate instability.</p>
H2.20	David Long – BCM	H2 General	<p>The sequential and risk-based approach to identify allocations provides greater certainty. The current Plan provides less certainty than the earlier version and is based on medium to larger development sites suited to some SMEs and/or National House Builders. The transformational development via Camp Hill and Newport Harbour is questionable.</p>
H2.21	Phil Salmon The Planning and Development Hub	Land at Fort Warden, Site A, Colwell	<p>Allocate site for mix of housing and retirement living.</p> <p>The site partly benefits from planning permission for apartments. Land stability on the seaward side of the site mean that the remaining elements of the approved scheme cannot be delivered but the site could be reconfigured and provide biodiversity net gain. The site is also sustainable, accessible, developable, could contribute to meeting housing and retirement need.</p>
H2.22	Phil Salmon The Planning and	H2 – Omission site – Fort	<p>Allocate site for residential self-build development.</p> <p>Site is accessible, close to bus stops, meets housing need in a sustainable location, opportunity for provision of active management of habitat and landscaping for</p>

	Development Hub	Warden Site B	<p>biodiversity supporting the coastline edge and SINC.</p> <p>Need more certainty of sites and choice for housing and economic development supporting sustainable aims and meeting local needs and positive development management procedures.</p>
H2.23	Christopher Stott The Planning and Development Hub	H2 Omission site – Merlins Farm Calbourne	Allocate site for mixed development with 50% affordable housing supported by Vectis housing. Can be started within 12 months, assisting in meeting the Government annual target of 1100 homes. Site has been subject to a positive Pre-Application response and was in the SHLAA process as a positive site.
H2.24	Phil Salmon The Planning and Development Hub	H2 Omission site – Land at Gunville Road	<p>Allocate site for housing.</p> <p>The site has been identified as ‘deliverable site’ in the 2018 SHLAA. The site is close to the existing settlement boundary for Newport, and within the Key Regeneration Area for Medina Valley; is accessible and a pavement to a bus stop: is accessible to primary and secondary schools; has a direct link to the town centre and will contribute to meeting housing need and affordable needs in a sustainable location; provide active management of habitat and landscaping, increasing biodiversity and provide certainty to investors.</p>
H2.25	Phil Salmon The Planning and Development Hub – Upton Road Ryde	H2 – Omission site at Upton Road, Ryde	<p>Allocate site for housing.</p> <p>The site could deliver much needed homes in Ryde over two years, including a significant contribution to affordable housing over two years. The site adjoins the existing settlement boundary for Ryde and is within the Key Regeneration area. The site is accessible; could provide up to 75 affordable units; is accessible to primary and secondary schools; has a direct link to the town centre; can accommodate the power line running across the site; provide biodiversity net gain; was identified as deliverable in the 2018 SHLAA and contributes to meeting housing need in a sustainable location; and provide certainty.</p>
H2.26	Phil Salmon The Planning and	H2	<p>The site is currently used as the County cricket ground.</p> <p>The site is sustainable with good access to transport and services. With close proximity to cycle and public transport links to Newport, there is potential for a mixed use scheme</p>

	Development Hub – Newclose Cricket ground Newport		(employment units and affordable housing, Employment starter units, leisure, holiday lodges/tourism, Biodiversity Net Gain, a retirement living hamlet with extra care facilities. The Plan is deficient in planning for housing and economic need and needs to identify more sites to offer jobs and provide for the long term.
H2.27	Peter Canavan Carter Jonas for Wadham College	H2	Allocate Land at Millhouse Farm, Upton Road, Ryde for development. The landscape arguments presented in the SHLAA do not reflect the findings of the Landscape and Visual Appraisal (LVA) was prepared by CSA Environmental in February 2015. The Council made a ‘policy on’ assessment in the SHLAA which is not an appropriate approach and decided the site to be unsuitable for development because of its “Strategic Gap” policy. There is nothing to justify this change in approach to landscape management and the site is in a sustainable location, with a good level of accessibility to a wide range of community, retail, health and leisure facilities. The vision for Land at Millhouse Farm, Upton Road, Ryde is for innovative and modern residential development in a highly sustainable location. Previous planning consent for residential.
Policy KPS1			
KPS1.1	Rachel Parry	KPS1	The site is too big. The fields surrounding the prison and staff car park should not be built on because of the impact on exceptional wildlife. Question where rainwater run-off goes.
KPS1.2	Stephen Hannam	KPS1	The Council do not own the land. Not clear why the development is needed. The area is the only open green space between Newport and Parkhurst Forest which has endangered species and rare plants. No objection to use of the former prison buildings or surrounding carparks. The land has heavy shrinkage and expansion during the year.

			<p>The surface water will lead to serious flooding of properties at the bottom of Horsebridge Hill and the main road to Cowes.</p> <p>The sewage treatment works cannot already cope and discharges into the sea occur. The Island's infrastructure is at its limit and this development adds to the pressures.</p> <p>The road network around this development needs serious improvement as is already crowded and busy.</p>
KPS1.3	Bridget Fox, Woodland Trust	KPS1	<p>Paras 7.27 and 7.28 - support the requirements to buffer the ancient woodland and SINIC and the presumption to retain existing trees and hedgerows.</p> <p>This is in line with Island Plan policy EV5 and NPPF sections 180b) and 186c)</p>
KPS1.4	Andrew Garratt	KPS1	<p>Para 7.24 – the figure of at least 750 needs testing. The allocation presents challenges for the area and has not been confirmed by the Ministry of Justice as available for development. Will add to pressures on existing strategically important, heavily trafficked roads and local services and comply with the masterplan and supplementary planning document. The strategy may well be sound but could be improved to reflect these comments.</p>
KPS1.5	Northwood Parish Council	KPS1	<p>More than 35% should be allocated for affordable housing particularly social housing.</p> <p>The site should be developed in accordance with a whole site masterplan and the design and layout accord with the National Model Design Code, relate positively to surrounding area and not have an adverse impact amenity in the surrounding area and should apply to all sites.</p> <p>Inconsistent with national planning policy and not sustainable. The Plan is ambiguous and contradictory, and figures don't add up.</p> <p>Northwood is a semi-rural village, a parish in its own right, and the designation changed.</p>
KPS1.6	Guy Robinson Historic England	KPS1	<p>Change wording to emphasise the need for heritage expertise to inform the approach to sustainable re-use of the Camp Hill prison buildings. Add requirement for heritage assessment, including archaeological assessment.</p>

KPS1.7	Cushman & Wakefield on behalf of MOJ	KPS1	<p>MOJ broadly supports in principle the creation of a sustainable, mixed-used, multi-tenured, high quality designed new neighbourhood. Development viability will ensure the allocation can be developed.</p> <p>MOJ is keen to continue engagement with viability needing consideration before submission of the Plan to demonstrate deliverability. Concern on the site's ability to deliver 35% affordable housing with site remediation and infrastructure improvements needed. Delivery of the site is subject to the site no longer being required for criminal justice purposes.</p> <p>Support the production of a masterplan for phasing and delivery and the quantum of development, the spatial distribution of built form and public open space and relationship with the surrounding area. The masterplan will include the current and future operational requirements of the MOJ's estate on the island.</p>
KPS1.8	David Long - BCM	KPS1	<p>There is no guarantee that HMP Camp Hill will be delivered. There is considerable uncertainty if the land will be disposed for development given shortage of capacity. Need confirmation from HMP that the land is surplus to requirements.</p>
KPS1.9	Chani Courtney	KPS1	<p>KPS1 Support ref to surface water management.</p>
KPS1.10	Jonathan Shavelar on behalf of Natural England	KPS1	<p>The allocation is adjacent to the Parkhurst Forest SSSI, which is suffering from impacts to condition of the habitat from recreational pressure and faces challenges with managing the visitor infrastructure.</p> <p>NE is concerned development may cause irreparable damage to the ancient woodland habitat and the species it supports. NE want to be involved in discussions on the scheme design to avoid or mitigate potential impact to the site.</p> <p>Welcome reduced scale of housing but previous comments at Regulation 18 have not been fully incorporated. Add reference to its status as a Site of Special Scientific Interest, the rare species it supports or the potential impacts arising from the allocation.</p> <p>The connectivity of the landscape and flightlines used by bats are not currently well understood and development proposals could have significant impacts. Also consider</p>

			<p>impacts from artificial lighting. Need to understand the needs of the bat population here and to ensure impacts are avoided. Impacts here may harm the wider metapopulation.</p> <p>Increased footfall and recreation can cause direct impacts. The proposal is likely to increase visitor pressure and discussion is needed with Forestry England.</p> <p>An aspiration for the management of the SSSI is to reintroduce grazing and restore the historic pasture woodland features. Woodland may be subject to impacts such as increased fire risk, vandalism, pet predation, garden dumping and boundary encroachment so design and layout are key to minimise impacts.</p> <p>A significant buffer is needed between built environment and the habitat. Best examples secured a distance of up to 100m. The ecology should be a key focus of the buffer.</p> <p>The proposal should consider potential hydrological impacts to the SSSI. Add to (m) that factors such as groundwater supply should be considered.</p>
Policy KPS2			
KPS2.1	Laura Lax Environment Agency	KPS2	<p>Do not consider that Newport Harbour is compatible with EV14 or the NPPF.</p> <p>It is difficult to assess flood risk given the boundary changes. Unclear how the site summary sheet and 'Newport Harbour Flood Risk Assessment (JBA 2021)' interact. The site summary sheet is not accurate or detailed enough to robustly assess the risk. The 'Newport Harbour Flood Risk Assessment (JBA 2021)' is more detailed but contains deficiencies so is unsuitable to demonstrate flood risks to and from the Newport Harbour site can be safely managed.</p> <p>Site boundary within areas which are or predicted to become, at flood risk due to climate change. 'Newport Harbour Flood Risk Assessment, 2021' may have used 1 in 20 water levels as a proxy but it is unclear how these were derived and if they represent fluvial or tidal flood extents. Lack of confidence that functional floodplain (Flood Zone 3b) has been accurately identified. A clear, robust understanding of the 3.3% AEP extent from rivers and the sea is essential.</p>

			<p>For development in Flood Zone 3a, impacts on flood flow routes or storage capacity must be considered and floodplain compensatory storage areas identified. This is not assessed in sufficient detail in the 'Newport Harbour Flood Risk Assessment, 2021' it must be demonstrated that development will not increase flood risk to third parties.</p> <p>Figure 4-1 does not reflect full extent of fluvial risk to the site. Do not support that 'fluvial flood risk on its own to the site is generally low'. Welcome acknowledgement of flood risk from a combination of fluvial and tidal sources. This is complex, but not modelled and so poorly understood. Appropriate mitigation to ensure safe development and safeguard against increasing flood risk to third parties is not possible with sufficient confidence. Climate change is not accurately or sufficiently assessed, likely being based on superseded UKCP09 climate change allowances which are likely to underestimate the risk.</p> <p>The 'Newport Harbour Flood Risk Assessment, 2021' or SFRA factsheet do not provide information about flood hazard variations across the site now or the future so not suitable for enabling the sequential approach to locating development. Revision of the site boundary means few areas of the site are not at risk of flooding over the development lifetime and sequentially locating development across Flood Zones to approach risk management is not possible.</p> <p>Flood hazards (depths and velocities) and the safety of ground floor uses is unclear. Need to identify the potential scale and frequency of flooding.</p> <p>Unclear if vulnerable/residential uses at ground floor level and if possible to raise floor levels above the design flood level. For more vulnerable/residential uses at first floor and above, flood hazard should be understood so that the ability for residents to obtain safe access and egress is clearer. Altering land levels and placing new development in flood risk areas could increase risk to others and is only permissible if suitable floodplain compensatory storage can be provided.</p>
KPS2.2	Northwood Parish Council	KPS2	If the land is coming free then why is only 35% allocated for affordable housing, it could be 100%.

