

BRIGHSTONE PARISH NEIGHBOURHOOD PLAN

Brook Hulverstone Mottistone Brighstone Limerstone

Pre Submission Consultation

Responses and Outcome

1 Introduction:

A six week consultation took place between Friday 16th October 2015 and Friday 27th November 2015. Each household in the parish received a leaflet and a sheet detailing the proposed draft policies in the Plan. Paper copies of the Pre-submission Draft Brighstone Parish Neighbourhood Plan, Brighstone Parish Design Statement and all background documents were made available at Brighstone Library and The Exchange. Copies were also available for short loan from two named Parish Councillors. Two events were held during the consultation period, on Saturday 24th October at the Seely Hall in Brook (12 members of the public attended) and on Saturday 7th November at the Wilberforce Hall in Brighstone (48 members of the public attended), comment forms were provided for those wishing to provide their views. A collection point for written responses was made available at the Village Shop, and an email address provided for those wishing to comment electronically.

In addition to consulting with the local community we also contacted neighbouring parish councils (Shorwell Parish Council, Calbourne Parish Council and Freshwater Parish Council), statutory consultees (Historic England, Environment Agency, Natural England, Marine Management Organisation), and other key local stakeholder organisations (the Isle of Wight Council Planning Policy Team, the Isle of Wight Area of Outstanding Natural Beauty Partnership and the National Trust).

2 Responses:

A total of 25 responses were received during the consultation period. These are set out in chronological order of receipt in the following pages. Those with a green top line indicate that comments made are noted but there was no requirement for discussion by the Steering Group. Those with an orange top line indicate that discussion took place at the Steering Group held on 1st December and the outcome of this is recorded.

Date	Individual/Organisation	Type
16/10/2015	Calbourne Parish Council	Email
Comment		
Thank you very much for your detailed information regarding the Brighstone Parish Neighbourhood Plan pre submission consultation. My Council were very interested in the information provided and wish you every success in your final submission but have no detailed comments to make.		
Action		
Noted / None required		
Recommended Response		
None required		
Outcome		
No required changes		

Date	Individual/Organisation	Type
16/10/2015	Graham Fell	Email to Steering Group
Comment		
All, I haven't participated greatly in this is due to other commitments but have been observing from the sidelines (and provided the odd comment). Well done everyone! What a great job you've all done on behalf of Brighstone and I'm sure that you have the thanks of the entire village.		
Action		
Noted / None required		
Recommended Response		
None required		
Outcome		
No required changes		

Date	Individual/Organisation	Type
19/10/2015	Mr Lamacq	Email
Comment		
In view of the IW Council's Development Committee's recommendation to give 'Conditional Permission' (all 44 pages of it) to the Blanchards development, how is this going to affect the Neighbourhood Plan?		
Action		
Project Manager discussed with Chairman. Chairman contacted Mr Lamacq and clarified the relationship between the Neighbourhood Plan and the planning appeal for the refusal of development on the Blanchards site. No further action required.		
Recommended Response		
None required		
Outcome		
No required changes		

Date	Individual/Organisation	Type
24/10/2015	Iris Tracey	Comment form at event
Comment		
This is a well evidenced document which is worded to provide the full detail required to send clear views and opportunity ideas for future developments. It is hoped that this policy will have sufficient 'teeth' to direct change. My hope is to support the developments that assist the ageing and local population.		
Action		
Noted / Discuss at Steering Group		
Outcome		
Steering Group agreed that matters raised were covered in the Neighbourhood Plan as drafted. Policy H3 covers local need specialist housing which includes housing for the elderly. JE1 and ICS1 both deal with the availability of local services and facilities. Other welfare matters are likely to be outside the scope of the policies within the NP.		

Date	Individual/Organisation	Type
24/10/2015	Marcia Begent	Comment form at event
Comment		
General vision is good and forward looking. However, while agreeing with giving priority to local people with a long term connection, this could be seen as discrimination. How many people who currently live in this area come from the Mainland?!! (me included!) Not (sic) mention of Hulverstone, Brook, Mottistone. Need to encourage more families to make the school viable. More modern designs should be agreed.		
Action		
Discuss at Steering Group		
Outcome		
Steering Group felt that the 'local connection' element may have been misunderstood by this respondent. No limitation proposed on occupation of market housing only on new affordable and specialist housing (H2 and H3). Regarding development outside of the Rural Service Centre, the Residents Survey clearly indicates support for concentrating development primarily within or immediately adjacent to the RSC (H1). If there is a definite and proven local need in another part of the community policy as written would allow for this particularly for specialist housing (H3). School viability not fully dependent upon population growth in Brighstone Parish as many pupils come from outside of the parish due to the school's good reputation and freedom of parental choice. Parish Design Statement indicates design appropriate to setting and this may allow for modern design in some locations within the parish (away from Listed buildings and Conservation Areas) where such design complements the area. Therefore no changes are suggested for the Neighbourhood Plan.		

Date	Individual/Organisation	Type
30/10/2015	Mr and Mrs Tearle	Email
Comment		
<p>Thanks for sharing the draft Brighstone Parish Neighbourhood Plan. We support the Policies as they seem very sensible and appropriate for a village such as ours.</p> <p>The main points we want to make relate to Traffic and Transport. We can't see how the businesses operating in the centre of the village can be expected to provide sufficient off road spaces to alleviate the congestion that frequently seems to occur these days, especially when delivery vehicles, buses and coaches are in. Maybe the pub would be willing to offer car parking, at least before midday? Of course Warnes Lane car park is useful but is not easy to access and not best placed for popping in for a paper or collecting heavy shopping from the Village Shop.</p> <p>I would also like to echo the infrequency of Southern Vectis bus services through the village. Teresa is often without a car and a great deal of planning is required to access Newport, Freshwater or Yarmouth and not get stranded! The FYT bus service must be fully supported by the Parish - a great initiative.</p>		
Action		
Discuss at Steering Group		
Outcome		
Respondent has misunderstood policy context of TT2 – this seeks to utilise opportunities as and when they arise rather than requiring existing businesses to provide additional parking. Other matters are noted but not directly linked to NP policy. No changes are necessary in the Neighbourhood Plan.		

Date	Individual/Organisation	Type
26/10/2015	The Environment Agency	Email
Comment		
<p>Thank you for consulting the Environment Agency on your Draft Neighbourhood Plan. We are a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans. We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest. It is important to note that although you have not allocated any specific development sites in this document, should you choose to at a later date any sites that fall within Flood Zones 2 or 3 will require to undergo the Sequential Test. In accordance with the National Planning Policy Framework (NPPF) paragraph 100-102, we recommend the Sequential Test is undertaken when allocating sites to ensure development is directed to the areas of lowest flood risk. The Sequential Test should be informed by the Local Planning Authorities Strategic Flood Risk Assessment (SFRA). We would have concerns if development is allocated in this high risk flood zone without the Sequential Test being undertaken. Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7a381.pdf We have worked with and supported your Local Planning Authority as they are developing their Charging Schedule. We would also welcome the opportunity to work with your neighbourhood forum on this to ensure environmental infrastructure is taken into consideration when looking to fund local infrastructure.</p>		
Action		
Discuss at Steering Group		
Outcome		
As the Neighbourhood Plan is has not identified specific sites the Environment Agency have indicated that they are comfortable with the policy approach we have taken. No changes to the Neighbourhood Plan required.		

