

19 August 2024



Our ref: IPS Representations on behalf of: 2734-11509 Perry Properties (IW) Ltd.

To: policy.consultation@iow.gov.uk
by email

Dear Sir/Madam

RE: ISLAND PLAN STRATEGY (IPS) REGULATION 19 REPRESENTATION: LAND REAR OF ROSEWOOD AND TRENALE (KNOWN AS SCHOOL HOUSE MEADOW) AND INCLUDING ST MICHAELS HIGH STREET, WHITWELL

BCM are writing on behalf of our clients and in response to the Regulation 19 Island Plan Strategy (IPS) consultation and in particular with regards the housing policies and allocations as set out in the draft IPS and specifically in relation to Land Rear of Rosewood and Trenale (known As School House Meadow) And Including St Michaels High Street, Whitwell.

Our clients, Perry Properties (IW) Ltd is a developer and registered affordable housing provider. They have recently had an application refused:

21/01827/FUL | Proposed development of 22 dwellings, access road, parking and landscaping (revised plans, tree report and ecological assessment) (revised description) (revised site address) (re-advertised application) | Land Rear Of Rosewood And Trenale (known As School House Meadow) And Including St Michaels High Street Whitwell Isle Of Wight

The proposed Location and Site plans are included as Appendix 1.

For the purpose of this representation, it will consider why the site should still be allocated in strategic terms, setting out why the site is suitable, albeit not dismissing the fact that via an allocation (or planning application) that wider ranging material considerations would need to be collated to inform the design and execution of the development.

In terms of specific policies, this representation will concentrate on:

- G2: Priority locations for housing development and growth
- H1: Planning for housing delivery
- H2: Sites allocated for housing
- H4: Infill opportunities outside settlement boundaries
- Policy EV2: Ecological Assets and Opportunities for Enhancement
- Policy EV8: Protecting High Grade Agricultural Land

The representation will refer to specific paragraphs and set out why it is considered the draft IPS is unsound and is not consistent with national policy.

Red Barn | Cheeks Farm | Merstone Lane | Merstone | Isle of Wight | PO30 3DE
t 01983 828800
www.bcm.co.uk

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For the avoidance of doubt, BCM would like to attend any pre-hearing or hearing when the IPS reaches examination stage.

There are several parts of the IPS which are inconsistent with the NPPF and are unsound. The IPS should be a 'forward looking' plan which meets the objective of paragraphs 15 & 16 of the NPPF. It is questionable, given the state of play, whether it:

- Has been prepared positively, in a way that is aspirational but deliverable.
- Is clearly written and unambiguous (as it defers several obligations to a future plan or decision-making process).

It is also unsound because it fails the requirement of paragraph 22 (NPPF) in that it should *"should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery"*.

For example, the IPS is based on a 2022 iteration which has not evolved or been adopted in a substantive way. Being some 2 years forward, even when reviewing housing supply, it now includes completions from 2022/23 and 2023/24. If one were to take out those completions for 2022/23 (357 dwellings) they would need to be replaced and provided for in subsequent years.

The above is even before contemplating the Council's housing approach to deliver an average of 453 dwellings per annum (based on exceptional circumstances) which is well below the current Standard Method of 703 dwellings or the elevated Proposed Method which equates to 1104 dwellings per annum - an uplift of 499 dwellings per annum. As such, Policy H1 (Planning for housing delivery) is unsound and not consistent with government policy.

As outlined throughout, the exceptional circumstances presented by the Council via the suggested 'ceiling' is premeditated on the fact the Island has developed no clear strategy and allocations since the adoption of the historic Unitary Development Plan (1996-2011). The UDP established a range of small and large scale allocations which gave the confidence and stability for investment and growth. That meant, at the back end of the UDP cycle that various housebuilders, including two national housebuilders, were exceeding delivery rates because large scale allocations were being built. The current Island Plan (2012) set to defer allocations via Area Action Plans. At adoption stage of the Island Plan, the Inspector was critical with such approach and requested the Council take prompt action as to not severely hinder delivery, stating that:

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“the Councils 5-year land supply sees a delivery of some sites that are not presently allocated. Clearly the prompt preparation of forthcoming AAP’s, notably those for the Medina Valley and Ryde (apposed in the Local Development Scheme) submission in 2012 and 2013 respectively, will be a significant factor in bringin sites forward to meet both the 5-year requirement and the longer term Core Strategy total”.

It cannot be said that prompt action has been taken since 2012 to bring sites forward by an allocations process considering the Island is now 12 years post the adoption of the Core Strategy. The Island is marred with uncertainty, risk, considerable time delay and frustration. To frame other reasons for an ‘exceptional circumstance’ is disingenuous and misleading, albeit there is common ground that the Island does have some practical challenges (which are not insurmountable).