			<p>The plan is not consistent with national planning policy and is not sustainable. The whole document is ambiguous and contradictory, the figures don't add up and it is not fit for purpose.</p> <p>The most important issue which has occurred all the way through the document is that Northwood has been categorised within 'West Medina' and part of Cowes and it is not, the two are very different. Northwood is a semi-rural spread-out village, a parish in its own right, and important that this designation is changed</p>
KPS2.3	Rebecca Loader/Isle of Wight Council Archaeology & Historic Environment Service	KPS2	<p>Page 123 - add specific requirements for assessment and mitigation. Archaeological investigation, including desk based assessment and field evaluation is needed with engagement with the Archaeology and Historic Environment Service.</p>
KPS2.4	Guy Robinson Historic England	KPS2	<p>Welcome policy aims but wording is potentially confusing.</p> <p>Criterion k risks missing the opportunity for schemes to respond positively to adjacent heritage assets and be led by the character and appearance of the conservation area.</p> <p>The Integrated SA misses the idea of development designed to respond sensitively to the historic environment. Welcome the requirement for heritage assessment but the wording risks downplaying the role of assessment to inform the design of the scheme.</p> <p>Field evaluation will be needed, also noting plans for district heating across the site.</p> <p>Add to supporting text a reference to the conservation area and this designated heritage asset is currently on the national Heritage at Risk register. "</p>
KPS2.5	David Long – BCM	KPS general	<p>HA44 - The Council have not provided a sequential test to demonstrate that this site would be sequentially preferable. Questionable if the site would be viable. Little information on the need for open space.</p>
KPS2.6	Chani Courtney	KPS2	<p>No mention of large roof surface water load and management. Add reference to points on page 124.</p>

Policy H3			
H3.1	Laura Lax Environment Agency	H3	Support bullet (e). Support the addition of bullet (b) that requires a sequential approach to flood risk.
H3.2	Bell Cornwell	H3	H3 e) requires housing developments to achieve 10% Biodiversity Net Gain. As a legal requirement it is not necessary for this policy to repeat that requirement, and that criterion should be deleted.
H3.3	Rebecca Loader/Isle of Wight Council Archaeology & Historic Environment Service	H3	H3 text box, g) should consider historic features e.g. historic routeways - ...incorporate any natural and historic features...
H3.4	Freshwater Parish Council	H3	“The use of modular housing solutions will be supported and is recognised as an efficient way of delivering housing of all types and tenures” Delete sentence as is not compliant with the Statement of Community Involvement as insufficient consultation on the use of ‘modular housing’. There is no known demand for modular housing and does not deliver better quality design.
H3.5	David Long – BCM	H3 general	<p>Policy H3e) should reflect exemptions to biodiversity net gain of at least 10%.</p> <p>Question requiring sites of 75 or more dwellings required to provide onsite SANG or contribute to offsite SANG given the Bird Aware contributions. Allocations should identify which sites require a SANG, with evidence and/or allocate an offsite SANG in the Plan.</p> <p>Viability against Policy H3a)-m) must be reviewed to ensure it is achievable and deliverable.</p> <p>Modular housing has an expectation of housing design repetition and uniformity. This approach is acceptable, as long as the Council sets their own reasonable expectations to agree to it.</p>

H3.6	Chani Courtney	H3	H3 Presumption against surface water load into the foul sewage line and application of SUDS. Add to page 128 add suds manual.
Policy H4			
H4.1	Northwood Parish Council	H4	H4b) should apply to all developments.
H4.2	Guy Robinson Historic England	H4	Clarify the language relating to consideration of the historic environment.
H4.3	Richard Holmes for Perry Properties Ltd	H4	H4 places unreasonable pre-conditions on defining a 'local need' outlined by the Plan as a windfall. It scopes out disjointed agricultural land whereas other housing policies accept development in rural areas.
H4.4	Richard Holmes for Susan Rann	H4	No text in supporting letter
H4.5	Richard Holmes for West Oak Homes and Billings Group	H4	Add site allocations in the Sustainable Rural Settlements. Relying on policies H4, H6, H7, H9 and H10 causes delay, objection and lack of certainty and limits the ability of smaller builders to deliver. Overlooks the need for growth of rural villages hampering their prosperity and ability to be economically and socially sustainable. Omission of sites leads to barriers reducing contribution to the housing requirement and impacts the local economy. Not consistent with national policy, paras 27 and 70.
H4.6	David Long – BCM	H4 General	The supporting text does not justify H4a) requirement to demonstrate a specific local need. The glossary refers to "need has been identified by a local Housing Needs Assessment and/or surveys". The Policy covers windfall sites in gaps in a otherwise built up frontage and question if a 'specific local need' is relevant and necessary when the Plan recognises that windfall sites are 'in need'. Para 7.54 adds complexity requiring that the 'small gaps' should not use agricultural land. This does not apply to H6, H10 or similar. A small gap in a built-up frontage, even if agricultural, will not be highly productive and would be a small and inconsequential loss.

			Not sure that the infill policy can be delivered as remaining sites are more aligned to gaps on agricultural land.
Policy H5			
H5.1	TG Barker	H5	Historic failure to deliver affordable housing arises from cost and inadequate registered provider response. RPs are best able to deliver and manage such housing. Each market housing scheme delivered needs a % of affordable housing on site, or a contribution towards provision.
H5.2	Home Consultancy Ltd	H5	Undertake up to date viability modelling with all requirements of island plan with pressures on Affordable Housing cross referenced to delivery models.
H5.3	Damien Lynch	H5	Add acknowledgment in policy (from para 7.63) to viability testing of older persons housing within the draft plan in relation to the proposed affordable housing policy. The council to apply a different affordable housing target to this typology based upon the evidence base findings. Add text to policy recognising that viability of specialist housing including housing for older persons is challenging. Affordable housing will not therefore be sought from such proposals. Without this amendment, H5 is not justified, effective or sound. Inconsistency in the requirements for wheelchair accessible homes. With C5 and H8.
H5.4	Katherine Harrison	H5	Permit affordable housing for young families as an exception in villages or adjoining settlement boundaries. Issue in rural villages in west Wight as families and younger persons are priced out and the settlements are becoming ghost villages.
H5.5	Bell Cornwell	H5	Policy is not flexible and positive. No provision for where 35% affordable housing is not viable, either on-site, off-site or through a financial contribution. Not consistent with the NPPF paragraph 58. Policy must provide flexibility to negotiate case-by-case to deliver an appropriate level of affordable housing provision. Amend policy to make clear that 35% affordable housing is subject to viability testing.”

H5.6	Northwood Parish Council	H5	Support but question if the level of affordable housing can be achieved. Clarify the term 'product type'. A lower housing requirement of 453 dwellings per annum would make less of an inroad to local housing needs.
H5.7	Emma Carter Freshwater Parish Council	H5	Para 7.58 final sentence " does not accord with the Statement of Community Involvement. Inadequate consultation on focusing on current affordable housing need, not newly arising need. And no evidence to support this. Delete sentence.
H5.8	Martha James Plan Research for East Cowes Town Council	H5	Principal residence is not defined in the Glossary.
H5.9	Troy Planning + Design Planning Agent on behalf of Nettlestone and Seaview Parish Council	H5	Add a definition of 'local connection' and how this should be interpreted. Add reference to First Homes housing and discount rates to be applied.
H5.10	Hyacinth Cabiles NHS Property Services	H5	Consider H5 to be sound but in implementing the policy should consider the need for affordable housing for NHS staff and those employed by other health and care providers in the local authority area and factor this into housing need assessments. Continue engagement with local NHS partners and consider site selection and allocation in relation to identified need for affordable housing for NHS staff, where sites are near large healthcare employers.
H5.11	David Long	H5 general	When collecting financial contributions, all developments up to 9 dwellings in or outside of the National Landscape should make a contribution.

			<p>Para 7.60 clarify that H5, and its sub text excludes development under Policy H6 and Policy H10.</p> <p>For Self and Custom Build Development financial contributions are not required.</p> <p>Concern on the target mix of 80% for social or affordable rent and 20% for other affordable housing products is unviable. particularly against policy AFF1 which sets greater discounts compared to what has been delivered.</p> <p>Evidence supporting AFF1 and H5 does not provide solutions to help deliver affordable homes. Registered Providers are seeking planning consents with grant funding via open market homes and not on S.106 housing stock.</p>
H5.12	Iain Delaney – Captiva Homes	H5 General	Concerns on delivery of S106 Affordable Housing. RPs are not interested in taking, S106 affordable homes. This is a barrier to delivering consented schemes and to the viability of future applications.
H5.13	Mark Behrendt HBF	H5	<p>The Viability Assessment notes exceptions for brownfield regeneration sites in urban areas which were less viable, especially for delivery of flatted development and a flexible approach should be taken. However, the VA shows many of typologies are marginal and viability may be affected if higher costs are faced. The cost to development of implementing the policy are underestimates. E.g. the land value for brownfield sites may be higher than that set out in the VA.</p> <p>BNG costs that may be underestimated, how the costs were arrived at is unclear. and if consideration has been given to the amount and cost of offsite provision or the impact of BNG on the developable area of a site. It is important the cost of this requirement is not underestimated so sites can be delivered.</p> <p>Further viability assessment of the 35% requirement is needed with higher costs included in relation to policy C11 and potentially with regard to BNG and brownfield land values.</p> <p>A flexible application of this policy is needed. The contents of para 7.63 should be included in the policy.</p>

<p>H5.14</p>	<p>Tetlow King Planning on behalf of Sovereign Network Group</p>	<p>H5</p>	<p>Policy H5 is consistent with national policy. The definition of affordable housing should reflect the definition in the NPPF or Glossary of the Plan.</p> <p>Support setting a target housing mix. Delete reference to `starter homes</p> <p>Welcome that applicants will be able to use data from the Housing Register, made neighbourhood plans, Parish level housing needs surveys (completed after 2018) and Local Housing Needs Assessments to justify an alternative mix of affordable housing to be provided on individual sites.</p> <p>Support affordable homes to be the principal residence of the occupant(s).</p> <p>Concern on the in perpetuity requirement which is not consistent with the current/draft NPPF or Planning Practice Guidance. other than the specific reference to rural exception sites in Annex 2 of the 2023 NPPF. The principle in respect of rural exception sites only is supported.</p> <p>A blanket approach to securing affordable housing in perpetuity is not supported as it restricts lenders' appetite to fund development; limits private companies investment; present challenges for registered providers owing to reliance to grant funding which are not compatible with restrictions on the 'staircasing' of shared ownership/intermediate products.</p> <p>Concerns homes secured being subject to parish specific local connection criteria which goes against current and emerging national policy and guidance as only rural exception sites are required to apply locality as a policy criteria.</p> <p>If geographical location comes before need, households with urgent housing needs will have to live in poor or unsuitable housing conditions for longer. Local connection criteria should only be applied to rural exception sites and a clear mechanism for a cascade to be triggered. Use the Island Home Finder as a model.</p>
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Policy H6			
H6.1	Tamsyn Veal	H6	The allocation of sites has been changed without consultation and does not serve local community needs. There needs to be proper public consultation. Complex predominantly IT/online based proposals is difficult for members of the public to understand and digest.
H6.2	Freshwater Parish Council	H6	Para 7.68 "The replacement dwelling should not be materially larger than the existing dwelling" is not legally compliant as it does not accord with the Statement of Community Involvement. There is no evidence a larger replacement dwelling causes harm to a rural area in principle. Delete this sentence.
H6.3	Martha James Plan Research for East Cowes Town Council	H6	The supporting text is more stringent than the policy by including "The replacement dwelling should not be materially larger than the existing dwelling."
H6.4	Guy Robinson Historic England	H6	Local Plan policy should not encourage enabling development for securing the future of a heritage asset. A simpler criterion is needed, as suggested. C) Secure the optimal re-use of a heritage asset or would be appropriate sympathetic enabling development (as detailed in Enabling Development and Heritage Assets ¹⁴ by Historic England) to secure the future of the heritage asset.
H6.5	David Long – BCM	H6 para 7.67	Para 7.67 on rural workers dwellings is, in part, outdated. It reminisces on historic PPS7 when seeking to establish that the rural employment activity has been established for at least 3 years and is financially sound. The sub text should reflect that rural workers dwellings are not curtailed to agriculture or farming but support a wide range of industries. Paragraph 7.67 and Policy H6, a) is outdated and should reflect the wording in the NPPF which states When "there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside". Policy H6 is also outdated against the NPPF where it scopes in "the subdivision of an existing residential building".
H6.6	Daniel James	H6	Delete 'single' from the policy. There may be cases where two or more rural worker dwellings are justified by the scale of an agricultural enterprise, which the NPPF allows for.

H6.7	Chani Courtney	H6 supporting text para 7.68 and 7.71	7.68 add to protected wildlife and use the opportunity to separate out surface water from entering any connected combined sewage line.
Policy H7			
H7.1	Peter Spink on my behalf as IW Councillor for Freshwater North and Yarmouth and for and on behalf of the Steering Group of the West Wight Villages Residents' Association	H7 supporting text para 7.78	<p>Delete para 7.78 which is not consistent with NPPF definition of rural exception sites. Lack of proper and fair consultation.</p> <p>Neither the Duty to Cooperate or Legal Compliance can be affirmed.</p>
Policy H8			
H8.1	Andrew Baxman	H8	New housing should be at least 50% affordable or be refused. Preference should be given to first time buyers.
H8.2	Nora Galley	H8	H8 as drafted is too strict and more likely to reduce delivery. Should provide the option of not emulating the mix on specific sites having regard to their context, the housing needs of the settlement, recent delivery rates and up to date evidence on delivery rates.
H8.3	Wootton Bridge Parish Council	H8	Unclear how the policy will prevent applicants from applying for under 10 and then once granted planning permission apply for further homes.
H8.4	Angela Brooks – Fisher German LLP	H8	Land at and adjacent to New Fairlee Farm as a housing site allocation.

