

NITON AND WHITWELL PARISH COUNCIL

RESPONSE TO DRAFT ISLAND PLANNING STRATEGY

Pg	Para/ Policy	Comments and observations
8	1.6	It would be helpful to have a definition of the part played by Parish Plans and Village Design Statements in the planning process
13	2.9	We note your observation: <i>Monitoring indicates that there seems to be a ceiling when it comes to the delivery of housing, as it has averaged around the 400 dwellings per year mark over this period and this might indicate a saturation point for the Island's housing market.</i>
14	2.10	With regard to the lack of affordable housing: a) a common approach used by developers is to build by multiple phases of 9 units at a time, thus avoiding the requirement for affordable housing on site; b) affordable housing is commonly confused with social housing
14	2.13	The objectively assessed housing requirement identified using the Government's methodology is 641, which is 60% above the empiric saturation point of 400
15	2.15	Lack of available larger sites: our experience is that developers delay the development of parts of a larger site in order to avoid affordable housing obligations. The proposed Chatfeild Road, Niton, (HA102) development is potentially an example of this.
16	2.32	<i>The Island is unique within the UK in having all of its mainland links provided by private sector companies, with no public service obligation and/or no community-based service level agreement.</i> The consequences have been keenly felt in recent months.
16	2.33	<i>... the Island is not driven through as part of a longer, onward journey. This means that we are not influenced or burdened by through traffic.</i> This also means the Island does not receive funding for trunk roads as all 'A' roads are officially classed as local. Undercliff Drive is a prime example.
16	2.35	In the mid to late 1980s, a flyover for traffic traversing Coppins Bridge between the Cowes and Sandown directions was being considered.
29	3.77	Niton will have benefitted from managed growth, where developments are well designed and have been brought forward in a coherent and phased manner. Measures should be implemented to ensure the phased manner does not preclude affordable housing; see 2.15 above.
29	3.78	<i>Small-scale high quality residential development in Whitwell has maintained the strong sense of community, and has provided community facilities, which may have incorporated play space.</i> The inference is that the statement relates to Whitwell in 2035 subsequent to development HA105, but clarification is needed.
30	3.86	Sustainable transport routes are desperately needed in rural settlements and not just between the new settlement and Sandown / Shanklin.

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30	3.89	<p><i>Community healthcare facilities are provided through a well-located locality hub. This looks suspiciously like the CCG's scheme, the subject of public consultation in January 2017 and vehemently opposed in Niton and Whitwell.</i></p> <p>The current Island Plan states: <i>There are eleven Rural Service Centres: Arreton, Bembridge, Brading, Brighstone, Godshell, Niton, Rookley, St Helens, Wootton, Wroxall and Yarmouth and these are shown on the Proposals Map and Key Diagram. These are all settlements with a population of around 3,000 or less. Not only do they provide important facilities for their residents, they also support a wider range of nearby smaller, more rural villages and hamlets. Rural Service Centres were identified following consultation, input from the SA/SEA and the preparation of a Rural Sustainability Matrix.</i> <i>The Rural Sustainability Matrix established a hierarchy of settlements across the Island based upon access to local shops, transport networks, local schools <u>and health provision</u>. The Matrix was applied to settlements across the Island, which were then scored against the criteria and the highest scoring settlements have been identified as Rural Service Centres.</i></p>
34	PSDG 3	<p>Niton remains a Rural Service Centre.</p> <p>However, under SP1 Spatial Strategy, proposals for greenfield and/or non-previously developed land within or immediately adjacent to Rural Service Centre settlement boundaries had to demonstrate that deliverable previously developed land was not available and an identified local need would be met. We note that SP1 is to be replaced by PSDG1, PSDG2 and, most significantly for this Parish, PSDG3.</p> <p>Whitwell is classed as a Sustainable Rural Settlement, presumably post HA105. Whitwell, with a garage and public house but no shops, scant public transport and only a satellite Post Office operating from the Parish Church two mornings a week, is barely sustainable currently.</p> <p>Proposal 2.:</p> <p><i>2. Clearly contribute to meeting the Island's objectively assessed housing need, economic aspirations or achieving Island-wide regeneration aspirations when they are located outside of, or not immediately adjacent to the settlement boundaries.</i></p> <p>represents a major change from current policy. Currently, there is an onus on the developer to establish a specific need to develop other than within or immediately adjacent to the settlement boundaries of the Primary Settlements, Secondary Settlements and Rural Service Centres. The new proposals merely require that the development clearly contributes to meeting the Island's objectively assessed housing need.</p>
34	4.10	<p><i>... or settlements where planned growth will enable them to become more sustainable.</i></p> <p>What happens in the interim until the settlements become more sustainable, particularly with regard to rural bus services such as the Southern Vectis number 6, which is commercially unviable?</p>
36	PSDG 4	<p>Is "affordable housing", priced at 20% below market value, actually affordable on the Island?</p>
37	4.27	<p><i>... the council will continually review the most appropriate mechanism for collecting developer contributions and will consider whether CIL should be introduced.</i></p> <p>What is the Council's perceived mechanism and timescales for considering CIL as a replacement for s106 agreements? How will town and parish councils be involved?</p>
47	DHWN 3	<p>What is the protocol for assigning "HA" status?</p> <p>Given the implications for the development of land with HA status, local consultation should surely form part of the process, as in the case of planning applications.</p>

