

19 August 2024



Our ref: IPS Representations on behalf of: West Oak Homes & Billings Group and Land Between Chatfeild Road and Allotment Road, Niton

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

Dear Sir/Madam

RE: ISLAND PLAN STRATEGY (IPS) REGULATION 19 REPRESENTATIONS: LAND BETWEEN CHATFEILD ROAD AND ALLOTMENT ROAD, NITON

BCM are writing on behalf of our clients, on their specific site and in general, 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 Between Chatfeild Road and Allotment Road, Niton.

Our clients, Westoak Homes Ltd and Billings Group, are both small SME housebuilders who are involved in a number of small housing projects on the Island. They have the capability to build between circa 1-50 unit developments and so the representation is site specific and general to the company. They have traditionally built within rural villages on the Island, with Niton being an area of focus historically. Westoak Homes currently have the following planning application submitted for residential development in Niton:

24/00798/OUT | Outline consent for residential development and means of access | Land Between Chatfeild Road And Allotment Road, Niton, Isle Of Wight

This was validated on 14/06/2024 and the proposed Site Plan is 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

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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.

For the avoidance of doubt, BCM would like to attend any pre-hearing of 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 Councils 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 brining 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.

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).

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.

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With regards to our clients' current application and Niton (which is pending - reference 24/00798/OUT), the draft IPS strategic policy G2 identifies Niton as a Rural Service Centre in which the focus is for sustainable housing growth within their settlement boundaries. However, given this focus for housing, it is disappointing that the IPS does not allocate any further development in the Niton Rural Service Centre and only relies on applications already approved or inside the settlement boundary.

It is therefore questioned *where* Niton 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). And 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"*.

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 clients' outline planning application is on land immediately adjacent to the defined Settlement boundary (in principle acceptable under the current local plan and Policy SP1) and which can be delivered by our client. But, under the draft IPS as set out now, this would be precluded. However, this site, along with other sites around Niton, were included within the Council's Strategic Housing Land Availability Assessment (SHLAA) (November 2018), which was prepared to inform the draft Island Plan.

The site comprises two SHLAA sites (IPS114 and IPS263) and both were recognised by the Council as being 'Developable'. The 2018 SHLAA Report 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 these two sites and their assessment, is included as Appendix 3. Our clients worked up a submission on that basis, along with very positive pre-application advice by the Council (attached as Appendix 4). The site is no longer included within the latest SHLAA report or Reg 19 IPS. There is no logical reason why this site should not be allocated, subject to conditions.

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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 Sustainable Rural Settlements. 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).

Paragraph 7.12 re-iterates the Council's knowledge that the Island operates via smaller builders and that historically, four or less dwellings have been built by those builders and equating to 96 dwellings per annum. Our clients have operated within this space for several decades. This re-iterates the disjointed nature of the IPS because the plan does not seek to allocate smaller sites. This could easily be achieved if the Council revert back to its 2018 approach to allocate small-scale sites in, for example, the Smaller Rural Settlements. The Council are 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. The policy and allocations approach will set to stifle and limit the ability of smaller builders and will have unintended consequences and will stifle delivery. Policy H2 (Sites allocated for housing) is therefore unsound.

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".

SME house builders are critical to increasing the country's housing supply and supporting the economy. On the Island this is even more vital, given the Island's geographical circumstances which somewhat deter the large homebuilders. SME's housebuilders can deliver quality, speed, affordability, know the local areas and often tackle difficult to deliver sites. SME's are critical to the local economy, employing

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local people. Our clients have successfully delivered a number of high quality housing developments on the Island, employing a number of local trades. The omission of such sites from the draft IPS will result in further barriers to SME housebuilders, which will significantly reduce their ability to contribute to the Council's housing requirements and impact on the local economy and employment.

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 Niton, which, in turn will hamper their ability to prosper and become economically and socially sustainable. The allocations put forward in the draft IPS generally for large sites, further driving SMEs out.

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 Niton should include site allocations and the draft IPS, in its Regulation 19 form, contains housing policies and lack of site allocations which are unsound.