Date	Individual/Organisation	Type
04/11/2015	Freshwater Parish Council	Email
Comment		
Thank you for your email. Freshwater Parish Council considered this at their meeting last night. The Council have no comment to make other than to congratulate those involved for their efforts.		
Action		
Noted / None required		
Recommended Response		
None required		
Outcome		
No change required		

Date	Individual/Organisation	Type
07/11/2015	David Tolfree	Comment form at event
Comment		
In general - fantastic job! Please see earlier written submission. (Provided when consulting informally with the PC and already discussed at earlier Steering Group – annotated copy given below). One small point - suggest reference to the new IW Coastal Path in section 9.4.15 - This may greatly increase footfall offering possibility of increase in visitor numbers to Brighstone but improved access and signage might need to be considered.		
Action		
Discuss at Steering Group		
Outcome		
Refer to Coastal Path in 9.4.1.5 where we outline the businesses along the Military Road and state that it can provide a means of access on foot, and to branch off to access the facilities in Brighstone village.		

Comments on Neighbourhood Plan Documents from Cllr D Tolfree

Neighbourhood Plan Consultation

Overall, this reads extremely well. It is obvious that a huge amount of work has gone into this – the group, and John B in particular, should be warmly congratulated on getting this far. The policies look strong, comprehensive and appropriate. My comments will focus mainly on areas where I think change is needed, but these comments should not be read as implying an overall negative view of the document.

Main Comments

Vision Statement (S. 5): because this is written in the present and past tense, it would be easy to read it as a statement of what the parish is like in 2015. It would be clearer if the future tense was used. Personally I would want to add a number of things:

- Taking steps to redress the current demographic imbalance, principally by facilitating more affordable homes, especially for families, partly because a more balanced demography is a good thing in itself, partly to ensure the viability of the school, Scout and Guide Groups etc.. this demographic imbalance is, in my view, a major issue which doesn't come across strongly in any of the documents
- At the same time, acknowledge that the parish will have an increasing number of very elderly people, making it necessary to respond to their needs through access to healthcare, social facilities etc. and by making the village as dementia friendly as possible

Discussed at Steering Group – decided that vision was written appropriately and did not agree to include two additional suggested bullet points.

Policies Section: I think you miss a trick by not exploiting fully the conclusions drawn from the BRSC document. Specifically, at 9.1.7 it might be helpful to make reference to the poor access to services detailed in the DEFRA access criteria. And in 9.2.6.1 a further reference to the BRSC document would seem vitally important.

Additional references to our research and conclusions now included.

In the Policies section, I think it an excellent idea to include a “justifications” section for each policy. However, sometimes these sections lack sharpness and evidence. To illustrate this, the justification in 9.7.6.1 lapses into the language of “should” rather than “why” and “because”. This Justifications section could produce better rationale for the policy – e.g. results of resident’s surveys, ensuring sustainability, enhancing health and well-being. I compared this with 9.8.5.1 which provides the rationale for the policy. I suggest a critical review of these sections would be helpful.

Justification text has been reviewed and altered to be more consistent through all sections of the document.

Picking up my comment in the Visions section about the demographic imbalance in the parish, I wonder if, in the Housing section we would make a stronger comment that the building of bungalows beyond the level of current demand in the parish will further encourage an inward migration of retired people, thereby further exacerbating the demographic imbalance.

Steering Group felt that this alteration was unnecessary as we focus on local need as the basis of new development.

Specific Comments

4.1.6: suggest an explanation of what the Local List is and how it can be accessed. **Done**

4.1.10 (and elsewhere): I understand that the Methodists like to refer to their building as the Methodist Church, not chapel. I have been corrected on this so there may be a little sensitivity here. **Done.**

5.2.2. could we add tourists to the list of people benefiting? **Done.**

9.2.1.5: it would be helpful if the table could include the totals. **Done.**

9.2.6: last bullet point – should be “alternative accommodation” **Done.**

9.2.8.1: suggest you cross-refer here to the Housing Need Survey as providing important evidence. **Done.**

9.2.5.1: first sentence - I think the wording could be improved – I found it confusing. **Re-worded.**

9.3.1.9: suggest you explain what Environmental Stewardship means – maybe a footnote? **Done.**

9.4.2.1: 6th bullet point – space between any and more. **Corrected.**

9.4.5.1 and Policy TT2: - suggest “potential for” rather than “potential on”. **Corrected.**

9.5.1.1: second line – add “is” after “of the parish” **Corrected.**

9.7.1.2: I suggest you insert the word “seasonal” before “Youth Hostel” – just to be clear. **Done.**

9.5: I suggest that at some point in this section you refer to the closure of Barneys, the Countryman, the Tea Gardens, the (stand-alone) Post Office and the National Trust shop as examples of businesses lost in recent years – they highlight the vulnerability of some local businesses and give added weight for the policy to support existing businesses.

Discussed at Steering Group – agreed that some reference should be included but that Barney’s and the Tea Rooms may be too long ago to be included. Wording altered.

9.7.1.3: there is no organised Bridge group in the parish (the club in Brook folded). **Corrected.**

Design Statement Consultation

General Comments

This is an excellent document – very clearly presented, excellent descriptions and strong guidelines. It obviously draws heavily on the old VDS, with some appropriate changes of content and layout.

Specific Comments

P. 35 – Landscape Guidelines point 4: I do have reservations about this. I suppose the key word is “inappropriate” but this is very open to interpretation. The Lodge development is a good example of subdividing a large plot. I think most people would prefer to see development like this rather than building on greenfield sites. **Comment superseded by changes to wording.**

Defining the Extent of Influence of the BRSC

This is an excellent document which provides important contextual information for the Neighbourhood Plan. If read as a stand-alone document, however, its important message doesn’t come across very clearly. It seems to me that it makes three main points: 1: the 2008 Matrix data is now quite out of date. 2: the Matrix doesn’t include some of the criteria used by the Defra Access to Services data, and when this is analysed for Brighstone, the area scores extremely lowly. 3: the Brighstone RSC actually services a relatively small population apart from its own residents and Shorwell. I feel that these points could be made in a more stark and punchy manner. The Conclusions section (para 8) really only picks up the third of these three key points. **Changed to include other suggested conclusions.**

One small point: in the very helpful charts, it might be an idea to highlight the figures for Brighstone in colour so that the figures stand out more clearly. **Done.**

At some point, I think it might be helpful to state that Shorwell (and not Calbourne or Freshwater) is linked to Brighstone by a number of other factors – same groups of churches, shared newsletter, school catchment area etc.. Less factually, there is a kind of social affinity with Shorwell that cannot be said of the other two neighbouring villages.