The IPS has been deflated since the 2018 version and has now removed a considerable swath of allocations spread across the Island. It does not readily or actively deal with allocations in the Rural Service Centres and only leaves a handful of focussed polices to be applied to the Sustainable Rural Settlements. They will very unlikely assist small-scale Island builders who develop the large majority of windfall sites. There is still an expectation that windfall sites will deliver a considerable amount of the housing supply, but the marginalised policy structure and the lack of small site allocations is disconcerting and unsound.

In correlation with the above, the IPS is premeditated on a plan wide viability assessment which evolved via various iterations up to 2022. Since 2022 the IPS has set to change the preference toward affordable housing tenures and discount levels and introduced a swath of new S.106 contributions. This is even before recognising the considerable inflationary rises and mortgage rate instability caused by the ‘Liz Truss’ mini budget. In that regard the IPS is not deliverable and is unsound.

Polices such as H4 place unreasonable pre-conditions on defining a ‘local need’ when that need is outlined by the IPS as a windfall which itself forms a critical part of the Island’s housing supply. It also seeks to scope out agricultural land which is disjoined and unique from other housing policies which accept development in rural areas.

Paragraph 1.4 of the IPS states that *“the Island consistently relies on smaller, Island-based developments with smaller sites, lower delivery rates and more limited development pipelines”*. Policy G1 states *“The allocations offer a range of sites of differing scales and delivery rates, with a focus on smaller and medium sized developments”*. However, the Council make no real attempt to allocate smaller sites spread across the Island in accordance with their settlement hierarchy and simply seek to allocate (mainly) larger development sites in the Primary Settlements and Secondary Settlements. Furthermore, in terms of housing numbers, the Council, via Policy G1 rely on two key priority allocated sites at Camp Hill and Newport Harbour, both are which are questionable (Policy KPS1 and KPS2).

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Whilst the approach in Policy G2 for a settlement hierarchy (Primary Settlements, Secondary Settlement, Rural Service Centres and Sustainable Rural Settlements) seems logical, the Council is then resistant to help deliver development via allocations within the Rural Service Centres and Sustainable Rural Settlements. Allocations in the Rural Service Centres are limited and non-existent, and none are within Sustainable Rural Settlements.

The draft IPS strategic policy G2 identifies Whitwell as a Sustainable Rural Settlement in which the focus is for sustainable housing growth within their settlement boundaries. The Council's own evidence – the Rural Sustainability Matrix Review (April 2022) – attached as Appendix 2 – has been developed to help create a hierarchy of settlements across the Island based upon their access to facilities and services to identify settlements which have the ability to accommodate sustainable growth. This report states that (on page 3): *“Any settlement scoring 24 points or more is identified as a suitable location for additional growth”*, and calculates that *“Niton and Whitwell combined have a population of 2,178 and score over 30 points. They both have good access to a range of services and facilities along with good public transport access. Niton has a primary school, GP Clinic and a permanent library. Overall, Niton has more facilities and services and is better placed to accommodate limited growth”*. Please see Appendix 2 for the Rural Sustainability Matrix Review April 2022.

Our client's site along with other sites within the Parish of Niton and Whitwell, were included within the Council's Strategic Housing Land Availability Assessment (SHLAA) (November 2018), along with previous SHLAA reports, which were prepared to inform the draft Island Plan.

The site comprises SHLAA site IPS117 recognised by the Council as being 'Deliverable' in the 2018 SHLAA Report, which states that *“If a site has been assessed as deliverable or developable there is an expectation that this site will come forward within the Island Planning Strategy period.”* An extract of the 2018 SHLAA Report, showing this site and its assessment, is included as Appendix 3. The 2018 IPS version included it within its draft policies (extract included as Appendix 4), although the 2018 version didn't progress to Reg 19. In fact, the 2018 (Regulation 18) IPS made a far more positive approach to deliver development and allocated land across the Island in general (inclusive of smaller sites).

Our clients worked up a submission on that basis. However, the site is no longer included within the latest SHLAA report or Reg 19 IPS. Our client worked up a submission on that basis, along with positive pre-application advice by the Council, with the Planning Officer stating that providing the proposal meets a local need, the principle of development is considered acceptable. There is no logical reason why this site should not be allocated, subject to conditions.

In fact, the 2018 (Regulation 18) IPS made a far more positive approach to deliver development and allocated land across the Island in general (inclusive of smaller sites). It included areas within the

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Sustainable Rural Settlements, including the subject site. To remove that certainty and to solely rely on policies H4, H6, H7, H9 and H10 for the Sustainable Rural Settlements will cause significant delay, objection and lack of certainty. The Council's housing supply suggested a delivery 100 dwellings via windfall sites (which could be the case). Giving greater certainty for where development should be located (via allocations) must be given high priority. The Strategic Housing Land Availability Assessment (SHLAA) determined a multitude of deliverable and developmental sites within or adjacent to the Sustainable Rural Settlements. There is no practical reason, bar political objection, why allocations should not be made. The Council's Rural Sustainability Matrix defined a clear rationale for accepting growth (including for Niton, as discussed above).

