

DRAFT ISLAND PLANNING STRATEGY DEVELOPMENT PLAN

Shalfleet Parish Council Consultation Response - February 2019

LOCAL CONSULTATION

Recognising the importance and significance of the draft Plan, since publication in early December 2018, Shalfleet Parish Council has met on two occasions with an open forum for local residents. Both meetings were well attended and a number of views were expressed and specific questions asked. It would be reasonable to say that while the Council and local residents understand the process there are genuine concerns about specific policies/allocations, the apparent vagueness of how certain objectives will be achieved and areas of significant interest that have not been adequately covered, or covered at all.

These meetings took place on 9th January and Wednesday 13th February 2019. In summary the matters that were discussed and debated were as follows.

- The fact that the future development of a garden village in or adjacent to our parish area would require good transport links, shops and suchlike as well as social/technical infrastructure. The consensus view was that in a semi-isolated sparsely populated part of the West Wight some distance from main centres this was most unlikely to be achieved and, in any event, unlikely to be welcomed.
- In terms of the provision of new and improving existing cycleways there some concern about general safety, maintenance and the local ecology.
- The overarching issue of the allocation of so many sites across the Island, largely seen to be a government requirement, as some sites (including some in our area) were unlikely to come forward and the logic behind allocating three sites in an area such as Wellow for 30 or more new homes, which is completely unjustified.
- Expanding on the above point reference was made to the width of Main Road (and lack of footways), no mains drainage and no gas supply. In addition to these technical points there is the likelihood of anyone or all of these sites creating an undesirable precedent for further development.
- Apparent or alleged inconsistency, with previous planning decisions where permission has been refused because of lack of or distance from local facilities.
- Some understandable scepticism as the 'bonus' that IWC might expect from thousands of new homes, although it is understood that this is not necessarily a material planning consideration.

1. INTRODUCTION

1.1 The strategic overview and overall vision and suchlike are discussed below as being fundamental to the draft Plan and the impact that it may have on the Island, the West Wight and, in particular the Shalfleet area which is diverse and unique. It is inevitable that **the real concern will always be 'how does this affect the area where I live?'** and, as a consequence, we feel obliged to concentrate on local aspects rather than the wider picture. In essence this about planning for the future and focussing on your area, which is unique for a number of reasons. **We have tried to develop a collective approach that reflects the consensus view in our community and the very genuine concerns held by an overwhelming number of people who fear for the future of the area and the likely impact on the character and appearance as well as the way of life over the next ten to fifteen years.** This is not intended to be an obstructive or negative response but due regard and appropriate weight has to be given the problems we are facing, the character and charm of this part of the West Wight, ongoing development and the future proposals for the area and whether these will improve or overcome these difficulties and protect and enhance the rural character of have a damaging impact on our environment.

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2. INITIAL OBSERVATIONS

2.1 As a Parish Council, we fully understand that what we are looking at is commonly referred to as the plan led approach and recognise that it is vitally important when developing policies for the future development of our area and those with the objective of protecting the character and appearance of a special environment that makes the area so attractive to residents and visitors alike. **We take the view that the present largely unique situation in our area has not been adequately evaluated in the draft Plan and that the specific policies (or absence of policies) and allocations for new development do not offer the best solution for us as a community moving forward over the next fifteen years.**

2.2 When examining the document in some detail and in our discussions with local residents, who have taken a keen interest in the implications of this planned approach, we have posed the question to ourselves as to why do we need to have an approved development plan and strategic and local planning policies? We are clear that, in terms of general principle, there is a need to direct development to key areas; a need to control development in sensitive areas recognised for their natural/built environment; to enable Local Authorities and statutory undertakers to make their own plans in terms of the provision of infrastructure (roads and other means of public transport, water supply, mains drainage, schools etc.); to introduce a degree of 'certainty' to the system for the benefit of developers and the general public; a need to increase/decrease expectation; a framework for continuity and consistency in decision making and a means of monitoring development and expansion of villages and towns and the preservation/conservation of protected areas in addition to the enhancement of both the village/hamlet environment and the countryside.

