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## **Planning Policy**

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16 August 2024

Our ref.: THP859

Dear Colleague,

### **Submission version Local Plan: Regulation 19 Consultation Response**

#### ***Introduction***

1. This consultation response is made by Troy Planning + Design on behalf of Nettlestone & Seaview Parish Council. Troy Planning + Design is also supporting the Parish Council to prepare a Neighbourhood Plan. The Neighbourhood Plan is being prepared in parallel to work on the Local Plan and is following the direction of travel established within that. It has been subject to several rounds of consultation and the feedback from that, coupled with the position established in earlier versions of the Parish Plan, has enabled the following areas of focus for policy and wider initiatives to be identified:
  - The Parish has a strong sense of identity and character, defined by its coastal setting, surrounding countryside, topography and important natural areas. The location, scale, form and design of new development will need to respond positively to the sense of place. To help inform this, a Parish-specific design code is being prepared alongside the Neighbourhood Plan.
  - If new residential development is to come forward, then this should focus on providing choice and opportunity that meets local needs, and which helps to address affordability issues exacerbated by the growing second and holiday home market. The mix, size and type of new homes should also reflect demographic change within the Parish.
  - Whilst recognising the impact of the second and holiday homes market on local housing needs, there is a need to balance this with support for year round activity in the area that sustains local services and facilities, including those necessary to support an ageing population.

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- To support a movement network that makes it safe and easy for people of all ages and abilities to move around the area and access services, facilities and employment further afield (e.g.: in Ryde).
2. In the context of the Neighbourhood Plan, Policy C15 (Community-led planning) of the Local Plan is noted and supported, specifically the second and third paragraphs of the Policy which state that applicants for development will need to submit a statement setting out how the proposal responds to place plans, adopted masterplans and local community views. This text should however be extended to make clear that applicants will need to clearly respond to Neighbourhood Plan policies, rather than an abstract reference to place plans or masterplans (which are not and do not have the same weight as Neighbourhood Plans). This will signal strong support for the process and use of Neighbourhood Plan policies in decisions.
  3. Linked to the above, the Parish Council suggests that all paragraphs within Local Plan policies are numbered. This will support clarity and use of the policies by applicants, consultees and decision-makers.
  4. It is to be noted that the Parish Council recognises the importance of the Plan-led system and the need for a new and up-to-date Local Plan to be prepared, providing clarity and certainty for applicants, decision-makers and, most importantly, local communities. Notwithstanding this, the Parish does have concerns with aspects of the Local Plan and summarises those within the following sections of these representations. It is to be noted that, although further changes are imminent to the NPPF, and which will need considering as the Local Plan progresses to Examination, these representations refer, as appropriate, to the December 2023 version of the NPPF.

### **Housing figures**

5. Policy H1 (Planning for housing delivery) states that there are six designated Neighbourhood Plan areas on the Island and that, in line with the NPPF, a housing requirement for each of these must be established. The approach that has been taken in the Local Plan is simply to assign a windfall allowance of 30 homes to each of the six Neighbourhood Plan areas, including Nettlestone & Seaview.
6. The previous Regulation 18 consultation version of the Local Plan did not allocate any new growth to Nettlestone & Seaview over and above existing commitments. It is entirely unclear what has changed between the Regulation 18 and current Regulation 19 version of the Local Plan to justify the introduction of this housing requirement figure and how it has been informed, particularly as the Regulation 18 version of the Local Plan was based on a higher overall housing target for the Island yet did not include separate housing figures for Neighbourhood Plan areas. There is no rationale for the figure, with no explanation provided in the supporting text in the Local Plan.
7. The approach does not follow the NPPF and supporting Planning Practice Guidance. The NPPF, at paragraph 67, states that *'strategic policies should also set out a housing requirement for designated neighbourhood areas'*. The word 'should' is important here: it is not an absolute requirement as implied by the use of the word 'must' in the Local Plan.