Furthermore, with regards to our client's previous planning application, this was not refused on the principle of residential development, but on other technical matters. Those technical considerations are being resolved now so that a revised planning application can be submitted. The following paragraphs from the Officer Justification is raised here to show how the Council considers Whitwell and this site as being within a sustainable location:

"Whitwell is not a 'defined settlement' for the purposes of SP1. Therefore, the application site is within the Wider Rural Area. Notwithstanding this, Whitwell is an existing rural village, with a built-up residential area centred around the High Street. Although local facilities are limited, the village is linked to Niton, which is a defined Rural Service Centre, via Rectory Road/Chatfeild Road/Kemming Road, with facilities/services in Niton, including a local shop, accessible by car, cycle, and public transport (bus) with travel time between approximately 5-10 minutes depending on mode of transport.

In conclusion, although the applicant hasn't submitted detailed information on housing need, officers considered that the proposal would make a significant positive contribution to meeting local housing needs on the Island (including need for affordable homes) and, notwithstanding the site location outside of a 'defined settlement', it would support local services and facilities within the village and within the nearby Niton Rural Service Centre, in light of the current housing delivery numbers. The proposal can therefore be supported 'in principle'".

Therefore, given the identifiable need for housing and the this focus on sustainable locations for such housing, it is disappointing that the IPS does not allocate any further development in Sustainable Rural Settlements and is only reliant on those windfall sites coming forward as cited within sections 7.515 albeit, in real terms, it is only Policy H4 (Infill Opportunities) and H9 (Housing on Previously Developed Land) that smaller builders could utilise. Policy H6 and H10 are bespoke to individuals while Policy H7 is directed to affordable housing providers (in general) or Registered Providers (our client). The policy and

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allocations approach will set to stifle and limit the ability of smaller builders and will have unintended consequences and will stifle delivery.

It is therefore questioned *where* Whitwell is to grow. Paragraph 6.13 of the draft IPS states that the approach of policy G2 is to direct new development to settlements that are already considered sustainable (where there are services, facilities, homes and jobs, and where there are the most sustainable modes of transport). It is clear that the Council has considered Whitwell as a sustainable location, capable of providing new houses. Policy G1 states that *“will be located in the most sustainable settlements on the Island, and through managed growth a number of settlements will see their sustainability improve”*.

This is then not consistent with national policy, as per the following paragraphs within the NPPF:

- NPPF Paragraph 27: “Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area” and
- (paragraph 70 of the NPPF) “Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”.

As stated, the site allocations contained within the draft IPS alarmingly comprise minimal sites outside of the larger towns on the Island, which are overlooking the need for growth of the rural villages such as Whitwell, which, in turn will hamper their ability to prosper and become economically and socially sustainable.

Considering the suggested revisions of the NPPF and the recent publication of housing need for each local authority based on standard methodology as set out by the Right Honourable Rayner, with mandatory housing targets which shows a significant uplift on the Island, and the previous consideration that Niton is a sustainable location for growth (and with SHLAA sites around Niton confirming this), Niton can clearly sustain more growth.

In recognising this, in our opinion Whitwell should include site allocations with our client’s land previously seen as ‘developable’ by the Council (as per Appendix 3) and draft allocations within the 2018 IPS version (as per Appendix 4). As such, the draft IPS, in its Regulation 19 form, contains housing policies and lack of site allocations which are unsound.

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Policy G5 is seeking to ensure planning permissions are delivered and the Council expects to see residential development starting as soon as practically possible, once planning permission has been granted. This is having and has had a debilitating effect on potential schemes, along with a wide range of smaller builders, SMEs and larger house builders who have seen considerable political resistance at all levels. If Policy G5 is felt to be sound by the Inspector, there must be some recognition that the Council themselves are complicit in how they operate and how they affect delivery – there is no reflection in G5 about how they can perform in a suitable timetable themselves and have their actions and consequences held into account.

Disbarring the above, the IPS make several policy recommendations which do not seem to be evidenced and/or are contrary to established industry standards and guidance.

Policy EV2 (Ecological Assets and Opportunities for Enhancement) considers, under paragraph 4.29, that buffer strips of between 8m and 16m should be provided between rivers and/or ordinary watercourses. Although buffering can be considered, it would seem more appropriate that the exact extent of buffering is considered at technical design stage and informed by surveys and explicit and detailed mitigation and enhancement packages. To set prescriptive measurements would seem to be unnecessary and unreasonable when the Council have presented no evidence why the measurements have been used.

Policy EV8 (Protecting High Grade Agricultural Land) is not particularly applicable to our client's application site because the land is not 'best or most versatile', but for the purposes of policy, if there is a desire to protect agricultural land, the policy and its subtext should factor in that development (which is identified to be 'in need') can act as an overriding material consideration to outweigh Policy EV8.

