

John Slater Planning

Brighstone Parish Neighbourhood Plan

Submission Version

A Report to the Isle of Wight Council on the Examination of the
Brighstone Parish Neighbourhood Plan

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Introduction

Neighbourhood planning is a process introduced by the Localism Act 2011 which allows local communities to create the policies which will shape the places where they live and work. The Neighbourhood Plan provides the community with the opportunity to allocate land for particular purposes and to prepare the policies which will be used in the determination of planning applications in their area. Once a neighbourhood plan is made, it will form part of the statutory development plan and will work alongside the Island Plan Core Strategy which was adopted in March 2012. Decision makers are required to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

The neighbourhood plan making process has been led by Brighstone Parish Council. A Steering Group was appointed to undertake the plan preparation made up of volunteers advised by a project manager. Brighstone Parish Council is a “qualifying body” under the Neighbourhood Planning legislation.

This report is the outcome of my examination of the Submission Version of the Brighstone Parish Neighbourhood Plan. My report will make recommendations based on my findings on whether the Plan should go forward to a referendum. If the plan then receives the support of over 50% of those voting at the referendum then the Plan will be “made” by the Isle of Wight Council, which is the Local Planning Authority.

The Examiner’s Role

I was formally appointed by the Isle of Wight Council in March 2016, with the agreement of Brighstone Parish Council, to conduct this examination. My role is known as Independent Examiner. My selection has been facilitated by the Neighbourhood Planning Independent Examiner Referral Service which is administered by the Royal Institute of Chartered Surveyors (RICS)

In order for me to be appointed to this role, I am required to be appropriately experienced and qualified. I have over 37 years’ experience as a planning practitioner, primarily working in local government, which included 8 years as a Head of Planning at a large unitary authority on the south coast, but latterly as an independent planning consultant. I am a Chartered Town Planner and a member of the Royal Town Planning Institute. I am independent of both the Isle of Wight Council and Brighstone Parish Council and I can confirm that I have no interest in any land that is affected by the Neighbourhood Plan.

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Under the terms of the neighbourhood planning legislation I am required to make one of three possible recommendations:

- That the plan should proceed to referendum on the basis that it meets all the legal requirements.
- That the plan should proceed to referendum if modified
- That the plan should not proceed to referendum on the basis that it does not meet all the legal requirements.

Furthermore, if I am to conclude that the Plan should proceed to referendum I need to consider whether the area covered by the referendum should extend beyond the boundaries of area covered by the Brighstone Parish Neighbourhood Plan area.

In examining the Plan, the Independent Examiner is expected to address the following questions:

- a. Do the policies relate to the development and use of land for a Designated Neighbourhood Plan area in accordance with Section 38A of the Planning and Compulsory Purchase Act 2004?
- b. Does the Neighbourhood Plan meet the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 namely that it specifies the period to which it is to have effect? It must not relate to matters which are referred to as “excluded development” and also that it must not cover more than one Neighbourhood Plan area.
- c. Has the Neighbourhood Plan been prepared for an area designated under Section 61G of the Localism Act and has been developed and submitted by a qualifying body.

I am able to confirm that the Plan, does relate to the development and use of land covering the area designated by Isle of Wight Council for the Brighstone Parish Neighbourhood Plan on 24th September 2013.

I can also confirm that it does specify the period over which the plan has effect namely the period up to 2027. The Plan did not have a start date and it would be helpful to include the time period in the title of the plan. I therefore suggest the plan period should be 2016 -27 and this should be included in the title of the Plan

I can confirm that the plan does not cover any “excluded development”.

There are no other neighbourhood plans covering the area covered by the Plan designation.

Brighstone Parish Council as a parish council is a qualifying body under the terms of the legislation.

