

Response to Draft Island Planning Strategy

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Section 4 Environment	From 46	<p>No reference to climate change or carbon emissions.</p> <p>We note that there is some relevant content in the Community Section, but as the world's most pressing environmental issue – the Environment section should also have a key focus on Climate Change.</p>	<p>To support the implementation of the recently adopted Climate and Environment Strategy¹ include a new policy which ensures that new development is net carbon zero (though mitigation) and makes developers accountable for this.</p> <p>Consider including the relevant RTPI Guidance in as background evidence²</p>
Section 5: Community C2: Improving Our Public Realm	88	<p>We welcome the reference to pedestrian and cycling connections but feel that the policy wording is ambiguous</p>	<p>Amendments in red:</p> <p>All proposals for major development must ensure that existing and new public realm is well integrated into the design, with street layouts and public spaces allowing for easy, clear and legible pedestrian and cycle connections which are compliant with Local Transport Note 1/20³, high quality public spaces and green infrastructure or access to it.</p> <p>Development proposals that enhance the public realm to improve soft landscaping, visual amenity and pedestrian and cycling connectivity will be supported.</p>

¹ <https://iow.moderngov.co.uk/documents/s1870/Climate%20and%20Environment%20Strategy.pdf>

² <https://www.rtpi.org.uk/media/3568/rising-to-the-climate-crisis-1.pdf>

³ <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>

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C15: Community led- Planning	113	With the Council empowering local communities to develop Local Cycling and Walking Infrastructure Plans for their areas, the policy would benefit from a reference to this.	Where town and parish councils have undertaken place plans (including Neighbourhood Plans, Local Cycling and Walking Infrastructure Plans) and/ or master planning work that has been endorsed by the council, development proposals should demonstrate how they contribute to achieving the aims of the community-led plan
Section 6: Growth G1 Our approach towards sustainable development and growth	116	<p>Not clear whether the crossing over the River Medina referenced in Policy G1 is the road crossing or the crossing at Newport Quay as included in the LCWIP. Please can this be clarified?</p> <p>The Island has ambitious plans for cycling and walking, and, as reflected in the current and emerging LCWIPs – which go much further than the two routes specified in the policy.</p>	<p>Amend:</p> <p>To facilitate travel on the Island, improvements to the existing road network, particularly in Newport are planned and a crossing over the River Medina is being investigated. The provision of a multi-user route between the West Wight and Newport and the completion of the East Cowes to Newport multi-user route will help facilitate more journeys by sustainable modes of transport.</p> <p>To:</p> <p>To facilitate travel on the Island, improvements to the existing road network, particularly in Newport are planned and a crossing over the River Medina is being investigated. The provision of cycling and walking infrastructure as set out in the current and future Local Cycling and Walking Infrastructure Plans will facilitate more journeys by sustainable modes of transport.</p>

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G3 Developer contributions	121	Disproportionate emphasis on highways and junction improvements.	<p>Amend:</p> <p>Highway infrastructure, including the provision of sustainable transport routes and facilities. Where relevant, contributions or provision shall relate to projects that have been identified through the council's infrastructure delivery plan and detailed junction design work related to it.</p> <p>To:</p> <p>Transport infrastructure, including the provision of sustainable transport routes and facilities. Where relevant, contributions or provision shall relate to projects that have been identified through the council's Infrastructure Delivery Plan and Local Cycling and Walking Infrastructure Plans.</p>
Section 7: Housing H3 Housing Development General Requirements	140	Currently there is no reference to cycling infrastructure, or recognition of cycling	<p>Amend</p> <p>new or extensions to footpaths or pavements, when relevant these shall be designed to take account of pedestrian safety, pedestrian and vehicular intervisibility and incorporate any natural features;</p> <p>to</p> <p>new or extensions to (Local Transport Note 1/20 compliant) footpaths, pavements or cycle infrastructure , when relevant these shall be</p>