Conclusion

It can be seen that as a strategic starting point, the growth applied by the draft IPS does not correlate with either the Current or Proposed Method of calculating local housing need. The Council indicates that there are barriers to development, but this is marred against the lack of allocations since 2012 and the political instability which has increased time, risk and costs.

The application site sits in an area which is capable of delivering growth and has previously been assessed as being deliverable within the SHLAA process, with the recent planning application acknowledging it being a sustainable location for new housing, so the Council previously considered the site to be sustainable in all respects.

There is no landscape, visual or environmental barrier to the delivery of development subject to a careful approach to the mitigations, enhancements and layout. Our client has spent considerable time

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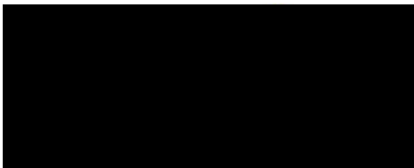
in working towards an appropriate scheme here, and is currently addressing the technical matters to address the reasons for previous reasons for refusal so as to resubmit an application, and will then be able to deliver this scheme within good time.

Thus, from a structural perspective, there is no reason why the land should not be allocated for residential purposes.

Significant and favourable weight should be given to this representation and the IPS allocations must be re-evaluated.

I trust that the above representations will be taken into account and positively reviewed.

Yours sincerely,



Richard Holmes BA(Hons) pg dip MA

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Please note: Letter sent by email only; original filed at BCM

Appendices:

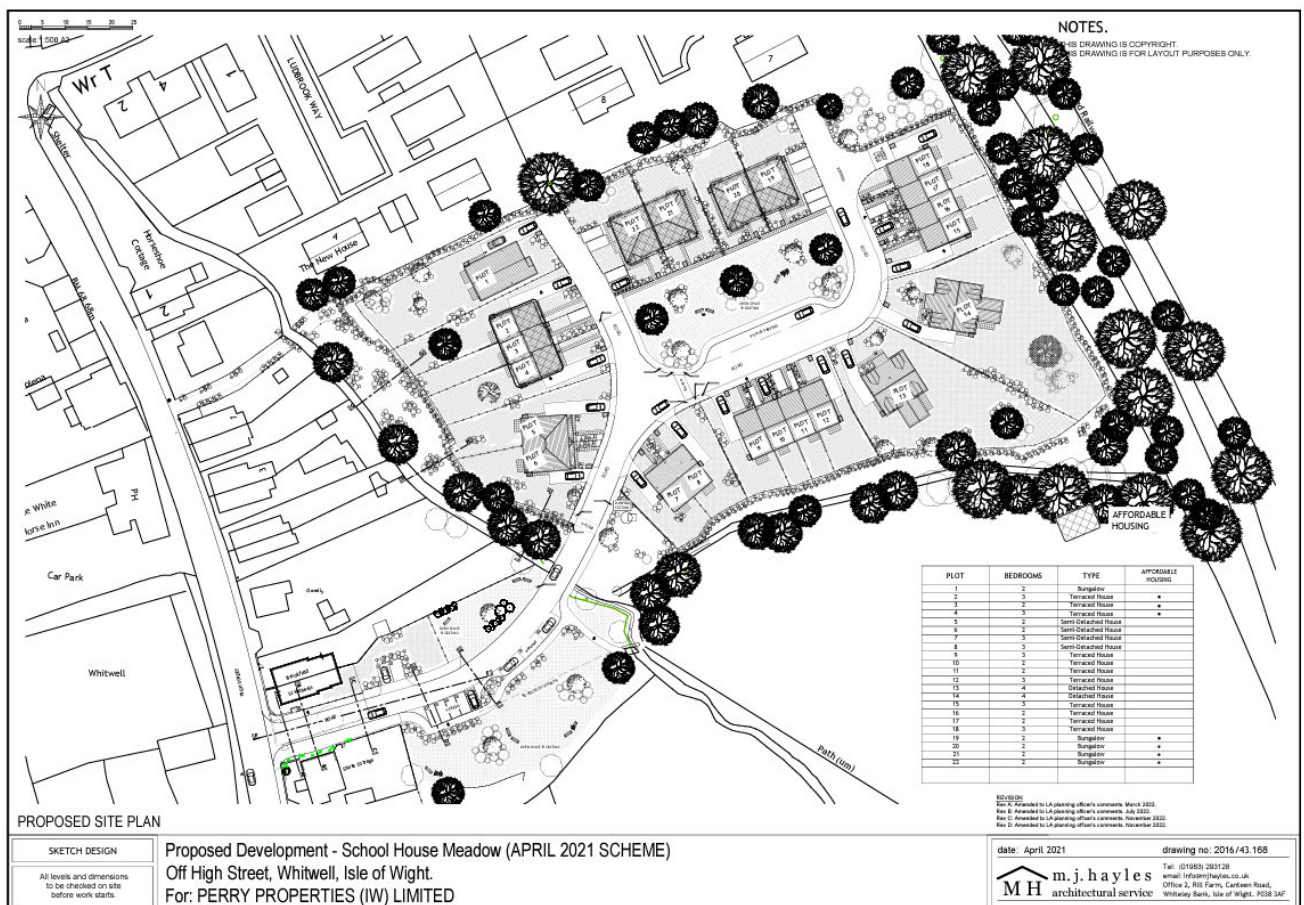
- 1) Proposed Site Layout 24-00798-OUT
- 2) Evidence paper - Rural Sustainability Matrix April 2022
- 3) Extract from the Council's Strategic Housing Land Availability Assessment (SHLAA)
- 4) Extract of 2018 IPS and allocations