Green Space Audit

General Comments

This looks to be a useful exercise but it didn't seem to contribute very significantly the Neighbourhood Plan or Design Statement. I guess I found it a bit inconsequential without an analysis – for example, of public rights of way that need to be developed further, improved etc.. Given the current steep rise in green tourism, the popularity of the Parish for walkers and cyclists, and the imminent Coastal Path, I feel there could have been space for some recommendations feeding into the Neighbourhood Plan for further developments and improvements. The Design Statement makes many references to views but there is little cross-referencing to the Audit document. It is, however, a useful background paper for future reference.

I appreciate that Blanchards falls outside of the definition of "Green Space". In many ways, however, it is seen as a large and highly valued green space (albeit agricultural) simply because it is in the centre of the village. Would it be worthy of a mention on this basis? Also, bearing in mind the above paragraph, could it be identified as a potential green space within your definition? Also perhaps a mention of the number of significant views across the field from the village?

The photographs are excellent and bring the document to life. The only one I would suggest changing is V35 in which parked cars rather spoil the picture – there are lots of others in the archives.

Discussed at Steering Group and decided that no changes should be made. Green Space and Views no considered within Design section of the Neighbourhood Plan.

Specific Comments

Map 4: this doesn't seem to show Permissive Paths, of which I believe there are a couple in Brook. Is it worth including these? Decided not to include Permissive Paths as these may change and there is no easily available source to identify all of them for inclusion.

The maps showing locally identified green spaces is a bit inconsistent in their use of colour (yellow and orange) – consistency might be a good idea here. Is it worth a comment on the maintenance of these areas – e.g. some difficulty in identifying people to undertake maintenance of areas in Ashley Way? Colour now altered to be more consistent. Decided not to include mention of management/maintenance regimes.

9.2.2: The Legend Box obscures six of the arrows making it difficult to read. Could the box go in the bottom left hand corner? Changed.

Date	Individual/Organisation	Type
07/11/2015	Name redacted as request of consultee	Comment form at event
Comment		
<p>Re Brighstone as a RSC. Page 3 1.1.5 Contradicts why Brighstone is a RSC? Perhaps our status should be changed? After all austerity wasn't so predominant in 2008. Page 7 provides validity for change of status?</p> <p>Am disappointed to note that it would appear that no development/small scale or otherwise is indicated for the remaining neighbourhoods (relates to H1). BPNP H1: New Housing Development - The first paragraph is quite 'biased' regarding development only in Brighstone. It's open to interpretation, like Health and Safety issues it's all areas responsibility to meet Government Housing Targets. Thank you for all your hard work.</p>		
Action		
Discuss at Steering Group		
Outcome		
<p>Comments were discussed. Steering Group has some sympathy with the challenge to the Rural Service Centre status of Brighstone Village but, as discussed at various Steering Group meetings, in order to be in compliance with the Island Plan we need to reflect this designation in our approach. The research we have carried out has concluded that the RSC serves Brighstone Parish and to some extent provides services for people living in Shorwell Parish; but doesn't extend further. We have also shown that the Brighstone RSC is the least sustainable location for new development of all of the other RSCs due to its full protected landscape status and the comparative difficulty of accessing services not available in the local area (not least because of the relatively poor public bus service). Policy H1 and H3 do allow limit development outside of the RSC if there is evidence of local need. It was decided that no change to the approach in the Neighbourhood Plan was required.</p>		

Date	Individual/Organisation	Type
07/11/2015	Mr and Mrs Edge	Comment form at event
Comment		
We wholeheartedly agree that any development within the Brighstone Parish, an AONB, should be of a small scale and in keeping with the surrounding area.		
Action		
Noted / None required		
Recommended Response		
None required		
Outcome		
No change required		

Date	Individual/Organisation	Type
07/11/2015	Paul Bradley	Comment form at event
Comment		
<p>ATT3 Highway Safety - Traffic enforcement should include PARKING enforcement on existing restrictions.</p> <p>Local Economy - facilities for tourist parking - important it includes coaches!!</p> <p>Fully support ATT1 efforts to improve bus services. Buildings Form - Should this include solar panels?</p> <p>CSCA1 Adoption of local windfarms should be resisted. Visual impact compared with benefit not worth it.</p>		
Action		
Discuss at Steering Group		
Outcome		
<p>Most of these comments relate to the Actions in the Neighbourhood Plan and will be taken forward by the Parish Council as and when the opportunity arises. In relation to tourist parking, this was discussed at a number of Steering Group meetings and it was concluded that there was insufficient support from the Residents Survey to require a policy on this issue. The Steering Group concluded that no changes were required for the Neighbourhood Plan.</p>		

Date	Individual/Organisation	Type
07/11/2015	N Bradley	Comment form at event
Comment		
<p>Good compromise limiting the size of development to 1 to 10 homes.</p> <p>Good specifying that affordable housing should be for local people.</p> <p>Good - restrict lighting - dark skies policy. Good - improve bus services. Good - encourage small scale businesses.</p> <p>Good - consider flood risks of new developments.</p>		
Action		
Noted / None required		
Recommended Response		
None required		
Outcome		
No changes required		

Date	Individual/Organisation	Type
07/11/2015	Mr and Mrs Williams	Comment form at event
Comment		
<p>Thank you for your hard work and impressive plans for the future of the parish. I think you have captured the concerns of most of the residents in protecting our surroundings but encouraging future growth if necessary.</p>		
Action		
Noted / None required		
Recommended Response		
None required		
Outcome		
No changes required		

Date	Individual/Organisation	Type
07/11/2015	Stephen Noyes	Comment form at event
Comment		
Well produced and easy to read, Extremely thorough and well informed by fact.		
Action		
Noted / None required		
Recommended Response		
None required		
Outcome		
No change required		

Date	Individual/Organisation	Type
07/11/2015	Rebecca Noyes	Comment form at event
Comment		
A great deal of work; in depth. Anything that keeps Brighstone as a rural location is to be applauded. Villages have to change/adapt but the rural essence should be preserved. Small scale development, dark skies, minimising street furniture as mentioned in the plan are all good examples.		
Action		
Noted / None required		
Recommended Response		
None required		
Outcome		
No changes required		

Date	Individual/Organisation	Type
07/11/2015	Barbara Turner	Comment form at event
Comment		
This is a well thought out plan taking into account the wishes of the village and the well-being for the future of Brighstone.		
Action		
Noted / None required		
Recommended Response		
None required		
Outcome		
No change required		