Recommendation

The title of the Plan should be The Brighstone Parish Neighbourhood Plan 2016-27

The Examination Process

The presumption is that the neighbourhood plan will proceed by way of an examination of written evidence only. However, the Examiner can ask for a public hearing in order to hear oral evidence on matters which he or she wishes to explore further or if a person has a fair chance to put a case.

I am required to give reasons for each of my recommendations and also provide a summary of my main conclusions.

I am satisfied that I am in a position to properly examine the plan without the need for a hearing. No parties have requested a hearing.

I carried out an unaccompanied visit to the whole of the Parish area during the course of the examination to familiarise myself with all the villages and the surrounding coastline and countryside.

The Consultation Process

The Neighbourhood Plan process started with the designation of the neighbourhood plan area in 2013 and with the Steering Group being recruited in August 2013. The evidence collection started with the Housing Survey in the following months which achieved a commendable 70% response, which initially would have raised awareness of the Plan's preparation. In May 2014 there were two Information Days, with a good turn out both in Brook and Brighstone, followed by a Residents Survey which achieved a commendable 54% response rate and a Business Survey - 50% response rate and a Youth Survey which regrettably achieved only 7 responses, although in my experience this low response rate is not unusual. There were separate Consultation sessions held again in Brook and Brighstone, which in the later case had over 130 attendees. It is clear that in the initial stages there was significant consultation with Parish groups, statutory bodies and stakeholder organisations as well as ongoing consultation with the Policy Team of the Island's Planning Department.

The Pre Submission Consultation document (Regulation 14) was consulted on over a 6 week period between 16th October to 27th November 2015.

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I am satisfied that the public consultation on the Plan was full and robust and people would have been aware of its production and had an opportunity to make their views known. Whilst I am satisfied there is evidence to show how comments have influenced the Plan, the process could have been more fully set out in the Consultation Statement as the Regulations require the document to summarise how the consultation has changed the Plan. That evidence does exist but in a separate Appendix to the evidence base.

Regulation 16 Consultation

I have had regard, in carrying out this examination, to the comments made during the period of final consultation which took place between 22nd January 2016 and 7th March 2016. This consultation was organised by the Isle of Wight Council who had received the Submitted Plan, prior to it being passed to me for its examination. This stage is known as the Regulation 16 Consultation.

In total 5 responses were received. These from from Natural England, Historic England, the Environment Agency, the Isle of Wight Council and a representation on behalf of a local landowner. I will refer to the results of the Regulation 16 consultation where relevant in the specific sections dealing with the Proposed Policies. I can confirm that I have read all the representations and have had full regard to the views when conducting this examination.

The Basic Conditions Test

The neighbourhood planning examination process is different to a Local Plan examination, in that the test is not one of “soundness”. The Neighbourhood Plan is tested against what is known as the Basic Conditions which are set down in legislation. It will be against these criteria that my examination must focus.

The 5 questions which constitute the basic conditions test seek to establish that the Neighbourhood Plan: -

- Has had regard to the national policies and advice contained in the guidance issued by the Secretary of State
- Will contribute to the achievement of sustainable development
- Will be in general conformity with the strategic policies set out in the Development Plan for the area?
- Does not breach or is otherwise incompatible with EU obligations or human rights legislation?

- Whether the making of the Plan will have a significant effect upon a European site or a European offshore marine site, either alone or in combination with other plans and projects.

Compliance with the Development Plan

To meet the basic conditions test, the Neighbourhood Plan is required to be in general conformity with the strategic policies of the Development Plan, which in this case is the Island Plan Core Strategy which was adopted in 2012. The Council has usefully identified that Policies SP1 – 9 are the strategic policies in the Plan. Brighstone Parish lies within the Wider Rural Area and Brighstone Village itself is identified as one of eleven Rural Service Centres in the Plan. I deal with the matter of compliance in more detail in the discussion of the Neighbourhood Plan as an Overview and in respect to specific policies.