			H8 sets out percentage splits for housing sizes and tenures but percentages included in the policy are a snapshot in time and housing needs will change over the plan period. Amend wording to be more flexible. The tenure mix for private/market homes is not robust and should be amended to respond to local market demand.
H8.5	Troy Planning + Design Planning Agent on behalf of Nettlestone and Seaview Parish Council	H8	The policy needs to be consistent with Policy H5 and acknowledge Housing Needs Assessments prepared as part of Neighbourhood Plans.
H8.6	Mark Behrendt HBF	H9	Suggesting a development must reflect the latest housing needs assessment can be construed as setting policy outside the plan. HBF would also suggest that in addition to the LHNA or local housing needs survey other relevant evidence should be included. This will ensure that decision makers can respond flexibility to any relevant evidence on mix provided by the applicant. With regard to 10% private homes M4(3) amend to M4(3)a (wheelchair adaptable homes) not M4(3)b (wheelchair accessible homes) which PPG outlines only apply to homes where the council nominates the person to live in that property.
Policy H9			
H9.1	James Tregoning, WightLife Homes	H9	Inconsistent with national policy. The sustainable redevelopment of low quality hotel stock to residential should be encouraged and supported. This would be consistent with NPPF paras 124 c), 124 d) and 127 a) as well as IWC policies EV1, C2, E7 and E8.
H9.2	Chani Courtney	H9 para 7.91	Para 7.91 add to protected wildlife and use the opportunity to separate out surface water from entering any connected combined sewage line.
Policy H10			
H10.1	Troy Planning + Design	H10	Support H10 but the policy needs to be more proactive in helping to shape the delivery of self and custom build housing. At present, the policy as framed will not lead to delivery.

	Planning Agent on behalf of Nettlestone and Seaview Parish Council		
H10.2	David Long – BCM	H10 general	In accordance with the CIL Regulations, it would be beneficial if the policy can provide clarity regarding the exemption from affordable housing contributions, as reflected in policy H5, paragraph 7.60.
Policy H11			
H11.1	Home Consultancy Ltd	H11	Allocate land.
H11.2	David Long – BCM	H11 general	Since adoption of the Core Strategy (March 2012) the Council have not progressed allocated sites. Continued delay means a lack of allocations leading to uncertainty, delay and frustration.

Representations on Section 8: Economy			
Rep number	Name of respondent	Paragraph or policy	Summary of issue raised
General comments			
EG.1	Chani Courtney	Economy general	<p>Para 8.28 - Add SUDS for pollution run off and reference to screening on drains.</p> <p>Para 8.86 - Add increasing soft landscaping or SUDS to increase biodiversity and reduce surface water run off.</p> <p>Page 166 - Add SUDS manual reference.</p> <p>Para 8.112 – Add manage surface water by SUDS.</p>
EG.2	Sustainable Freshwater Community Group	Economy general	<p>Add promoting investment to provide local employment in West Wight and infrastructure to support remote working.</p> <p>Transport / roads / infrastructure is needed to get to work. Section 6.7 does not refer to Freshwater and is not sufficient given the growth proposed which increases the carbon footprint from more cars.</p> <p>Add to para 4.75 that Grade 3 agricultural land is an important contributor to the Island's economy and food security.</p> <p>Remove greenfield sites from plan as these affect the environment and vital tourism through cultural and visual impact on the landscape.</p>

			<p>Freshwater has potential for growth with regards to landscape and eco-tourism but tranquillity and views must be protected. Urbanisation impacts on landscape, biodiversity and tourism.</p> <p>Prioritise small developments on brownfield sites. Insufficient and flawed consultation.</p> <p>Freshwater is a rural village.</p>
EG.3	Sarah Sims	Economy general	<p>Add promoting investment to provide local employment in West Wight and infrastructure to support remote working.</p> <p>Transport / roads / infrastructure is needed to get to work. Section 6.7 does not refer to Freshwater and is not sufficient given the growth proposed which increases the carbon footprint from more cars.</p> <p>Add to para 4.75 that Grade 3 agricultural land is an important contributor to the Island's economy and food security.</p> <p>Remove greenfield sites from plan as these affect the environment and vital tourism through cultural and visual impact on the landscape.</p> <p>Freshwater has potential for growth with regards to landscape and eco-tourism but tranquillity and views must be protected. Urbanisation impacts on landscape, biodiversity and tourism.</p> <p>Prioritise small developments on brownfield sites.</p>

EG.4	Freshwater Bay Residents Association	Economy general	<p>Add promoting investment to provide local employment in West Wight and infrastructure to support remote working.</p> <p>Transport / roads / infrastructure is needed to get to work. Section 6.7 does not refer to Freshwater and is not sufficient given the growth proposed which increases the carbon footprint from more cars.</p> <p>Add to para 4.75 that Grade 3 agricultural land is an important contributor to the Island's economy and food security.</p> <p>Remove greenfield sites from plan as these affect the environment and vital tourism through cultural and visual impact on the landscape.</p> <p>Freshwater has potential for growth with regards to landscape and eco-tourism but tranquillity and views must be protected. Urbanisation impacts on landscape, biodiversity and tourism.</p> <p>Prioritise small developments on brownfield sites.</p>
EG.5	James Attrill - BCM	General	<ul style="list-style-type: none"> •The removal of Basic Payment subsidy from agriculture in 2016 has forced the industry into a rapid and substantial drive to transition the way it farms in an unsupported world. Food production in the UK is notoriously unprofitable and , in many cases, diversification is not simply 'extra profit' but the very means of business survival. •A wide range of farm business diversification uses are already evident on the Island. The scope allowed needs to be wide to stimulate growth but also avoid sector competition – by allowing a variety of uses the overall income to the rural economy will be higher. •Allowing sensitive and appropriate residential re-use of redundant farm buildings is sound policy. Farmers will either convert farm buildings to provide much needed residential rental stock or sell the sites to reinvest in their holdings (many farms are woefully underinvested due to low profitability over many decades). This 'reinvestment' need could also make the farm holding more viable and , as such, reduce the need for wider diversification activity going forward.

Policy E1			
E1.1	Bell Cornwell	E1	16.1 Add reference in policy to the Pennyfeathers site delivering a mixed-use commercial development.
E1.2	Christopher Jarman	E1	<p>Add promoting investment to provide local employment in West Wight and infrastructure to support remote working.</p> <p>Transport / roads / infrastructure is needed to get to work. Section 6.7 does not refer to Freshwater and is not sufficient given the growth proposed which increases the carbon footprint from more cars. Add to para 4.75 that Grade 3 agricultural land is an important contributor to the Island's economy and food security.</p> <p>Remove greenfield sites from plan as these affect the environment and vital tourism through cultural and visual impact on the landscape.</p> <p>Freshwater has potential for growth with regards to landscape and eco-tourism but tranquillity and views must be protected. Urbanisation impacts on landscape, biodiversity and tourism.</p> <p>Prioritise small developments on brownfield sites.</p>
E1.3	Bob Seely	E1	<p>Add promoting investment to provide local employment in West Wight and infrastructure to support remote working.</p> <p>Transport / roads / infrastructure is needed to get to work. Section 6.7 does not refer to Freshwater and is not sufficient given the growth proposed which increases the carbon footprint from more cars.</p> <p>Add to para 4.75 that Grade 3 agricultural land is an important contributor to the Island's economy and food security.</p> <p>Remove greenfield sites from plan as these affect the environment and vital tourism through cultural and visual impact on the landscape.</p>

			<p>Freshwater has potential for growth with regards to landscape and eco-tourism but tranquillity and views must be protected. Urbanisation impacts on landscape, biodiversity and tourism.</p> <p>Prioritise small developments on brownfield sites.</p>
E1.4	Freshwater Parish Council	E1	Upgrade Golden Hill Industrial Estate with some additional land, to an employment allocation.
E1.5	Angela Brooks – Fisher German LLP	E1	<p>Land at and adjacent to New Fairlee Farm' (Ref: HA040), for a residential led mixed-use development. and an improved road network including a park and ride hub. The allocation should be reinstated in the Plan.</p> <p>Policy E1 allocate 29.2ha of employment uses the same as in the 2018 Draft IPS but the quantum of housing has been reduced. Sufficient housing land is needed to support the economic growth.</p>
E1.6	BNP Paribas Real Estate, on behalf of BAE Systems, Cowes	E1	<p>Support BAE Cowes site as an Employment Opportunity Area. Amend wording to avoid development with a detrimental impact on BAE Systems.</p> <p>Amend final policy paragraph to support intensification/expansion of existing employment uses in employment opportunity areas and ensure new development outside the area has no detrimental effect on them.</p>
E1.7	David Long BCM	E1 General	The Freeport designation is not matched by housing growth and this is not recognised by policy E1.

			<p>Allocating employment sites across the Island is essential but the site at Nicholson Road still requires determination by the Isle of Wight Council. Question if this site can be delivered.</p> <p>The allocation at Sandown Airport has been refused planning consent on landscape and visual grounds, not having suitable or safe highway considerations and access to a bus stop.</p>
E1.8	Phil Salmon The Planning and Development Hub	E1	<p>Jobs need to be sustainable not seasonal, or visitor based. Sites like Kingston in East Cowes and Nicholson Road in Ryde have not come forward.</p> <p>No jobs creation target, and the policy `wholeheartedly supports` an environment where businesses have the confidence to invest. Sandown Airport, Sandown is allocated for employment use, but permission was refused for reasons which can be overcome.</p> <p>For the policy to be successful it requires support from across the council.</p> <p>For a `plan-led` strategy to deliver jobs on the Island, more sites need to be allocated, backed-up by actual support for certainty of delivery.</p>
E1.9	Richard Holmes for MK Assets	E1	<p>Policy E1 and the site allocations are not sufficient to meet the Island's growth and fails to meet paragraph 86 of the NPPF.</p> <p>Allocating employment sites across the Island is essential. Nicholson Road requires determination and question if this site can be delivered.</p> <p>Sandown Airport allocation has been refused on landscape and visual grounds, not having suitable or safe highway considerations and access to a bus stop.</p> <p>Freeport designation is not recognised by policy E1 and allocations.</p>

Policy EA1			
EA1.1	Laura Lax Environment Agency	EA1	Support f) and g). Welcome paragraph 8.12.
EA1.2	Chani Courtney	EA1	EA1 No mention of surface water management. As commercial needs large roof space suds and water holding tanks and permeable car parks to be mentioned.
Policy EA2			
EA2.1	David Long – BCM	EA2	As outlined within Policy E1.
EA2.2	Chani Courtney	EA2	EA2. No mention of surface water management. As commercial needs large roof space suds and water holding tanks and permeable car parks to be mentioned.
Policy EA3			
EA3.1	BNP Paribas Real Estate, on	EA3	Policy EA3 and HA022 are considered together. The land to the north, west and east of the BAE site is an important transmission zone.

	behalf of BAE Systems, Cowes		<p>Development here could result in detrimental impacts on BAE's ability to develop and test radars and could prevent use of this site leading to job losses.</p> <p>Meeting housing needs should not be to the detriment of an important local employer.</p> <p>Both allocations should be removed. As an alternative amend EA3 and Appendix 2 to include an additional bullet j) "have no detrimental impact on operations at BAE System's Cowes site to the west."</p> <p>Amend Appendix 2: Site-specific requirements for HA022 on archaeological and biodiversity assessments adding : "The proposed development should also ensure there is no detrimental impact on operations at BAE System's Cowes site to the west."</p>
EA3.2	Chani Courtney	EA3	EA3 - No mention of surface water management. As commercial needs large roof space suds and water holding tanks and permeable car parks to be mentioned.
Policy EA4			
EA4.1	Chani Courtney	EA4	EA1 and EA2, EA3, EA4, EA5 and EA6 No mention of surface water management. As commercial needs large roof space suds and water holding tanks and permeable car parks to be mentioned.
Policy EA5			
EA5.1	Chani Courtney	EA5	EA5 - No mention of surface water management. As commercial needs large roof space suds and water holding tanks and permeable car parks to be mentioned.

Policy EA6			
EA6.1	Angie Jordan	EA6	Delete EA6 at Sandown Airport.
EA6.2	Penelope Baker	EA6	EA6, paras 8.37-9. Road changes to accommodate high volume traffic that has safe access to the site is not viable. High volume traffic is contrary to carbon reduction and net zero. A energy intensive development is against net zero and carbon reduction and threatens energy security. The site is appropriate for a solar farm and area should be designated for renewable infrastructure.
EA6.3	David Long BCM	EA6	As outlined within Policy E1.
EA6.4	Chani Courtney	EA6	EA6 - No mention of surface water management. As commercial needs large roof space suds and water holding tanks and permeable car parks to be mentioned.
Policy E2			
E2.1	Freshwater Parish Council	E2	Give priority to brownfield sites. Should be for the long term economic benefit of the island population. Justification for sites should be proven and evidenced. Many brownfield/PDL sites in coastal areas which are damaging to tourism. Give greater emphasis on supporting Section 4: Environment and our areas of special significance, National Landscape, SSSIs, Ancient Woodland, Biosphere, Add policies to reflect sustainable economic growth. The rural nature of the Island underpins tourism a significant part of the economy.