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		<p>Emphasis on contributions for off-site junction improvements is disproportionate and not compatible with the principles of sustainable development. Implies that off-site contributions will only be taken for junction improvements and that all development will generate a significant net gain in private vehicle trip generation.</p>	<p>designed to take account of pedestrian and cyclist safety, pedestrian, cyclist and vehicular inter-visibility and incorporate any natural features;</p> <p>Amend</p> <p>“proportionate contributions to improvements to off-site junctions identified in Tables 9.1 and 9.2, if required.”</p> <p>To</p> <p>“proportionate contributions to off-site transport infrastructure (T1 and T2)”</p>
<p>Section 8: Economy</p> <p>E9 Supporting high quality tourism</p>	185	No reference to sustainable transport or active travel	<p>Add additional bullet point as follows:</p> <p>[Proposals should demonstrate how they]:</p> <p>Promote and facilitate active travel and create no net gain in private car trips.</p>
<p>Section 9: Transport</p> <p>T1: A Better Connected Island</p>	192	The key infrastructure schemes named in the policy appear to be just a selection of schemes and it’s unclear why these have been prioritised for contributions. The reality is that the Council can seek contributions for many more schemes than those listed.	Make it clear that the list of schemes are just a selection e.g. ‘schemes include...’
Para 9.5	193	‘The council is charged with promoting sustainable transport’ is a strange form of words. Makes it sounds like the Council has committed an offence by promoting sustainable transport!	Reword

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Para 9.7	193	<p>The narrative references the Island Infrastructure delivery work, but the Infrastructure Delivery Plan isn't included in the Evidence Library so it's not clear whether the list of costed schemes is based on the IWC Troy Planning Report⁴, or the Solent LEP Lichfields Report⁵.</p> <p>Furthermore, we would question the validity of using pre-pandemic evidence as justification for the list of schemes. Numerous studies have concluded the workplace and business travel have changed forever as a result of Covid.</p>	<p>Provide a source for the list of infrastructure schemes.</p> <p>Make reference to Local Cycling and Walking Infrastructure Plans which also include lists of costed schemes.</p>
Para 9.11	194	<p>Isle of Wight Council published its Infrastructure Funding Statement⁶ in December 2020 setting out its approach to securing planning obligations through new development, as means of mitigating the negative off site impacts of development. The statement makes reference to the 'tests' by which planning obligations can be sought, which include:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; • fair and reasonably related in scale and kind to the development. <p>The Statement goes on to identify in para 2.6 that <i>where contributions or works are required for highway or sustainable transport improvements, these are agreed on a case by case basis, following consultation with Island Roads, on behalf of the Council as Highway Authority and the details contained within any submitted transport assessment.</i></p> <p>Para 9.11 makes lengthy reference to collecting developer contributions to improve the Strategic Road Network and lists up to 30 specific junction</p>	<p>Either list all transport infrastructure schemes which developer contributions can be collected for, or remove the list of junction improvements from the document.</p>

⁴ <https://www.iow.gov.uk/azservices/documents/2981-2018.10.26-IoW-IDP-.2.pdf>

⁵ <https://solentlep.org.uk/media/2324/15735-iiip-final-report-300518.pdf>

⁶ www.iow.gov.uk/documentlibrary/view/infrastructure-funding-statement-2020

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		<p>improvement schemes at which the funding would be used. It goes on to state that <i>These [junction improvement] schemes are important to achieving the vision, objectives and requirements of the IPS and any development proposals that prejudice the implementation of these schemes will not be permitted.</i></p> <p>CycleWight raises the following questions:</p> <ul style="list-style-type: none"> • The Vision for Transport (p19) states that <i>we can encourage people to move around as much as possible without using a motor vehicle</i>, so why are the proposed junction improvements important to achieving the vision? • What is the extent of the Strategic Road Network on the Isle of Wight? (In Department for Transport terms, the Island doesn't have any strategic road network⁷ as managed by National Highways (formerly Highways England)). • What is the strategic objective of improving the junctions as listed? Is it to reduce congestion, improve network capacity, improve highway safety or the safety of vulnerable users? • How do the junction improvements meet the tests for securing transport obligations without an admission that the development will increase private car trip generation? • What is the evidence base which presents the need for the junction improvements. An SRTM Modelling Report (2018) is available as supporting evidence but this is pre-pandemic when people still travelled to a workplace. CycleWight would question whether this is still a valid evidence base given that numerous studies now suggest that workplace and business travel have changed forever as a result of the pandemic and improved digital connectivity. 	

⁷ https://highwaysengland.co.uk/media/qe1cjb2b/lee21_0022_network_management-03-03-2021_v4.pdf