8. Where a figure is to be provided, Planning Practice Guidance (Neighbourhood Planning, Para 101, Reference ID 41-101-20190509) explains how this might be derived. Whilst saying there is no set method, it advises that it should make reference to the spatial strategy established, local constraints, land availability, local character and housing need. This is clearly far more nuanced than simply apportioning a windfall figure to all neighbourhood plan areas.
9. The Local Housing Needs Assessment undertaken in support of the Local Plan (GL Hearn, May 2022) breaks the Island down into a series of sub-areas to help better understand the granularity of housing need in different locations across the Island as a whole. Nettlestone & Seaview Parish is grouped within the Ryde sub-area. The findings for this area are heavily skewed by demographic patterns, housing stock and affordability in Ryde and do not reflect the position within Nettlestone & Seaview. This is the closest we get to understanding local housing dynamics and how this might be used to inform a disaggregated housing figure but, even then, it stops short of doing this, and is silent on what the need might be in the Neighbourhood Plan areas, and how this relates to the housing requirement in Policy H1.
10. The NPPF makes clear, at para 72, that *'where an allowance is to be made for windfall... there should be compelling evidence that they will provide a reliable source of supply'*.
11. The 'Island Planning Explainer Document (Growth and Housing)' produced by IoW Council alongside the Local Plan does not explain how the windfall figure for the Neighbourhood Plan areas has been calculated. Equally, 'Housing Evidence Paper A' is silent on the approach taken. Nor is there any explanation in 'Housing Evidence Paper B'.
12. The IoW Five Year Land Supply Annual Position Statement (April 2021) states, at para 7.9, that over the five year period 2016/17 to 2020/21, windfall development of small sites resulted in delivery of around 100 homes per year across the Island. There is no disaggregation of this to different areas across the Island and how much of this windfall has been in urban areas as opposed to rural areas, nor between neighbourhood plan areas and elsewhere. The lack of evidence as to how the housing figure responds to local needs is compounded by Policy G2 of the Local Plan, which only supports proposals for windfall development in rural settlements, including Nettlestone and Seaview, where it is shown that it meets a local need. There is thus a degree of conflict between the policies in the Local Plan (which, on the one hand, actively support windfall development but, on the other, place restrictions on this) which needs resolving.
13. The assessment and calculation of windfall in the Annual Position Statement is limited. The five year period used to calculate windfall does not take into account the effects of Covid and subsequent financial crisis, and whether this has impacted upon delivery rates or not. We would expect (a) the calculation of windfall to be based on a longer period, allowing for fluctuations and economic cycles to be taken into account, (b) for the calculation to incorporate a discount to allow for non-delivery (which can be around 35-40%), and (c) to break this down spatially to understand how and where windfall delivery takes place across the Island. The evidence does not do this.

14. In short, the Local Plan and supporting evidence does not, at any point, explain how the windfall housing figure for the Neighbourhood Plan areas has been calculated, and no compelling evidence has been provided to demonstrate that the windfall allowance will, in any event, be a reliable source of supply.
15. Assigning a housing requirement of 30 homes to each of the Neighbourhood Plan areas is overly simplistic. Beyond the points above it raises other questions. What happens if another parish is designated for Neighbourhood Planning purposes? Will this automatically be assigned a housing figure of 30 homes? What if all 33 Parishes on the Island are designated as Neighbourhood Plan areas? Does each get assigned the same housing figure? How does this relate to settlement hierarchy, environmental constraints, infrastructure carrying capacity and spatial distribution of growth?
16. The policy requirement cannot be found sound. It is not justified and not supported by evidence. The policy should be modified to remove the windfall housing allocation assigned to each of the Neighbourhood Plan areas.
17. Furthermore, and in any event, the contribution made by windfall towards the housing requirement in Policy H1 is unclear. The second para of the Policy breaks down the sources of supply, broken down by commitments, allocations and windfall, with the third para explaining that 100 homes per year will be delivered on windfall sites across the Island. The fifth para then sets out the windfall figure for each of the Neighbourhood Plan areas. It is unclear whether this forms part of the total windfall allowance for the Island, or whether it is over and above that. The policy wording (if it were to remain – and the Parish recommends that it doesn't) needs to clarify this, and thus how future assessments of housing delivery and supply against the requirements (e.g.: as required for the Housing Delivery Test) can be calculated. Removal of the requirement, as outlined above, would resolve this issue.
18. The Parish also contends that the housing supply figures contained within Policy H1 are incorrect. The table contained within the policy shows that there are 78 homes on large sites with planning permission in the Parish. This information links through to Appendix 1 of the Local Plan which breaks planning permissions down by 'regeneration area'. Sites in Nettlestone and Seaview are contained within the 'Ryde regeneration area'. Three sites are listed as being in the Parish, including:
  - i. Former Pondwell Holiday Camp (application ref.: P/00867/17): Permission for 25 homes, currently under construction. The Local Plan assumes 11 homes from this site will contribute towards housing supply in the Plan period.
  - ii. Land north of Woodland Close, Puckpool Hill (20/10733/OUT): The Local Plan assumes that this site will contribute 50 homes in the Plan period. However, this site was subject to an outline planning application validated in October 2020 and which was due to be determined in January 2021. The timeframe for determination is shown on the IoW planning application portal as being extended to March 2024. However, the last correspondence on the portal associated with this site is dated June 2022. Given lack of progress on the site it cannot be relied upon as contributing to the supply of land for new homes. It

does not have planning permission, does not constitute a 'committed site' and should be removed from the calculation of housing supply.

- iii. Gibb Well Field (P/00496/18): The Local Plan assumes that 17 homes will come forward on this site during the Plan period. The site does benefit from outline planning permission, and does therefore represent a reasonable prospect for delivery in terms of national guidance. However, the site has been subject to further planning applications for reserved matters: the application was validated in July 2023 and was originally due to be determined in October 2023, with that being extended to January 2024 but, at the time of writing, it still remains undetermined. A key issue relates to the suitability of access and impact on parking associated with the requirement for implementation of a Traffic Regulation Order, an application for which was subsequently refused. Correspondence from Highways indicates that conditions associated with this have not been satisfied, raising significant concerns about the deliverability of the site. If this cannot be satisfied then it should not be relied upon in calculations of housing supply.