E2.2	David Long BCM	E2	<p>The policy doesn't set out locational requirements. Add a definition of "existing industrial estate" or "employment site"?</p> <p>The rural economy is just horticulture but includes tourism and leisure a significant economic contributor. E2 should including those sectors in the rural economy employing significant numbers.</p> <p>d is onerous and inflexible and conflicts with policy H9. Clarify in H9 or E2 the intentions of housing delivery on PDL.</p>
E2.3	Phil Salmon The Planning and Development Hub	E2 – Sandown Airport Employment site	Support allocation. Should consider solutions to overcoming transport issues.
Policy E3			
E3.1	Freshwater Parish Council	E3	Should upskill young people as there is limited local education in West Wight. Disadvantages post 16 of children in West Wight should be recognised and policies added to support people living in West Wight.
E3.2	Guy Robinson Historic England	E3	Add reference to heritage skills.
Policy E4			
E4.1	Rebecca Loader/Isle of Wight Council Archaeology & Historic	E4	Para 8.56 add 'Proposals may need to be supported by an appropriate Heritage Statement and historic building recording may be required prior to conversion works'

	Environment Service		
E4.2	C. Curtis	E4	E4 (c) delete 'intensification' as it will lead to more commercial traffic on unsuitable roads, degradation of the rural environment and encourages development.
E4.3 (and E4.4 - duplicate comment)	Stephen Davis	E4	E4 (c) delete 'intensification' as it will lead to more commercial traffic on unsuitable roads, degradation of the rural environment and encourages development. Diversification of the rural economy can be beneficial if implementation is properly controlled. Replace "intensification/expansion" with "appropriate development". The published summary of comment suggested amending criteria c) but this has not been done.
E4.5	Guy Robinson Historic England	E4	Support re-use of historic buildings but amend policy and supporting text to refer to heritage significance. "Applications within the Newport and Ryde town centres and other historic conservation areas across the Isle of Wight (as appropriate) will be expected to adhere to the Newport and Ryde Commercial Frontages Design Guide heritage action zones (HAZ) will be expected to adhere to any design guides or other appropriate documents as part of the respective HAZ projects."
E4.6	Lucy Charman Country Land & Business Association (CLA)	E4	b). Amend to, "Farm Diversification will be supported". c). Support but add rural housing developments within proximity of intensified sites will be encouraged.

			<p>d). Farm buildings can be converted to employment, leisure, tourism, education and residential and the policy seeks to limit this. Policy should support the reuse of farm buildings wherever possible and enable this type of development.</p> <p>Outside the AONB, permitted development rights exist which the policy omits. Need to recognise historic redundant farm buildings no longer suitable for modern use can provide for the rural economy and rural housing.</p> <p>Support e). but could be used to prevent development coming forward. Add further guidance on suitable design and the scope of evidence needed.</p>
E4.7	David Long – BCM	E4 A-f and para 8.55-8.56	<p>b) clarify if “principal land use” is by area</p> <p>Farm diversification is essential, and farming may not be the principal land use. Clarify why core objectives of E3 do not fit within E4.</p> <p>f) what is meant by “sustainable” rural tourism and leisure activities and does it include “transport sustainable”. Requiring “transport sustainable” will stifle tourism and leisure projects. The policy approach conflicts with the NPPF.</p> <p>Should recognise sites to meet local business and community needs in rural areas may be adjacent to or beyond existing settlements, and locations with poor public transport.</p> <p>Development may use some best and most versatile land for diversification or , intensification but help support the rural economy.</p> <p>Paragraphs 8.55-8.56 acknowledges the reuse of “historic stone farm buildings”, albeit in many instances there is no barrier to reuse modern farm buildings.</p>

E4.8	Christopher Stott The Planning and Development Hub for West Wight Alpacas	E4	Encouraging growth through change in rural businesses is supported. Important to allow rural businesses to adapt and respond emerging and developing trends.
E4.9	James Attrill - BCM	E4a	<p>what is defined as 'growth' ? . This policy should be more specific in recognising the need for larger , more efficient, holdings to expand their agricultural assets (farm buildings, infrastructure, etc) while allowing smaller, less efficient holdings, to be subsumed into the larger holdings. This later point will naturally release redundant buildings which smaller holdings may need to repurpose for non-agricultural uses.</p> <p>What is the 'food production sector' ? all farming and horticulture produces food. If this is intended to reflect food processing than, yes, that should be supported 'on farm' but it should be noted that on-farm food processing is a niche sector and should not be given priority above the need to allow for agricultural transition in amore general sense.</p>

E4.10	James Attrill - BCM	E4b	E4b – a large majority of farm diversification relates to farm buildings as well as ‘farmland’ . Farm buildings should be specifically referenced in E4b
E4.11	James Attrill - BCM	E4c	E4c – expansion of existing rural industrial sites or employment sites is welcomed but this policy should be expanded to allow the creation of suitable new sites. Existing sites are often at capacity or incapable of being expanded and limiting expansion to ‘existing’ risks denying diversification to be applied more widely and keep rents at reasonable levels thereby also encouraging rural/Island employment/business growth.
E4.12	James Attrill - BCM	E4d	E4d – the limiting of conversion to ‘employment use’ will stifle healthy farm diversification. The use should be expanded to include tourism and residential use. Allowing residential use could assist in achieving housing targets in rural areas.
E4.13	James Attrill - BCM	E4e	E4e – The flexibility of new- build development (as opposed to building conversion) is welcomed.
E4.14	James Attrill - BCM	E4f	E4f – encouragement of tourism and leisure are welcomed . Development of renewable energy sites should also be included both to allow rural business to decarbonise but also generate income from renewable energy as a form of diversification.
E4.15	James Attrill - BCM	E4 General	Land Quality : ‘best quality’ is not defined under E4 . A sense of proportionality should be applied here – the policy seems to indicate that, for example, a grain store might be allowed on ‘high quality’ land to serve the wider holding but a new- build diversified building to support the holding would not. Holdings with high quality land still require the latitude to diversify and other policy factors (e.g. visual impact) may restrict them to applying on a small area of the holding which is designated ‘ high quality’. It is worth noting that the majority of ‘low quality’ land is within the Isle of Wight National Landscape (previously AONB) which suffers a further raft of restrictions on diversification and agricultural development and covers the majority of the Island

E4.16	James Attrill - BCM	E4 para 8.55	8.55 – a good recognition of traditional and stone buildings no longer fit for purpose. The economic reality is that such buildings are extremely expensive to convert and , as such, the rental income achievable on the Island does not cover the investment required. While it may work in a minority of cases it would be more productive to expand this allowance to include residential use conversion either as the dominant use or in a ‘mixed use’ situation where workers can live on site and access work space without travel. Expanding to include residential use could assist the Island in achieving residential housing targets in rural areas.
E4.17	James Attrill - BCM	E4 para 8.56	8.56 – It is not clear why this point is limited to ‘employment use’, why not include tourism, leisure, residential and renewable energy. It is not necessary to refer to protective species in this point as such considerations are already dealt with within existing national regulations. It is also unreasonable to expect ‘no impact’ without context - indeed mitigation can be provided to enhance protected species, and this should be considered as part of any application rather than a binary exclusion form development.
E4.18	James Attrill - BCM	8.58	8.58 – this consideration of ‘suitable site’ should be expanded to include the development on ‘high quality’ soils if it cannot be avoided and also building reuse (should the ‘type’ of building’ be restricted by policy in some way)
E4.19	James Attrill - BCM	8.61	8.61 – this is an unnecessarily restrictive and counterproductive point. The vast majority of farm holdings on the Island have ‘at cost and more modern structures’ . Business use requires large commercial spaces which ‘modern’ farm buildings provide ; traditional buildings frequently fail to provide useful , modern work space. The policy should be focused on allowing farms to diversify their buildings and providing employment, tourism, leisure and residential uses to enhance the Island’s rural economy. This policy aims to restrict the reuse of farm building to traditional stone barns – this is unviable and does not address either the need to diversify or the provision of what is demanded by the ‘commercial tenant ’. Reuse of buildings does need to be done sensitively but this policy point should be focused on re-use for diversification not an extreme focus on aesthetics alone. To name a specific make of building as unsuitable for conversion is discriminatory and badly judged. This policy point is directly in opposition to the policy proposed to allow ‘new’ commercial buildings under E4.

Policy E6			
E6.1	Bell Cornwell	E6	Para 17.1 Requiring greater standards than current building regulations could stifle delivery. This is unnecessarily onerous and could frustrate delivery.
E6.2	Lucy Charman Country Land & Business Association (CLA)	E6	Support but must reflect the need to increase connectivity in rural areas. Where bandwidths are sufficient and the connection reliable, many businesses in hard to reach areas may not require a fibre connection but can rely on alternatives that are far cheaper than provision of a fibre connection.
E6.3	David Long	E6 General	Is this policy needed as developments factor in digital connectivity as it is essential infrastructure and seems unnecessary.
Policy E7			
E7.1	Wootton Bridge Parish Council	E7	Support policy but would like support for Local and Village Centres also rather than just focus on Newport and Ryde. Loss of shops and local amenities affects character.
E7.2	Bell Cornwell	E7	Para 18.1 – need to recognise there may be retail uses that cannot be located in town centres, for instance availability of appropriately sized sites. Para 18.2 - reword to enable flexibility in circumstances where a retail impact assessment demonstrates this is the case.
E7.3	Guy Robinson Historic England	E7	Welcome reference to the design guide but it should look forward on how this guidance could be used, including its potential value in other historic parts of the island. Production of other design guidance or codes should be referenced differently not framed by the HAZ programme. This merits minor changes to the end of paragraph 8.89.

Policy E8			
E8.1	Southampton City Council	E8	<p>Support importance of tourism and its sustainable growth to the economy of the Island but need to mitigate the impacts including on Southampton ferry port which experiences significant queuing at peak times causing overspill and congestion to the adjacent main road and impacting on air quality.</p> <p>E8 should recognise this and add measures to reduce car use for travel to the Island. Add cross- referencing to T1 and T2 to encourage travel on the Island without car use. Explore car clubs on the Island open to tourists to reduce greenhouse gases from tourism in line with achieving net zero in CC1.</p>
E8.2	Nora Galley	E8	<p>Support E8 and para 8.97 but there are no target locations or opportunity areas and is not pro- active enough. Eg. holiday accommodation could be promoted for year round accommodation.</p> <p>Issues include an absence of allocations for tourism use or priority, the Island lacks high quality year round tourist accommodation, hotel consents are not being built. Should be proactive promotion of the island's opportunities to reduce risk in pursuing ambitious projects affecting the economy.</p> <p>Allocate the Island Harbour sites for holiday accommodation or housing.</p>

E8.3	Lucy Charman Country Land & Business Association (CLA)	E8	<p>Support. Redundant farm buildings can be converted to accommodation and E8 should reflect this. Amend policy adding support for mixed tourist offerings. Seasonal enterprises should be supported of various sizes.</p> <p>Amend policy to allow re-purposing of tourist accommodation for familial members through ill health or to aid succession of a business.</p>
E8.4	David Long BCM	E8	<p>Para 8.100 assumes creating suitable levels of demand maintains a sustainable business. Hotels located in Core tourist accommodation areas are in desirable locations but are not in demand for traditional holidays as consumer choice has changed. Hotels have therefore had poor levels of demand even in “prime” locations leading to decline, low room rates and sporadic trade. The Core Tourist Accommodation areas approach is incorrect. Protecting hotels has not worked and not likely to change. Hotels could be put to alternative uses without proving needing to prove exceptional circumstances.</p>
E8.5	Christopher Stott The Planning and Development Hub on behalf of West Wight Alpacas	E8	<p>E8 - The range of tourist accommodation should reflect the wide market, some of which are cheaper alternatives.</p>