Compliance with European and Human Rights Legislation

In view of the importance of the designations that affect the Parish a full Sustainability Appraisal has been carried out which incorporates a Strategic Environmental Assessment as required by EC Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations 2004. I am satisfied with the conclusions of that assessment. In addition, the draft plan has been screened under the Habitat Regulations and it has been confirmed that a full Habitat Regulation Assessment is not required. This has been confirmed by Natural England. I can confirm that I do not consider that any of the Plan proposals will have any detrimental effect on any European designated sites including the maritime area which is a Special Area of Conservation.

There are no human rights issues that arise from the plan and I can confirm that in my opinion there are no conflict European legislation.

The Neighbourhood Plan: An Overview

This Neighbourhood Plan sets out a very clear Vision as to what the Parish should look like in 2027. Most of the Plan's policies are specifically geared to delivering to this vision. I am satisfied that the Plan has been drawn up, in the main, based on a robust set of evidence, and this is particularly important in the context of housing need, at least for the first five years of the life of the Plan. This evidence base will

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need to be kept updated if the local housing need element of the housing policies are to remain an effective measure in development management decision making.

I am also conscious that planning permission has recently been granted on appeal for the Blanchards site between Upper Lane, Moortown Lane and Main Road. This has clearly been an important decision for the future of the Village of Brighstone and covers what is likely to be the largest development site within or adjacent to the Village.

The approach that the Neighbourhood Plan takes with regard to housing sites departs from that set out in the Island Plan Core Strategy in that it introduces additional and specific constraints as to the way that future planning applications for housing will be considered, which go beyond what is set out in the Spatial Strategy of the Development Plan - which is clearly one of the Plan's strategic policies. That is because it would not allow the residential development of land if the site was larger than 0.5 ha or even if the site area was smaller than that, if the proposal was for more than 10 units, irrespective of the size or type of development, or consideration of other factors such as the delivery of affordable housing.

I do fully acknowledge that this policy enjoys a good degree of public support and it is an underlying principle of neighbourhood planning that communities should be able to shape their communities through planning policy. However equally there is an underlying tenant of neighbourhood plan policy, which is confirmed in the NPPF that neighbourhood plans should not promote less development than that set out in the Local Plan. My concern is that rather than giving a local perspective or definition to the policy in the Core Strategy the policy introduces a stricter threshold is such that it will lead to less development than would otherwise be the case as it imposes arbitrary thresholds in Policy H1 that do not exist in the Local Plan in policy SP1. I am satisfied having visited the area that there is a case for promoting small scale incremental development but I have a particular concern regarding the specific limits as to what constitutes *small scale* development. As written I believe the criteria will lead to an unreasonable constraint on how residential development is considered.

In my assessment, that matter goes to the heart of my consideration of the Basic Conditions Test and I expand on this more fully in my discussion on the individual policies but it is right to flag it up as a significant issue.

Beyond this I have found little in the Plan that would raise such significant concerns in my consideration of the Basic Conditions Tests. Commendably, compared to other plans, this neighbourhood plan restricts itself to policies for the use and development of land rather than seeking to address matters beyond the normal scope of planning powers, which are properly differentiated in the document.

The Neighbourhood Plan Policies

Policy H1: New housing Development

In essence, this policy draws upon the Strategic Policy SP1 – which is the Island Plan’s Spatial Policy. This points new housing development to land within or immediately adjacent to the settlement boundary of Brighstone Village, which is listed as a Rural Service Centre. It repeats the preference for the redevelopment of previously developed land where there is brownfield land for the proposed development which is available, suitable and viable. It goes on to allow the possibility (through the use of the word “may” new housing in the wider rural area i.e. not within or adjacent to the village of Brighstone, if it is to meet proven local need.