Appendix 1 - Proposed Site Layout 24-00798-OUT

Appendix 1

Location and Site plans for planning application 21/01827/FUL





**Appendix 2 - IPS Evidence paper - Rural Sustainability Matrix April
2022**

Rural Sustainability Matrix Review

April 2022

Introduction

A sustainability matrix has been developed to help create a hierarchy of settlements across the Island based upon their access to facilities and services including for example, local shops, transport networks, schools, employment and health provision. This provides a way to identify settlements which have the ability to accommodate sustainable growth and where that settlement fits within the 'settlement hierarchy' across the island. The settlements assessed in this study are predominantly those in rural areas and do not include the current primary and secondary settlements (as defined in the Core Strategy) in the regeneration areas of Newport, Cowes, East Cowes, Ryde, the Bay, Ventnor or West Wight (including Totland and Freshwater). The sustainability matrix gives a total score for each settlement based on the availability of its services and facilities. Some of the smaller settlements (but not exclusively) tend to have fewer facilities and services in place and therefore not score as highly.

The sustainability matrix was originally developed in 2008 to support the Core Strategy that was adopted in 2012. This has now been updated to take account of any changes to facilities and services in each of the settlements and an additional criterion has been added on local employment. The purpose of the matrix is to help support draft IPS policy G2 when considering priority locations for growth and where settlements fit within the settlement hierarchy. High scoring settlements may move up in the hierarchy and low scoring settlements may move down. For information, Bembridge and Wootton were not included in the version of the matrix supporting the Core Strategy as they had a population of over 3,000, however they have been included in this version to ascertain how they score against some of the other settlements.

Methodology

Each of the settlements have been given a weighted score based upon the services and facilities within them. Some facilities are given a higher weighting as they are essential to daily living needs e.g., primary school, GP surgery and provision of an hourly bus service. Settlements with a higher population have also been given a greater weighting. This is because higher populations are likely to be able to support and sustain more services and facilities, even if they are not currently present, and may be more attractive to investment in that regard.

Since the 2008 study was undertaken, an additional criterion has been added on local employment. The availability of local employment is considered important to a settlement's viability and suitability for further growth. To score on this criterion, the definition of employment is limited to activities arising from office, industrial or warehousing use. It is recognised that employment can be generated from many other activities including shops, car showrooms, and leisure uses. However, these activities have already been considered by the other existing criteria. However, employment opportunities arising from offices, industrial or warehousing activities have not been included up to this point. This new criterion gives settlements with 3 or more employment units 2 points and those with 1 or 2 units 1 point.

Any settlement scoring 24 points or more is identified as a suitable location for additional growth. The level of growth within the IPS is dependent on other factors including for example, the availability of suitable sites and the overall spatial strategy for the island. Settlements scoring 23 points or fewer are not identified for further growth.

Results from the Sustainability Matrix analysis

The settlements covered by the Sustainability Matrix and a general overview of their position are summarised below. This reflects the analysis of their facilities and services set out in *Table 1 Settlement Population and facilities* and *Table 2 Settlement Facilities and Services and overall score*.

Settlement analysis

Arreton has one of the smaller village populations but scores very well overall in terms of its services and facilities. These include shops, a post office, primary school, village hall and the village has good transport links. It is therefore a sustainable location and could therefore accommodate some further growth.

Bembridge has the highest population of settlements outside of the key regeneration areas. It has good access to facilities including shops, a post office, primary school, a GP surgery and a village hall along with good public transport access, including an hourly bus service. Overall, it has the highest score of all the settlements in the study (one of only 4 scoring over 30 points) and could accommodate further growth. Consideration to move from Rural Service Centre to Secondary Settlement.

Brading - good access to a local shop and other facilities including a post office, primary school and public house along with good public transport access which includes an hourly bus service and a railway station with links to Ryde and the Bay area. Overall it scores highly and as a result could accommodate growth.

Brighstone has a mid-sized population of the settlements in the study. It has the facilities of some of the larger settlements including shops, a primary school and a GP surgery. Residents also have access to a permanent library. Its drawback is poor public transport services and relative isolation from urban centres. However, overall, it scores highly (over 30 points) and could accommodate some growth.

