

## Response to the Island Plan from Robert Seely, Member of Parliament for the Isle of Wight (Final Draft)

I would like to thank Council Officers for their work on the three planning challenges outlined in the report (social, economic and environmental). I am also aware of the legal necessity of the plan.

I am grateful for references in the Island Plan for the need to protect the Island. I also note the worsening affordability (para 2.17) mentioned. I support, with reservations, the idea of rural exception sites (DHWN 7). I welcome farm diversification, provided this is done in a sensitive way (p. 65). I support: SGOE 7 (p. 81) calls for shopping areas in town centres, and for housing above existing shops to be supported, for a shared path route in the West Wight BCI 1 (p.88), improved connectivity between Island Line and the Steam Railway in BCI 4 (p.94), the blue light hub in CSSHC 8 (p. 107), renewable energy in CSSHC 9 (p. 108), community-led planning in CSSHC 14 (p. 119), conserving and enhancing our historic environment (p. 121), protecting and providing green and open spaces in HQE 4 (p. 127), preserving settlement identity in HQE 7 (p. 132) and dark skies in HQE 9 (p. 135).

I believe that house building on the Island needs to serve - as much as possible - the needs of Islanders. In general, I believe that we need a policy that can support sustainable development. I support plans for the Council to become more engaged in shaping the house-building market on the Island. I support plans to set up an Island housing company to build affordable homes for Islanders.

**However, I strongly oppose the Government-imposed housing targets accepted in the Island Plan. Therefore, I will not be supporting the Island Plan in its current form. I am concerned for the following reasons:**

- First, every year we are due to build, on average, over 600 homes. This target is not deliverable due to the lack of building capacity on the Island. The industry, even with moderate imports of labour, can just about build 250-300 houses per year.
- Second, we do not have the infrastructure to support significant extra housing which is expected to take place over the next 20 for 50 years, and thanks to factors such as the Green Book funding formulas, we are unlikely to get the necessary funding for infrastructure.
- Third, the current housing is not being built for Islanders. There is almost no population growth on the Island. Most developments are not designed for local people, but for the broader South East England housing market. We allow the building of three and four-bed houses when demand from Islanders is for one and two-bedroom properties. As a result, our young people are unable to find or afford the right housing and are forced off the Island. This export of people of working age undermines our economy.
- The Island's economy is in part dependent on a tourism economy. The Island's landscape has a significant economic worth and value in its own right. This worth is damaged if the housing targets are too high. The beauty of our Island is actually key to its sustainable success – from attracting high-skilled jobs and employees with the outdoor lifestyle we can offer, to sustaining and enhancing the tourist experience. **Destroying our landscape to build sprawl greenfield housing that Islanders can't afford is directly counter to building a sustainable economy and the interests of Islanders.**
- There is a fundamental confusion between local need (e.g. the housing needs of people living here) and external demand (people wanting to buy a second home or move to the Island to retire). Local demand is for between 200-300 homes per year. Indeed, the numbers of affordable homes built is shocking. Last year, 1,341 new homes in 2017 (financial year) were agreed. Of those, 340 homes were built. Of that, 34 were affordable. The majority were three and four-bedroom housing.
- By accepting targets that it cannot fulfil, the Council leaves itself open to developers to be able to cherry-pick greenfield sites and force through inappropriate developments. It would be considerably better for the Council to challenge housing figures now than accept one it has no hope of fulfilling.
- Historic human interaction with the landscape. As well as having significant economic worth, the landscape as very considerable worth in its own right due to its role as a source of inspiration for artists over the past two hundred years. This applies to designated and non-designated land. Yet only designated land is seen in this Plan to have worth. This makes the same mistake that we have made for half a century – to prioritise quantity of development over quality and type of development as well as landscape protection.

- We should not be basing the Island’s housing need on the current target system, which is arbitrary and flawed, as this report from the CPRE explains: <https://www.cpre.org.uk/resources/housing-and-planning/housing/item/4158-set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside>
- There is simply no public support on the Isle of Wight for large-scale house building. The idea of building 7,000 homes on greenfield sites has zero public support.

**Therefore, I cannot see how the Island Plan claims to ‘reflect the needs of Islanders’ when its housing targets are not designed to meet the needs of Islanders. I also find it remarkable that the Island plan is described as supporting sustainable development when it will unleash wave after wave of greenfield development to build housing that Islanders can’t afford.**

I have additional concerns:

- I would love to know how communities can keep their sense of identity given the level of house-building (para 3.60).
- I see little hard thinking about sustainable development (i.e. PSDG1 on p. 31) with the level of building planned, only half of which is designed to meet local demand.
- I find it difficult to see how the Island’s “environment and unique island characteristics are celebrated,” not to mention its visitor destination location and need to support young people, can be delivered under the current plan (box below para 4.3).
- I am very concerned what PSDF 2 implies. I would like to state now that I will appeal to the Secretary of State against any major planning applications that I do not believe are in the interest of the Isle of Wight (p. 32).
- I cannot see how the current housing targets are in any way ‘sustainable’, which is a word which appears in the Island Plan a great deal.
- I would also like it noted that, currently, I support only one new garden community development, for Camp Hill. I am, in particular, shocked by the Island Plan outline of a new community (DHWN 4) in the Wellow/Calbourne corridor (Para 319). This shows the need for an extension to the AONB to prevent overdevelopment and sprawl. I wish to make it very clear that - as far as things currently stand - I will be challenging this decision through my powers as MP. I do not believe that this option is viable (para 5.47).
- In addition, I am very concerned that 2,000 homes have already given planning permission. Why are developers, especially on greenfield sites, being granted planning permission if they have a record of non-delivery?
- None of the figures in DHWN (p. 41) are acceptable. The idea that the Island can accommodate 700 new homes per year is simply wishful thinking.
- In addition, I question how the strategic priorities set out on p. 44 can be met. I see no support on the Island for housing targets. I see no indication of how we are going to be conserving and enhancing our historic environment (p. 121). I do not see how settlement identity can be preserved (p. 132). I have been disappointed that the Council has in previous years supported major developments in the AONB.
- The Council calls for the right mix of housing (DHWN 8). For decades, we have had the wrong mix of housing.
- I would like more details on (SGOE 1). I am concerned at the level of greenfield development and believes that this sends entirely the wrong message.

#### **Changes that I wish to see made**

- I believe that the Council - with my support - needs to request that the Island seeks **Exceptional Circumstance** to change its allocated housing target and to agree a more ambitious agenda for providing housing for Islanders. Exceptional Circumstance is specifically recognised as a viable and accepted reason for changing housing targets in

the Department of Housing, Communities and Local Government Draft Planning Practise Guidance.<sup>1</sup> I am concerned that the Council has not sought this option already.

- This clearly means challenging the Objectively Assessed Needs (OAN) and putting an alternative case. There is scope to do this both in the Draft Planning Practise Guidance as well the 2018 NFPP update, which states in paragraph 60 that: “strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”<sup>2</sup>
- The Council should now make a public statement to assume against all greenfield development unless it is of genuine strategic interest. We should not build to meet arbitrary Government targets.

### The result

- We will seek to change our annual house-building targets from approx. 640 to 200-300 houses per annum, **but increase significantly the percentage of housing designed for Islanders**. In practice this will mean 200-250 properties per year being delivered for Islanders in a variety forms, rather than the 35-40 or so which are being built at the moment. If developers wish in addition to redevelop properties, they are more than welcome to do so.
- This new target will entail some new house building, perhaps 200-250 per year, whilst repurposing other property. Here are some ideas for the Council to:
  - Work with housing associations to see options for a **buy-back scheme**, whereby bungalows are bought and repurposed, for example by adding an extra floor to create two properties. The Council should adopt this as a planning aim.
  - Identify empty properties and use what powers are available by the Council to encourage these properties to be used or put onto the market.
  - Encourage the use of property above shops to be repurposed for housing.
  - Identify grant opportunities to support the Island’s **local** housing-building agenda.
  - Develop the 35 sites it has and uses them to prioritise development Islanders rather than allow development of private and greenfield farmland. In particular, that the Council work with me to ensure that Camp Hill can be taken into Council use to ensure a modest and consistent supply of land for housing, and thereby taking the pressure of other areas of the Island.
  - Withdraws all marginal sites from the SHLA, especially close to or between Areas of Outstanding Natural Beauty.
  - Rule out the creation of large-scale new so-called village sites, with the exception of the brownfield Camp Hill site.
- However, achieving a National Park status or Island Park status may be the only way to deliver a housing plan that works for Islanders. Along with other benefits, this would give further support in putting in place a housing strategy that would serve local needs, and crucially, would not destroy our beautiful landscape to service external demand and arbitrary Government targets.

**To help inform Islanders, I would like the Council to make a public statement to answer the following:**

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<sup>1</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/687239/Draft\\_planning\\_practice\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/687239/Draft_planning_practice_guidance.pdf), p. 24.

<sup>2</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)

- How many acres of greenfield sites does the Council think will be developed under this plan over the next 10/15 years?
- In Para 2.23, the Island Plan states that the Island's population is increasing. Is this due to external demand or internal demand? Is there any attempt to understand local housing need, as opposed to external demand?
- Para 2.36 states that the local population is skewed towards over 65s. Does the Council believe that the house-building strategy of the past 25 years has contributed to that? In para 2.37, the Plan states that the population of working age is decreasing. Does that not reinforce the need for a housing strategy geared towards younger people and Islanders?
- In page 3.1, the Plan states that the vision for the Island is for, "an inspiring place in which to grow up, work, live and visit". I would like to know how the Council's planned overdevelopment affects this vision?
- If the Council will join me in a joint letter to the Secretary of State for DCLG calling for the Island to apply for Exceptional Circumstances and to forcefully make that case in submissions?
- Has there been any attempt to question or reduce the imposed housing targets?
- What value does the Council put on non-designated land?
- Does the Council recognise that the NPPF provides some scope for lowering housing targets?
- Can the Council confirm that it wishes to see 7,000 houses built on greenfield sites?
- The Council argue that affordable housing demand (para 5.57) is at 242 dwellings per year. I do not understand why the Island cannot build to that target of 242 homes per year? This could be achieved through a Council-house building company, the kind of which the Council aims to establish. What changes in law are required for the Council to achieve this aim?
- What has been done to ensure that brownfield sites are being used both for housing but also employment sites.
- Finally, I would like please to be kept informed of all and any Planning Officer discussions concerning medium and large-scale developments on the Island.

**Ends**