19. If the land north of Woodland Close and that at Gibb Well Field are discounted from the housing supply, it would reduce the number of new homes on sites with planning permission in the Parish to 11, rather than 78.
20. However, Appendix 1 also includes land at the former Harcourt Sands Holiday Park as being a site with planning permission for 128 homes (P/00573/15, and P/01127/16). The Appendix assigns this site to Ryde. Although part of the Ryde settlement area it is actually within the Parish of Nettlestone and Seaview, as correctly indicated on the interactive policies map associated with the Local Plan. This needs correcting in the Appendix and Policy H1. Adding it to the 11 homes forming part of the supply as noted above would increase the number of new homes with permission in the Parish to 139. It is unclear how this then links through to other matters, such as infrastructure requirements within the Parish. Either way, it would mean the 'windfall' requirement of 30 homes for the Neighbourhood Plan area can be considered to have been met and, notwithstanding points above, that requirement should be removed for the Parish. The approach to housing supply figures in Policy H1 needs to be clarified and amended.

#### ***Growth locations and local needs***

21. Policy EV10 (Preserving settlement identity) establishes a settlement gap between Nettlestone/Seaview and Ryde, and between Nettlestone/Seaview and St. Helens. This is mapped in Figure 1. The purpose of the gap is to preserve the separate identities and character of individual settlements, and to preserve the generally undeveloped and open nature of land in the gaps. This is strongly supported by the Parish Council, being a long term aspiration included within the Parish Plan.
22. Policy G2 (Priority locations for housing development and growth) establishes a settlement hierarchy. It directs growth to primary and secondary settlements, and rural service areas. Ryde is defined as a primary settlement. Parts of Ryde, as shown on Figure 1, overlap with the Parish boundary. These generally comprise areas of

previously developed land well related to the main settlement area and where development is directed.

23. Policy G2 defines Nettlestone and, separately, Seaview, as ‘Sustainable rural settlements’. Policy G2 states that these areas do not benefit from a settlement boundary and where development for housing, including windfall development, will only be supported if they meet a specific local need. This approach is also supported by the Parish Council. However, and as stated above, this undermines the establishment of a windfall housing target for the Parish (in Policy H1) but where this is not supported by any evidence.