Where the Neighbourhood Plan departs from the Core Strategy through its definition of *small scale*. It requires new housing to be limited to sites no larger in size than 0.5 ha. This raises the issue about the acceptability of an area of previously developed land which was appropriate in all other respects for housing but for the question of the size of the site being above the 0.5 ha threshold. It could result in the bizarre situation of plots of land being arbitrarily subdivided to come under the size threshold. That would not be in the interest of good planning. Furthermore, I am concerned that setting a specific limit of 10 units, sets unjustifiable constraints on how a site could be developed. For example, a development of 12 two bedroom homes would be contrary to the policy whilst a development of 10 no 5 – bedroom houses would not. For the sake of clarity I do not accept that the definition of “major development” used in the context of Para 116 of the NPPF, which presumes against major development in AONBs except in exceptional circumstances, is the same definition as set out in the Town and Country (Development Management Procedure)(England) Order 2015 .

The NPPF as one of its 12 core principles “encourages the effective use of previously developed land, provided it is not of high landscape value”. [I address the significance of the AONB designation separately]. Furthermore, in paragraph 58 of the Framework, the Secretary of States requires that development should “optimise the potential of the site to accommodate development”.

My concerns are that the policy as written in terms of restricting as a matter of policy the size of development sites and quantum of development would not deliver “sustainable development”, nor would it be in line with Secretary of State advice and is more restrictive than set out in the Island’s Spatial Strategy, which if implemented

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in the current form would deliver less housing numbers than set out in the Local Plan. All these are matters that go to heart of the Basic Conditions Test.

I am also conscious from reading the correspondence between the Parish Council and the Planning Department that practise has revealed that Bembridge's policy which imposes similar constraints, has created genuine difficulties when previously developed sites come forward, that are over the 0.5 ha threshold.

My proposal is to accept the community's clearly expressed preference for *small scale development* but not to set arbitrary definitions of what that might comprise. That would then require the judgement to the decision maker, in the context of the specific site including an assessment of its characteristics and setting and also the consideration of the specific proposal before the Local Planning Authority. I accept that this approach goes somewhat against national policy advice in the Planning Practice Guidance urging neighbourhood plan policy to be written in a manner that gives certainty providing *certainty*, but in exercising my planning balance, I believe that leaving *small scale* as undefined would at least mean that the policy reflected locally expressed views, which I would have been required to discount, if I were to be forced to recommend the removal of "small scale" from the policy in its entirety, due to my concern with the arbitrary thresholds.

I now address the matter of local needs. It is clear that Policy SP2 indicates that some 980 homes should be delivered through small scale developments in Rural Service Centres and the wider rural areas. However, the supporting text provides greater detail in paragraph 5.38 which says that such smaller scale development should be meeting identified local needs. I consider it quite appropriate for the neighbourhood plan area to establish own level of need by undertaking a parish based housing needs assessment. Concern has been made through a representation on behalf of a landowner that this report only covers a 5-year period. I do not see that to be a fundamental flaw and it would indeed be less reliable to seek to establish at this stage what local need will be likely to exist, say in ten years' time.

I do consider that the objector's concerns have been overstated, as the plan merely established a general location where new development could be considered acceptable and that the quantum should be based on a robust understanding of local housing need. The scenario would be different, if the Plan was specifically allocating land to meet a specific number of dwellings which were being established at this stage. If there was a situation where the housing need assessment was not being updated in 5 years' time, then it would be difficult for the LPA and the Parish Council to resist a planning application that purported to address housing need without submitting contrary evidence. I am satisfied that the requirement to meet local housing need is based on supportive and proportionate evidence and that planning applications should be capable of being determined after the expiry of the plan's 5-year time horizon.

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I am concerned that the third bullet point could be seen as setting down separate design criteria for new residential development as against the more comprehensive set of design parameters set down in Policy D1. I suggest it would be better to make reference to Policy D1 instead.