Date	Individual/Organisation	Type
07/11/2015	Alison Austin	Comment form at event
Comment		
I think that this is a very well presented document and see any obvious issues. Many thanks to all who have so hard in its preparation.		
Action		
Noted / None required		
Recommended Response		
None required		
Outcome		
No change necessary		

Date	Individual/Organisation	Type
07/11/2015	Don Appleby	Comment form at event
Comment		
A well-researched document fully supported by a good evidence base which matches the needs and expectations of the Parish. I fully support the principles underpinning the documents ensuing detail.		
Action		
Noted / None required		
Recommended Response		
None required		
Outcome		
No changes required		

Date	Individual/Organisation	Type
07/11/2015	Julian Kemp	Comment form at event
Comment		
Policy JE2 should include a positive initial paragraph similar to that in JE1.		
Action		
Discuss at Steering Group		
Outcome		
Similar positive statement to be included in policy JE2		

Date	Individual/Organisation	Type
18/11/2015	Shorwell Parish Council	Email
Comment		
The documents you forwarded have been reviewed by the individual councillors of Shorwell Parish. They have commented on the depth of information provided and the coverage devoted to the key areas. They have no specific comments to make or additional items they would wish to see included.		
Action		
Noted / None required		
Recommended Response		
None required		
Outcome		
No change necessary		

Date	Individual/Organisation	Type
24/11/2015	Natural England	Email
Comment		
<p>Thank you for your consultation on the above dated 15th October 2015 which was received by Natural England on 15th October 2015.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Screening Request: Strategic Environmental Assessment: It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils), that there are unlikely to be significant environmental effects from the proposed plan.</p> <p>Neighbourhood Plan: Guidance on the assessment of Neighbourhood Plans in light of the SEA Directive is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of an SEA, for instance where: 1) A neighbourhood plan allocates sites for development. 2) The neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan. 3) The neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan. We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected. Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary. Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make. For any queries relating to the specific advice in this letter only please contact Matt Taylor on 0300 060 4846. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk. We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.</p>		
Action		
Noted / None required		
Recommended Response		
None required		
Outcome		
No change necessary		

Date	Individual/Organisation	Type
27/11/2015	Isle of Wight Council	Email/Letter
Comment		
See separate letter and annotations given below.		
Action		
Discuss at Steering Group		
Outcome		
This is set out briefly in the annotated letter and expanded upon in the letter sent by the Parish Council to the IWC.		

Via email

Wendy Perera, Head of Planning & Housing Services

Isle of Wight Council, Council Offices,
Seaclose, Fairlee Road, Newport, Isle of
Wight, PO30 2QS

Tel (01983) 823552
Email planning.policy@iow.gov.uk
Web iwight.com/planning

IWC Ref BriNDP/Reg14
Your Ref

Contact Ollie Boulter
Date 27 November 2015

Dear John,

Brighstone Neighbourhood Development Plan Pre-Submission Consultation

Thank you for giving the Isle of Wight Council, as the local planning authority (LPA), the opportunity to comment on the pre-submission consultation version of the Brighstone Neighbourhood Development Plan (BNDP) and accompanying background documents. The comments provided by the council are given under the spirit of the 'duty to support' set out in the amendments to the Town & Country Planning Act 1990.

As I am sure you are aware, a key role of the council is ultimately to determine whether the neighbourhood development plan meets the basic conditions. The council is not required to make this decision until after it has received the examiner's report. I previously provided comments on the emerging BNDP, in a letter dated 10 September 2015, and I am pleased to note that a number of the suggestions made have been incorporated.

The LPA is able to draw on its experiences of offering advice to two neighbourhood plans that have been through the statutory process and now, perhaps more importantly, of implementing policies within those neighbourhood plans when determining applications.

I have shared the current version of the plan and supporting document with colleagues, and their feedback has informed this response. The comments provided are based on the consultation documents and the council reserves the right to raise further or new issues, later on in the process, should it be deemed necessary.

The following comments flag issues where the council considers amendments would contribute to giving greater confidence that the Basic Conditions will be met, to ensure that the plan and policies are fit for purpose and will result in the development that balances sound planning principles and the aspirations of the community, and to reduce the risk of 3rd party objections later on in the process.

As you will be aware the LPA is responsible for organising and paying for both the examination process and the referendum. It is in the LPA's best interest therefore to ensure that the BNDP stands the best chance of successfully going through the statutory processes.

The council reserves the right to come to a different view on whether the BNDP meets the basic conditions later on in the process, although I would hope that this would not be necessary due to the opportunity we have had to be involved at this stage.

It is worth re-iterating that an examiner probably will not know Brighstone – the place, the people or the issues. The only way they will be able to understand these things will be through the information you (or third parties) provide. You can therefore reduce the risk of questions being raised, or the plan not meeting the basic conditions, by making sure that sufficient evidence is provided to support your policy approaches.

In the following comments where amendments to wording are suggested, additions are underlined and deletions shown with a ~~strikethrough~~. The reason for the suggestion and/or any commentary is set out in *italics*. The draft BNDP and supporting documents have been circulated within Planning Services, and the following comments reflect the input received from officers.

Specific comments

8.1 ...monitoring of the Brighstone Parish Neighbourhood Plan once it has been adopted and becomes part of the a Development Plan used to determine planning applications within the parish of Brighstone ~~Document of the Island Plan~~. *This change is suggested to ensure that terminology consistent with legislation is used, thereby avoiding any confusion over the status of the plan.*

Changes made as suggested

9.1.14 *Whilst the plan helpfully includes a Policies Map, does it show all the policies that identify specific sites/areas and other policy considerations (i.e. key views)? It would be helpful for the users of the plan to have all this information in one clear map, and the LPA is able to assist with this if required.*

No requirement as our approach to Green Space has altered (see end of this letter and PC response letter to IWC)

9.2.1.5 This gives a housing need of a total of 30 individual properties of various size and tenure over the period 2014-2019. *Such an amendment would make the lifetime of the housing needs survey clear and reflect the wording of the policy.*

Changes made as suggested

BPNP Policy H1: New Housing Development (Location) – *the amalgamation of housing policies into one is welcomed and supported. As raised in previous correspondence there are officer concerns relating to the proposed approach of restricting the size (either the number of dwellings or the physical size of the site). This position has not changed and there is still officer concern over the approach and its potential impacts, although it is acknowledged that the proposed approach is favoured by the respondents to the various public consultation exercises undertaken to inform the BNDP.*

See comment at end of this letter and PC response to IWC (we believe our approach is fully justified)

It is interesting to note that through the 'Defining the extent of the influence of our Rural Service Centre' it is suggested that Brighstone is the least accessible village on the Island. The paradox to this though is that the village does comprise a very good range of facilities for its residents that includes two local shops, a pub, a very highly rated primary school, a doctors surgery, hair-dressers, playing fields and tennis courts, Church, village hall, to name but a few. Indeed it was for these very reasons that Brighstone was identified as a Rural Service Centre in the core strategy, and being appropriate to accommodate future development.