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. As stated, our clients are small housebuilders who have already delivered a number of schemes across the Island. There is no desire for our clients, or developers in general, to stall development once they have committed to the process of investing. The delay in obtaining timely planning permissions sterilises business and undermines their performance, ability to plan and ability to reduce risk and invest wisely. This is having and has had a debilitating effect on our clients and their 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

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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 is adjacent to the current settlement boundary and has previously been assessed as being deliverable within the SHLAA process, 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 clients have spent considerable time in working towards an appropriate scheme here and are well planned and available 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,

A handwritten signature in blue ink, appearing to read 'Richard Hobbs', followed by a period.

19 August 2024

Richard Holmes BA(Hons) pg dip MA

t [REDACTED]

e [REDACTED]

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) Pre-Application Response: land at Allotment Road Niton



Appendix 1 - Proposed Site Layout 24-00798-OUT



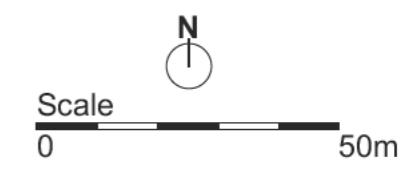
Rev	Date	Description	Rev By

Notes:
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This drawing must not be scaled. All levels and dimensions must be checked on site, figured dimensions must be checked on site, figured dimensions should be taken in preference to scaled dimensions. Scheme design based on receipt of Third Party Topographical Digital Survey information.

- Key:**
- 35 sqm 2no. Flats 2-Storey (x1)
 - 80 sqm Terraced 2-Storey (x3)
 - 80 sqm Terraced 2-Storey (x10)
 - 80 sqm Semi-detached 2-Storey (x2)
 - 100 sqm Semi-detached 2-Storey (x4)
 - 100 sqm Detached 2-Storey (x8)
 - 160 sqm Detached 2-Storey (x4)
 - 110 sqm Detached Bungalow (x1)
 - 150 sqm Detached 2-Storey (x1)

Total: 35 units





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Project	Allotment Road, Niton		
Client	Westoak Home Ltd.		
Scale	1:1250 @ A3		
Drawing No	SK07-005		
Drawn By	SM	Date	Jan 2024
Drawing Title	Illustrative Site Plan		

Illustrative Site Plan 1:1250



**Appendix 2 - 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 - Extract 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 sites in Niton (IPS114 and IPS263)

SHLAA Site Assessments - Developable SHLAA Ref No:

SHLAA Ref No:

Site Area:

Site Address:

Site location



Site Description: The site is part of a larger agricultural grazing field on the outskirts of Niton. It is fairly flat with hedges to three sides. There is residential to the south east and south west and can be accessed from either Chatfeild Road or Allotment Road.

Stages A and B - Discounting

Environmental designations A1:	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:	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:	The site is located in FZ1 and is not on class 1 or 2 agricultural land.	<input type="checkbox"/> Discount

Stage C - Assessment - Suitability

Proximity to settlement:	The site is outside and not immediately adjacent to the settlement boundary, however, the site forms part of a larger field and the subsequent area submitted under IPS263 is immediately adjacent to the settlement boundary
It is brownfield/greenfield:	The site is greenfield, there are no buildings or structures located on the site.
Potential landscape impact:	The site is not located in an AONB but is located in close proximity to it. The land is fairly level and has residential properties to the south west and south east. Whilst it is located close to the settlement it has a rural feel. If development is considered appropriate, the impact on the wider area and views into and out of the site will need to be considered and reflected in any design principles.
Potential biodiversity impact:	The site is not located in an environmental designation. There are no trees