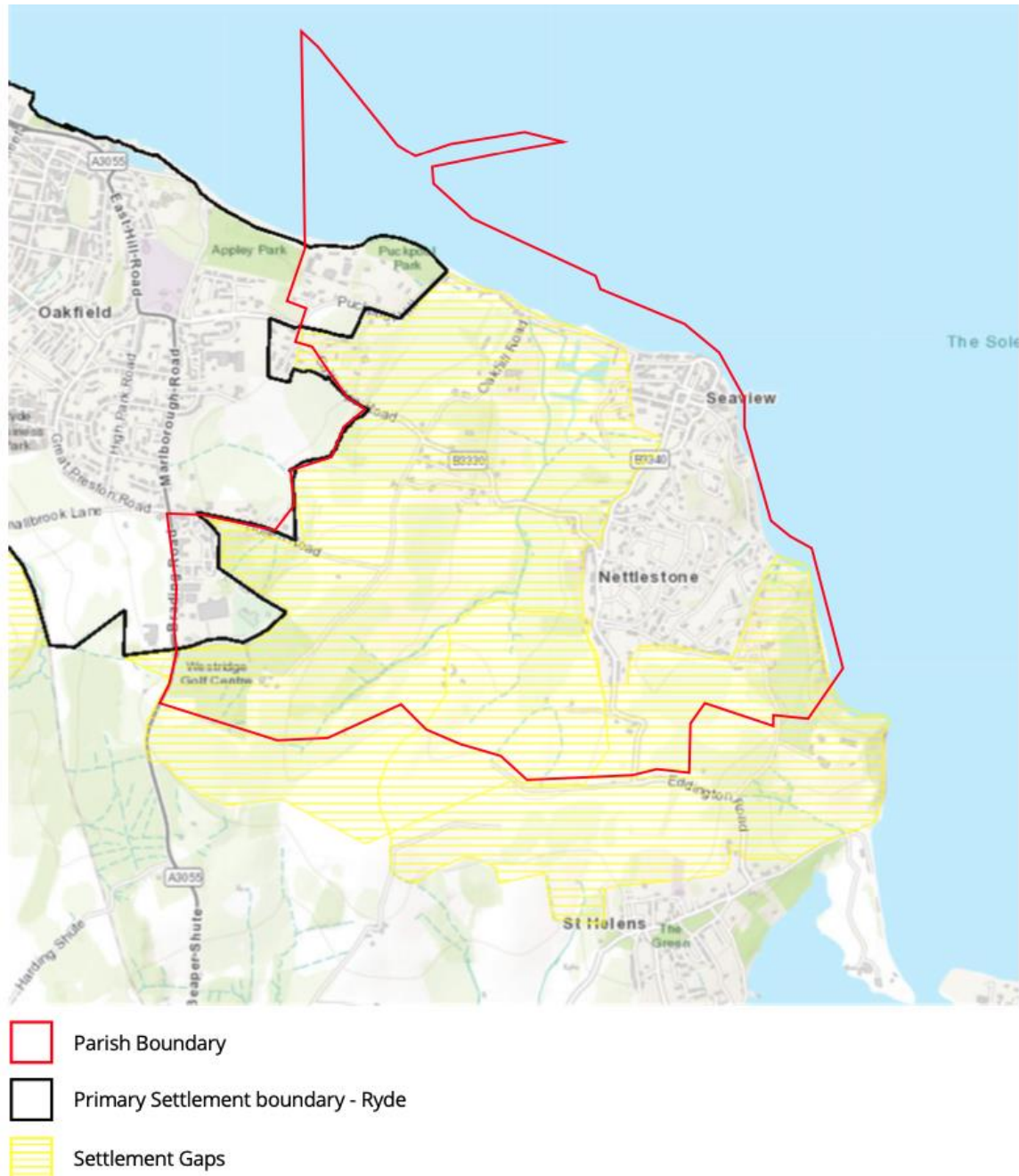


Figure 1: Extract from online version of Local Plan policies map, showing the Ryde settlement area and defined settlement gap between (a) Nettlestone / Seaview and Ryde, and (b) Nettlestone / Seaview and St. Helens. The Parish boundary has been overlain onto this.

24. In terms of identifying a local need for housing (as specified in both Policy G2 and H4: infill opportunities outside settlement boundaries) the Parish notes that Policy H5 (Delivering affordable housing) makes reference to findings within the IoW Housing Needs Assessment as well as information within adopted Neighbourhood Plans and parish level housing surveys. This is supported. The Parish Council is, through the Neighbourhood Plan, preparing a Parish-specific Housing Needs Assessment. This has a particular focus on matters of affordability, housing size and type, particularly in response to demographic patterns, and the impact of the second and holiday home market.
25. The Parish Council is also supportive of paras 7, 8 and 9 of Policy H5 which seek to ensure that affordable housing: (a) remains affordable in perpetuity and is used as a primary residence, (b) that it is designed to be tenure-blind, and (c) that it will be subject to local connection criteria. To strengthen this, the Parish Council recommends that the Local Plan provides a definition for 'local connection'.
26. Policy H5 is closely related to Policy H8 (Ensuring the right mix of housing) which provides the preferred breakdown of housing type sizes by tenure to be delivered. This is an Island-wide breakdown and does not reflect the granularity of housing market dynamics in different locations (and which was the purpose of identifying sub-areas within the IoW Local Housing Needs Assessment). The first para of the policy states that proposals will need to respond to 'the latest Housing Needs Assessment and/or Local Housing Needs Surveys'. For consistency with Policy H5 the wording should be amended to make clear that this also includes Housing Needs Assessments prepared for Neighbourhood Plans. There is otherwise a slight tension between the two policies. The Parish also suggest that the ordering of the Local Plan is amended so that Policy H5 and H8 follow one after the other as they are intrinsically linked.
27. Policy H5 establishes an affordable housing requirement of 35% on schemes of ten homes or more. The Parish Council questions whether this will deliver the amount of affordable housing required to meet local needs.
28. The most recent IoW Annual Monitoring Report for 2022-23 states that the housing affordability ratio across the Island is 9.27:1. By comparison, mortgages are generally offered on a ratio of 3.5:1. This effectively puts housing out of reach of most people, unless they benefit from equity or some other form of savings. At the same time, the Monitoring Report also states that there is an increasing demand for housing, which is reducing the availability of first time buyer accommodation and exacerbating the need for affordable housing for people on low incomes. But despite this, affordable housing completions have been and remain low, and well below targets established in the Housing Needs Assessment. This is well illustrated in the graph below (Figure 2) extracted from the Annual Monitoring Report.
29. House prices are, on average, higher in Nettlestone & Seaview than they are for the Island as a whole. The affordability gap is thus greater in the Parish and is compounded by the impacts of the second and holiday home market.
30. The consistent undersupply of affordable housing against requirements raises a very real concern: there is simply no evidence to suggest that affordable housing will be

delivered in the numbers needed and that this will create a significant shortfall in the areas of greatest need, including delivery of smaller homes for younger families otherwise excluded from the housing market.