Noted but whilst Brighstone is well served for local services, not all required services are available locally and require travel to access. Brighstone is the least sustainable of the 11 RSC when it comes to travel to access services away from the RSC as evidenced by the Defra Access to Services data 2012.

BNP Policy H2: Affordable Housing – *the rewording of the policy is welcomed, as it gives greater clarity and reflects current guidance and policy. The LPA notes that this guidance may change (again) whilst the BNDP is going through the statutory adoption processes, and as such recommends that the issue (nationally introduced thresholds of when financial contributions towards affordable housing will not be required) is monitored.*

Agreed – watching brief will take place regarding this issue.

BNP Policy H3: Specialist Housing – *officers welcome the greater flexibility given to the policy by the introduction of the word ‘significantly’ in relation to the potential over supply of specialist housing, although concerns still remain that the general approach is unduly restrictive (i.e. seeking to prevent such accommodation being available for people with no local connection to the area).*

We do not believe that our approach is ‘unduly restrictive’ see the PC letter of response for more detail.

BNP Policy POE1: Conserving and enhancing our environment – *the last paragraph of the policy, ‘Proposals should show conservation or in preference enhancements of these important assets’,*

seems to introduce further (and different) requirements to those beyond the core strategy. It is unclear what the justification for such an approach is, particularly as it applies to three different elements (landscape, natural and historic environments), which have different statutory levels of protection and tests. For ease of use and improved clarity it is suggested that this paragraph is removed, as it is suggested the issues are already suitably covered in the core strategy.

Changes made as suggested

9.4.5.1 – *there seems to be a typographical error in the penultimate sentence*

Corrected

BNP Policy TT2: Additional Car Parking Space for public benefit – *officers welcome the changes to the policy, which are considered to give greater clarity.*

BNP Policy TT3: Sites along the Military Road – *the wording of the policy suggest that the ways of mitigating the likely traffic generation are ‘through the use of public transport and the public rights of way network’ and therefore no other mechanism can be considered. Whilst public transport and the rights of way network can be used to mitigate any impacts, other measures could and should be considered. In light of this it is suggested that the following wording is removed ‘through the use of public transport and the public rights of way network’.*

We have added ‘such as’ before mentioning public transport and rights of way which would allow for further measure to achieve the same aims.

BNP Policy JE1: Zone 1 – Brighstone Village Centre – *as drafted it is unclear whether all three of the first three bullet points are required to be met for a proposal to be compliant, or whether it is an and/or requirement.*

Changed to include ‘and’ to indicate that all three bullet points should be met.

BNP Policy JE2: Zone 2 – Existing large scale tourism related businesses close to the coast - *officers welcome the amendment to bullet point 4 of the policy. However, bullet point 3 introduces the requirement to ‘incorporate opportunities to conserve and where possible enhance the area’. This is outside the context of national and local designations, and the approaches to which are already covered by national and local planning policies. In light of this, the addition of this ‘test’ seems unduly onerous, especially when considering there doesn’t appear to be any evidence that justifies the need for such an approach.*

We disagree and believe that the approach is justified. This is set out more fully in the PC letter to the

IWC.

BNP Policy JE3: Zone 3 – Rural business and tourism in the rest of the parish - *officers welcome the changes to the policy, which are considered to give greater clarity, and the support the policy gives in relation to the conversion, re-use or adaptation of rural buildings for small scale business or tourism purposes.*

However, as a number of the bullet points in the policy are considered to duplicate existing policies (both in the document and the core strategy) it is suggested they are not necessary. Bullet point 3 relates to design is it necessary, bearing in mind that there is a dedicated design policy and design guide which covers these issues, and likewise for bullet point 4 which is already covered by Policy POE1: Conserving and enhancing our environment. Bullet point 5 covers parking (Policy TT1: Private Car Parking for New Development) and impact on road network (which is already sufficiently covered by policy SP7 Sustainable Travel).

These bullet points are now removed to be replaced with one which cross references the other relevant policies of the Neighbourhood Plan.

BNP Policy D1 – Design Criteria – *whilst the amendment to bullet point 4 is noted, it is suggested that the issue is covered by policy BPNP Policy ICS2: Public Access, Open/Green Spaces and views.*

This is no longer an issue as we have decided to deal with green space and views within Design and not within Improving Community Services. All references to green space and views have been removed from ICS2.

Within the Design Statement itself point 2 of the Landscape, Natural and Historic Environment, Settlement Pattern and Setting Guidelines, refers to retaining the distinctive silhouette of parish settlements by preventing the erection of structures or changes to buildings that would cause material harm to the landscape and AONB. Officers are not clear how evidence could be produced regarding the silhouette of the settlements and how this would or wouldn't be harmed – particularly by one off buildings, and therefore be determined. If silhouette is taken to mean the overall outline of the settlements and spaces between, then it is suggested that the guideline would be more likely to achieve what is understood to be its intended outcomes by refer to larger developments that extended the form of the village.

Agreed and will alter wording accordingly.

Point 4 of the design statement says that sub-division of larger plots must be controlled to ensure that the important character of existing plots ratios is retained. This is a good point, but it would appear to be too focussed on larger plots – subdivision of any site could cause harmful alteration to the historic layout of the villages and in any event, this comes down to character and context. It is suggested that the guideline is more positively worded to state that the layout of development sites should reflect the historic layout of settlements or simply remove this requirement and refer to criteria 9.

Agreed and will alter the wording accordingly.

Criteria 5 says that ornamental planting should be restricted to gardens in settlement areas. This policy would seek to remove a person's entitlement to manage their garden as they see fit. There is no evidence in the plan to demonstrate why ornamental planting is harmful and indeed, other parts of the plan praise Mottistone Manor and yet its gardens are planted in a formal and manicured fashion. Officers consider that this requirement is unreasonable and would be difficult to enforce.

Agreed will remove final sentence from this criteria.

Point 12 states that decorations such as house colour and shop signs should blend in with the style of the locality. This is again prescriptive and lacks evidence as to why this is necessary.

A person should be able to decorate their house as they see fit – unless it is a listed building and/or in a conservation area and some harm would be caused. Legislation means that the LPA already has the ability to protect listed buildings and the colour of signs that require consent.

This guideline will be removed entirely.

Point 15 states that low hedges should be used to enclose boundaries. Whilst the idea behind this is understood, the LPA can't force people to keep low hedges as this would be too prescriptive and fall outside of the planning legislation, and bearing in mind a neighbourhood plan can't bring in new legal requirements.