2.3 We have stressed and continue to stress, to all concerned, the importance of this consultation process progressing to approval of the Plan that will effectively become the 'blueprint' for next fifteen years (subject to further reviews) and, most importantly from your perspective, once a site is allocated for (residential) development the likelihood of resisting it in terms of principle at the planning application stage is minimal. Even as one factor this underlines the importance of the process leading the eventual approval of the new Plan in the next couple of years.

3. CURRENT POSITION

3.1 **We are advised that the Island Plan should have been reviewed (and approved) two years ago; it is, in effect, out of date. That, in itself, in combination with the National Planning Policy Framework (2018) known as the NPPF, the failure to designate (or allocate) any residential sites and the established and well evidenced housing need means that the Island is vulnerable to opportunist applications and challenges that has led to, what can best be described, as an 'unplanned' approach,** especially if you give due regard to the fact that now all land within or immediately adjacent to the development envelope is, in principle, is deemed to be suitable for development, subject to certain detailed requirements. Effectively the LPA is not in full control of planning and development in our area and people will have noted in the local media news of developers winning appeals. We believe that our own unique and diverse area is threatened by this situation

3.2 **We know that the Government requires the Island to achieve a target growth for the Island of 641 new homes per annum; (previously the 'target' in the Island Plan was 525 dwellings a year) and that equates to 9,614 units for the plan period of fifteen years from 2020 up to 2035. However the draft Plan is looked at this is inevitably the main topic for debate and the principal area of concern for the overwhelming majority of residents, especially people living in such an unspoilt area like Shalfleet, Newbridge, Hamstead and Wellow.**

3.3 As we say, housing need is constantly a topic for discussion, paragraph 2.9 of the draft Review says.

There has been a shortfall in delivery against the identified objectively assessed need figure on the Island during the life of the Island Plan Core Strategy (adopted March 2012). 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.

3.4 In common with other PC/TC's in the West Wight, if the assertion about a saturation point is to be believed then it has to be formally challenged (not by canvassing/lobbying) and/or dealt with a more innovative fashion because simply allocating all this land for development, seemingly arising from the SHLAA exercise, clearly is not identifying the most suitable sites in terms of location or specific characteristics/constraints and merely striving to find enough land that, in theory, can accommodate this number of new homes. The widespread allocations in the simple hope that some of these may come forward at times over the plan period to meet the identified demand is hardly a planned approach. We also take the view that the approach to (new) consents, presumably post Plan, that are not implemented and the suggestion (without apparent detail) of phasing are impractical, not feasible and unlikely to be overly successful.

3.5 In lay terms, for almost any Island resident, this number of new homes required is a frightening prospect if you take into account the need to provide employment and the necessary technical/social infrastructure, which includes access, energy, water supply, foul/surface water disposal, flood protection, community facilities, healthcare, education and suchlike with all of that included in an overarching need to protect and enhance the urban/rural environment; especially in our area the latter if due regard is given to the importance of the tourist industry. In our area we think this is unlikely to be achieved by allocating space for another 70 or more homes that, in theory, could be built over the next fifteen years.

3.6 Due to the ever worrying trending characteristics of our local economy, especially in terms of the low/average household income, making new housing affordable is a key challenge as well as ensuring people have access to services and jobs, particularly in our rural areas, remains a priority. We have a rich, diverse and distinctive landscape, with communities of different sizes where people enjoy living/visiting and spending their leisure time, which needs to be protected for its own sake and in the interests of the local economy that is still heavily reliant on tourism.