E8.6	Justin Gentleman - Foreland Homes	E8	I am extremely disappointed to see the proposed continuation of policy to resist the loss of tourist accommodation within the Bay area. This restriction is outdated and damaging what should be a prime area for the Island. It is clear that this policy has failed when looking at the derelict properties trapped by the policy. They are of no benefit nor assistance to our tourism offer, and only seek to deter tourism; protecting them is abjectly foolish
E8.7	David Long BCM	E8	Policy E8 is out of date. Protecting hotel stock is unsound and has not worked. Many hotels are under occupied, cannot reinvest and in consequence they spiral in decline. The restriction should be removed.
Policy E9			
E9.1	Laurence Smith	E9	Policy assumes all short let holiday properties remove housing from local people. No distinction is made for large properties closer to hotels than residential homes. Add a cut-off point, for example 10 or more guests in a single dwelling, are not included. Higher spending tourists could support for example in developing the "foodie market" and luxury accommodation. Add support to move towards net zero goals.
E9.2	Troy Planning + Design Planning Agent on behalf of Nettlestone and	E9	Address the issue of second and holiday homes. Evidence supports such a policy on a spatial basis. Support Policy E9 but the issue is wider than short-

	Seaview Parish Council		<p>term lets and extends to the impact of the second and holiday home market.</p> <p>E9 is does not address the challenges of the second and holiday home market. Add similar text to H5 which includes that when new affordable homes are delivered, these will be subject to a condition that retains them as the principal resident of the occupant. Should extend to new build homes in the 'hotspots', for second and holiday homes.</p>
E9.3	Lucy Charman Country Land & Business Association (CLA)	E9	<p>E9 needs to ensure adequate flexibility for businesses and individuals for short-term rental and holiday lets which contribute to the economy, support local shops and restaurants and create jobs.</p> <p>Converting unused/underutilised properties, not suitable as homes into holiday accommodation contributes to a community's economic vitality.</p> <p>Locations outside designated tourist accommodation areas should be supported and the impact on local shops, restaurants, and attractions outside designated tourist areas recognised.</p>
E9.4	David Long BCM	E9 general	<p>E9 - there is concern a Change of Use to a sui- generis use would be restricted under E8 and its protection for tourism accommodation. Amend E9 adding that changing from a Sui-Generis (short term holiday let) use back into residential would be acceptable without complying with policy E8 (and the demonstration of viability).</p>

			Paras 8.105-6, the threshold of 140 nights per year does not align with current tax thresholds. As of 2024 the threshold is 105 nights per year.
E9.5	Justin Gentleman - Foreland Homes	E9	<p>E9 Short term let holiday accommodation – makes up a vital part of our tourism offer. Shortage of accommodation in the private rental sector is the result of ill-judged political policies, which have changed taxation and increased legislation. Where these units are commercially successful, they are, in fact, fulfilling their role as part of the Island’s tourism offer. These short-term holiday letting units will only survive in the long term in good quality, tourism appropriate locations.</p> <p>The madness of this view can be seen when considering policy comments on E8 and E9 together. In this circumstance, would it not make sense to follow the changes of the market and seek to support short-term holiday accommodation where it works and seek to relax tourism policy where it fails?</p> <p>We have a local housing need because we have insufficient housing, because we have failed, and we continue to fail to deliver enough housing. Restricting short-term holiday accommodation will affect our tourism visitors and their reducing spend will affect our economy.</p>
Policy E10			
E10.1	Guy Robinson Historic England	E10	Amend archaeology to archaeological remains.
E10.2	David Long BCM	E10 General	As per comments regarding holiday accommodation and policy E8

E10.3	David Long BCM	E10 General	Policy E8 and E10 are out of date. Protecting hotel stock is unsound and has not worked. Many hotels are under occupied, cannot reinvest and in consequence they spiral in decline. The restriction should be removed.
Policy E11			
E11.1	Guy Robinson Historic England	E11	Welcome reference to the design guide but it should look forward on how this guidance could be used, including its potential value in other historic parts of the island. Production of other design guidance or codes should be referenced differently not framed by the HAZ programme.
Policy E12			
E12.1	Southampton City Council	E12	The Solent Freeport provides economic growth opportunities for local authorities in the Solent region and this policy takes a suitably flexible approach. Southampton City Council (SCC) will cooperate with Isle of Wight Council (IoWC) on commercial matters related to the Freeport as outlined in the SCC & IoWC Statement of Common Ground.
E12.2	David Long BCM	E12 General	The Freeport designation is not matched by housing growth particularly when some new skilled workers and direct jobs will live on the Island. That correlates with Policy T3 (Cross Solent Transport) which supports the maintenance and improvement of routes and methods of crossing the Solent.
E12.3	Richard Holmes for MK Assets	E12	Policy E12 (Solent Freeport) seeks to support sustainable development proposals which are linked to the Freeport. Council's evidence base and Employment land Study has not considered the freeport within their study.

Representations on Section 9: Transport

Rep number	Name of respondent	Paragraph or policy	Summary of issue raised
General comments			
TG.1	Sustainable Freshwater Community Group	General	<p>Re-designate areas on the periphery of Freshwater settlement is providing more homes in areas without improving employment prospects, amenities, infrastructure, travel facilities or affordability.</p> <p>The IPS makes no proposals to improve transport links nor basic infrastructure, making no provision to a more sustainable transport solution. Coupled with the lack of work in West Wight, will attract more of an ageing population.</p> <p>Add promoting investment to provide local employment in West Wight and infrastructure to support remote working.</p> <p>Transport is only mentioned in section 6.7 as a 'multi user route between the West Wight and Newport'. It does not refer to Freshwater.</p> <p>West Wight is not an employment hub, reliant on limited retail and mostly on tourism. Increased residential footprint in the West Wight, increases the carbon footprint for more cars.</p> <p>Insufficient and flawed consultation</p>

TG.2	Mandy Pearce	Transport General	<p>The West Wight and surrounding area have limited safe travel methods without use of cars. No plan to enable further safe cycle ways from Newport to Freshwater, not returning to a train service. Encouraging car use. Bad for environment Transport planning is essential if employment is to improve; Doctors and Dentist services to be made available and general communication with the rest of the Island.</p> <p>The increase in traffic to Newport from Freshwater, and Totland will only increase with the development plans that are being put forward, thus increasing our carbon emissions, against the already agreed plans. The proposal to redesignate areas outside of Freshwater boundary will provide more homes again WITHOUT the required infrastructure, which this plan does not cater for.</p>
TG.3	Isle of Wight Bus and Rail Users' Group	Transport General T1 and T4	<p>In order to give people the option of using public transport, developments should be located within easy walking distances of bus routes or rail stations. Ideally, the text could be strengthened to help ensure that this is the case.</p> <p>The IW Bus and Rail Users' Group supports Policy T4 here in (Page 182). The protection of disused rail formations from development to facilitate future public transport schemes is important. An example of particular interest to us is the Shanklin - Ventnor rail formation.</p>
Policy T1			
T1.1	Rodney Archer	T1	<p>All relevant proposals should provide and improve accessibility for pedestrian, cycling, equestrian and public transport, and should demonstrate that they:</p> <p>H. incentivise a modal shift that extends the concept of Free Public Transport on the Isle of Wight.</p>

T1.2	Northwood Parish Council	T1	<p>Para 9.7 - What is the definition of 'on the edge', does this replace 'immediately adjacent to' the settlement boundary?</p> <p>Northwood is a semi-rural, a parish in its own right, and not part of Cowes. The designation should be changed.</p>
T1.3	Wootton Bridge Parish Council	T1	<p>We welcome an emphasis on green transport including cycling within infrastructure plans. However, we would have liked to see a more ambitious plan for sustainable transport infrastructure. We note on figure 3.1 there are just three proposed cycle paths. There is also limited mention of bus connectivity within the plan and there are currently villages with no bus service.</p>
T1.4	Sustainable Freshwater Community Group	T1	<p>Re-designate areas on the periphery of Freshwater settlement is providing more homes in areas without improving employment prospects, amenities, infrastructure, travel facilities or affordability.</p> <p>The IPS makes no proposals to improve transport links nor basic infrastructure, making no provision to a more sustainable transport solution. Coupled with the lack of work in West Wight, will attract more of an ageing population.</p> <p>Add promoting investment to provide local employment in West Wight and infrastructure to support remote working. Transport is only mentioned in section 6.7 as a 'multi user route between the West Wight and Newport'. It does not refer to Freshwater.</p> <p>West Wight is not an employment hub, reliant on limited retail and mostly on tourism. Increased residential footprint in the West Wight, increases the carbon footprint for more cars.</p>

T1.5	Huw Jenkins	T1	<p>Housing allocations (180 homes) in West Wight Regeneration Area (Appendix 2) with newly granted planning permissions (141 homes in Appendix 1) and recent house completions (106 net completions in the year to April 2022 – see note below) are not compatible with T1 Supporting Sustainable Transport and T2 A better connected island.</p> <p>Increasing the West Wight population will place more pressure on three roads to Newport. The Military Road is already at risk due to landslides. The main road (Middle Road) is an accident black spot.</p> <p>We should build homes close to employment opportunities and key services.</p> <p>In the year 2021 to 2022 there were 490 house completions on the island (IPS 2.25) of which 106 (22%) were in Freshwater.</p>
T1.6	Sarah Sims	T1	<p>9 – Transport (T1 supporting sustainable transport and General transport)</p> <p>Re-designate areas on the periphery of Freshwater settlement is providing more homes in areas without improving employment prospects, amenities, infrastructure, travel facilities or affordability.</p> <p>The IPS makes no proposals to improve transport links nor basic infrastructure, making no provision to a more sustainable transport solution. Coupled with the lack of work in West Wight, will attract more of an ageing population.</p> <p>Add promoting investment to provide local employment in West Wight and infrastructure to support remote working.</p> <p>Transport is only mentioned in section 6.7 as a ‘multi user route between the West Wight and Newport’. It does not refer to Freshwater.</p> <p>West Wight is not an employment hub, reliant on limited retail and mostly on tourism. Increased residential footprint in the West Wight, increases the carbon footprint for more cars.</p>

T1.7	FRESHWATER BAY RESIDENTS ASSOCIATION	T1 – Whole section	<p>Re-designate areas on the periphery of Freshwater settlement is providing more homes in areas without improving employment prospects, amenities, infrastructure, travel facilities or affordability.</p> <p>The IPS makes no proposals to improve transport links nor basic infrastructure, making no provision to a more sustainable transport solution. Coupled with the lack of work in West Wight, will attract more of an ageing population.</p> <p>Add promoting investment to provide local employment in West Wight and infrastructure to support remote working.</p> <p>Transport is only mentioned in section 6.7 as a ‘multi user route between the West Wight and Newport’. It does not refer to Freshwater.</p> <p>West Wight is not an employment hub, reliant on limited retail and mostly on tourism. Increased residential footprint in the West Wight, increases the carbon footprint for more cars.</p>
T1.8	Angela Brooks – Fisher German LLP	T1	<p>Land at and adjacent to New Fairlee Farm’ (Ref: HA040), was identified in the November 2018 Draft Island Planning Strategy as a proposed allocation site for residential led mixed-use development accommodating at least 880 dwellings, a green, open and recreational space, community uses and an improved road network including a park and ride hub. The allocation should be reinstated.</p> <p>When compared with the 2018 Draft IPS Policy ‘BCI 1 – A Better Connected Island’, we note that the 2021 Policy T1 – Supporting Sustainable Transport, has omitted the previous reference to the provision of a Park and Ride Scheme on Fairlee Road, Newport.</p> <p>It is not clear why this commitment has now been deleted. Indeed, none of the transport related background evidence published with the 2024 Submission Plan contains any reasoning for this omission. As well as reinstating the New Fairlee Farm housing allocation in Policy H2, we believe Policy T1 should be amended to include the provision of a Park and Ride Scheme on Fairlee Road, Newport.</p> <p>This is supported within the Island Transport Plan Strategy 2011-2038 which states at C.9.2 that the Council “will need to consider a range of strategic options including the possible development and/or expansion of existing park and ride facilities”.</p>

T1.9	Troy Planning + Design Planning Agent on behalf of Nettlestone and Seaview Parish Council	T1	<p>The Policy needs to explain what is meant by '20- minute neighbourhood' design principles and how these should be used to inform an approach to sustainable development.</p> <p>It lacks clarity and is open to interpretation. See attached representations for more information.</p>
T1.10	Isle of Wight Council Public Health	T1 general	<p>Policy could be strengthened by acknowledging the positive health and climate benefits that active travel would bring to the community. Recommend reference to The-role-of-active-travel-in-Improving- Mental-Health.pdf (healthyplacemaking.co.uk) in demonstrating the link between physical activity, physical and mental health.</p> <p>Welcome incorporation of the 10 Healthy Street indicators approach within this policy to ensure alignment with the local transport plan and to underpin the priority matrix set out in Manual for Streets 1 and 2.</p> <p>Reference or linkage across to C1 design policy would be useful to ensure the design of streets and space linked sensitively with those around the built form.</p>

T1.11	Tom Bell - Portsmouth City Council	T1 and supportin g text	PCC supports the recognition of the importance of cross-Solent Transport in the supporting text to policy T1 of the island strategy and supports the overall intention of the policy to deliver sustainable transport. PCC will continue to work with IoWC to improve cross-Solent sustainable transport links.
Policy T2			
T2.1	Kenneth Oliver	T2	The Policy refers to Military Road. The need for viable road transport extends the length of the A 3055 from Ryde to Freshwater and the Policy should cover all this route.
T2.2	Northwood Parish Council	T2	Northwood's Newport Road and Nodes Road not included in Table 9.1 (Key road junctions identified for improvement) only in Table 9.2. Should be prioritised in table 9.1. Essential it is improved. Somerton roundabout should be improved given amount of additional traffic from permitted and proposed developments. Consideration given to the junction of Three Gates Road and Place Road. Should be regarded as a key road junction under Table 9.1 Pallance Road - It is considered it does not provide safe, legible access for pedestrians, cyclists or vehicle users. Mention of proper footway along the length of Wyatts Lane to Pallance Road and also along the western side of Place Road from Cockleton Lane towards the Range.