Policy wording will be changed and the term 'encouraged' used rather than 'should'.

Point 18 states that re-use of existing buildings conserves energy. Officers do not necessarily agree with this statement, as the adaption of buildings that have fallen into a very poor state or that have simply reached the end of their design life can use far greater amounts of resources than a re-build. It is agreed that historically important buildings should be retained but not that in all situations that this uses less resources.

Agreed we will reword this point accordingly.

BPNP Policy ICS1: Community Facilities/Services – an addition to the previous iteration of the policy is that proposals for new community facilities will be supported if they meet a proven local need. It is suggested that such an approach will restrict what community facilities may come forward, as they might not be able to demonstrate a local need (even if a wider need/demand was identified). This would seem to be unduly restrictive and may stop community facilities coming forward. Is this the intention?

We believe that our approach is justified and not unduly restrictive. More detail is given in the PC letter to the IWC.

BPNP Policy ICS2: Public Access, Open/Green Spaces and views – the proposed policy provides the hook for the information in the Brighstone Parish Green Space Audit. The 'locally identified Important Green Spaces' in the audit are extensive, and it is not clear how they relate to the approach toward, and criteria for, local green space.

From the maps provided in the audit a significant amount of 'locally identified Important Green Spaces' seem to be roadside verges. It may be that such land is 'highway land', and as such the Highway Authority are able to undertake highway-related works in those areas without the need for specific consents (planning or otherwise). In light of this it is considered that the policy as drafted (or at least based on a lot of the areas identified) cannot be implemented and would not meet the Basic Conditions.

It is suggested that the 'locally identified Important Green Spaces' are assessed against the above information and the criteria given in the National Planning Policy Framework in paragraphs 76 and 77, in the same manner that other neighbourhood plans have done. The benefit of designating areas as Local Green Space is that development would only be expected to occur in 'very special circumstances'.

It is noted that locations such as Brighstone Recreation Ground are not included in the Audit. Without pre-judging whether they would meet the criteria referenced above, it may be a useful exercise to establish whether such sites would be appropriate for the designation.

As we are not designating NPPF 'Local Green Space' in our Neighbourhood Plan paragraphs 76 and 77 of the NPPF do not apply. What we have done is identify areas of land which contribute to the character of the settlements of the parish. Brighstone Recreation Ground is included in the Green Space Audit under areas already identified by the Isle of Wight Council so doesn't require our

designation. References to views and green space have been removed from ICS2 and their contribution to the character of the parish and its settlements are now covered in D1.

A number of 'key views' are identified in the Audit. However, there is no explanation as to why they are considered important and without such an assessment it will be difficult to apply the policy in a robust and defensible manner. Because of this it is suggested that each view should be accompanied by an explanation of its importance. The LPA remains to be convinced that all the views identified are of sufficient importance to warrant such a specific level of protection above the wider policy framework.

As above views are now considered within the Design section of the Neighbourhood Plan and in policy D1. The Brighstone Parish Green Audit document has given details of the views which the community believe to be indicative of the relationship between settlements, downland and coastline and views to and from these areas. They are not definitive but along with the views shown in the Conservation Area Appraisals may be a useful starting point for developers who will be looking to identify the impact of their proposals on the area.

BPNP Policy CSC1: Flood Risk – *existing guidance clearly sets out when a Flood Risk Assessment (FRA) is required, and as such the policy is not considered necessary or that sufficient justification has been provided to demonstrate why the approach should go beyond that already set out. It is considered that the policy as worded would effectively mean if a site that was not at risk of flooding was the subject of an application and did not contain a FRA, then it would be contrary to policy CSC1. This is considered to be unduly onerous.*

The policy will be reworded to ensure compliance with FRA when required and to 'encourage' the consideration of ground water and surface water issues outside of these areas.

BPNP Policy CSC2: Coastal Development – *whilst the issue is an important local one and a locally distinctive approach is welcomed, it may be beneficial to introduce an approach commensurate to the level of development proposed. Is the intention of the policy to cover coastal defences or development as a whole? If so it would be helpful to make this clear in the policy. By using the word development in the planning sense this covers anything that requires planning permission. Perhaps a more proportionate approach would be to only refer to major development? To also aid clarity over the policy, the following wording is suggested:*

There is a presumption against any major development ~~seeking that would~~ to reduce or prevent natural rates of coastal erosion due to the coastline's landscape and ecological importance ~~of the coastline in the parish.~~

Changes made as suggested.

Sustainability Appraisal

The Sustainability Appraisal will be a useful tool in demonstrating that the Plan is contributing to sustainable development (and how it is done), which is a Basic Condition. In light of this it is considered that the appraisal would benefit from further explanation of how alternative policy approaches have been considered, where appropriate assessed and compared, and a clear justification for why they were ruled out. This could be achieved by starting with a long list of all possible options and then through a relatively quick process, screen out those which are not realistic, either using set criteria and/or providing some justification for the determination made.

Following on from this point, it is considered that Table 2: Alternatives would benefit from an explanation of why and how potential options were ruled in or out as a summary of Appendix 2. Appendix 2 itself lacks any actual justification of assessment or rationale of the preferred identified option.

Sustainability Appraisal has been altered to provide details of the alternative and why we chose the

options that we did for the Neighbourhood Plan (Table 2 and Appendix 2 in particular).

Within a Sustainability Appraisal one would normally expect to see details on proposed mitigation, suggested changes and policy iteration/development. It is not clear from the current document where these are and whether they meet the requirements of the SEA Directive.

We believe that the level of detail given is commensurate with the proposals in the Neighbourhood Plan and this is supported by the Natural England comment (see Report on Pre-submission responses).

If it would be benefit officers can attend a meeting to go through these issues in more detail.

Habitats Regulation Assessment

To give greater confidence in the document and its findings it is suggested that references to the regional plan/South East Plan should be removed/amended as this has been revoked and that the correct (adopted) core strategy policies are referred to.

Changes made as suggested

General comments

A recent noteworthy experience has been the determination of a planning application in the parish of Bembridge. As I am sure you are aware the Bembridge Neighbourhood Development Plan seeks to restrict the size and yield of sites. However, an application ([P/01479/14](#)) to redevelop a former primary school site (therefore a brownfield site) for affordable housing (meeting a local need) was submitted with a level of residential development above the prescribed figure in the plan. To seek a lower figure would have, whilst being compliant with the particular element of a policy, resulted in underdevelopment of the site and made the development unviable.

Based on the facts of the case, the other relevant policies of the development plan and the requirement to determine planning applications in accordance with the development plan unless material considerations indicate otherwise, the LPA granted permission for the proposal. The issues associated with the application arose from the thresholds introduced through the neighbourhood plan, and I would again suggest that the implications of such a policy approach are considered very carefully against the policies of the development plan and the Basic Conditions.