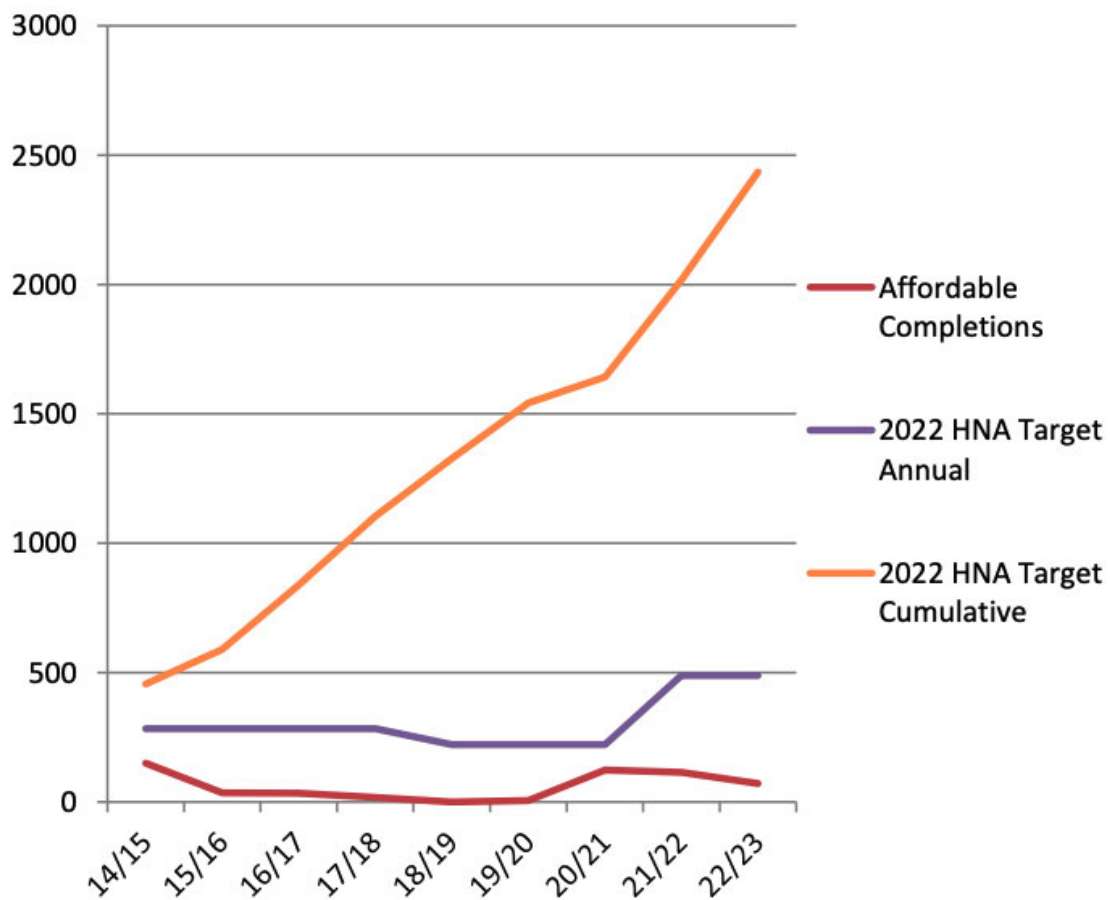


Figure 2: Graph extracted from the IoW Annual Monitoring Report 2022/23, showing actual delivery of affordable housing against targets.

31. It should be made clear that the Parish Council is not suggesting that the thresholds and targets for affordable housing should be revised downwards to reflect the reality of delivery (indeed – it strongly supports an increase over and above this), but rather that alternative housing products need to be delivered and that the Local Plan should be far more proactive in helping to bring these forward.
32. To this end, the Parish Council notes and supports Policy H10 (Self and custom build). However, the policy is drafted as one that expresses support for proposals for self and custom built homes, rather than requiring them (for example, as a proportion of all plots on major housing sites). It will not necessarily lead to delivery of any such homes on the Island.
33. References to First Homes are limited in the Local Plan to those that represent exception sites (as per Policy H7: Rural and first homes exception sites). Reference to First Homes as an affordable housing product should be clearly stated in Policy H5, forming the mix of different housing types and tenures to be delivered. The Local Authority also has the ability to increase the nationally set discount on First Homes from



30% to 50%. Given the clearly acknowledged affordability challenges on the Island the Parish would expect the Local Plan to establish a higher discount and, acknowledging that market conditions vary across the Island, provide scope and support for Neighbourhood Plan groups to establish different levels of discount where suitably evidenced by Parish-specific Housing Needs Assessments. Policies in the Local Plan in respect of affordable homes are thus ineffective as they will not deliver the scale and type of new homes needed.

34. Returning to the matter of growth locations and settlement hierarchy, Policy G2 identifies a series of 'sustainable rural settlements'. As above, these include Nettlestone and Seaview. Supporting text (at para 6.17) states that these settlements do not have settlement boundaries. They do not therefore form the focus of development on the Island, which comprise the boundaries of Primary and Secondary settlements, and Rural Service Centres.
35. Para 6.17 however explains that IoW Council wishes to carefully manage growth in the Sustainable Rural Settlements, focusing on small infill development opportunities, reuse of previously developed land and or development of rural exception sites. Whilst the Parish Council does not disagree with this, it is unclear how and why this approach is differentiated from all other small settlements across the Island which are not listed as a Sustainable Rural Settlement and where the same policies in respect of infill, previously developed land and rural exception sites equally apply. Furthermore, the identification of Sustainable Rural Settlements has no application in any other section of the Local Plan: there is no reference to these for example in the hierarchy of town centres, nor in respect of how and where social and community infrastructure should be provided.
36. The question therefore is why does the Local Plan identify Sustainable Rural Settlements if there is no specific policy applicable to these? The Policy as currently worded is thus ineffective as it is not clear what the intent is and how this should be interpreted.