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47	DHWN 3	<i>3. Improved access to public transport.</i> How will this be realised in rural areas?
52	5.52 5.53	Development which both preserves the character and quality of the local environment and is sympathetic to the character of properties in the immediate area in terms of height, scale, mass, design, appearance and materials is a priority for the Parish Council.
53	5.54	The Parish Council's Housing Needs Survey 2014- 2019 clearly identified a need for affordable housing within the Parish.
53	DHWN 6	In the case of less than 10 dwellings, will contributions be pro rata? Will contribution be retained within the Parish?
54	5.57	<i>The council's Housing Needs Assessment identifies that an annual figure of 242 dwellings per annum should be provided to meet the affordable housing need, based on an overall housing need of 641 dwellings per year (2). The council's annual monitoring report 2017/18 identified that 18 affordable housing units were delivered. For 2016/17 it was 34 and 35 in the monitoring year 2015/16.</i> Are the targets being set anywhere near realistic?
55	5.67	Is HA105 in Whitwell a rural exception site?
56	5.73	<i>Rural exception sites are defined in national planning policy. Key elements of this definition are that they are small sites used for affordable housing in perpetuity where sites would not normally be used for housing.</i> <i>Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.</i>
56	5.75	<i>All affordable housing in rural exception sites will be in perpetuity, and the council will secure the first and future occupation of the affordable homes to those who meet the council's local connection criteria.</i> How would this be enforced?
60	5.99	It may be of concern that the regulations relating to self or custom build do not apply to holiday homes or second homes.
77	6.65	If applications for agricultural workers dwellings are supported, they will include conditions resisting occupation of the dwelling for what purpose?
81	SGOE 7	Additionally, businesses should be required to maintain the exterior of existing buildings.
82	6.88	Niton has been identified as a main retail town centre of the Island.
82	6.89	<i>These centres play differing roles in the Island retail market and the council wish to build on the existing individuality of centres and extend the 'dwell time' and spend of visitors/ residents visiting the town and in turn the vitality and viability of the centre.</i> Since Niton is one of the centres, this aim would support the reinstatement of Undercliff Drive.
83	6.94	<i>To enhance the town centre offer the council will support applications for schemes that would enhance the appearance of existing buildings within the centre, with consideration being given to an increase in soft landscaping and a removal of large areas of ground level car parking.</i> Where would customers leave their cars?
83	6.99	<i>The council wishes to improve the evening offer in the town centres across the Island. This will support their ongoing vitality and viability, by diversifying the offer and encouraging people to visit town centres at different times of day and for different reasons.</i> The Parish has no evening bus service.