It is considered that the community's concerns of over development and 'inappropriate' development are likely to arise over any visual impact and harm of a development, rather than an arbitrary distinction between the number of units. Any proposal will be considered in terms of likely visual harm and therefore officers consider that a strong suite of design policies and associated local character information will enable the LPA to make sound planning decisions and development that does not result in an unacceptable level of visual harm.

We believe that our approach is fully justified and appropriate for Brighstone Parish – see PC letter to IWC for further detail.

In summary officers retain their concern that the proposed approach of restricting the number of dwellings on a site and the scale of a site will restrict the likelihood of residential development coming forward to meet local requirements. This has the potential to be against the Basic Condition that requires neighbourhood plans to contribute to the achievement of sustainable development, and in light of this officers would welcome amendments to the proposed policy in-line with the suggestions in this letter. If the Qualifying Body does not wish to make such changes, officers suggest that the Basic Condition Statement covers the issue in a sufficiently robust way.

See PC letter of response to the IWC and also the Basic Condition Statement which sets out our

robust justification for the small scale incremental approach being proposed in the Neighbourhood Plan.

Unless the intention is for an approach towards local green space different to that set out in the NPPF, it is suggested that the approach towards local green space is aligned with the NPPF as set out in this letter.

Our approach to green space and views has now changed as set out above and in the letter from the PC to the IWC.

I hope that you find these comments helpful and if you require any further information, or wish to follow-up any of the issues please do not hesitate to contact me.

Yours sincerely,

Ollie Boulter
Planning Team Leader

Cc (via email)

Wendy Perera (Head of Planning & Housing Services)

Susannah Jennings (Brighstone Parish Council)

John Cirrone (Brighstone Parish Council)

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10th December 2015.

IWC Ref: BriNDP/Ref14

Dear Mr Boulter

Isle of Wight Council Planning Service consultation response to pre-submission draft Brighstone Parish Neighbourhood Plan.

Thank you for providing detailed comments from yourself and colleagues from the Isle of Wight Council Planning Service.

These were discussed at the recent meeting of the Brighstone Parish Neighbourhood Plan Steering Group along with other comments received as a result of the consultation on the pre-submission draft of the Brighstone Parish Neighbourhood Plan. It was agreed at the meeting that a response should be given from Brighstone Parish Council (as the qualifying body for the production of the Neighbourhood Plan).

This letter provides details of our response to the points and questions that you have raised in your consultation response and comes in advance of our submission of the suite of documents (including a Basic Condition Statement) as required by Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

Turning first to your general comments. You discuss your concern at the potential sustainability of our approach regarding the size and scale of new housing development as set out in BPNP H1. You provided details of the approach

undertaken by Bembridge in their Bembridge Neighbourhood Development Plan and details of the recent approval for development on a large brownfield site which was contrary to their adopted plan and therefore a departure from the Island Plan. In our opinion the situation in Bembridge is not comparable with the planning policy and local context of the Brighstone Rural Service Centre.

We believe our approach is fully justified primarily due to the location of the whole of Brighstone Parish and the village of Brighstone (the Rural Service Centre) within the Isle of Wight Area of Outstanding Natural Beauty, a nationally protected landscape. The National Planning Policy Framework (NPPF) clearly states that when making a Local Plan there is a need to restrict development in sensitive areas such as AONBs and Heritage Coasts (NPPF paragraph 14 footnote 9) and as it is the intention for the Brighstone Parish Neighbourhood Plan to become part of the Island Plan this consideration applies. NPPF also confirms that great weight should be given to conserving the landscape and scenic beauty of AONBs and critically there is presumption against major development which should only be given consent in exceptional circumstances where there is clear public interest (NPPF paragraphs 115 and 116). The Town and Country Planning (Development Management Procedure)(England) Order 2010 defines what constitutes major development and states that in relation to proposed housing as being 10 or more dwelling houses, or development on a site of more than 0.5 hectares.

In addition to the national policy framework, our approach is also consistent with:

- the policies of the Island Plan particularly policies SP1, SP2 (see 5.38), SP5, DM3 and DM4
- the findings of our research into the extent of influence of the Brighstone Rural Service Centre (see Defining the extent of influence of the Brighstone Rural Service Centre)- namely that Brighstone is the least sustainable of the eleven Rural Service Centres in terms of access to services not available in the local area and provides for the community of Brighstone Parish and to some extent people living in the neighbouring parish of Shorwell.
- the fact that Brighstone Church of England aided Primary School is currently expanding due to increased roll numbers with many of the students living outside of the parish
- the fact that local businesses have not identified that their viability is under threat due to a lack of major housing growth in the area
- the fact that small-scale incremental growth is consistent with the approach to development that has been taken over the last twenty or so years with such sites being accommodated without significant change to the size or character of the rural settlement
- the rural character of the protected landscape area is valued by the local community, is a major draw for visitors and contributor to the Island's tourism economy

- the approach taken has been influenced by the clear community support identified and evidenced by the results of the Residents Survey (with its over 50% return rate)

We will of course set this out again fully in the Basic Condition Statement.

Your second general point relates to the approach taken to green space in the Neighbourhood Plan. We are grateful to you for raising this issue as it has resulted in our decision to de-couple green space and views from our Improving Community Services policy (ICS2). We will now include reference to the findings of the Brighstone Parish Green Space Audit within our Design policy section. This better reflects our intention to emphasise the importance of views and green space to the character of the rural area. We will seek to encourage their consideration in new proposals for development with the Brighstone Parish Green Audit being illustrative rather than definitive in relation to the sites and views deemed to be of importance for their contribution to the character of the area and its nationally protected landscape status. By taking this approach we believe that there is no requirement to reproduce the maps shown in the Brighstone Parish Green Space Audit in the Neighbourhood Plan and it will also allow us to continue to direct readers to look at the Brighstone Parish Green Space Audit as an important background document alongside the Brighstone Parish Design Statement.

Regarding your more specific comments, we thank you for these and in many instances we are in agreement with the points you have raised and will amend the documents accordingly. However, we do wish to respond to several of the points you have raised where we disagree with your view and have set these out below:

- Brighstone Rural Service Centre (RSC) - we acknowledge that Brighstone village is one of the eleven Rural Service Centres identified in the Island Plan and recognise that this was largely based on an audit of services available in the area in 2008. However, we believe that we have given greater definition to the context for the Brighstone Rural Service Centre in our various documents and that the following underpin our approach:
 - the fact that RSC and the whole of Brighstone Parish are entirely located within the AONB and the requirements of the National Planning Policy Framework in this respect
 - the findings of the analysis in the 'Defining the extent of influence of the Brighstone Rural Service Centre' report which includes the Defra Access to Services data for those facilities not available locally
 - responses received from both Shorwell Parish Council and Calbourne Parish Council indicating some limited use of services in Brighstone Village by people living in Shorwell Parish, but little if any use by people living in the parish of Calbourne
 - the impact of reduced public sector funding for service provision

We believe that all of these have impact on the relative sustainability of the Brighstone village when compared to the other Rural Service Centres. We believe that this fully justifies our suggested small-scale incremental approach to new development in the area.

