

## **St Helens Parish Council - February 2019 Meeting – Agenda Item 7**

### **Consideration towards the IWCC Planning Strategy Development Plan**

The IWCC has issued a draft Planning Strategy Development Plan (the 'Island Plan') for consultation, with a revised closing date of the 25<sup>th</sup> February 2019. The Island Plan will have a significant influence over the development of the Island and our local Community of St Helens, with the IWCC's aim to finalise the Plan in 2019/20 to cover a 15year period. Therefore, it is important that our local Community engages on and responds to the Consultation, both individually and collectively through bodies such as the Parish Council.

The following is the proposed response by the Parish Council to the Consultation focussing on the key topics approved at the January Meeting. The Parish Council are recommended to:

- 1) Agree the text of the response by the Parish Council to the Consultation on the Island Plan (see attachment)
- 2) Continue to seek a face to face meeting with IWCC to discuss the aspects and issues raised, particularly regarding the specific area strategy (including designation) and site development proposed for St Helens
- 3) Further evaluate options for St Helens area conservation designation within the IWCC and other appropriate Bodies such as Natural England
- 4) Agree to keep the current planning application for Guildford Road Camp Site as a regular update topic on the Parish Council agenda to monitor status and to consider appropriate response going forward.

## St Helens Parish Council

### Consultation response to the IWCC Planning Strategy Development Plan

#### (‘Island Plan’)

The following consultation response was approved by the St Helens Parish Council at their February Meeting. The response is based on our interpretation of the Island Plan core document and supplementary information which we have been able to review at this time through our limited resources. We recognise that a face to face meeting would enhance our understanding and appreciation and may lead a modification of the consultation response provided herein. Accordingly, the response is provided in two parts a summary of the key issues and aspects with recommendations, together with supplementary information supporting the summary reached.

#### Summary

##### **1. Housing Demand and Planned Development**

The rationale for the proposed net increase in housing stock over the period (of over 9,000 net households) is not evidenced by specific local demand. The calculation is derived from a national framework which appears to lack substantive evidence of specific local requirements and rationale for the significant level of net increase proposed. Furthermore, the Plan states that the overall population increased by just over 2,000 people in ten years between 2005/10, which seriously questions the overall housing demand proposed - with the one key exception of affordable housing needs (see point 2).

This over inflated and unrealistic growth projection does not meet the fundamental social, environmental and economic needs of the Island and is driving the inappropriate speculative behaviour across the entire planning process from policy to delivery.

#### **Recommendation**

**The IWCC should petition Central Government for dispensation to derive the proposed increase in housing stock demand from the Island’s local requirements supported by local public consultation – (see point 5), with greater emphasis on balancing the overall needs of the Island with those of the local areas.**

## **2. Affordable Housing**

There is no apparent change in strategy currently evidenced with the Island Plan to redress the widening gap between demand and supply of affordable housing. One can only assume the situation is going to get worse unless the IWCC take positive direct action, which we believe they are minded to, through involvement in a 'delivery unit' and other measures.

### **Recommendation**

**The IWCC should significantly enhance policy on affordable housing development (such as removal of the option for financial contribution as an alternative for the delivery of the affordable element) to stimulate expansion. The IWCC should also take direct intervention into housing delivery for a proportion of the affordable housing requirements e.g. for large 'brown field' sites, possibly in collaboration with the private sector.**

## **3. Planning Strategy and Policy definition**

The Plan lacks depth of detail in critical areas of planning strategy and policy, particularly on important areas such as the fundamental planning criteria e.g. alignment with Services. This is particularly worrying when the IWCC are also proposing approval by default "presumption in favour" (see point 4).

### **Recommendation**

**The IWCC should commit more time to defining specific planning policy development, particularly given the default position of 'presumption in favour', such as the following;**

- prioritisation of the eleven Corporate Plan 'outcomes' in planning criteria and planning decisions which may conflict with one another
- definition & prioritisation of the planning 'sustainability criteria' e.g. 'alignment with Services'
- inclusion of public services within the 'housing allocations general requirements'
- further consideration to increasing the level of parking provided on new developments, which are unrealistic with public demand
- greater clarification on planning policy towards caravan / mobile homes sites and alignment with the policy towards high quality tourism (see comments below)
- ensuring planning permissions are delivered (e.g. more definitive on timing)
- approach to community lead planning & level of influence (see point 5)
- **St Helens Village Design Statement (1999) should be recognised as already approved by IWCC as Supplementary Planning Guidance**
- rationale and planning criteria for new garden communities (extremely limited for size of schemes proposed, with greater policy emphasis placed on developing potential 'brown field sites').

### **Caravan Parks/'Mobile Home' sites**

The St Helens area is populated with numerous 'mobile' home style site developments which are utilised for tourism and permanent residency, with significant developments proposed e.g. Priory Hotel and Brading Marshes. The Island Plan does not appear to address the special issues surrounding these developments including alignment with the sustainability criteria including density and design criteria in relation to the specific location and alignment with public services.