### **Second Homes**

37. Policy E9 (Short term let holiday accommodation) says that proposals for change of use from residential properties to short-term holiday lets will only be supported in certain locations. This recognises the impact of such change of use on access to housing for local people, but also the importance of the tourism sector on the local economy. Such an approach is supported by the Parish Council. However, the issue is wider than short-term lets and also extends to the impact of the second and holiday home market.
38. Policy C15 (community-led planning) says that Neighbourhood Plans may explore this area further and place restrictions on new build properties from being used as second and holiday homes. Whilst this is welcome it does, in effect, absolve the local authority of all responsibility from addressing what is a critically important component of the housing market. The Island Planning Evidence Paper on Second Homes effectively states that, because the test of Basic Conditions for Neighbourhood Plans is lighter than the Examination process for Local Plans, it is easier for the issue to be addressed through a Neighbourhood Plan. This is a dereliction of duty: if, as the evidence indicates (and it does), that second and holiday homes is an issue, then the Local Plan should be seeking to address this.

39. This is of particular importance in Nettlestone & Seaview: the evidence paper notes that coastal communities predominate amongst those where there is a high proportion of homes with no usual households and that Nettlestone ranks highly on this: it is eighth on the list of communities in England with the highest proportion of houses with no usual residents. The evidence also shows that the Isle of Wight as a whole ranks nineteenth out of all local authorities in England based on people with a second address as a proportion of all usual residents. It also reviews Council Tax data and uses this to conclude that more than 22% of the housing stock in Nettlestone & Seaview comprises second homes.
40. The evidence paper concludes that levels of second home ownership on an Island wide basis are not sufficient to justify an Island-wide policy restriction. However, it acknowledges that there are 'hotspots' where this is an issue. It suggests that other policies, such as those in respect of spatial distribution and housing mix, will minimise second homes and address affordability issues. It won't: these policies simply say how and where new housing will be considered appropriate or not. These do not then link through to how that home is used. This thus represents a gap in policy.
41. The evidence paper says that Neighbourhood Plan groups could look to introduce policies on second and holiday homes if they think it an issue. But if IoW Council has the data and supporting evidence to indicate where the 'hotspots' are, then why isn't this evidence used to support a policy in the Local Plan? Indeed, Policy E9 does just this in terms of identifying specific locations where changes of use from residential to short-term lets will be supported, and, by definition, those where they won't be supported.
42. There are only six designated Neighbourhood Plan areas on the Island (of which Nettlestone and Seaview is one). The reliance on these Plans to address the second and holiday home sector will only have limited, localised impact, requires those areas to research and prepare sufficient evidence, and where the quality and robustness of that evidence may vary from place to place. It will not address challenges in those areas that are not designated for Neighbourhood Planning and is likely to result in a patchy and inconsistent application of policy across the Island.
43. Policy E9 is thus ineffective as it does not sufficiently address the challenges of the second and holiday home market. Policy H5 (Delivering affordable housing) includes a clause that when new affordable homes are delivered, these will be subject to a condition that retains them as the principal resident of the occupant. Similar text could be extended to all new build homes in the 'hotspots', with the second and holiday home market instead being satisfied by the sale and purchase of existing homes.

### **Design**

44. The most recent NPPF places great emphasis on the importance and role of design in creating 'well-designed and beautiful places'. The Parish Council supports aspirations for well-designed and high quality places as set out in Policy C1 (High quality design for new development) of the Local Plan. The importance of design and character is emphasised throughout the Local Plan, being referenced in numerous policies, including but not limited to: Policy C10, G1, H1, KPS1, KPS2, H3, H4, H6 and H9. The frequency

with which design is referenced in the Local Plan emphasises the importance of a strong, unambiguous policy which establishes clear expectations.

45. However, Policy C1 is very general, essentially establishing principles, but without showing or saying how these should be interpreted and applied so that development responds appropriately to character and helps enrich the quality of place. Local Authorities are required to prepare Design Codes (as per para 133 of the NPPF). There is reference in the Local Plan to production of such a Code (at para 5.19), but this is silent on when it will be prepared, what it might cover, and how it will be used to inform and help determine planning applications. We would expect to see reference to the Design Code and, at the very least, a 'forthcoming Design Code', to be included in Policy C1, allowing for use of this within decision making at a future date. Until such time as a Code is prepared Policy C1 represents no more than 'warm words', allowing different interpretations of what is meant by character, why this is important, and how it should be responded to.
46. Supporting text to the Policy (at Para 5.4) says that IoW Council expects the principles within the National Model Design Code to be used as a tool to steer development. Whilst helpful, this should not be seen as a replacement for a local authority prepared Design Code as it does not, and indeed cannot, reflect and present Codes that respond to specific local qualities. In the Isle of Wight, the relationship between development and the sensitive natural environment, the coastline and topography, are key features that should be developed further and which the National Model Design Code is unable to address.
47. Supporting text (at Para 5.6) goes on to state that IoW Council will refuse applications for poor design that fail to take opportunities available to improve the character and quality of an area. The Parish is supportive of this position but questions how such decisions can be effectively justified in the absence of an Island Design Code that clearly indicates how development should respond to character. This is crucial given para 139 of the NPPF which states that '*development that is not well-designed should be refused, especially where it fails to reflect local design policies...*'.
48. The way the Policy is framed at the moment means that it is left to applicants to determine character and distinctiveness, and appropriateness of response, through their design approach, but this can and likely will vary between applicant. The risk is that this results in a piecemeal and uncoordinated approach which then undermines the very character and qualities that the policy is seeking to enhance.
49. It is noted that the supporting text (para 5.5 and again at para 5.19) makes reference to 'community-led design codes' and use of these to help inform proposals for new development. The Parish Council supports this and, as set out in the introduction to these representations, is preparing a Parish-specific Design Code alongside the Neighbourhood Plan.
50. The Parish Council fully expects IoW Council to prepare a Design Code for the Island which establishes clear expectations as to what is good design and what the key qualities of different places are. Given the importance of design in creating successful places this should be fast-tracked and prepared for adoption alongside the Local Plan.