Calbourne has a small population and a much more limited range of services and facilities but it has good public transport links. It has a village shop; however, it does not have a post office or a local primary school and so does not score as highly as some of the other settlements and is therefore not likely to be able to accommodate further growth.

Chale has more limited access to services and facilities with only access to a village shop, post office (at Chale Green) and a village hall but it has good public transport links. It is however 7 miles away from Newport. It is unlikely to be a suitable location for planned growth.

Fishbourne has a small population. It has a regular bus service but does not have access to any local shops or post office and does not have a local primary school or health services. Overall, it has a low score and is unsuitable to accommodate planned growth.

Chillerton and Gatcombe have the smallest population of the settlements in the study. Facilities include a primary school and a village hall. However, it lacks other services and facilities including a local shop and post office and as a result is not likely to be able to accommodate planned growth.

Godshill scores highly overall with access to a number of local shops, a post office, primary school and a public house. It also has good public transport links and a GP surgery and therefore is a sustainable location and could accommodate planned growth.

Gurnard scores highly overall. It has good access to a range of services and facilities, including a primary school, has good public transport links and lies adjacent to Cowes. It therefore could support planned growth.

Havenstreet & Ashe have a combined population of over 700. Public transport access to both settlements is poor. However, Havenstreet does have a steam rail station. Havenstreet does have access to more service and facilities than Ashe, but neither settlement has access to a village shop, post office or local primary school so do not score highly overall and are unlikely to be able to accommodate further growth.

Together, **Nettlestone and Seaview** have a population around 2,700. Most of the facilities and services are concentrated in Seaview and include a shop, post office, primary school and village hall. However, there is no GP surgery in either village. There is good access to public transport and potentially some further growth could be accommodated.

Newchurch, like Brading, has one of the higher populations and a reasonable range of facilities and services including a primary school, village hall and post office. However, it lacks a local convenience store and a GP surgery and has limited public transport services. It is not likely to accommodate further growth.

Niton and Whitwell combined have a population of 2,178 and score over 30 points. They both have good access to a range of services and facilities along with good public transport access. Niton has a primary school, GP Clinic and a permanent library. Overall, Niton has more facilities and services and is better placed to accommodate limited growth.

Northwood has a sizeable population with good access to a range of facilities and services, including a shop and primary school. It has good public transport links and lies adjacent to Cowes. Though it does not have its own GP surgery, it does lie within easy distance of Cowes Medical Centre. The settlement scores well and it is considered that could accommodate some planned growth.

Rookley has one of the smallest populations of any of the rural settlements included in the study. It has good access to local facilities and services with a local shop, a post office, village hall and good public transport links. However, it has no primary school or GP surgery. Overall, it has a medium score and based on the facilities and services available it is considered that it could accommodate some limited growth.

St Helens has a mid-range population and access to a very good range of facilities and services including a primary school and GP surgery as well as having good public transport access. It therefore could accommodate some planned growth.

Together, **Shalfleet and Newbridge** have a population of over 1,500 people. Shalfleet has greater access to a range of services and facilities and therefore scores higher overall. Both settlements have good public transport access but are over 5 miles from the nearest urban centre. Although together their scores are high, individually their scores are low and so would only be able to accommodate limited growth.

Shorwell is a small settlement and although it has access to a village shop, a local post office, a village hall and open space it does not have a local primary school or a GP surgery and is over 5 miles from Newport. As a result, it is unsuitable for further growth.

Whippingham has reasonable access to facilities and services, including a primary school, has good public transport links and adjoins East Cowes. It lacks a local shop and GP surgery. It is not considered that it could accommodate further planned growth.

Wootton has one of the highest populations outside of the named key regeneration areas. It has good access to shops and facilities including shops, a primary school, GP surgery and village hall along with a bus service every 10 minutes and is in close proximity to both Newport and Ryde. Overall, it scores highly (over 30 points) and as a result could accommodate further growth. Consideration to move from Rural Service Centre to Secondary Settlement.

Wroxall has a good range of facilities and services located in the settlement including a shop, post office, primary school and a village hall. It has good public transport links and is just over 2 miles from Ventnor. It therefore could accommodate some further growth.

Yarmouth has a small population, but it has good access to a range of facilities and services including a village shop, post office, primary school and village hall. It has good public transport links and is only 2 miles from Freshwater and Totland. It could therefore accommodate some limited growth.