I know that my conclusion (on the specific criterion) will be received with disappointment in terms of my recommended removal of the size and number of units' criteria and I recognise that it was a policy that enjoys local support and neighbourhoods should be able to propose policies to shape their communities. However, my role as examiner is to seek whether the Plan meets the Basic Conditions. For the reasons I have outlined I do not think that it does meet the tests. I am aware that the Parish Council considers that the area's designation as an Area of Outstanding Natural Beauty justifies that criteria, but as recent appeal decisions for larger developments show, it is the assessment of the impact of individual proposals on the landscape that are the determining issue as to their acceptability and that the designation would not rule out development of sites over 0.5 ha or beyond 10 units. I am further reinforced in my view by the fact that Rural Service Centres which has a supportive policy towards new housing, include those with in the AONB.

Recommendation

Delete "(small scale is defined as between 1 and 10 units on sites of no more than 0.5 hectares in size)

In the second bullet point " replace "meet" with " it meets"

Delete the third bullet point and insert " it complies with the requirement of Policy D1"

The supporting text will need to be amended to remove reference to the criteria for defining "small scale"

Policy H2 Affordable Housing

This policy is essentially in line with the Island Policy except it encourages on site delivery on sites of 9 units or less, however the option of a financial contribution is available. I support this approach as it ensures that affordable housing is delivered in a manner aimed at satisfying local need i.e. through on site delivery. Once the financial contribution is pooled, it is difficult to ensure that the affordable housing that is funded, is built within the same communities as the development which funded it.

The policy as written only deals with sites of 10 and that in view of my suggested change to Policy H1 this policy needs to be amended to provide for developments of 10 or more units. Criticism has been expressed as to the reliance on the housing

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needs assessment rather than the SHMA and also the local authority housing register. However, I am satisfied that the submitted housing needs assessment has been informed by both the SHMA and the Home Finders database and it is also has the benefit of a survey response rate of 70%.

The one area of substantive dispute relates to the eligibility criteria set out in Appendix 1. The LPA considers that the timescales being imposed at 10 years is too long and the other criteria are excessively onerous. They also consider that the expectations/ implications imposed on the LPA are excessive. They recommend either the removal of what they describe as the rigid template or alternatively they would suggest a policy based on that used in the Bembridge NDP (Policy H3). That policy deals with criteria for all new housing to meet a local connection on first occupation. That is not a comparable situation. I have seen no convincing evidence to justify having a higher threshold of eligibility for residency of affordable housing for Brighstone compared to other communities on the Island, so I recommend the deletion of the Appendix 1 criteria and make reference to the Island HomeFinder Allocation Policy

Recommendations

Insert “or more” after “10 units” in the first bullet point

Delete Appendix 1 and insert “Island HomeFinder Allocation Policy”

Policy H3 Specialist Housing

The Isle of Wight Council are concerned that the policy as written is too onerous in terms of requiring a local connection for occupation of specialist accommodation. I agree that it is too restrictive. It could lead to specialist accommodation being left empty if there were no residents who met the local connection policy. I believe that the requirement that the initial proposal is required to meet a local need is sufficient assurance.

Turning to the Essential Rural Worker Housing Policy, I am concerned that it could lead to isolated housing in the countryside, which would be contrary to the advice set out in para 55 of the NPPF. I propose rather to the policy meeting a local need, rather there should be a functional requirement for the need for the accommodation to be provided at that location. Subject to these amendments I consider that the policy meets the Basic Conditions.

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Recommendations

Delete the 5th bullet point of Housing for older people section and change “local” to “functional” before “need” in the first bullet point of the Essential Rural Worker Housing part of that policy.

Policy POE1 Conserving and Enhancing Our Environment

The LPA has pointed out in their representation that if this policy was to relate to all development then this would be too onerous and go beyond what was proportionate. I propose to recommend the revised wording suggested by the Council which will mean that it meets the Basic Conditions.

Recommendation

Delete policy and replace with the revised Policy “Where it is necessary to assess the likely impact of a development proposal, proportionate information should be submitted to demonstrate how the landscape, natural and historic environment of the Parish has been considered”

Policy POE2 Tranquillity

The first sentence of the policy is a statement as to why the policy is required rather than being a policy that can be used to determine a planning application.