T2.3	Warren Whyte	T2	<p>T2h and the Military Road needs upgrading to a higher level of priority for the connectivity of West Wight and the important tourism and economic benefit this road brings to Freshwater and neighbouring parishes.</p> <p>The duty to cooperate via Solent Transport appears limited, with no agenda item in the last few years on the ferries. There is no evidence that any meaningful discussions have taken place by plan makers on the role of the ferries on housing demands, impact on economic development or existing business or indeed tourism.</p>
T2.4	Nick Stuart	T2	<p>T2H Military Road is a critical road link for the local communities, economy of the West Wight and the visitor economy. Recognition and importance of this road being retained by realignment should appear in the IPS and associated documents.</p>
T2.5	Guy Robinson Historic England	T2	<p>“Opportunities to avoid or mitigate any environmental impacts should be considered” is not ideal phrasing and has the potential to be confusing, given the same policy encourages reducing impacts on air quality and climate change.</p> <p>We advise combining this line in an amended form of wording with the third bullet as suggested opposite. “The council will support proposals that:</p> <ul style="list-style-type: none"> •increase travel choice; •provide alternative means of travel to the car; •reduce the impact on air quality and climate change while avoiding or mitigating other environmental impacts <p>Opportunities to avoid or mitigate any environmental impacts should be considered.”</p>

T2.6	David Long BCM	T2 general	The Council has embarked on the Local Cycling and Walking infrastructure Plans which have costed out measures succinctly well. This is unlike the key road junctions identified for improvement under table 9.1. It is essential that the Council collate the costs for each of those junctions as soon as possible as this has been a significant hindrance in the delivery of development sites.
T2.7	Isle of Wight Council Public Health	T2 General	T2: A better connected Island. We suggest, as with policy T1, a reference is made here to the Healthy Streets concept. This will align the Isle of Wight LTP4 and the work being delivered through the greenway link project.
T2.8	National Trust	T2 - A Better Connected Island	<p>The National Trust has significant land holdings towards the western end of the road stretching for several miles of its length. This land is protected by several designations including Heritage Coast, SSSI, SAC and SPA with a Marine Conservation Zone to the southwest. As a major stakeholder, the National Trust supports the council's inclusion of criterion (h) the Military Road within proposed Policy T2 and the identified need for the council to collect financial contributions for this essential transport link from development. The Trust will continue to collaborate and support the Isle of Wight Council, Island Roads and other major stakeholders to identify a sustainable solution for the continued use of the Military Road. It is recognised that finding a solution that avoids or mitigates any environmental impacts in this sensitive location will be challenging, but the Trust has a strong view that focus should be applied to identifying a long-term solution to the delivery of road improvements, rather than taking forward a short to medium solution that may have limited social and environmental benefits and potentially be a less efficient use of financial resources. Any scheme coming forward needs to facilitate change, deliver best value, and added benefits for the Island community and environment over the long-term.</p> <p>The Trust therefore supports proposed wording within Policy T2 which states, 'The council will work with partners and landowners to understand the impacts of the future loss or truncation of the Military Road (which is recognised as an essential transport link) on the surrounding transport network, settlements and area, with the principles of a preferred approach to be set out in the local transport plan'.</p> <p>The Trust welcomes the council's preparation of a new local transport plan (LTP4) which will provide a much-needed update to the existing transport strategy to guide future investment and decision making on transport for the Island. It will be important that the Implementation Plan provides flexibility so that once a preferred approach has been identified and agreed with all major stakeholders, the policy framework can be put in place without delay to provide project certainty and enable the potential to attract project specific funding. The Trust therefore supports policy wording within the draft Local Plan that seeks to prevent development prejudicing the delivery of infrastructure improvements set out in the local transport plan.</p>

Policy T3			
T3.1	Tim Brayford	T3	The TITF report recommended a study on a cross- Solent link. This has not been done.
T3.2	Rebecca Loader/Isle of Wight Council Archaeology & Historic Environment service	T3(Para 9.29)	Consideration of the environmental and economic effects of proposed new terminals should include an assessment of the direct effects of the proposed development on the historic environment and also of any compensatory environmental mitigation that is proposed.
T3.3	Red Funnel	T3 as a whole	Supports policy T3 for cross-Solent travel and its intention to improve the Island's cross-Solent services
T3.4	Southampton City Council	T3	SCC supports this policy's intention to maintain and improve the choice of routes and methods of travelling between the Island and mainland. SCC will work with Isle of Wight Council (IoWC) on matters relating to cross-Solent travel and its implications for sub-regional transport planning as per the SCC & IoWC Statement of Common Ground.
T3.5	Mandy Pearce	T3	The IPS makes no proposals to resolve the issues with transport to and from the Island. Affordability is key. Many people from the Freshwater and Totland area need to make use of the ferry service for work or business. Used to be a public service.

			<p>The IPS needs to promote investment and inspire an improved Island economy allowing for a younger working population spread Island wide.</p> <p>Redesignating areas on the periphery of the Island means more homes, more travel and STILL THERE IS NO ENOUGH INFRASTRUCTURE.</p>
T3.6	Peter McGowan – On behalf of New Forest District Council	T3	<p>No changes have been proposed in the pre- submission Local Plan that would adversely impact the Lymington ferry that connects to the Island.</p> <p>NFDC welcomes the inclusion of draft Policy T3 which support proposals that help to maintain and improve the current choice of routes and methods of crossing the Solent and sets out how development proposals at existing crossSolent passenger and vehicular terminals will be considered.</p> <p>NFDC would welcome cooperative working with IoW Council, in conjunction with Hampshire County Council, to seek to address any issues arising in maintaining and improving Cross Solent ferry transport for commercial and passenger traffic.</p>
Policy T4			
T4.1	Rodney Archer	T4	<p>Criterion h) replace `rapid bus scheme` with `light Rail-Metro scheme. Amend wording to h. ... other related transport improvements, including the transformation potential Light Rail-Metro scheme.</p>
T4.2	Rodney Archer	T4 - Supporting	<p>i - The extension of the existing Island Line service (Ryde-Shanklin) south of Shanklin to Ventnor - or support the development of other related transport</p>

		our Railway Net	improvements, including Land Train and Very Light Rail schemes. Land Train and Very Light Rail schemes are fully endorsed by the Department for Transport.
Policy T6			
T6.1	Mark Behrendt HBF	T6	This policy states that parking should be in delivered accordance with standards set out in the relevant supplementary planning document. As the council will be aware planning policy cannot be set in supplementary guidance and the council cannot confer the status of a local plan policy by requiring a development to meet specific standards set out in supplementary guidance. Therefore, the policy should be amended to read “have regard to the standards set out in the relevant supplementary planning guidance”.

Representations on Section 10: Delivery, Monitoring and Review

Rep number	Name of respondent	Paragraph or policy	Summary of issue raised
S10M.1	Mark Behrendt HBF	Section 10	Support key indicators against which the plan will be monitored and when these will indicate the need to review the plan. To be effective the amount allocated land would need to be significantly higher and to allow the market to deliver beyond the 453 dpa requirement set out in the H1.
S10M.2	Rebeca Loader/Isle of Wight Council Archaeology & Historic Environment Service	Section 10 10.7 EV1 Policy Performance Indicators	Suggest an additional Policy Performance Indicator: Number of applications refused due to adverse impact on a heritage asset or its setting.

Representations on Appendix 2: List of Allocated sites

Rep number	Name of respondent	Paragraph or policy	Summary of issue raised
APP2.1	Fran Newbury	Appendix 2	<p>The plan risks being immediately out of date and not reflective of the new Government's intentions and plans.</p> <p>Support the development of Camp Road in Freshwater. New homes for families are needed and it will encourage growth and employment opportunities.</p>
APP2.2	Northwood Parish Council	Appendix 2	<p>HA022 - still refers to 130 homes when the outline application is for approximately 160 homes and employment land.</p> <p>HA022 - there is an outline application of approximately 160 homes and employment land, currently being determined and the text refers to 130 homes?</p> <p>All three Housing Allocations for Northwood HA022, HA025 and HA121 have on occasion had their locations addressed as Cowes rather than Northwood. The two locations are entirely different.</p> <p>Northwood is categorised as within 'West Medina' and part of Cowes but it is not and this designation should be changed.</p>
APP2.3	Sustainable Freshwater Community Group	Appendix 2	<p>Housing outside Freshwater settlement boundary provides more homes without improving employment, amenities or affordability. No proposals to improve transport links nor basic infrastructure.</p> <p>No strategy to rebalance the population to retain young islanders and attract skilled incomers. Need for schools, sports and leisure facilities and these have no firm proposals. Promotes a strategy of managed decline.</p>

			<p>Freshwater is a rural village, with challenges from proximity to the coast, and flooding of the Western Yar.</p> <p>West Wight has a disproportionate number of houses in relation to brown field capacity, social, medical and utility infrastructure. Numbers boosted by the SHLAA process allocating large sites outside existing settlement boundary.</p> <p>Revised settlement boundary subverts protection given to greenfield sites of agricultural and ecological value.</p> <p>Revised settlement boundary, and SHLAA process have not been subject to public consultation, thus misunderstood and should be changed to 'proposed'.</p> <p>The settlement boundary revisions do not takes account of 'Exceptional Circumstances'. Should consider National Park status or other options leading to lower housing growth.</p>
APP2.5	Sarah Sims	Appendix 2	<p>Housing outside Freshwater settlement boundary provides more homes without improving employment, amenities or affordability. No proposals to improve transport links nor basic infrastructure.</p> <p>No strategy to rebalance the population to retain young islanders and attract skilled incomers. Need for schools, sports and leisure facilities and these have no firm proposals. Promotes a strategy of managed decline.</p> <p>Freshwater is a rural village, with challenges from proximity to the coast, and flooding of the Western Yar. West Wight has a disproportionate number of houses in relation to brown field capacity, social, medical and utility infrastructure. Numbers boosted by the SHLAA process allocating large sites outside existing settlement boundary.</p> <p>Revised settlement boundary subverts protection given to greenfield sites of agricultural and ecological value.</p> <p>Revised settlement boundary, and SHLAA process have not been subject to public consultation, thus misunderstood and should be changed to 'proposed'.</p> <p>The settlement boundary revisions do not takes account of 'Exceptional Circumstances'. Should consider National Park status or other options leading to lower housing growth.</p>

APP2.6	Bell Cornwell	Penny feathers site	<p>Support allocation of the Pennyfeathers site and is considered sound and deliverable.</p> <p>Existing consent has expired, and a hybrid application is being prepared for late 2024, including an emerging masterplan for a range of uses including up to 900 dwellings, commercial buildings, open space, landscaping and highway realignments and junction improvements.</p> <p>The housing allocation figure could be increased to 'at least 875 homes' to give greater clarity, better reflect site capacity and provide more affordable housing.</p> <p>Natural England has confirmed that due to the distance of the site from the coast, onsite SANG is not required but a contribution to Bird Aware will be applicable. A Statement of Common Ground on these issues is being prepared.</p> <p>The plan should acknowledge the ability of the site to deliver an element of commercial development as well as residential.</p> <p>It is envisaged, that all the proposed dwellings could be delivered by 2037 and therefore within the plan period.</p>
App2.7	Peter Spink (IW Councillor for Freshwater North and Yarmouth) and on behalf of the Steering Group of the West Wight Villages Residents' Association	HA005	<p>HA005 is Grade 2 agricultural land, and its allocation is inconsistent with NPPF para 180(b) as is the extension of the Freshwater Settlement boundary to assist its development. The Plan should be amended.</p>