3.7 As the local Parish Council we support the view that there is a very clear need for more affordable housing, ideally for rent, in our area that must be appropriately located. The proposed rent will need to reflect the fact that the average household income is low compared with the national average. Hopefully at least 35% of new units could be affordable, in some shape or form. **Unfortunately, like much of the West Wight area, that is only part of the problem as in our area, with an ageing population (33.4% of our population are over 65); an equally important requirement is to make adequate provision for the elderly in all the various differing forms of accommodation including community care, assisted accommodation and residential/nursing homes all within a sustainable distance of local facilities and with the appropriate level of medical support.** With 65% of new housing to be sold on the open market, with the majority of those units being taken by the middle aged, early retired or retired persons some living locally but many others relocating from the mainland because of the attractiveness of the area and, depending where you currently live, cheaper house prices that, in due course, will only add to burden placed on local public facilities, especially care for the elderly.

3.8 For the reasons outlined in the preceding paragraphs **we are keen to advocate not just a carefully controlled increase in the amount for affordable housing but also possibly a number of small rural exception sites, or something very similar, irrespective of whether these are inside or immediately adjacent or outside the development envelope boundary. This would be subject to prospective tenants satisfying specific criteria. These could be in isolation or as part of a larger development; solely for local people (in perpetuity) in combination with more innovative properly funded solutions in terms of elderly care in terms of accommodation and support services.**

3.9 These are just some of the specific constraints, but the likelihood is that there will be further limited development in Shalfleet and the immediate area is something that, to an extent, we accept but it will need to satisfy all the other criteria including protection of the environment and maintaining the character of the area. This is why, in our view, it is important to take a realistic approach while still looking to reduce the number of new sites or homes and, wherever possible, achieving appropriate mitigation in the form of some sort of 'planning gain' or even provision of essential services to offset the loss of open land, the increase in the number of new homes/population and potential erosion, in whatever form, of the integrity of the area. Paragraph 3.25 says,

In Shalfleet existing permissions and a well-integrated allocation will have been delivered, growing the village to the west, providing a range of market and affordable housing options. Improvements linking this area to the main road will have been made, enabling easy access to bus services for pedestrians.

(It is not entirely clear whether this statement relates to the village itself or the Parish area)

3.10 Notwithstanding these views this consultation should not be viewed as a thankless task. Indeed this point in time is critical as once the new Plan is approved, including some or all of the proposed allocations (see above), when planning applications are lodged it may be difficult, if not impossible, to contest the development of these sites in terms of general principle...it will, as they say, all be in detail.

4. OUR FUNDAMENTAL POSITION

4.1 We have to given due regard and appropriate weight to the fact that your area is now included in the West Wight Regeneration Area with Freshwater/Yarmouth as a 'settlement hub'. This clearly implies that our area, to some degree, will need to 'share the pain' but the key is that this should be proportionate and take into account the character of the area that is quite clearly different from Ryde, Cowes and Newport, or even Freshwater/Totland and Yarmouth recognised as a hub settlement. A considered approach would suggest that most new development should take place there where there is good transport links, established infrastructure and employment. Without being overly fond of the situation we are inclined to accept the position, subject to appropriate controls and the protection and enhancement of our countryside area. However, within these parameters we believe that up to 70 additional homes in conjunction with non-allocated sites coming forward and extant permissions (see below) is excessive, even over a fifteen year period, and needs to be reduced in terms of the number/location of sites and the number of new units.

5. SPECIFIC ALLOCATIONS

5.1 It has been assumed that these allocations came through the Strategic Housing Land Availability Assessment (SHLAA) but there has to be some doubts whether these sites are suitable or even the best sites in terms of overall size/location, or merely the ones that are deemed to deliverable/developable that may contribute to the overall objective of 9,615 new homes. There is also some genuine concern over the ability to control phasing and the ability to enforce implementation of any extant or future consents is also, at best, dubious because although it may be possible to limit the term of the consent it seems unlikely that if a consent is not implemented whether any future application could be rejected (PSDG6) if there has been no change in circumstances. We take the very firm view that these issues should be resolved and adapted or amended policies incorporated into the draft Plan.