SHLAA Site Assessments - Developable SHLAA Ref No: **IPS114**

	preservation orders or larger trees within the site. The site is bounded by hedges and may need to be considered in terms of any biodiversity benefits.
Potential heritage impact:	The site is not located in a conservation area and there are no listed buildings close by. Previous archaeological comments have noted that an earthwork HER 4841 lies within part of the area.
Site access aspects:	The site can be accessed of both Chatfeild Road and Allotment Road.
Access to public transport:	There are bus stops within the village of Niton. They run Mon - Sat 5 journeys & Sundays 3 journeys
Access to pedestrian/ cycle:	There are public rights of way in the area of the site that extend into the wider countryside and AONB.
Access to services/ facilities:	Niton has a range of facilities in line with it being a RSC.
Access to open spaces:	There are some open space provisions within Niton and there is access to the wider countryside.
Air quality sensitivities:	None known Agricultural land class: The classification is Grade 4
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:	
Infrastructure capacity aspects:	The site is close to the settlement boundary where adjoining properties appear to benefit from connections to utility services. Drainage may need further investigation.
Potential compatibility impacts:	The site is close to existing residential, no compatibility issues are envisaged. There are power lines that cross the centre of the site.
Brief planning history:	No apparent planning history.
Overarching policy context:	The site is located outside and not immediately adjacent to the settlement boundary of Niton a RSC. It is however part of a larger field with the remaining part adjacent to the settlement boundary which has come forward under a separate submission (IPS263). 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 in part. There are concerns over including the entire site as submitted but a smaller area in combination with the adjacent site IPS263 over a longer period of time is considered appropriate.

Site suitable if ticked

Site available if ticked

Stage D - Assessment - Availability

Availability:	The site is immediately available and is owned by developers with a reasonable prospect of development taking place within 5 years. Once commenced could be achieved within 5-10 years
Put forward for:	The site has been put forward for general housing.
Conversion?:	No
Rural exception?:	No

Stage E - Assessment - Achievability

Steering group's conclusions:	The steering group concluded that the site is suitable in part and achievable. The are
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SHLAA Site Assessments - Developable SHLAA Ref No:

considered suitable relates to utilising part of the site following the line of the nearby Lower fields area down towards the road. The design should be very sensitive due to the visual impact on the wider area. Likely to be years 11-15.

Indicative yield:

Site achievable if ticked

Stage F - Assessment - SHLAA Panel Comments

Panel comments:

Stage G - SHLAA Conclusion

Final conclusions:

The site is considered:

Site could be considered for allocation if ticked

Site is suitable for BFR if ticked

SHLAA Site Assessments - Developable 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, SIN, 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 site is located in FZ1 and is not on class 1 or 2 agricultural land."/>	<input type="checkbox"/> Discount

Stage C - Assessment - Suitability

Proximity to settlement:	<input type="text" value="The site is located outside but immediately adjacent to the current settlement boundary which is along the south western boundaries."/>
It is brownfield/greenfield:	<input type="text" value="The site is greenfield, there are no buildings or structures located on the site."/>
Potential landscape impact:	<input type="text" value="The site is not located in an AONB but is located in close proximity to it. The land is fairly level and has residential properties to the south west and south east. Whilst it is located on the edge of the settlement it has a fairly rural feel. If development is considered appropriate, the impact on the wider area and views into and out of the site will need to be considered and reflected in any design principles."/>
Potential biodiversity impact:	<input type="text" value="The site is not located in an environmental designation. There are no tree preservation orders or larger trees within the site. The site is bounded by hedges and may need to"/>

SHLAA Site Assessments - Developable SHLAA Ref No:

	be considered in terms of any biodiversity benefits.
Potential heritage impact:	The site is not located in a conservation area and there are no listed buildings close by. Previous archaeological comments have noted that an earthwork HER 4841 lies within part of the area
Site access aspects:	The site can be accessed of both Chatfeild Road and Allotment Road.
Access to public transport:	There are bus stops within the village of Niton. They run Mon - Sat 5 journeys & Sundays 3 journeys
Access to pedestrian/ cycle:	There are public rights of way in the area of the site that extend into the wider countryside and AONB.
Access to services/ facilities:	Niton has a range of facilities in line with it being a RSC.
Access to open spaces:	There are some open space provisions within Niton and there is access to the wider countryside.
Air quality sensitivities:	<input type="text" value="None Known"/> <small>Agricultural land class:</small> <input type="text" value="The classification is Grade 4."/>
Mineral resources?:	The site is not located in a mineral or mineral safeguarding area.
Is there a loss to employment:	<input type="text" value="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 the settlement boundary where adjoining properties appear to benefit from connections to utility services. Drainage may need further investigation.
Potential compatibility impacts:	The site is close to existing residential, no compatibility issues are envisaged. There are power lines that cross the centre of the site.
Brief planning history:	No recent planning history.
Overarching policy context:	The site is located outside but immediately adjacent to the settlement boundary of 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 if considered with part of IPS114. There are concerns over the small site and the ability to deliver an appropriate layout in isolation when taking the neighbouring context into account. Could be considered suitable if considered in combination with adjacent site IPS114.