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		<ul style="list-style-type: none"> • Why is a disproportionate amount of narrative given to collecting contributions for junction improvements, it gives the impression that these are the priority? We would make the case that other schemes are required to support the Councils own declaration of a climate emergency and the targets in its recently adopted Climate Change and Environment Strategy. <p>Importantly, CycleWight would conclude that prioritising the allocation of planning obligations towards junction improvements is direct recognition that new developments will act as significant trip generators for the highway network, and is therefore at odds with:</p> <ul style="list-style-type: none"> • The principles of sustainable development • The targets and objectives of other Council Strategies, such as the Climate Change and Environment Strategy, and the emerging Local Transport Plan 4. • Disproportionate to the scale of trip generation arising from development proposed in the draft Island Planning Strategy. 	
T2 Supporting Sustainable Transport		<p>We were surprised to note that there is only a single reference to Local Cycling and Walking Infrastructure Plans in the Transport Chapter narrative or policies. Local Cycling and Walking Infrastructure Plans (LCWIPs), as set out in the Government’s Cycling and Walking Investment Strategy, are a strategic approach to identifying cycling and walking improvements required at the local level. They enable a long-term approach to developing local cycling and walking networks, ideally over a 10 year period, and form a vital part of the Government’s strategy to increase the number of trips made on foot or by cycle.</p> <p>Isle of Wight Council adopted its first LCWIP in April 2020, covering Newport and Ryde, presenting over 50 costed cycling and walking schemes in the two towns. We understand the Council will shortly be</p>	Ensure that LCWIPs are properly reflected in the Policy and the supporting narrative.

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		<p>setting out its approach to expanding the geographic coverage of LCWIPs on the Island using an allocation of funding from its Department for Transport Capability Fund grant.</p> <p>The Department for Transport LCWIP Technical Guidance⁸ sets out how local authorities should integrate LCWIPs into transport land use planning, including:</p> <p><i>Local planning authorities should consider incorporating LCWIPs into Supplementary Planning Documents where this would build upon and provide more guidance on the policies in the Local Plan. Local authorities may also wish to refer to LCWIPs in Area Action Plans and Neighbourhood Plans.</i></p> <p><i>Where Neighbourhood Plans are being prepared at the same time as the LCWIP, the parish or town council, or neighbourhood forum should be encouraged to engage positively with the LCWIP process.</i></p> <p><i>The benefits of incorporating LCWIPs into local planning policy are to:</i></p> <ul style="list-style-type: none"> <i>• ensure that appropriate consideration is given to cycling and walking in all local planning and transport decisions, and identify potential policy conflicts</i> <i>• add to the evidence base which can be used to support a Local Plan, Neighbourhood Plan or Local Transport Plan</i> <i>• enable the consideration and adoption of wider policy levers to encourage more walking and cycling</i> <i>• enable authorities to seek appropriate contributions to the provision of walking and cycling infrastructure when drawing up the Regulation 123 list for the Community Infrastructure Levy; through planning agreements</i> 	

⁸ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908535/cycling-walking-infrastructure-technical-guidance-document.pdf

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		<p><i>in the form of Section 106 obligations; and when Section 278 highway agreements are made</i></p> <ul style="list-style-type: none"> <i>• identify places where new strategic cycling or walking routes can be delivered by a new development, and ensure the protection of alignments for future planned cycling and walking routes</i> <p>CycleWight would encourage Isle of Wight Council to give due consideration of LCWIPs in the Island Planning Strategy, and as a minimum, include 'Schemes identified in LCWIPs' as an additional category for planning contributions in Policy T1 (none of the cycling and walking schemes currently listed are within adopted LCWIPs).</p>	
T2 Supporting narrative	196	<p>The Council has been successful in securing DfT funding to deliver sustainable transport programmes in recent years, and has published a wealth of evidence⁹ around how these funding programmes have delivered positive outcomes in terms of mode shift and carbon reduction.</p> <p>Much of this evidence is relevant to Policy T2 and could be used to strengthen the Policy and it's supporting narrative.</p>	Reflect Access Fund outcomes in the supportive narrative.
T1 and T2		There is significant overlap between Policies T1 and T2 which causes confusion for the reader.	
T4 Supporting our railway network	199	<p>We are surprised that this policy makes no reference to the Council's recent submission to the Restoring Your Railways Fund, presenting the Strategic Outline Business Case¹⁰ for reopening rail corridors between Newport and Ryde and extending the existing Island Line to Ventnor. CycleWight welcomes this initiative as both a mechanism for reducing private car use, and because the proposal commits to retaining and enhancing traffic free routes which currently follow the former rail corridors.</p>	To add an additional bullet point to the Policy, supported by narrative, which references the ambition to reopen the Newport to Ryde railway and extend Island Line to Ventnor.

⁹ <https://www.iow.gov.uk/documentlibrary/view/isle-of-wight-access-fund-for-sustainable-transport-report-year-3-report>

¹⁰ <https://iwightinvest.com/regeneration-prospectus/restoring-your-railway/>

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		To be successful it is essential that the medium term proposals for reopening rail lines are reflected in the Island Planning Strategy, both within the policy and the supporting narrative.	