5.2 Overall the housing need statistics are a result of the overwhelming need for sustainable affordable housing, slow building rates since the last Plan was approved (2012) and persuading landowners to develop when there are viability questions arising from achievable house prices and the various additional requirements as result of the planning process in terms of on-site and off-site works regarded as essential if development is to be permitted; usually characterised by significant financial contributions. In the present economic circumstances, in common with many other PC/TC's and Island residents, that is why we are dubious as to whether a 100+ residential allocations across the Island, with the objective of over 9,000 new housing units is realistic. Inevitably there is also some scepticism and concern on the new garden communities and the vagueness about these allocations in terms of location and (eventual) delivery and the fact that although two 'general areas', West Wight and SE Wight, have been identified without identifying the precise location. The very fact that two areas have been identified means that there must be fairly specific sites that have been considered but yet to be revealed.

5.3 We are opposed to the apparent concept of 'sharing the load' and question if it is appropriate to develop across the Island, perhaps in some shape or form to reduce the amount of public objection,

rather the correct and sound planning approach of expanding in well established and sustainable locations. In this particular instance it is important to put the (original) settlements or constituent parts, all of them unique, that make up our area in context with its location and scale/size with other parts of the overall area and, as a consequence, the impact on the character, amenities and available facilities will have on this area should they come forward in their entirety and when this will happen as the Plan specifically cites the need for phasing over the plan period up to 2035.

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6. SPECIFIC ALLOCATIONS

6.1 In this particular instance it is important to put the settlements that make up your Parish in context with its location and scale/size with other parts of the Area and, as a consequence, the impact on the character, amenities and available facilities will have on this specific area should they come forward in their entirety and when this will happen as the Plan specifically cites the need for phasing over the plan period.

HA010...Land at Main Road, Wellow (15)

HA011...Land at Manor Farm (West Field) (7)

HA012...Buildings at Lee Farm (10)

HA013...Land fronting Thorley Street (15)

HA014...Land at Warlands, Shalfleet (30)

6.2 What will the area be like in 2035? Nobody really knows because of the overwhelming number of unknown factors but we are obliged to make an assessment on the basis of the proposed new development in the draft Plan

6.3 In common with the approach that we understand has been adopted by Freshwater PC and others in the West Wight Local Councils (WWLC) group we feel the need to ask some fundamental questions and ask for further clarification.

- We wish to know why sites that already have the benefit of extant permissions or sites where development has commenced but are not completed are not included as allocated sites and the very significant contribution that they make to the number of housing units envisaged for our area. This distorts the statistical assessment and misleading in terms of what may, or may not, be anticipated and potential impact on the character of the area.
- Furthermore the figure(s) in the brackets are obviously the projected number of units. This another point that needs to investigate further as we believe that these may be underestimates especially if appropriate weight is given to the very nature of affordable housing and the general viability of the individual proposals. Due to that factor and other inevitable constraints imposed by the grant of permission as confirmed by policy PSDG5 (Managing Viability) the resulting densities may well, if not certainly, increase beyond these estimates.
- Of course, there may be other sites within the area that come forward over the plan period if they meet with the criteria of being inside or adjacent to the development envelope boundary, known as windfall sites. Obviously this could also add to the total number of units.

6.4 Setting aside the three points above, the 'yield' from the five allocated sites is 87 units. This seems to be a disproportionately high number for an area such as ours, comprising two villages, a small linear hamlet and other sporadic development. If due regard is given to our semi-isolated location in relation to both the primary settlements (PSDG 3) and the 'settlement hub to the west based around Freshwater, the prevailing pattern of development and the current population. Therefore, in Island terms, we are semi- isolated and largely unsustainable communities in terms of transport, employment, medical support and ever diminishing community facilities and suchlike.