Site suitable if ticked

Site available if ticked

Stage D - Assessment - Availability

Availability:	The site is immediately available and is owned by developers with a reasonable prospect of development taking place within 5 years. Once commenced could be achieved within 5-10 years
Put forward for:	The site has been put forward for general housing.
Conversion?:	Not applicable
Rural exception?:	No

Stage E - Assessment - Achievability

Steering group's conclusions:	The steering group concluded that the site is suitable and achievable in combination with adjacent site IPS114 over a longer period of time. See IPS114.
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SHLAA Site Assessments - Developable SHLAA Ref No:

Indicative yield:

Site achievable if ticked

Stage F - Assessment - SHLAA Panel Comments

Panel comments:

Stage G - SHLAA Conclusion

Final conclusions:

The site is considered:

Site could be considered for allocation if ticked

Site is suitable for BFR if ticked



Appendix 4 - Pre-Application Response: land at Allotment Road Niton

PRE-PLANNING APPLICATION ADVICE - RESPONSE FROM PLANNING



Application Reference G.0039.22

Please note: There are limits to the pre-application advice that can be given by officers. The pre-application advice service is not a passport to getting permission for unsuitable planning proposals. The final decision on planning applications is made by council members or senior officers. It can only be taken once a formal planning application has been received and consultations have been carried out with adjoining occupiers, those bodies which the council has a statutory requirement to consult and other interested parties. You should therefore be aware the council's officers are unable to give any guarantees about the decision that will be made on an application.

The pre-application advice provided is based on the information that you submitted. Formal planning permission will be the subject of publicity and consultation in accordance with the council's procedures. These and other matters which may subsequently come to light could result in additional issues being raised that are relevant to the outcome of the application.

Applicant Details	
Title	Mr
Forename	David
Surname	Long
Building/house name/number	Red Barn, Cheeks Farm
Street Address	Merstone
Town Name	Newport
County	Isle of Wight
Postcode	PO30 3DE

Application Site Address	
Building/house name/number	
Street Address	Land at Allotment Road
Town Name	Niton
County	Isle of Wight
Postcode	

Description of the Proposal

Proposed housing development.

Proposed housing development comprising up to 21 dwellings, access roads and landscaping.

Pre-Application Advice (Please note the amount of advice will likely relate to the scale of the proposal)

Planning Officer's name	Russell Chick
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General comments:

The proposals are supported by detailed layout plans along with the design of proposed housing.

Officers have visited the site and spoken with the agent.

Relevant policies:

National Planning Policy Framework

- Section 5; Delivering a sufficient supply of homes
- Section 12; Achieving well-designed places
- Section 15; Conserving and enhancing the natural environment

Island Plan Core Strategy

SP1 Spatial Strategy

SP2 Housing

SP5 Environment

SP7 Travel

DM2 Design Criteria for New Development

DM3 Balanced mix of housing

DM4 Affordable Housing

DM11 Historic and Built Environment

DM12 Landscape, Seascape, Biodiversity and Geodiversity

DM17 Sustainable Travel

Other policy guidance

Isle of Wight Council Housing Needs Assessment 2022

Affordable Housing Contributions SPD

Guidelines for Parking Provision as Part of New Developments SPD

Guidelines for Recycling and Refuse Storage in New Developments SPD

Bird Aware Solent Mitigation Strategy

Isle of Wight Council Position Statement: Nitrates

Constraints:

The site is immediately adjacent to the settlement boundary for Niton, which is a Rural Service Centre. The site is outside of the buffer zone for the Southampton and Solent Waters SPA/ Ramsar mitigation project. Land south of the site is designated as an AONB.