- BPNP H3 – Once again our justification for this approach relates to the fundamental requirement for small scale development in AONBs as conferred by the NPPF (see above) and is also reflected in the policy context of the Island Plan. For clarity, we do not see this policy being used in isolation from H1 and do not believe that this is unduly restrictive.
- BPNP JE2 – We disagree that the approach we are suggesting is outside of the national and local policy context. All these sites are within the Isle of Wight AONB, the Tennyson Heritage Coast and may also include SSSI and SAC designated land. As such they are internationally or nationally valued landscape and nature conservation areas where you would expect as a minimum conservation of these qualities and encourage enhancement wherever possible. We do not feel that our approach is unduly onerous and suggest it should be pursued as a matter of course. Interestingly the early 1960s report of the National Park Commissioners on the original designation of this coastline as part of the Isle of Wight AONB includes an expectation on the then Isle of Wight County Council to actively pursue improvements to the existing large tourism related sites which were specifically mentioned as requiring enhancement (see the Isle of Wight AONB designation history hard copy held by the Isle of Wight AONB Partnership). We would also draw your attention to the weight given to the AONB designation on the recent Planning Inspectorate’s appeal decision upholding refusal for development at Atherfield Bay (P/01199/13).
- Brighstone Parish Design Statement – We have considered the points that you have raised and we have altered the text accordingly. This includes the removal of terms such as ‘should’ to be replaced with ‘are encouraged’ to reflect that in some cases these matters are outside of the formal planning process.
- BPNP ICS1 – We believe that our suggested approach is justified as we wish to ensure that any development reflects the smaller-scale approach and local need requirements of the Brighstone Rural Service Centre. The lack of regular public transport (compared to other Rural Service Centres) is a major consideration and constraint. The bus service has declined over the last few years. Our conversations with Southern Vectis lead us to believe that there is no plan to reverse this decline in service as they now have a preferred straight line route through Calbourne to Yarmouth via Freshwater. We have been told by them that as far as they are concerned Brighstone is seen to be an ‘out of the way service’. At present there is a reduced daily service, no evening service on any day of the week and no Sunday service at all in the winter months. We believe that this factor contributes to the comparative lack of sustainability of Brighstone as a location for any services providing for a wider geographic area.
- BPNP ICS2 – As mentioned earlier in this response, we will remove references to green space and views from this policy, transferring them to the Design section of the Neighbourhood Plan. It is accepted that some activities that may have an impact on these facets of the character of the area may not require formal consent. However, we believe that our Brighstone Parish

Green Space Audit is a useful tool to assist organisations such as Island Roads in discharging their statutory duty to have regard to the conservation and enhancement of the Isle of Wight AONB, complementing the AONB Management Plan. Regarding views, we will amend the wording to encourage the consideration of views to and from settlements from coast and downland as part of the Design policy rather than requiring their blanket protection. We will continue to cite the Brighstone Parish Green Space Audit as a useful indicative rather than definitive document.

- BPNP CSC1 – We will reword but still include reference to encouraging the consideration of ground and surface water run off issues in new development.
- Sustainability Appraisal – We will include more information on the reasoning behind our chosen alternatives in both section 5 and Appendix 2 of the Sustainability Appraisal. We are confident that the SEA element of the document is commensurate with what is proposed in the Neighbourhood Plan and have had no contra-indication of this from Natural England in their consultation response, namely *'It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils), that there are unlikely to be significant environmental effects from the proposed plan.'*
- Habitats Regulation Assessment – We will make the suggested change and remove all reference to the Regional / SE Plan.

We thank you once again for your comments prior to and during the pre-submission consultation process. We look forward to working with you to take the Brighstone Parish Neighbourhood Plan through the next stages and remain confident of its adoption as part of the Island Plan in 2016.

Yours sincerely

John Cirrone

Chairman of Brighstone Parish Council

Cc Brighstone Parish Neighbourhood Plan Steering Group

Date	Individual/Organisation	Type
27/11/2015	Isle of Wight AONB	Email/Letter
Comment		
<p>Thank you for inviting the Isle of Wight Area of Outstanding Natural Beauty Partnership (IW AONB) to comment on the above document. May I start by applauding the Parish Council, their advisors and the local community on producing what is an informative and comprehensive Plan which recognises the value and importance of the protected landscape.</p> <p>The Plan highlights that the whole of Brighstone Parish is located within the boundaries of the IW AONB whilst some of its coastline is designated Heritage Coast. The National Planning Policy Framework provides specific planning guidance for plan makers and decision takers in relation to AONBs and confirms that great weight should be given to conserving landscape and scenic beauty and AONBs have the highest status of protection in relation to landscape and scenic beauty. Additionally it is confirmed that the conservation of wildlife and cultural heritage are important considerations in these areas.</p> <p>In this context I welcome the broad policies set out within the draft Plan which align with the objectives of the IW AONB Management Plan 2014-19 and specifically those in relation to:</p> <ul style="list-style-type: none"> • protecting the local environment - POE1 and POE2, • promoting high quality design - D1; • supporting sustainable communities - JE1, JE2 JE3, ICS1, ICS2, CS2. <p>Please accept these comments without prejudice.</p>		
Action		
Noted / None required		
Recommended Response		
None required		
Outcome		
No change necessary		

Date	Individual/Organisation	Type
27/11/2015	David Motkin	Email/Letter
Comment		
<p>I have examined the Consultation Draft and think that the team should be congratulated on their work. I did not find anything there with which I disagreed and there seemed to be little in the way of contentious policy – perhaps this is the responsibility of the County planners.</p> <p>I found the descriptive parts at the beginning of the main document generally very good and I was glad to see the present state of the Parish described so well. However, when considering the future of an area it is not sufficient to consider what it is like now, we also need to understand the past development and how and why the area came to be as it currently is. Only with this understanding can its future development be steered. I thought that the three paragraphs on Page 8 were insufficient in this respect.</p> <p>I have offered a more complete, though necessarily brief, alternative to this part of the text and attach it here. I hope that you will view it as an improvement. It requires four additional illustrations and while these are embedded in my text, they are also attached here as jpg files.</p> <p>With congratulations and best wishes to all concerned</p>		
Action		
Discuss at Steering Group – doesn't impact on NP directly but does suggest change to Parish Design Statement.		
Outcome		
Steering Group agreed to insert factual text into the Parish Design Statement with photographs.		