The policy requires positive measures to conserve and where possible to enhance tranquillity. That may be going too far and all that the policy is required to do is to presume against any development which, without good reason, detrimentally affects the tranquillity of the area, whether through minimising the loss of night-time dark skies or through the generation of unnecessary noise. That is entirely in line with the approach recommended by the NPPF.

The installation is not a matter that ordinarily requires the submission of a planning application and is in any event unnecessary as it is covered by a general presumption against proposals that reduce the dark skies of the Parish.

Recommendation

Delete the policy and replace with the following revised policy wording “There will be a presumption against proposals that detrimentally affect the tranquillity of the area including through unnecessary lighting, that results in the loss of night times dark skies or through the generation of unnecessary noise”

Policy TT1 Private Car parking for New Development

I am satisfied that this policy meets the Basic Conditions Test and no changes are recommended.

Policy TT2 Additional Car Parking Space for Public Benefit

This policy is supportive of additional parking areas where a specific need exists. The second paragraph is very similar to the wording used in Policy TT1 except that it refers to development which has public access. That caveat is unnecessary as all new development should aim to meet its own off street parking requirements irrespective of whether the parking is for occupiers or for visiting members of the public. This duplication complicates the policy so I propose to recommend its deletion in the policy as it is unnecessary.

Recommendation

Omit the second paragraph of the policy.

Policy TT3 Sites Along Military Road

The policy relates to proposals that come forward for existing business sites along Military Road. It clarifies that the requirements do not relate to minor works. The LPA has usefully suggested that the policy should merely relate to Major Development Proposals which are likely to have transport implications. The matters that the policy seeks to address are likely traffic generation and mitigation measures. These are issues that should be covered by a Transport Statement or Assessment as required by para 32 of the NPPF for any development that will generate significant amounts of movements.

Subject to these amendments the policy meets Basic Conditions

Recommendations

Insert at the start of the policy “Major”

Insert after “details” “through the submission of a Transport Study or Assessment,”

Delete the second paragraph of the policy

Policy JE1 Zone 1 – Brighstone Village Centre

The Council have raised issues related to the reasonableness of the third criterion, namely that for a change of use of a building to be granted planning permission it will be a requirement that the building has to have been kept in a good state of repair and safe condition. I share their concerns, as I would have thought there would be an incentive to grant consent for a new use that would bring the building back into beneficial use.

Furthermore, it will be recognised that permitted development rights which allow uses to change without needing a planning permission. Planning control does not prevent the use of a newsagent changing to a shop selling different items. I sense some ambiguity as to which changes the policy is seeking to protect, is it seeking to prevent the loss of any business use to say residential use, rather than say a pub changing to a shop which are both in the policy's terms - business use.

The NPPF does promote the retention of local services in villages such as local shops and public houses. It is therefore quite appropriate for the policy to be phrased as a presumption against its change of use unless it can be shown that its continued use is not viable and attempts to market it have failed say over a 12-month period.

I agree with the Council that the last paragraph and its bullet point to be too subjective in terms of how a decision maker would assess whether a planning application for a change of use would complement existing businesses bearing in mind that planning only deals with use classes rather than the type of occupier. I propose to recommend the deletion of this part of the policy

Recommendations

Delete the third bullet point

Delete everything in the last paragraph after “zone”

Policy JE2 Zone 2 – Existing large scale tourism related businesses close to the coast.

The Council is concerned that as written the policy is imprecise and subject to different interpretations. Whilst I understand the point, the policy does allow some latitude in terms of the appropriateness of uses. I believe that the policy is aimed at

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retaining or reintroducing large scale tourist operations within this defined zone. I consider that the policy meets the Basic Conditions.