6.5 The population of the parish area is probably no more than 1600; even a low occupancy rate may result in an increase of say 200/250 people in addition to natural growth with significant implications for local infrastructure and facilities. It could be argued that an area like this is taking a disproportionate 'hit' when compared with other similar rural areas but that would require further research in order to confirm this as a position. Our Community Plan (2012) identified a need for more affordable housing (see below) and views will doubtless be expressed as to whether this has or will be achieved at Warlands. Our own Sustainable Housing Survey undertaken five years ago concluded, by saying.

Based directly upon the responses to the questionnaire and a review of the balance of housing available in the Parish, It is estimated that an additional 24 homes are required over the next 5 years to meet the needs of local residents and to encourage a greater diversity in the population of the Parish. 75% of the new housing should be classified as 'Affordable' in order to support the SPC objectives of creating a greater diversity in the households within the Parish. The availability of affordable housing will help, but not halt the flow of younger people to urban areas where there is often a greater chance of employment. Good quality affordable housing will also attract younger people to the area. The effect of increasing the affordable housing for the part of the population considering downsizing is more difficult to estimate. Downsizing is a complex decision to make if you have a large house. The main reasons to move are generally to reduce costs and improve lifestyle or move to an area with greater social support, so the location and facilities on offer should reflect this. Downsizing will have the additional benefit of releasing larger houses for families who are expanding, or wish to move into the area.

6.6 We do not believe that the situation has changed radically in the last few years other than the commencement of the Sovereign development that will, when complete, provide 24 affordable units for rent that may well contribute to re-energising the central core of the village. Some may consider that a figure of an additional ninety units over a fifteen year period is not unrealistic if the majority of the new units were affordable homes especially if at least some of those could be restricted to local people only. Unfortunately this is an unlikely scenario for a whole range of reasons.

6.7 There are specific requirements in respect of HA010, HA011 and HA012.

HA010 and HA011 Main Road and Manor Farm, Wellow two sites are allocated in Wellow to provide for a mix of local housing and choice. Both sites should provide homes that are a mix of size and tenure to provide choice for the local community. Design should be of a high quality, taking account of the local context, levels and nearby neighbours.

1. Land at Main Road of approximately 1.7 hectares is allocated to deliver:
 - a) At least 15 homes providing a mix of sizes and an affordable housing contribution in line with DHWN6. Where appropriate development should frame the village green and road and provide onsite parking;
 - b) contribute to additional bus shelter provision; and
 - c) contribute to additional footpath provision.

2. Land at Manor Farm (west field) of approximately 1.3 hectares is allocated to deliver:

- a) At least 7 homes;
- b) one vehicular access, with onsite parking and provide for an internal footpath
- c) contribute to additional bus shelter provision; and
- d) buffer to the watercourse and retention of roadside hedge.

When considering flood risk across the site please refer to the council's SFRA Level 2 Fact Sheet.

Development should be located to the north of the watercourse and

consider biodiversity enhancements to the south. For both sites archaeological assessments may need to be undertaken by any potential applicant and early liaison with the council's Archaeology and Historic Environment Service is advised. Sites within Wellow shall be phased so as not to prejudice the delivery of nearby sites within or adjacent to the village.

HA012 Buildings at Lee Farm A brownfield site of approximately 2.2 hectares is Wellow allocated at Lee Farm, Wellow to:

- a) Deliver at least 10 homes of high quality design providing a mix of styles and sizes; and
- b) make land available under the wider ownership to facilitate the delivery of a cycle track between Freshwater and Newport.

When considering flood risk across the site please refer to the council's SFRA Level 2 Fact Sheet.

Archaeological assessments may need to be undertaken by any potential applicant and early liaison with the council's Archaeology and Historic Environment Service is advised.

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7. GENERAL COMMENTS ON ALLOCATED SITES

7.1 HA010 is in reasonably close proximity in a settlement that doesn't seem to benefit from the type of facilities often associated with a village; really Wellow is no more than a (linear) hamlet. We would be opposed to any form of development that goes beyond our assessment and feel that 20+ units will damage the very integrity of the this enclave and have a detrimental effect in the character of the area and the general prevailing ambience. There are limited local facilities in the vicinity so the site is demonstrably in an unsustainable location, especially from a transportation perspective with virtually nil pedestrian safety for those using Main Road. The higher elevation of the site from the road would cause increased surface water run-off. Plus the development would affect the heritage and amenity value of the houses opposite. Access would be problematic.

