

Draft IPS Comments

Introduction

The Parish council believes the new Island Plan should on principle challenge the government-set standard assessment of housing need; better protect the undeveloped landscape; protect green spaces and prioritise the development of brownfield sites; ensure that affordable and social housing is situated in existing towns - near shops, schools, and transport amenities.

Many of the Parish Council's concerns are highlighted in depth by the Island's MP 'Bob Seely' and we are uploading his response document to this consultation in support of his assertions.

Environment Responses

EV1 – Conserving and enhancing our historic environment

In section 4.20, it is stated that the council will monitor buildings or other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk through discussions with owners and willingness to consider positively development schemes that would ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers. The parish council feels that The Royal York Hotel in Ryde is an example of where the council appear to have done too little to prevent the building falling into decay. The Isle of Wight Council needs to be much more aggressive in dealing with these situations.

EV5 - Trees, Woodland and hedgerows

In section EV5, it is stated that development proposals that include the loss or deterioration of ancient woodland and ancient or veteran trees will be refused, other than in wholly exceptional circumstances and where a suitable compensation strategy is proposed. Where new or replacement planting is proposed, appropriate species should be used wherever possible that reflect or add to the setting of the surrounding area. The parish council feels that appropriate species should be used at all times, not wherever possible.

In section 4.50, the following words are used: Where the benefit of development is considered to outweigh the benefit of preserving these features, development will be permitted subject to adequate compensatory provision being made. Where the loss of trees, woodlands and hedges is unavoidable, replacement provision should be of a commensurate value to that which is lost. The parish council believes the replacement should be with mature trees/hedges etc. if that is what is lost but the sentence is ambiguous - is it monetary value or environmental value? This requires clarification.

EV11 - Isle of Wight AONB

The IOW Council has a laudable policy to achieve net zero emissions across the Island by 2030. On page 100 of the draft plan it is shown that to be self-sufficient in renewable electricity, the Island requires an installed capacity in the region of 220 to 300MW – based on the 2016 annual consumption of c 537GWh (gigawatt hours).

Provision of housing at the rate identified in the draft will dramatically increase annual consumption so the Island will be forever chasing growing targets.

The Parish Council has concerns about the consideration being given to providing renewable energy sources. The Plan acknowledges that renewable energy and low carbon technologies must not have

an “unacceptable impact” on the area nor cause “unacceptable harm”. However, the Plan also states that large scale wind and photovoltaic schemes will be outside the AONB and designated areas.

Policy C10 states that “Proposals outside the settlement boundaries or site allocations should demonstrate they have taken account of: the visual impact on the character of the area; and the consistency of the proposal with nature conservation and heritage asset objectives.”

The Nettlestone and Seaview community prizes its own landscape setting even though it is not designated as AONB. The East Wight area is currently being targeted with large scale development and the Parish Council is concerned for what green areas remain and this plan should be used to address this issue and look to introduce the AONB inside the parish boundary. Residents have no faith in what is and is not allowed as a visual impact nor nature conservation etc, because experience suggests that these seldom meet the standards expected by the populace.

50 tons of carbon are generated in the building of a single house, and this does not include the calculations of the ongoing carbon emissions resulting from each new dwelling even though policy requires energy efficiency standards.

Has the carbon offset provision that will be needed to counter the 7,290 dwellings (based on the target of 486) to be built during the 15-year plan period been properly considered? Failure to cover the provision – which will in fact be impossible to achieve with the high target of delivery – will destroy any expectation of net zero carbon by 2030.

The Parish Council cannot believe that the 2030 target of net zero emissions and the delivery of 486 dwellings pa during the same period can possibly be achieved simultaneously.

Housing

H1 - Planning for housing delivery

The fact that the IOW Council has reduced the housing target is to be welcomed but the Parish Council does not believe that it goes far enough.

The justification for building 486 dpa is based on a statistical analysis of averages of delivery during each fifteen-year period between 2000 and 2020 and then taking an average of those averages. It remains a rough and ready estimated target and far exceeds the current level of delivery of dwellings. The Parish Council believes that the reasons for this slow delivery - which is in spite of the Island having the highest rate of approvals for new homes in the South East - should be spelled out within the Plan.

This delivery figure remains below the government target for the Island of 668 dpa. The Island Plan HAS to have clear reasons for why it is promoting an aspirational figure that is 179 per annum less than the government target.

Without a clear justification it is likely that the Inspector will return the plan with a requirement to go back to the official figures and the IOW Council should be ensuring that this does not happen.

Even if the Inspector supports the figure of 486, if the delivery fails, the Island will remain in the same position as it does presently – i.e. that it will not be meeting an adopted plan and so is open to unrestricted applications.

The Parish Council therefore strongly supports the Island MP in his efforts to plead exceptional circumstances under paragraph 61 of the NPPF and for the IOW Council to provide the technical

information for this: both for the purposes of inclusion in the Plan and to support an advanced “plea” under paragraph 61.

If the Island is recognised as an exception prior to the Plan getting to Examination by an Independent Planning Inspector, it will aid acceptance of delivery targets below the current Government targets for the Island.

H2 - Sites allocated for housing

The Parish Council finds it disappointing that the Draft Plan includes in the committed numbers:

HA060 - Westridge Cross Dairy and land to the north of Bullen Road, Ryde for 474 dwellings (p217).

This application was approved by the Planning Committee after the issue of the consultation draft. It suggests a predetermination of the decision-making process and the Parish Council contends that applications should not be brought to approval prior to the EIP assessment by the Inspector. It is noted that there are other sites listed - across the Island – also not approved by an Inspector but for which planning application is imminent. The planning authority should not be considering these sites in advance of the finalisation of the plan.

Furthermore, there is also inclusion of 17 dwellings (p242) to be delivered in year 1 of the Plan in Seaview (basing this on an agreed permission). In fact, the allocation must refer to the outline permission for 17 dwellings at Gibb Well Field which is actually in Nettlestone (not Seaview). This application is highly contentious and has yet to be determined in any detail so again should not be totalled into delivery expectations.

Economy

E6 - Future-proofing digital infrastructure

The future of the economy is in IT and there needs to be a very strong emphasis on upgrading internet access. Friends and relatives invariably complain about internet speeds when visiting and the council needs to support and encourage modern infrastructure. Many more people are working some of the time from home and the Island is an attractive place from which to do this - provided you can commute easily, as is not the case at present, and the IT infrastructure supports it.

Transport

T3 - Cross-Solent transport

Much is said about the local infrastructure and connections to the mainland but the latter seem to focus on infrastructure and not service delivery. The Parish Council know from experience that bus times and costs are real inhibitors to free movement - particularly to those on shift work. Connections on the FastCat at Portsmouth can be haphazard and it would seem that Southern Rail have now decided to terminate at Portsmouth and Southsea, rather than at Portsmouth Harbour. There is a 15 minute delay in getting a train up the line to connect with the Southern Service. Whilst this may only affect a relatively small number of people, it clearly undermines any concept of excellent communications and would seriously affect any commuters on this route. It is clearly apparent that the Wightlink timetables have deteriorated in frequency and reliability over recent years and the Council should be taking them to task over this. Access has also declined so that people can be obliged to buy expensive tickets just because there are no apparent multilink bookings available and yet the boat may not be anywhere near full. The Isle of Wight Council may

reason that it is not within their power to take on the providers but that should not be a barrier to working with the MP to pressure the Government into action over a Public Service Obligation.