Principle:

The proposals are generally housing related, with housing proposed on land east of Allotment Road, Niton.

There is also the potential for a new pre-school to be located adjacent to the existing village school and pre-school. Subject to design issues being discussed, the Planning Authority would fully support the provision of land for a new preschool. There is a redundant barn on the land adjacent to the school, and this could be converted to a registered nursery via the prior notification process, outlined by Class S of the General Permitted Development Order. If this element of the proposal did progress, then a legal agreement would be required to secure the land for such a use.

The NPPF requires Local Authorities to deliver a sufficient supply of homes, with numbers for each area derived via the Government's Standard methodology.

The amount of housing and where it is anticipated to be located on the Island is set out within the Island Plan Core Strategy. However, the Council has not delivered the amount of housing expected by Government and is not meeting its requirement for a 5-year land bank for housing.

As a result, the Council is the subject of the Presumption in Favour of Sustainable Development that is set out within paragraph 11 of the NPPF. This means that certain requirements of housing related policies within the Island Plan are out of date, most notably the defined settlement boundaries and the housing numbers set out within policy SP2 (Housing).

The site is outside of but immediately adjacent to the settlement boundary for Niton. Niton is a rural service centre where moderate growth in housing is anticipated. The site would generally be considered to be acceptable in terms of its location and proximity to services, although links to the many services and facilities within Niton would need to be improved. There is currently no pavement access between Allotment Road and the village centre, owing to the lack of a suitable pavement within Chatfeild/ Rectory Road. Any application should assess the feasibility of providing pedestrian/ cycle links to the services and facilities within the village. If this was not feasible, then improvements to the local right of way network to the west of Allotment Road should be considered.

The site should provide affordable housing in line with the requirements of policy DM4 of the Island Plan and the mix of housing (not yet provided) should reflect the most up to date housing needs assessment available. The Council has recently published its Local Housing Needs Assessment (2022) and this can be found via the following link [Local-housing-needs-assessment-may-20221](#)

We would expect for the housing to meet the needs of the local area and provide a mix of smaller family houses. Subject to the final mix of housing being agreed, and the remaining considerations set out below, the scheme is considered to be acceptable in principle.

Impact on the character of the area/street scene/design:

Policies DM2 and DM12 of the Island Plan require development proposals to be of a high quality of design, to compliment the character of the surrounding area, and to conserve, enhance and promote the Islands landscape. It should be noted that policy SP1 also states that in all cases development on non-previously developed land will need to clearly demonstrate how it will enhance the character and context of the local area.

The site is located adjacent to the eastern end of Niton, in a valley basin that is low and generally flat. The site is not prominent within the wider landscape but is noticeably visible from surrounding footpaths and highways. Nonetheless, the proposals would result in the development of a small proportion of the site, with the remainder left as open space. Subject to landscaping, it is considered that this development would not result in material harm to the landscape or the adjacent AONB, resulting in change that could be accommodated by the surrounding countryside.

In terms of design, Niton does have a relatively strong identity. There is a significant number of detached red brick cottages (characteristic of Niton, Rookley and Whitwell), set close to more historic cottages and some later inter-war development. The proposals include example designs for the scheme, which would generally be acceptable. We would expect a simple approach to housing design, with individual properties to include simple and balanced fenestration, a limited palette of high quality materials enlivened by brick coursing (of the same colour to the main

elevations), eaves detailing and in places, stonework or stone cills. Recent successful examples of this approach can be seen at Rookley and the Blanchards site at Brighstone. To avoid repetition, a handful of design types would be beneficial. We would expect soft landscaping to blend with boundary treatments, to allow the development to reflect its rural surroundings.

Turning to layout, I have provided some basic advice within a separate file, attached with this advice.