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88	BCI 1	<i>It will work with partners, agencies and developers to ensure that the transport network on the Island supports the level of growth planned for and is sufficiently robust.</i> This policy should be underpinned by a commitment to maintain current bus services as a minimum. Please note our disappointment that consideration of Undercliff Drive is omitted from Section 7.
92	BCI 2	With its narrow roads and many elderly drivers, providing cycleways apart from the road network seems sensible. In the case of <i>a. Create sustainable routes between urban and rural areas</i> , there is no indication as to how this could be achieved.
93	BCI 3	More robust means of cross Solent transport should be considered. The impact of the Isle of Wight Festival on cross Solent travel should be considered.
94	7.24	<i>The railway line on the Island plays an important role in connecting people and providing an alternative transport option to the private motor car.</i> Not in this Parish!
96	7.34 7.35	The approach taken does not concur with the Parish Council's experience. Under-provision of car parking has led to unsuitable or unsafe on-street parking within the villages. What evidence is there to support the assertion that the amount of parking provided can influence people's transport choices, except in the case of travel to a destination other than home?
99	8.7	Measures should be set in place to ensure this policy is strictly enforced.
99	8.9	Should minimum room sizes and amenity space be specified? Within the Parish, the provision of excessively small gardens has led to the use of car parking areas being used to augment outdoor amenity space.
99	8.20	<i>Towns and villages on the Island have a distinctive character and appearance and when developing these areas it is essential that these are not only protected but enhanced where possible. Development should be about more than just the buildings within the application boundary. Consideration also needs to be given to how these buildings and their surroundings address the existing street scenes and surroundings. It is felt that this has been overlooked in past development and public realm, both within and out from the site has not been given sufficient consideration.</i> The Parish Council attaches importance to this aspect of planning, as reflected in its comments on planning applications.
99	8.21	What realistic alternative is there to the private car in a rural environment?
102	8.25	As an Age Friendly Council, the Parish Council warmly welcomes these measures. However, the bus stops provided do need to be served by buses.
104	CSSHC 5	When allocating accommodation, would priority be given to existing Island residents? Locally, much-needed disabled accommodation is often offered to non-residents of the Island.
106	CSSHC 7	As 3.89 above. Would there be any provision of GP and other health services outside of the Locality Hubs?
109	8.54	<i>It is important that new renewable energy and low carbon technologies proposals do not result in unacceptable impacts on the area by virtue of the technology or as a result of the infrastructure needing to store energy or to connect to the grid.</i> This is an important consideration as apparently "green" technology may not be as environmentally friendly as claimed e.g. working fluids used in closed solar heating systems should be disposable without harm to the environment.
114	8.77	A sensible measure. However:

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114	8.79	<i>In specific relation to water and wastewater infrastructure, the council will generally condition planning permission approvals that no development will occur until the applicant can demonstrate, through capacity calculations from Southern Water, that there is the capacity in the system to accommodate the level of development.</i> The assessment and calculations should be supplied by an independent third party or, at least, independently verified. The Parish Council's experience is that Southern Water reports that there is no problem with [particularly] wastewater infrastructure when local knowledge demonstrates otherwise.
115	CSSHC 12	Should LPG and oil also be considered?
117	CSSHC 13	" <i>wherever possible, public transport</i> " implies that public transport may not always be a viable option. What happens when it is not?
118	8.93	How much influence will community-led plans have in reality? Are developers obliged or advised to take notice?
118	8.96	Will contributions be retained within the Parish?
127	9.31	Who will be responsible for the maintenance of the green spaces post development?
132	HQE 7	What criteria formed the bases for determining the settlement gaps within this policy?
132	9.62	The Parish Council insists on the preservation of Niton and Whitwell's settlement identities. Niton and Whitwell Parish Plan 2013 (SPD) states "A strongly-held view that both villages should retain their independence was consistent with a rejection of ribbon development."
135	HQE 9	Niton and Whitwell Parish Council is supporting the AONB's application for Dark Skies status and warmly welcomes this Policy.
143	9.103	The use of soakaways to discharge surface water should also be precluded within inland parishes, such as Niton and Whitwell, where experience has shown it to be totally ineffective.
146	9.113	<i>Applications for development will generally need to be accompanied by a ground stability report prepared by a competent person. The detail required within the report will vary depending upon many factors, including type/scale of development and location of the development within a geotechnical context. Where a site is affected by land stability issues, responsibility for securing a safe development rests with the developer and/ or landowner.</i> While it is appreciated that the required detail within the report will vary, clear guidelines should be established on order that the planning process will not be unduly complicated or costly for applicants. A recent example within this Parish is P/00632/18, TCP/08830/H.
202/3	HA102 HA103	Planning permission for 9 units has already been approved with no requirement to build affordable housing on site. Phases should be linked for the purposes of determining the requirement for affordable housing on site.
202/3	HA102 HA103 HA105	There are no details of the means by which public transport is to be improved. The current bus service, the Southern Vectis number 6 route, has no journeys which are commercially viable. Furthermore, the winter Sunday and bank holiday services are entirely funded by the three rural Parish Councils through whose Parishes the service operates.

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202/3	HA105	<p>Pre-application consultation: The Localism Act 2011, Section 122, provides for pre-application public consultation in certain circumstances. The Isle of Wight Council Statement of Community Involvement, August 2015, states: “Pre-application consultation 3.4 For applications that are likely to have a significant impact on the wider community developers are encouraged to engage with the local community before submitting the application. 3.5 In particular, the council encourages developers running pre-application consultation to:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Discuss the consultation approach with the council. <input type="checkbox"/> Inform local people of the details of the scheme and be clear what elements can be influenced by making comments. <input type="checkbox"/> Clearly identify any changes made as a result of comments based on sound planning reasons. <input type="checkbox"/> Submit a statement with the planning application outlining the community involvement that has been carried out, the comments received and any changes made as a result.” <p>Has the feedback from the Niton and Whitwell Parish Council provided on 29th June 2017 and from the public consultation carried out in Whitwell on 12th October 2017 been taken into account?</p>
202/3	HA105	<p>DHWN 3 Housing Allocations General Requirements states that: <i>All sites allocated for residential or housing-led mixed use development will deliver sustainable, high quality design, taking account of the context, setting, character and local vernacular in accordance with the relevant policies of this plan, and provide</i> 3. Improved access to public transport. 5. Safe vehicle and pedestrian access ... Improved Access to Public Transport: As above, there are no details of the means by which public transport is to be improved. The current bus service, the Southern Vectis number 6 route, has no journeys which are commercially viable. Furthermore, the winter Sunday and bank holiday services are entirely funded by the three rural Parish Councils through whose Parishes the service operates. Safe Vehicle Access: We note that vehicular access is proposed via Meadow Close, which would entail vehicles entering the High Street from Nettlecombe Lane. This is a dangerous junction with extremely poor visibility splays. Visibility to the right is virtually zero with almost no potential for improvement due to the position of the old Methodist Chapel building and the brick wall forward of it: please see photographs below.</p>
202/3	HA105	<p>Sewerage: It is widely recognised by our residents, although not by Southern Water, that there is a serious problem with sewerage at the lower end of Whitwell High Street: please see Niton and Whitwell Parish Council’s comments on relevant planning applications, for example P/00123/10, TCP/10944/F and P/00827/08, TCP/27410/A.</p>

HA105 Access: Photographs showing junction of Whitwell High Street with Nettlecombe Lane



1. Limit of visibility of vehicles approaching the junction along the High Street travelling south:

2. Visibility from driver's window of a vehicle at the end of Nettlecombe Lane, looking north along the High Street (less than 20 metres):