Table 1 Settlement Population and facilities (Points in this table are carried forward to Table 2 where total points are calculated)												
Parish	Population		Village shop	Post office	Primary school	Village hall	Public house	Bus service	Rail service	Distance from nearest urban centre	Points	Sub-total points
	Under 300 300-599 600-899 900-1199 1200-1499 1500-3000+ *ONS population estimate 2020	0 1 2 3 4 5	2 points	2 points	3 points	2 points	1 point	Hourly – 3 point Less than hourly – 1 point	1 point	10 miles or more = 0 points 5-10 miles = 1 <5 miles = 3		
Arreton	1,056	3	2	2	3	2	1	3		4	3	19
Bembridge	3,646	5	2	2	3	2	1	3		6.6	1	19
Brading	2,126	5	2	2	3	2	1	3	1	4.1	3	22
Brighstone	1,594	5	2	2	3	2	1	1		5.6	1	17
Calbourne	844	2	2				1	3		4.8	3	11
Chale	632	2	2	2		2	1	3		7	1	13
Fishbourne	736	2					1	3		2.7	3	9
Chillerton and Gatcombe	421	1			3	2		1		2.9	3	8
Godshell	1,490	4	2	2	3		1	3		3.8	3	18
Gurnard	1,923	5	2		3	2	1	3		1.8	3	19
Havenstreet and Ashe	767	2				2	1		1	3.8	3	9
Nettlestone and Seaview	2,688	5	2	2	3	2	1	3		3.3	3	21
Newchurch	2,537	5		2	3	2	1	1		3.6	3	17
Niton and Whitwell	2,178	5	2	2	3	2	1	3		4	3	21
Northwood	2,345	5	2	2	3	2	1	3		1.7	3	21
Rookley	611	2	2	2		2	1	3		3.4	3	15
St Helens	1,207	4	2	2	3		1	3		4	3	18
Shalfleet and Newbridge	1,591	5	2	2	3	2	1	3		6	1	19

IPS evidence paper: Rural Sustainability Matrix

Shorwell	712	2	2	2		2	1	1		5	1	11
Whippingham	906	3		2	3	2	1	3		1.7	3	17
Wootton	3,517	5	2	2	3	2	1	3		3.7	3	21
Wroxall	1,724	5	2	2	3	2	1	3		2.6	3	21
Yarmouth	791	2	2	2	3	2	1	3		2	3	18

Table 2 Settlement facilities, services and overall score											
Parish	Other shops/facilities	Recreation facilities	Organisations and clubs	Recycling facilities	Public open space	Church or chapel	Library	GP clinic	Employment	Points	Total points
	2 points	1 point	1 point	1 point	1 point	1 point	Mobile – 1 point Permanent – 3 points	3 points	Industrial estate of 3 units or more 2 points Under 3 units 1 point		
Arreton	2	1	1		1	1	1		1(glass blowing workshop)	7	27
Bembridge	2	1	1	1	1	1	3	3	2	13	34
Brading	2	1	1		1	1	1			10	29
Brighstone	2	1	1	1	1	1	3	3	1(county fencing)	13	31
Calbourne		1			1	1	1			4	15
Chale	2	1	1			1	1			6	19
Fishbourne	2		1				1			5	14
Chillerton and Gatcombe	2	1	1			1	1			6	14
Godshill	2	1			1	1	1	3		9	27
Gurnard	2	1	1		1	1	1			7	26
Havenstreet and Ashe	2					1	1			4	13
Nettlestone and Seaview	2	1	1		1	1	1			7	28
Newchurch	2					1	1			4	21
Niton and Whitwell	2	1	1		1	1	3	3		12	33
Northwood	2	1	1		1		1			6	27
Rookley	2	1	1	1*	1		1		2	7	24

IPS evidence paper: Rural Sustainability Matrix

St Helens	2	1	1		1	1	1	3		10	28
Shalfleet and Newbridge	2	1	1		1	1	1			7	26
Shorwell		1	1		1	1	1			5	16
Whippingham		1	1			1	1		1	4	22
Wootton	2	1	1	1	1	1	1	3	1	12	33
Wroxall	2	1		1	1	1	1			7	28
Yarmouth	2	1	1		1	1	1			7	25

*Limited to clothing recycling at the Co-op convenience store



**Appendix 3 - Extracts from the Council's Strategic Housing Land
Availability Assessment (SHLAA)**

Appendix 3

Extract from the Council's Strategic Housing Land Availability Assessment (SHLAA) (November 2018) – SHLAA site IPS117

SHLAA Site Assessments - Deliverable SHLAA Ref No:
 SHLAA Ref No: Site Area:

Site Address:

Site location



Site Description:

Stages A and B - Discounting

Environmental designations A1:	<input type="text" value="The site is not located within any environmental designations including, ancient woodland, LNR, marine conservation zone, NNR, RAMSAR, SAC, SINC, SPA, SSSI, scheduled ancient monument or RIGG"/>	<input type="checkbox"/> Discount
Environmental designations A2:	<input type="text" value="The site is not located within any environmental designations including heritage coast, historic park or garden, open space."/>	<input type="checkbox"/> Discount
Flood zones/agricultural class/size:	<input type="text" value="The south west edge of the site is located in FZ2 and 3. The flood zone relates to the stream. This area will need to be removed from the developable area.