#### **Recommendation**

**The IWCC should give greater consideration to the development policy for 'mobile' home sites, including approvals for redevelopment and expansion.**

### **4. Approval through Default ('presumption in favour')**

The proposed policy of approval through default ("presumption in favour") appears to place the emphasis on third parties defining objections to specific developments against an extremely complex set of criteria. Applications can lack significant and material evidence in support of the proposed specific development which may become speculative to assess likelihood of approval.

This approach may risk adverse public reaction towards inappropriate transparency, governance, accountability and public scrutiny of key decisions impacting local Communities, particularly the level of influence of the public consultation feedback in the decision / approval process (see point 5).

#### **Recommendation**

**IWCC should review the policy towards 'presumption in favour' and increase the emphasis placed on Developers to demonstrate alignment to the IWCC Sustainability criteria with appropriate commitments.**

### **5. Public Consultation**

Although there is some positive encouragement towards options for local development plans, the Plan lacks appropriate focus on the importance of public consultation, particularly, on how the needs and views of local people are appropriately considered. Furthermore, the current process for 'place plans or 'masterplans' is recognised as resource challenging and problematic, particularly for the smaller Parish Councils. The development of the highly speculative 'land bank' of specific development sites identified in the Island Plan demonstrates the critical urgency required towards aligning Island and local needs. No reference is made to St Helens Village Design Statement!

#### **Recommendation**

**IWCC should give greater consideration for the development of local plans between IWCC and Town/Parish Councils right across the Island driven by the IWCC to provide greater degree of local participation in area planning strategy (demand & supply). The process for developing local plans should be simplified.**

## **6. St Helens (SH) area strategy including designation**

St Helens is an area of outstanding natural beauty (Village centre is a designated conservation area), comprising the second largest village greens in the Country, with the historic sea shore (part of the Solent & Southampton SPA), the Duver (National Trust), East River Yar (Brading Marshes, RSPB) and Bembridge Harbour (a designated SSSI site) and rolling countryside that separates the boundaries towards Ryde and Nettlestone (see the East Wight Landscape Character Assessment Plan).

The area is extremely important for the Island's economy supporting Tourism, albeit the area has limited and overly stretched public services and very limited retail provision. No reference is made in the Island Plan to the 'St Helens Village Design Statement 1999, which has been approved by the IWCC as 'supplementary planning guidance'.

Further clarity is required on the rationale for St Helens area designation, including;

- why is SH defined as part of the Ryde regeneration area, when Ryde has specific strategic regeneration aspects?
- why is SH defined as a "Rural Service Centre" rather than a "Sustainable Rural Settlement" and what consequences arise from the designation?
- further clarity is required on settlement and environmental area boundaries, particularly in relation to future planning development.

### **Recommendation**

**IWCC, working with SHPC, should give careful consideration towards the reclassification of St Helens as a 'Sustainable Rural Settlement', affording the area with the status requiring 'carefully managed growth' in housing development.**

**IWCC, working with SHPC, should undertake a 'Councils Conservation Area Appraisal' with the aim of 'preserving settlement identity' and in recognition of the strategic importance of the area's conservation in support of maintaining Island's identity and economy.**

Further consideration should be given towards supporting the area's natural conservation, such as;

- applying to Natural England for Area Of Outstanding Beauty (AONB) status
- increasing the area designated as SSSI, specifically the land kept as pasture on the Fakenham Farm above Eddington road and the field below Eddington road adjacent to the Duver road.

## **7. St Helens proposed specific development**

The strategy proposed for St Helens and the specific development proposal ((HA076, page 194, Guildford Road Camp Site & Fakenham Farm) for +100 homes is opportunistic and speculative, with no perceived regard to local views or local needs and runs counter to key objectives set for sustainable development, most importantly with no alignment with local services.

The specific development is contrary to the strategy contained within the St Helens Village Design statement (1999), which has not been referenced by the IWCC.

The specific proposal does not align to the "Housing General Allocation Requirements" key strategic priority of "The environment and unique island characteristics are celebrated". Please see area characteristics defined in point 6 above.

There is limited information available on how the specific development site was selected for the IWCC 'land bank' (i.e. a "strategic housing land availability assessment") and how the assessment was derived as 'suitable, available and achievable'? The 'land bank' document (Strategic Housing land Availability Assessment) lacks transparency on the criteria evaluation for acceptance or rejection.

### **Recommendation**

**The IWCC should remove the specified development (Guildford Road Camp site & Fakenham Farm site) from the specific area development for St Helens.**

**Furthermore, the IWCC should work with SHPC to consider options for carefully managed housing growth in keeping with the area delivering the objective of local sustainable development, in an area of outstanding beauty and of such strategic benefit to local Islanders and tourists alike.**