51. Given work on the Neighbourhood Plan, the Parish Council would be interested in understanding how Neighbourhood Planning groups can work with IoW Council on the Design Code process (para 132 of the NPPF for example says that design policies should be developed with local communities which, to date, hasn't been done by IoW Council). The Parish envisages a two-tier approach: IoW Council establishing strategic design principles for the Island as a whole (and which might cover matters such as sustainable design approaches, street typologies, parking provision etc), with Neighbourhood Plans then having the potential to provide more local interpretation of these. The Parish Council would support clear reference to such an approach in the Local Plan.

### *The Twenty-minute Neighbourhood*

52. Criteria 'n' of Policy C1 includes what appears to be a 'throw-away' remark about the need for new development to incorporate the design principles of the '20 minute neighbourhood'. A similar reference is made in criteria 'g' of Policy T1 (Supporting sustainable transport). These are the only reference to the concept of the '20-minute neighbourhood' in the Local Plan.
53. The Parish is supportive of the concept and inclusion of this in the Local Plan. However, it must be recognised that the concept is about much more than 'design principles'. The concept, as developed by the Town and Country Planning Association (TCPA) is about 'creating healthier, active and prosperous communities'. It extends to the location and mix of uses, provision of the full range of supporting community facilities to support and sustain day-to-day life, supporting ease of access to these, providing choice and opportunity in terms of housing mix and local employment opportunities. The concept reflects an approach to sustainable development.
54. The TCPA guide to the '20-minute neighbourhood' provides advice for local authorities on how they can use and develop the concept. However, it is not clear how IoW Council has made use of the '20-minute neighbourhood' concept to develop policy in the Local Plan. If it truly is to be a key tool in the creation of sustainable development then it should be used to help inform the scale and direction of growth, need for and relationship with services and facilities. We cannot see how and where this has taken place. It has not informed the settlement hierarchy study nor the site selection process, and does not appear to have been fully followed through into policies in the Local Plan.
55. Through the Local Plan and the work underpinning this IoW Council has an opportunity to map the provision of services and facilities, the quality of these and access to them, and help use this to inform potential directions of growth and where new infrastructure might be directed. It does not do this.
56. In isolation, it is unclear how proposals for development are expected to incorporate the design principles of the '20-minute neighbourhood'. This needs to be addressed at the 'town-wide' scale and led by IoW Council.
57. At present, the very limited reference to the '20-minute neighbourhood' leads the Parish to question the effectiveness of the approach taken. The outcome will most likely be 'business as usual'. The Local Plan needs to be far more aspirational and look towards a sustainable and successful future for the Island and its communities. It should be more proactive rather than relying on the market to bring forward schemes

that may or may not meet the ambitions expressed by the 20-minute neighbourhood. This relates to the location, layout and mix of development, as well as provision of essential infrastructure.

58. A key aspect of the '20-minute neighbourhood' is the way in which it helps reduce reliance on the private car by supporting compact, complete and well-connected places, where services and facilities are within close proximity to and easy access of the home. For active and sustainable travel to be an attractive proposition it needs to be a compelling alternative to the car. This is made clear in the NPPF, with para 108 stating that *'transport issues should be considered from the earliest stages of the plan making and development proposals, so that... opportunities to promote walking, cycling and public transport use are identified and pursued'*. Para 110 goes on to state that *'planning policies should... identify... sites and routes which could be crucial in developing infrastructure to widen transport choice... and provide for attractive and well-designed walking and cycling networks with supporting facilities'*.
59. The IoW Council should be exploring all measures to support this. A fully integrated network of active and sustainable movement routes that is direct, safe and convenient for people to use must be sought. This also extends to the use of other complementary interventions, including filtered permeability, low traffic neighbourhoods and school streets. Reliance on applicants to 'where possible, incorporate 20-minute neighbourhood design principles' will simply not deliver on the ambitions for the Island. Indeed, use of the words 'where possible' means there is no requirement for applicants to meet these aspirations. It is crucial for IoW Council to address this as it is not just a transport issue but is central to inclusion, the environmental, health and well-being agendas.