Policy JE3 Zone 3 – Rural Business and Tourism in other areas in Brighstone Parish

The only suggestion is that rather than giving examples of other policies it would have been more elegant to refer to “relevant policies”. This is not a change required to bring the plan in line with Basic Conditions but a suggestion of a minor change rather than a formal recommendation that the Qualifying Body and the LPA may wish to consider.

Policy D1 Design

I have made enquiries as to the status of the Brighstone Parish Design Guide and it has been confirmed that it is not part of the Neighbourhood Plan and is therefore not the subject of this examination but I am satisfied that the document has been the subject to public consultation and is a companion document.

This policy only requires minor amendment to clarify that the use of locally appropriate materials is additional to a scheme being appropriate in terms of its “scale and mass, height, size, layout, density”

The final requirement “and in line with that seen in the immediate local area” is too imprecise to be a robust design policy.

Recommendations

In the first bullet point replace “through” with “and”

Delete from the last bullet point “and in line with that seen in the immediate local area”

Policy ICS1 Community Facilities / Services

The only issue regarding this policy is whether it reasonable for a new community facility, as part of its planning submission to demonstrate that it will meet a proven local need. It may well be that a new facility could in itself create community demand which may not exist as the facilities may not be present. I therefore propose to recommend the deletion of this part of the policy as being too onerous.

Recommendation

Delete the bullet point “meet a proven local need”

Policy ICS2 Public Access

This policy meets Basic Conditions and no changes are required.

Policy CSC1 – Flood Risk

One of the requirements of a neighbourhood plan policy as set out in the Planning Practice Guidance is that a “policy should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it had been prepared”.

The policy, as written, requires that applications for new development need to comply with other policies in another part of the development plan and “EA obligations” – which are in fact national policy set out in the Technical Guidance attached to the NPPF. This policy adds nothing by way of planning policy in its own right merely signposting to other policy documents. Flood risk policy is comprehensively covered by Policy DM14 of the Island Plan Core Strategy and I therefore propose the deletion of the neighbourhood plan policy.

Recommendation

That Policy CSC1 and its supporting text, be deleted

Policy CSC 2 Coastal Development

The wording of the first sentence of the policy appears to restrict its application to “new development on existing sites” when in fact it should be applicable to any site along the Neighbourhood Plan’s coastline. I propose the removal of the wording “on existing sites”. I also consider that protective works are only required where a risk has been identified. This can be achieved by the insertion of the caveat “where appropriate” before the requirement of schemes to address the threat.

Recommendations

Renumber the policy as Policy CSC 1

Delete “on existing sites”

Insert “where appropriate” before “to design schemes to minimise...”

The Referendum Area

If I am to recommend that the Plan progresses to its referendum stage, I am required to confirm whether the referendum should cover a larger area than the area covered by the Neighbourhood Plan. In this instance I can confirm that the area of the Brighstone Neighbourhood Plan as designated by Isle of Wight Council is the appropriate area for the Referendum to be held and the area for the referendum does not need to be extended.

Summary

I must firstly congratulate the Parish Council and the Steering Group on the hard work that clearly has gone into the preparation of this Neighbourhood Plan – which is the third Neighbourhood plan on the Island to reach its examination stage.

It is clear that the Parish prides itself on its location within the beautiful countryside of the Island's AONB. My visit confirmed that the Parish of Brighstone remains a beautiful collection of villages with fine listed buildings and obviously a thriving vibrant community. I note that Brighstone has been able to successfully assimilate recent developments into the village, perhaps in a better way than some of the estates that were built a generation or so ago. The Neighbourhood Plan will still provide a planning framework for retaining and enhancing much of what the community clearly values.

Finally, I can confirm that my overall conclusions are that the Plan, if amended in line with my recommendations, meets all the statutory requirements including the basic conditions test.

I am therefore delighted to recommend to the Isle of Wight Council that the Brighstone Parish Neighbourhood Development Plan, as modified by my recommendations, should now proceed to referendum.

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5th April 2016