APP2.8	Northwood Parish Council	Table 2	Table 2 shows 351 of the proposed 388 new homes without planning permission were in Northwood. This represents a 35% increase, and this is too much for a rural village without the infrastructure.
APP2.9	Northwood Parish Council	Appendix 2 – HA025	<p>HA025 - This site cannot be developed due to the value of the land containing ancient woodland and the 50 metre buffer required.</p> <p>All three Housing Allocations for Northwood HA022, HA025 and HA121 have on occasion had their locations addressed as Cowes rather than Northwood. The two locations are entirely different.</p> <p>Northwood is categorised as within 'West Medina' and part of Cowes but it is not and this designation should be changed.</p>
APP2.10	Northwood Parish Council	Appendix 2 – HA121	<p>HA121 - planning permission already lapsed once on this site and problems with road access have been identified. The requirement to "not prevent adjacent sites coming forward" was objected to.</p> <p>All three Housing Allocations for Northwood HA022, HA025 and HA121 have on occasion had their locations addressed as Cowes rather than Northwood. The two locations are entirely different.</p> <p>The housing allocations for Northwood are addressed as Cowes and the two locations are different Northwood is categorised as within 'West Medina' and part of Cowes but it is not and this designation should be changed.</p>

APP2.11	FRESHWATER BAY RESIDENTS ASSOCIATION - FBRA	HA005	<p>Camp Road development should not be included in IPS</p> <p>1. Camp Road has a huge frequent flooding problem. We are dealing with an historical water system that can't cope with the mass of sewage and storm water and the result is frequent sewage spills into the Yar. We need to solve this sewage pollution before any new development. This will all take years. A ditch located along the boundary of the site flows northwards before entering a drainage pipe beneath the road adjacent to the Camp Road field gate which ultimately discharges into the Western Yar watercourse. Natural springs run from the Downs under this field & feed into the Marshes (SSSI) to the Causeway/The Yar both being Internationally protected RAMSAR Sites. Development will cause input of Phosphorus and Nitrates into the natural water courses leading to eutrophication. EV9 states Development proposals will be required to: a ensure new development avoids both direct and indirect adverse effects or cumulative impacts upon the integrity of landscapes and seascapes; The underlying clay does not allow for soak away. A further 100 houses would put unsustainable pressure on a very fragile system. The proposed development is the last green field remaining between Tennyson Down and Afton marshes. Planning on this field will destroy a massive vital green wildlife corridor between the two areas, areas that are AONB, important conservation areas and SSSI. The FNP says that developments should "not increase the likelihood of surface water flooding within the village or exacerbate foul drainage capacity problems. Flooding is likely to worsen because climate change is expected to bring more intense rainfall events, and the proposed site would prevent natural soakaway. There has been no site-based survey work during the rainy period upon which the development could be based with complex underlying geology.</p> <p>2. Harm to Important Heritage Assets Trails & Historical Buildings of Interest Heritage Assets will be compromised - irreversibly and forever. A full archaeological survey hasn't been carried out just a desk based evaluation. A report states there is potential for unknown heritage assets relating to the Bronze, Iron and Roman age, as well as Medieval. Harm to Important Heritage Assets Trails & Historical Buildings of Interest- This proposed development in contravention to the council's EV1: Conserving and enhancing our historic environment Strategic where the council states it will support proposals that positively conserve and enhance the significance and special character of the Island's historic environment and heritage assets. This proposed development would create substantial harm to this area's most important heritage asset and its setting, both visually, economically and environmentally. It severely risks the conservation, enhancement and enjoyment of one of the most important island heritage assets known as "The Tennyson Mile". Consideration must be given to the fact that this development will materially detract from the asset's significance, it will also damage its economic viability now, and in the future, thereby threatening its ongoing conservation. Significance derives not only from a heritage asset's physical presence, but also from its setting. The public value of the heritage assets is the contribution that they can make to understanding and interpreting our past. The history of this area is an important economic lifeline for islanders and councils alike. For centuries the "Tennyson Mile" area has been an area of inspiration for scientists and explorers, writers, artists, photographers and nature lovers, and it still inspires today drawing many film crews to the area. This proposed development is on a field that is higher than the houses on all the surrounding roads - a development on top will tower above and become a blot on the landscape - highly visible from tourist coach routes on Bedbury Lane and walking routes on Tennyson Down. The Island is dependent on its tourism. This area was the draw of explorers and</p>
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			<p>scientists. The Farringford Historic House and Gardens, grade 1 listed is opposite the proposed site. Any development will create substantial harm to this most important heritage asset. This is contrary to Policy FN6 "The design, location, and layout of all developments should (c) protect, and take every available opportunity to enhance landscape and biodiversity" This is a farm field that is used by several rare and protected species e.g., newts, slow worms, toads, birds including numerous species of raptor and corvid, and mammals such as foxes, badgers, voles, shrews and dormice. Any building on the field will be ecologically detrimental.</p> <p>3. Ecology - The latest report from Woodside Tree consultancy has had whole paragraphs blacked out from their conclusions – obscuring what wildlife is indeed present. It shows that this is a document, paid for by developer and is not impartial.</p> <p>The Council must not ignore the FNP plan it was paid for and requested by the local people of Freshwater. Policy FNP6. Not increase the likelihood of surface water flooding within the village or exacerbate drainage capacity problems. FNP 9 "To ensure the sustainability of the farming sector, including eco-tourism and the promotion of local produce. Other Breaches of Policy FNP6 which demand that all new developments:(a) Be compatible with the distinctive character of the area, respecting the local settlement pattern, building styles, and materials, with reference to the FVDS(b) Conserve and enhance all heritage assets, taking account of their significance(c) Protect and take every available opportunity to enhance landscape and biodiversity, including through the incorporation of landscaping appropriate to the site's context and character(d) Conserve and, where possible, enhance the views referred to in the "Most Valued Views" document. The proposed development is expected to exacerbate congestion, pose unacceptable highway safety impacts, and undermine pedestrian safety. It fails to align with Policy DM17 of the LDP, which mandates sustainable.</p>
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APP2.12	FRESHWATER BAY RESIDENTS ASSOCIATION - FBRA	APP2 as a whole	<p>The proposal to re-designate areas outside of the Freshwater boundary settlement simply provides more homes in an area without improving employment prospects, amenities or affordability. The IPS makes no proposals to improve transport links nor basic infrastructure. This will simply attract more of an ageing population, thus perpetuating an already unbalanced and ultimately untenable position.</p> <ul style="list-style-type: none"> • The IPS rightly identifies an ageing population but makes little attempt to promote strategies which might rebalance the population. Retaining younger Islanders and attracting skilled incomers with good employment opportunities would seem to be the way forward. This also means providing for younger members of the community with schools, and sporting and leisure facilities. There are no firm proposals on these matters. The IPS appears to be more inclined to promote a strategy of managed decline. • Freshwater is a rural village, with exceptional challenges some of which are caused due to our proximity to the coast, and flooding of the Western Yar, regularly returning us to “Freshwater Isle’. • West Wight has been allocated a disproportionate number of houses in relation to our available brown field capacity, social, medical and utility infrastructure. The accommodation of these numbers has been facilitated by the SHLAA process allocating large sites outside our existing settlement boundary. • By re-designating greenfield land as “urban development land” by way of a quietly introduced hardened settlement boundary. This re-designation seeks to subvert many of the protections given to them by their current designation as “Greenfield Sites” of maybe varying, but significant agricultural and ecological value. • The revised settlement boundary, and the SHLAA process itself perhaps, has not been subject to public consultation, and due process. It therefore cannot be referred to within DIPS as the ‘revised settlement boundary’ and should be changed to ‘proposed’. Scrutiny of this point has been widely misunderstood and overlooked by the communities and local public bodies that you are consulting. • The settlement boundary revisions have not been consulted on and do not factor other options, including ‘Exceptional Circumstances (see NPPF Section 5: Delivering a sufficient supply of homes: Paragraph 61)’, National Park status and other options which would lead to a lower, more realistic and achievable target for housing growth.
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APP2.13	Dominic Hicklin	Appendix 2 general	<p>The proposal to redesignate areas outside of the Freshwater boundary settlement simply provides more homes in an area without improving employment prospects, amenities or affordability. The IPS makes no proposals to improve transport links nor basic infrastructure. This will simply attract more of an ageing population, thus perpetuating an already unbalanced and ultimately untenable position.</p> <ul style="list-style-type: none"> • The IPS rightly identifies an ageing population but makes little attempt to promote strategies which might rebalance the population. Retaining younger Islanders and attracting skilled incomers with good employment opportunities would seem to be the way forward. This also means providing for younger members of the community with schools, and sporting and leisure facilities. There are no firm proposals on these matters. The IPS appears to be more inclined to promote a strategy of managed decline. • Freshwater is a rural village, with exceptional challenges some of which are caused due to our proximity to the coast, and flooding of the Western Yar, regularly returning us to “Freshwater Isle’. • West Wight has been allocated a disproportionate number of houses in relation to our available brown field capacity, social, medical and utility infrastructure. The accommodation of these numbers has been facilitated by the SHLAA process allocating large sites outside our existing settlement boundary. • By re-designating greenfield land as “urban development land” by way of a quietly introduced hardened settlement boundary. This re-designation seeks to subvert many of the protections given to them by their current designation as “Greenfield Sites” of maybe varying, but significant agricultural and ecological value. • The revised settlement boundary, and the SHLAA process itself perhaps, has not been subject to public consultation, and due process. It therefore cannot be referred to within DIPS as the ‘revised settlement boundary’ and should be changed to ‘proposed’. Scrutiny of this point has been widely misunderstood and overlooked by the communities and local public bodies that you are consulting. • The settlement boundary revisions have not been consulted on and do not factor other options, including ‘Exceptional Circumstances (see NPPF Section 5: Delivering a sufficient supply of homes: Paragraph 61)’, National Park status and other options which would lead to a lower, more realistic and achievable target for housing growth. • The camp road development should not be an allocated site as grade 2 agricultural land. This is in contravention of policies to protect biodiversity and best farm land. One of only 2 grade 2 sites on the island. the settlement boundary should be hardened to the west of it to preserve the agricultural land, the settlement gap and not create the risk to life that the extra traffic and insufficient access to it as affirmed by Island roads. Other problems include runoff directly into the SSSI.
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Representations on Appendix 3: Site Specific requirements

Rep number	Name of respondent	Paragraph or policy	Summary of issue raised
APP3.1	Rebecca Loader IOW Archaeology & Historic Environment Service	HA002	5 th bullet point Replace 'Given the building is recorded on the HER' with 'Given the building is an undesignated heritage asset recorded on the HER'
APP3.2	Rebecca Loader IOW Archaeology & Historic Environment Service	HA005	Replace with 'Archaeological investigation, including desk based assessment and field evaluation will need to be undertaken. Early liaison with the council's Archaeology & Historic Environment Service is advised.'
APP3.3	Rebecca Loader IOW Archaeology & Historic Environment Service	16 Medina Yard, Cowes	Include: Archaeological mitigation including field evaluation will be required as set out in condition 15 of Planning Permission: P/00496/16. Early liaison with the council's Archaeology & Historic Environment Service is advised.
APP3.4	Rebecca Loader IOW Archaeology & Historic Environment Service	Housing Allocation: HA022 Somerton Farm	Replace text relating to archaeological assessment with: Archaeological investigation, including desk based assessment and field evaluation will need to be undertaken. Early liaison with the council's Archaeology & Historic Environment Service is advised.

APP3.5	Rebecca Loader IOW Archaeology & Historic Environment Service	Housing allocation: HA025 Land rear of 84 Wyatts Lane	Replace text regarding archaeological assessment with: Archaeological investigation, including desk based assessment and possibly field evaluation will need to be undertaken. Early liaison with the council's Archaeology & Historic Environment Service is advised.
APP3.6	Rebecca Loader IOW Archaeology & Historic Environment Service	Housing allocation: HA033	Add paragraph relating to archaeological mitigation: Archaeological mitigation, including field evaluation and a consideration of historic hedgerows and routeways will be necessary. Early liaison with the council's Archaeology & Historic Environment Service is advised.
APP3.7	Rebecca Loader IOW Archaeology & Historic Environment Service	Housing allocation: HA120	Add paragraph relating to archaeological mitigation: Archaeological investigation, including desk based assessment and field evaluation will need to be undertaken. Early liaison with the council's Archaeology & Historic Environment Service is advised.
APP3.8	Rebecca Loader IOW Archaeology & Historic Environment Service	Planning permission: 0/01061/FUL Westridge Cross Dairy and land to the north of Bullen Road Ryde	Archaeological evaluation has already taken place and no further mitigation is required.
APP3.9	Rebecca Loader	Housing allocation: HA064 land	Archaeological investigation, including field evaluation and a review of historic hedgerows will be required.