The remainder of the site is located in FZ1 and is not class 1 or 2 agricultural land.."/>	<input type="checkbox"/> Discount

Stage C - Assessment - Suitability

Proximity to settlement:	<input type="text" value="Whitwell does not currently have a settlement boundary."/>
It is brownfield/greenfield:	<input type="text" value="The site is a greenfield site, there are some structures on it relating to the keeping of a horse. Whilst they have requested the site be considered as a brownfield site it does not meet the tests as it has not been previously developed."/>
Potential landscape impact:	<input type="text" value="The site is not located in an AONB but is separated from it by the adjacent dismantled"/>

SHLAA Site Assessments - Deliverable SHLAA Ref No:

	<p>railway. The boundaries to the site are varied mix of hedges, post and wire fencing, scrubby trees and a stream.</p> <p>Part of the site used to be a village green. If development is considered appropriate consideration will need to be given to the adjacent residential uses and proximity in terms of views/privacy etc.</p>
Potential biodiversity impact:	The site is not located in an environmental designation. There are no tree preservation orders or significant trees within the site. There is a stream and there may be some biodiversity related impacts.
Potential heritage impact:	The site is not located in a conservation area and there are no listed buildings close by.
Site access aspects:	The site has two narrow accesses off the High Street that are located between existing houses. There is a stream that runs across the site and any access road would need to cross this stream. Potential to consider access from Meadow Close.
Access to public transport:	There are bus stops to the along the high Street north of the site.
Access to pedestrian/ cycle:	There is a public footpath (N14) across the southern edge of the site through one of the potential vehicular accesses. There are no defined cycle links close by
Access to services/ facilities:	Whitwell is not recognised as a rural service centre but does have some limited services including a pub, village hall and garage. Service and facilities are joined with nearby Niton (a RSC).
Access to open spaces:	There are only small areas of recreation/open space within Whitwell
Air quality sensitivities:	None known <input type="text"/> Agricultural land class: <input type="text" value="The classification is Grade 3"/>
Mineral resources?:	The site is not located in a mineral or mineral safeguarding area.
Is there a loss to employment?:	No
Potential constraints to delivery:	There is one landowner and there are no known covenants or legal issues.
Infrastructure capacity aspects:	The site is immediately adjacent to other properties which appear to benefit from connections to utility services
Potential compatibility impacts:	The site is close to existing residential, no compatibility issues are envisaged.
Brief planning history:	No apparent planning history.
Overarching policy context:	Whitwell does not currently have a settlement boundary but does have some services and is located close to Niton a RSC. Niton and Whitwell have a Parish Plan SPD (2014) which in relation to housing sets out that infill is preferred as opposed to multi-unit schemes.
Steering group's conclusion:	The steering group concluded that the site is suitable. It relates well to the built form and development is likely to meet an identified local need. Access could be a restriction due to stream and width of access required. Development could be undertaken in the areas not subject to flood risk. Areas that are more at risk could be green and open space or biodiversity enhancements.

Site suitable if ticked

Site available if ticked

Stage D - Assessment - Availability

Availability:	The site is immediately available with a reasonable prospect of development taking place within 5 years. Once commenced could be achieved within 2 years
Put forward for:	The site has been put forward for general housing. The submission has suggested that a shop and/or playground could form part of a development.
Conversion?:	No

SHLAA Site Assessments - Deliverable SHLAA Ref No:

Rural exception?:

Stage E - Assessment - Achievability

Steering group's conclusions:

Indicative yield:

Site achievable if ticked

Stage F - Assessment - SHLAA Panel Comments

Panel comments:

Stage G - SHLAA Conclusion

Final conclusions:

Site could be considered for allocation if ticked

The site is considered:

Site is suitable for BFR if ticked



Appendix 4 - Extract of 2018 IPS and allocations

Appendix 4 - Extract of 2018 IPS and allocations

The Bay Regeneration Area			
Settlement	Housing Allocation Reference Number	Specific or Generic Policy Requirement	Indicative Yield
Niton	HA102	Specific	30
Niton	HA103	Specific	25
Niton	HA104	Generic	6
Whitwell	HA105	Specific	20

HA105	Land rear of High Street Whitwell	<p>Whitwell benefits from some services and facilities and a small amount of development and play space to serve local needs may help support and enhance the area.</p> <p>A greenfield site of approximately 1.6 hectares is allocated at land rear of High Street Whitwell to deliver a sustainable, high quality predominately residential development. The development shall provide:</p> <ul style="list-style-type: none"> a) At least 20 homes providing a mix of sizes and an affordable housing contribution in line with DHWN6; b) play space to serve local needs; c) public rights of way links and improvements; d) public transport and highway improvements as required; and e) landscape buffers and biodiversity enhancement to the watercourse. <p>Any proposal should be of high quality design and be centred on a strong community identity focusing on the village.</p>
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