In terms of landscaping, the Planning Authority would support the proposed area of open space. This would benefit the appearance of the local area and also curtail the impact of the development. The proposed access road would run adjacent to this area, but subject to the curtilage of facing dwellings being suitably landscaped, this could provide an attractive vista that would provide a good transition between the housing and countryside beyond, different to the usual rather blunt fenced boundary treatments that tend to act as the termination of a development.

The proposals show a new parking area, for public use. This would be beneficial in terms of allowing people to park and then access the many fine public footpaths that run through the adjacent AONB. Again, some suitable but low-level landscaping should be used to soften the appearance of this feature.

Impact on neighbouring properties/uses:

The development would be located close to several adjoining properties, within Allotment Road and Chatfeild Road. The layout advice refers to one dwelling that should be removed to improve the relationship with 28 Allotment Road. The remaining properties would share a suitable relationship with existing dwellings in the area, subject to the final design and location of windows.

The proposed layout appears to show a suitable relationship between each of the proposed dwellings.

Highway considerations:

The plans show that the proposed access road would adjoin both Chatfeild Road and Allotment Road. We would advise you to seek further advice in relation to highway capacity and safety issues from the Island Roads Development Control Team.

Other matters:

A preliminary ecological appraisal should be undertaken for this site, and include surveys undertaken in accordance with Natural England guidance, given that the various natural boundary treatments that surround the site. The site benefits from a range of hedgerows and established groups of trees and therefore has the potential to support protected species. It is considered that ecology information should set out existing biodiversity and set out how a net gain would be achieved, along with avoidance or mitigation measures and habitat creation.

Natural England has published standing advice relating to issues of high levels of nutrients within the Solent water environment, which have resulted in dense mats of green algae in coastal areas. The Southampton and Solent Water Special Protection Area (SPA) is an important habitat for protected species of birds, which use the coast for feeding. Natural England's concern is that the nutrients levels have resulted in algae in coastal areas, which prevent protected species from feeding. Natural England's standing advice is that these issues are caused by wastewater from housing and agriculture.

Natural England's current advice is that development should not add to existing nutrient burdens on designated sites and thus, achieve nutrient neutrality. In respect of the Island, this can either be achieved through draining development to the Waste Water Treatment Works (WWTW) at Sandown (which discharge away from the Solent) or to impose conditions that require the developer to demonstrate nutrient neutrality. Thus, the Planning Authority advises that Southern Water should be contacted at the earliest opportunity so that they can confirm which treatment works would serve this development.

Due to the size of the site, a flood risk assessment would be required. It is noted that the site is within an area that is at a low probability of flooding. A drainage assessment should also be provided to demonstrate how foul and surface water would be drained. In terms of surface water drainage, we would expect the site to achieve the standard 40 per cent reduction to greenfield flows, in order to account for climate change. If an on-site solution would be suitable for the site, then the statement should outline the system of swales, balancing ponds, silt traps and hydrocarbon interceptors that would be used, along with the final point of discharge. There is a water course alongside Chatfeild Road and this should be left open and treated as a landscape feature.

Financial contributions:

The site is not located within with the Solent Protection Area Buffer Zone and therefore a contribution would not be required in conjunction with the guidance set out within the Bird Aware Solent Recreation Mitigation Strategy.

There may be a requirement to contribute towards education, sustainable transport (including rights of way) and community facilities within the area and this may be negotiated through any subsequent planning application.

Documentation or information requirements:

The following information would be needed to support a planning application:

- Location plan.
- Block/site plans, including levels.
- Plan showing proposed access and visibility splays.
- Proposed floor plans.
- Proposed elevations and roof plans.
- Proposed street scenes.
- Existing and proposed site sections.
- Ecology and tree reports (if a tree report is required) .
- Landscaping scheme.
- Drainage Statement.
- Legal Agreement/Heads of terms for contributions and to secure on-site affordable housing.
- Transport assessment.
- Design and access/ planning statement.

Further guidance on submitting a planning application can be found on the [Planning Portal](#) website which offers step-by-step help and advice.