	IOW Archaeology & Historic Environment Service	north of Mill Road and east of High Street, Bembridge	Early consultation with the council's Archaeology & Historic Environment Service is advised.
APP3.10	Rebecca Loader IOW Archaeology & Historic Environment Service	Housing allocation: HA065 Land east of Hillway Road and south of Steyne Road, Bembridge	Archaeological investigation, including desk based assessment and field evaluation will need to be undertaken. Early liaison with the council's Archaeology & Historic Environment Service is advised.
APP3.11	Red Funnel	All housing allocation HA120	<p>Red Funnel suggests that the policy wording is updated as follows:</p> <p>A brownfield site of approximately 2.4 hectares is allocated at land at Red Funnel and surrounds, East Cowes to deliver a sustainable, high quality mixed use development resilient to climate change and sympathetic to the character of the area and which shall provide delivery of:</p> <ul style="list-style-type: none"> a. approximately 30 homes providing a mix of sizes and an affordable housing contribution in line with H5 and H8; b. tourist accommodation and approximately 520m² of flexible commercial space (use class E); c. demolition of unused buildings; d. terminal buildings with associated marshalling facilities; e. public transport, access and highway improvements as required as well as opportunities to enhance or create links to the local sustainable transport network; f. on-site parking and cycle provision; g. enhanced public realm, open and recreation space; h. pedestrian connectivity improvements; i. appropriate landscaping and boundary treatment; j. an appropriate level of public access to the waterfront; k. an appropriate level of access to the waterfront and marine-related infrastructure, where it is required for existing and future marine and maritime-related businesses l. seawall and coast defence improvements; and <p>any other measures that enhance East Cowes as a destination</p>

APP3.12	Bell Cornwell	Appendix 3	<p>15.1 The allocation of the Pennyfeathers site is welcomed and considered to be sound. Considerable work has been undertaken on the site and Smallbrook Developments Limited is confident it is deliverable. However, we must make a series of comments on the detailed wording of the policy below to ensure delivery.</p> <p>PENNYFEATHERS</p> <p>15.2 The site is a suitable and appropriate to deliver part of the Island’s much needed housing. As noted in the introduction, outline permission was granted for the site in September 2017 for a mixed-use development with up to 904 dwellings, demonstrating through a comprehensive assessment that the site is an appropriate site for a range of uses and is a material consideration. Whilst that consent has expired, Smallbrook Developments Limited are preparing a hybrid application for the site, the emerging masterplan for the site is included as an appendix to this response for information and context.</p> <p>15.3 Work on the application is at an advanced stage. The revised scheme will provide up to 900 residential units (C3 with an element of C2/C3 flexible units), up to 5,500m2 of commercial / light industrial / community flexible space (Use Class E/ F2/ B2 / B8) up to 4,000m2 of commercial / light industrial / hotel flexible non-residential use (Use Class C1/E/B2/ B8) and associated servicing facilities, parking, plant space, open space and landscape treatment. As part of the development proposals, the existing highway network will also be reconfigured, including realignments and junction improvements.</p> <p>15.4 The proposed development will come forward in phases, with details submitted as part of the planning application for the strategic means of access, landscape treatment, layout, scale, drainage and appearance of building that will provide a supermarket and residential dwellings comprising phase 1.</p> <p>15.5 An Environmental Impact Assessment (EIA) scoping opinion has been provided by the Isle of Wight Council and work on the EIA is at an advanced stage and the team is working towards the submission of the hybrid application by the end of 2024.</p> <p>POLICY WORDING</p> <p>It is noted that figure 2.1 sets out the delivery of housing during the plan period for the Core Strategy, from 2012 to 2023. In total over the eleven-year period there has been a shortfall against the number of homes needed of 1,512 dwellings. That is significant number of households unable to access the homes they require. The housing allocation for Pennyfeathers suggests the site should deliver at least 800 homes. Given the housing need on the Island, whilst we recognise the figure is given as ‘at least’ for clarity, this level of development could be increased to ‘at least 875 homes’ to provide the local community with great clarity and better reflect the capacity of the site. By allowing for additional homes on the allocation, not only will it enable it to make a greater contribution to meeting identified need, but this could also result in the delivery of additional affordable housing. Accordingly, there are clear benefits.</p>
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			<p>15.6 It is noted that paragraph 4.40 of the draft plan encourages applications to ascertain whether SANG is required (for developments over 75 dwellings) through consultation with Natural England. However, policy HA119 b requires the Pennyfeathers site to deliver onsite SANG. As part of the pre-application work that has been undertaken, through the Discretionary Advice Service, Natural England has confirmed that due to the distance of the site from the coast, onsite SANG is not required but a contribution to Bird Aware will be applicable. Smallbrook Developments Limited is happy to facilitate a Statement of Common Ground on these issues between themselves, the Isle of Wight Council and Natural England to provide that clarity at the examination.</p> <p>15.8 The housing allocation, by its nature, includes no reference to commercial development. The intention is to deliver a mixed-use development with a range of commercial space, including a supermarket. The site is well located to deliver an element of commercial development, and the intention is to focus the commercial uses along Brading Road, adjacent to the existing commercial uses. As a result, the scheme will deliver significant direct and indirect economic benefits in its own right, creating jobs and enhancing tourism offer. The plan should acknowledge the ability of the site to deliver an element of commercial development as well as residential.</p> <p>15.9 Appendix 2 includes a list of allocated sites and their indicative yield. Ryde Regeneration Area table on page 207 of the plan indicates that the site will deliver a yield of 290 dwellings by 2037. As noted above, the project team are in the process of preparing a hybrid planning application for the site and it is envisaged, should planning permission be granted in a timely manner, then all the proposed dwellings could be delivered by 2037 and therefore within the plan period.</p> <p>In conclusion, whilst some amendments to the policy wording are suggested, the overall allocation of the site is considered sound as it is appropriate and deliverable. It will help to meet the Island's housing and employment land needs, is an appropriate site to deliver development (as demonstrated by the outline permission), and it is deliverable over the plan period.</p>
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APP3.13	Bridget Fox Woodland Trust	Appendix 3	The western boundary of this site is adjacent to an area of approximately 3ha of woodland designated as Ancient Semi-Natural Woodland. The policy should be amended to make explicit reference to the need for 50m buffer in line with Island Plan policy EV5 and NPPF para 186c)
APP3.14	Bridget Fox Woodland Trust	Appendix 3	HA119 We recommend that the policy is amended to recognise the presence of ancient woodland, requiring that any development on site ensures the retention of the woodland remnants. In line with Island Policy EV5 and NPPF para 186c, we request a buffer zone for the ancient woodland fragments within the sites and also between the site and the area of ancient woodland to adjacent to the southern border.
APP3.15	Bridget Fox Woodland Trust	Appendix 3	HA020 - The eastern border of this site is adjacent to an area of woodland of 0.5 Ha designated as Priority Habitat Inventory - Deciduous Woodland (England). Although this area is not ancient woodland, it forms a green corridor to a larger area of ancient woodland (approx. 7 Ha) to the south east of the site. We therefore request that the policy be amended to ensure protection of this green corridor, by requiring retention and buffering of the woodland, in line with NPPF sections 180b) and 180d), and Island Plan policy EV5.

APP3.16	Bridget Fox	Appendix 3	<p>HA036 - The south western area of this site contains an area of approximately 1 ha of woodland designated as Priority Habitat Inventory - Deciduous Woodland (England). This is part of a larger area of woodland of total area 7 ha which forms a green corridor to a large area of ancient replanted woodland (PAWS).</p> <p>We recommend that the site boundary is adjusted to exclude this area of woodland, or that a suitable buffer zone be applied to protect this habitat connectivity, in line with Island Plan policy EV5 and NPPF sections 180d) and 185a) & b).</p>
APP3.17	Guy Robinson Historic England	Appendix 3 HA046: Land at Crossways	The entry here refers to generic policy, when a site specific requirements have been prepared. Delete Generic and replace with Specific
APP3.18	Guy Robinson Historic England	Appendix 3 Housing allocation: HA002	Sound
APP3.19	Guy Robinson Historic England	Appendix 3 HA005	Sound
APP3.20	Guy Robinson Historic England	Appendix 3 Housing allocation: HA006	Though there is intervening development between the site and Golden Hill Fort Scheduled Monument (SM) and vegetation, recognition needs to be made in policy that development of this site has the potential to impact on the setting of the SM if it is sufficiently tall. We suggest wording for consideration.

			<p>While we welcome a requirement for archaeological work to be undertaken, the wording is rather vague, out of sequence and combines uneasily with biodiversity assessment. Also, it misses the distinction between desk-based assessment and field evaluation, as recognised in the NPPF paragraph 200. It would be clearer to list requirements separately, combined with encouragement to liaise with local advisers. “The layout and design of the development should take account of any impacts on the setting of Golden Hill Fort Scheduled Monument (in particular regarding massing) and where possible retain the existing trees, hedges and flower meadow. The meadow could form part of the SANGs, open and recreation space provision.”</p> <p>“Archaeological and biodiversity assessments may need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects. Archaeological investigation, including desk based assessment and, most likely, field evaluation will need to be undertaken. Early liaison with the council’s Archaeology and Historic Environment Service is advised.”</p>
APP3.21	Guy Robinson Historic England	Appendix 3 HA018	Sound
APP3.22	Guy Robinson Historic England	Appendix 3 HA020	<p>We recommend adding a requirement for planting in the eastern edge of the site linked with screening to the cemetery, which is locally listed. “a at least 146 homes providing a mix of sizes and an affordable housing contribution in line H5 and H8; b onsite soft and hard landscaping (<i>incorporating a suitable buffer to the cemetery on the eastern edge;</i>”</p>
APP3.23	Guy Robinson Historic England	Appendix 3 HA022	<p>We recommend adding a requirement for planting in the eastern edge of the site linked with screening to the cemetery, which is locally listed. “Biodiversity assessments will need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects. Archaeological investigation, including desk based assessment and, most likely, field evaluation will need to be undertaken. Early liaison with the council’s Archaeology and Historic Environment Service is advised.”</p>

APP3.24	Guy Robinson Historic England	Appendix 3 HA025	We recommend adding a requirement for planting in the eastern edge of the site linked with screening to the cemetery, which is locally listed. “Biodiversity assessments may need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects. Archaeological investigation, including desk based assessment and, most likely, field evaluation will need to be undertaken. Early liaison with the council’s Archaeology and Historic Environment Service is advised.”
APP3.25	Guy Robinson Historic England	Appendix 3 HA031	We recommend adding a requirement for planting in the eastern edge of the site linked with screening to the cemetery, which is locally listed. “Biodiversity assessments will need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects. Archaeological investigation, including desk based assessment and, most likely, field evaluation will need to be undertaken. Early liaison with the council’s Archaeology and Historic Environment Service is advised.”
APP3.26	Guy Robinson Historic England	Appendix 3 HA036	We recommend adding a requirement for planting in the eastern edge of the site linked with screening to the cemetery, which is locally listed. “Biodiversity assessments will need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects. Archaeological investigation, including desk based assessment and, most likely, field evaluation will need to be undertaken. Early liaison with the council’s Archaeology and Historic Environment Service is advised.”
APP3.27	Guy Robinson Historic England	Appendix 3 HA037	We recommend adding a requirement for planting in the eastern edge of the site linked with screening to the cemetery, which is locally listed. “Biodiversity assessments will need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects. Archaeological investigation, including desk based assessment and, most likely, field evaluation will need to be undertaken. Early liaison with the council’s Archaeology and Historic Environment Service is advised.”
APP3.28	Guy Robinson Historic England	Appendix 3 HA038	We recommend adding a requirement for planting in the eastern edge of the site linked with screening to the cemetery, which is locally listed. “Biodiversity assessments may need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects. Archaeological investigation, including desk based assessment and, most likely, field evaluation will need to be undertaken. Early liaison with the council’s Archaeology and Historic Environment Service is advised.”

APP3.29	Guy Robinson Historic England	Appendix 3 HA110	The site is immediately adjacent to the conservation area as shown in the policies map. This needs to be recognised in the policy. I suggest wording for consideration. "Development should respond sensitively to the character and appearance of the Newport conservation area."
APP3.30	Guy Robinson Historic England	Appendix 3 HA046	We support the policy but note the table on page 207 needs to be corrected to refer to these site specific requirements.
APP3.31	Guy Robinson Historic England	Appendix 3 HA0120	Housing allocation: HA0120 The site includes a local list entry referring to Medina view. This does not seem to be picked up in the text for this site.
APP3.32	Guy Robinson Historic England	Appendix 3 HA064	Sound
APP3.33	Guy Robinson Historic England	Appendix 3 HA065	Sound
APP3.34	Guy Robinson Historic England	Appendix 3 HA0116	Sound
APP3.35	Guy Robinson Historic England	Appendix 3 HA084	The site requirements should refer to the conservation area, noting the site lies within the Shanklin conservation area. Reference is made to character, but we would consider it unsound to omit reference to the conservation area, seeking to conserve or enhance its character. "The development should be of high quality design and reflect conserve or enhance the character of the conservation area, respecting the proximity of the buildings and uses adjacent to the site."