### **Local Green Spaces**

60. Policy EV7 (Local green spaces) seeks to protect designated Local Green Spaces from loss in line with the NPPF. This is supported by the Parish Council.
61. However, the policy text only refers to Local Green Spaces identified on the Local Plan Policies Map. Supporting text (at para 4.74) notes however that Local Green Spaces can be designated through both the Local Plan and Neighbourhood Plans. Policy EV7 should thus be expanded to make clear that the policy will also apply to Local Green Spaces designated through the Neighbourhood Plan process. The supporting text should express support for communities who wish to identify and designate Local Green Spaces through the Neighbourhood Plan process. Equally, Policy C15 (Community led planning) lists those policy areas which Neighbourhood Plans may wish to consider. This should be extended to include reference to Local Green Space designations.
62. Although potential local green spaces have been assessed for designation through the Local Plan, some of these were discounted by IoW Council because it was unclear what value they have for the community. This does not mean they do not hold value. Indeed, this represents an important area where the community itself can present that information and support designation of other locally important spaces. IoW Council should support this through amendment of Policy C15 and EV7.

### Summary points

63. These representations are made on behalf of Nettlestone & Seaview Parish Council. To be clear: the Parish Council is supportive of the Plan-led system and recognises the importance of and benefits of an up-to-date Local Plan being adopted. This support for the plan-led system is demonstrated through the commitment by the Parish Council to prepare a Neighbourhood Plan. The Parish Council however believes that the Local Plan needs amending as policies as currently drafted are unsound and ineffective. In summary:

- a. Policy H1 is unsound. The setting of windfall housing targets for the designated Neighbourhood Plan areas is overly simplistic, is not based on evidence and is unjustified. The approach taken does not follow guidance in the NPPF nor the associated Planning Practice guidance. The lack of supporting evidence for the policy means it is in conflict with Policy G2. To be made sound the windfall housing targets for the Neighbourhood Plan areas in Policy H1 should be removed. Furthermore, the housing supply figures (large sites with planning permission) assigned to Nettlestone & Seaview Parish within Policy H1 and Appendix 1 of the Local Plan are incorrect, relying on sites that cannot be considered deliverable and wrongly assigning one site to Ryde rather than the Parish. To be made sound these figures need to be updated and, beyond this, clarification provided as to what this means in terms of the windfall housing target for the Parish.
- b. Policy H5 is ineffective as it does not establish a definition of local connection and thus how this should be interpreted by applicants and decision-makers. Policy H8 is closely related to Policy H5 but is inconsistent with that as it does not acknowledge Housing Needs Assessments prepared as part of Neighbourhood Plans. Until amended it is ineffective.
- c. Furthermore, Policy H5 is ineffective as it makes no reference to the First Homes housing product, nor the discount rates to be applied to these to help address the affordability gap.
- d. Policy H10 is ineffective as it will not lead to the delivery of any self or custom build homes. IoW Council needs to be far more proactive in helping to shape delivery of this housing product.
- e. Policy G2 is ineffective as it refers to 'Sustainable Rural Settlements' but does not explain what is meant by this category of settlement and how the approach to development in these is differentiated from proposals in the wider rural area.
- f. Policy E9 is ineffective as it does not address the issue of second and holiday homes, despite the evidence having been prepared to support the drafting and implementation of such a policy on a spatial basis.
- g. Policy C1 is ineffective as it does not provide sufficient clarity on what is meant by local character and how this should be reflected in proposed new development. This has wider implications for the Local Plan with matters of design and quality referenced in numerous policies. The Local Plan needs to be

supplemented by production of a Design Code at the earliest opportunity, with reference made to this in the policy, and support expressed for Neighbourhood Plans to develop locally-specific Codes.

- h. Furthermore, Policy C1 (and Policy T1) are ineffective as they express support for '20-minute neighbourhood' design principles but fail to acknowledge and define what those principles are. Indeed, the Local Plan as a whole fails to grasp the concept of the 20-minute neighbourhood and how this can and should be used to inform an approach to sustainable development.
- i. Policies EV7 and C15 are ineffective as they do not recognise that Neighbourhood Plans may include Local Green Space designations, that they have the ability to do this as conferred through the NPPF, and that they will have the same policy weight as the Local Green Spaces designated in the Local Plan. Policy C15 should also make clear that proposals for development will need to demonstrate how they respond to policies within Neighbourhood Plans.
- j. All policies would benefit from being reformatted, so that all paras are numbered, supporting the way in which they are referenced and providing clarity for all users.

64. On a final point, the Parish notes and welcomes the use of and links back to the UN Sustainable Development Goals throughout the Local Plan. Equally, and notwithstanding the Written Ministerial Statement of December 2023 (by Lee Rowley MP) in respect of setting sustainable building standards, the approach taken to Zero Carbon Development in the Local Plan and supporting evidence paper is welcomed and supported by the Parish Council.

Yours faithfully,  
for Troy Planning + Design

**Jon Herbert**

Director

cc:

██████████  
Clerk / Financial Officer

Nettlestone & Seaview Parish Council



