

Planning Policy Team
Isle of Wight
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19th August 2024

Dear Sir/Madam,

ISLE OF WIGHT COUNCIL LOCAL PLAN REGULATION 19 RESPONSE

Cushman & Wakefield is instructed by the Ministry of Justice to provide a written response to the Island Planning Strategy (Regulation 19) consultation, which is taking place from Monday 8th July 2024 to Monday 19th August 2024.

C&W, on behalf of the Ministry of Justice, has previously submitted comments to site allocation KPS1:HA39 Camp Hill Draft Island Planning Strategy (IPS) in 2021.

Background – Role of The Ministry of Justice

The Ministry of Justice (MoJ) is a major government department, at the heart of the justice system. The MoJ work to protect and advance the principles of justice. Their vision is to deliver a world-class justice system that works for everyone in society. Four strategic priorities to deliver this vision are:

1. A prison and probation service that reforms offenders
2. A modern courts and justice system
3. A Global Britain that promotes the rule of law
4. A transformed department that is simpler, smarter and more unified

The MoJ is responsible for many parts of the justice system including Courts; Prisons; Probation services; and Attendance centres. Relevant to this consultation response is the MoJ's responsibilities for prisons. The priority outcomes for the MoJ are:

1. Protect the public from serious offenders and improve the safety and security of our prisons.
2. Reduce reoffending.
3. Deliver swift access to justice.

Land interest

The MoJ owns several parcels of land on the Isle of Wight, comprising:

- HMP Parkhurst and HMP Albany (both operational);
- HMP Camp Hill, which was decommissioned in 2014; and
- Adjacent land including areas previously used in association with the former HMP Camp Hill.

Policy KPS1 Key priority site 1: HA39 Camp Hill

“A mix of brownfield and greenfield land at the former HMP Camphill as shown on the policies map is allocated for sustainable high-quality mixed-use development, resilient to climate change and which shall provide delivery of all of the following:

- a. At least 750 homes providing at least 35 per cent affordable housing and a mix of housing sizes in line with H5 and H8.*
- b. Approximately two hectares of serviced employment land for office, general industrial or storage and distribution uses (class E and B2 or B8 uses) as appropriate to the site and its wider context, ensuring that there is a mix of unit sizes. Support will also be given to other employment generating uses provided they are compatible with the immediate surroundings and do not conflict with town centre uses.*
- c. Community use floorspace (class E uses).*
- d. An improved road network to allow ease of movement to and through the site.*
- e. Public transport improvements.*
- f. Multiuser links to the existing sustainable transport network and the wider area.*
- g. A mix of on-site SANGs, open and recreation space and improvements to Parkhurst Forest as a recreational space.*
- h. utilisation of buffers to the ancient woodland and SINC for enhanced landscaping and biodiversity improvements.*
- i. a site wide district heating system to which all development will connect, with preference given to using heat from the Forest Road energy from waste facility, subject to viability and technology. In order to address sustainable development issues, the site should be developed in accordance with a whole site masterplan prepared by the developer or landowner in conjunction with the local community and agreed by the Isle of Wight Council. The masterplan should ensure that:*
- j. the design and layout accords with the National Model Design Code, relates positively to the surrounding area and does not have an adverse impact on the amenity of surrounding properties;*
- k. existing trees and hedgerows on the site are maintained and enhanced wherever possible and management put in place to support their future retention and maintenance;*
- l. opportunities for connections into and from Parkhurst Forest are fully explored together with working*

with Forestry England on other joint ventures where there is a benefit for new and existing residents, for example through contributing to improvements to the existing recreational function of Parkhurst Forest;

- m. there is adequate provision for surface water run-off and due consideration of flood risk elsewhere;*
- n. good links to the wider footpath and cycle network are provided;*
- o. highway improvements necessary for the development to go ahead are delivered;*
- p. the development is appropriately phased alongside required infrastructure. Proposals will not be permitted where they prevent a comprehensive approach to the delivery of development and infrastructure across the whole site and the surrounding sites allocated for development;*
- q. the development conserves the significance of the heritage assets on the site and uses these assets to reinforce the cultural connections between the site and its surroundings. Ensuring a sustainable future for the Camp Hill prison buildings is encouraged.*

Archaeological, historic and biodiversity assessments must be undertaken to assess potential impacts, inform design proposals (avoiding adverse impacts where possible) and provide mitigation where appropriate.

The council will prepare a supplementary planning document (SPD) to include KPS1 and nearby residential and other land use allocations to ensure a comprehensive approach to infrastructure planning and delivery. Opportunities should be taken to co-ordinate any community and social provision from the Camp Hill site with that provided from both KPS2 Newport Harbour and land allocated under policy C4 health hub at St Marys to ensure that the schemes deliver maximum benefit for local residents. The SPD will also need to be informed by proportionate heritage impact assessment.”

MOJ Response

Within its previous response in 2021, the MoJ confirmed it broadly supports in principle the creation of a sustainable, mixed-used, multi-tenured, high quality designed new neighbourhood. The MOJ highlighted the importance of development viability in order to ensure the strategic land use allocation can be developed. The viability of this development site is a critical factor that determines whether a project can proceed. This assessment is particularly important in the current economic climate, where factors such as inflation and interest rates can significantly impact both the costs of construction and the prices buyers are willing to pay.

It is noted that the Local Plan Viability Report (July 2022 update by Aspinall Verdi) confirms that the viability risk to the strategic allocation is high and states:

“This policy places specific requirements upon the site and we have appraised a strategic site typology to reflect this. We would recommend engaging with the landowner / promoter / developer up front before plan adoption to ensure the viability modelling reflects the known infrastructure requirements but also appraisal inputs in terms of land value.”

The MOJ is keen to continue engagement with your authority in relation to the above. Matters of viability

need to be considered prior to the submission of the Local Plan for consideration by the Inspector and demonstrate that the site is deliverable.

MOJ recognises the need for affordable housing within the Island but also continues to have significant concerns about the site's capability of delivering 35% affordable housing due to the high costs associated with site remediation and infrastructure improvements.

Notwithstanding the above comments, the MoJ remain committed to working in partnership with the council and key stakeholders to assist in the potential delivery of this key priority site subject to the site no longer being required for criminal justice purposes. It should be emphasized that a decision on the MoJ/HMPPS future requirements for the site has not yet been made. MOJ welcomes continued dialogue, analysis and discussions.

It is noted that a masterplan for the whole area will be agreed by the Council to guide the phasing and delivery of this site. The production of a masterplan is strongly encouraged by the MoJ. This will be essential not only to work out the phasing and delivery but also working out the quantum of development that can be delivered, the spatial distribution of built form and public open space and how the site knits into the surrounding area. Any masterplan will need to work with the current and future operational requirements of the MoJ's estate on the island.

Next Steps

We look forward to receiving confirmation that these representations have been received and we reserve the right to comment on future rounds of consultation. Should you have any questions or require any further information please do not hesitate to contact me direct.

Yours sincerely,



Ugne Staskauskaitė MRTPI

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