7.2 Not surprisingly, we take a similar view on HA011 and would argue that this presents additional challenges as it is, in effect, open land that could be visually intrusive if handled inappropriately and there is scope to increase of the estimated number of units and/or increase the overall area of the site; something that would be steadfastly opposed by the PC and doubtless local residents. Perhaps the possibility of designating this as a small rural exception site for local people should be explored. Access is also problematic.

Coopers Lane and Ford are characteristic heritage to this village and alterations would destroy this.

7.3 Lee Farm (HA012) presents a quite different scenario inasmuch as it is technically a brownfield site, something that is generally favoured, and an opportunity to move away from agricultural diversification that might not necessarily be overly appropriate in a high amenity rural location. However, there also needs to be awareness in terms of setting an undesirable precedent for further 'bolt-on' development, similar to the concern about HA011. Irrespective of whether or not the PC welcomes a limited development on this site (Lee Farm) we are able to see that this is more likely to comply with local and emerging policies and, as such, maybe acceptable.

7.4 The other two sites, subject to generic requirements, include land further to the west in Thorley Street that might be seen as being somewhat similar to HA010 but it is quite different as this area is later development and at a lesser density. It is not infill development but instead it is an extension of more modern ribbon development on an oversized site with an excessive estimated number of units with the capability of being extended at a later date in an easterly direction. These factors in combination with concerns about HA010 and HA011 mean that this allocation is also firmly opposed by the PC.

7.5 Finally there is HA014 which is a sizeable area to the west of Fleet Way and to the rear, south of the recently commenced affordable housing development at Warlands that has the benefit of a substantial frontage onto Yarmouth Road (A3054). The diverse and contrasting nature in terms of the constituent settlements in our area means that this is a quite different case to those sites allocated in Wellow/Thorley Street. This site presents an opportunity for a modest expansion of the village without overwhelming issues in terms of potential damage to the character and appearance of the area. The estimated density seems to be appropriate but the real considerations will come with the question of access (ideally it would seem through the new development that has just commenced) and the type of unit/tenure that might come forward when the scheme is developed. Inevitably there is some concern but, at this stage, it is best viewed as an opportunity in the longer term and preferable to alternative solutions elsewhere in our area that we believe are impractical and unsuitable for the reasons outlined in the preceding paragraphs. Further facilities for this site, which is already being developed, should be examined.

7.6 We would submit that these detailed observations demonstrate a realistic approach by the Parish Council to possible new development in our area. However, that said, if there are inadequate support facilities in terms of medical services and education or problems relating to technical infrastructure then it is clear that new development should not be allowed until this has been addressed and rectified.

7.7 On a general point applicable to all sites in this area (and elsewhere on the Island), as mentioned in paragraph 6.3, it would be dangerous to attach undue weight to the estimates made for the number of units on each individual site. The reason is that these appear to be generally low density projections and there is the question of viability because of the Council want to encourage

small/medium developers, the need for financial contributions, on site and off site works and the provision of affordable housing all pointing to need for medium/higher densities. There is also the need to ensure that foul/surface water disposal can be handled satisfactorily. Finally in terms of this area itself due weight has to be given to the fact that wherever new development is envisaged ultimately there will be an inevitable focus on private transport and the need for care of the elderly (an issue that will be highlighted in the Freshwater and WWLC comments).

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8. CONCLUSION

8.1 With an out of date Plan, government edicts in terms of house building and the well documented housing need here on the Island there are obviously difficult decisions that that have to be taken. However, due regard and appropriate weight has given to the current level of pressure on local social infrastructure; significant transport problems and the intrinsic character of the area that is valued highly by local residents and visitors alike.