



Committee report

Committee	CORPORATE SCRUTINY COMMITTEE
Date	15 DECEMBER 2021
Title	REPORT OF THE DRAFT ISLAND PLANNING STRATEGY TASK AND FINISH GROUP
Report of	CLLR PETER SPINK, LEAD MEMBER

SCOPE OF THE TASK AND FINISH GROUP ("THE COMMITTEE")

1. To provide an assurance that the content of the draft Island Planning Strategy is based upon current evidenced data and takes into account views made during the previous consultation exercise.
2. The assumptions made in terms of delivery within the draft strategy are realistic in meeting the evidenced needs of the island's community.
3. There are satisfactory arrangements in place for the consideration of any comments made during the consultation period and that reasons will be provided for the inclusion or exclusion of these.

SUMMARY OF FINDINGS/ RECOMMENDATIONS

4. The reasons supporting our findings and recommendations are set out in full in the main part of this report.
 - a) We find that a very extensive process was/is in place for recording the responses to the 2019 and 2021 Consultations. We also find that the responses were considered and reasons provided for the inclusion/exclusion of these in the Draft Island Planning Strategy (DIPS) and that measures are in place for this to be repeated.
 - b) We find that the summary of the DIPS prepared for the Consultation ending on the 1 October 2020 did not represent a clear and balanced precis of the contents of the DIPS and was not sufficiently informative. We are of the opinion, therefore, that the weight that can be attached to the responses is substantially reduced.
 - c) A case of exceptional circumstances, paragraph 61 NPPF, should not be ruled out as an alternative future course of the DIPS.

- d) Consultees opposition to the 2 Garden Villages have been taken into account and removed from the DIPS.
- e) The minimum number of houses to be built should be reduced to 300 or less, which is deliverable and aspirational within the meaning of the NPPF.
- f) Further research into imposing conditions that prevent new developments being rented/sold to second homers and inward retirees; 'local connection condition' should be imposed re the affordable element of all private developments and social housing and strictly enforced. The definition of 'local connection' should be specified in the glossary of the DIPS and should include key workers moving to the Island for employment.
- g) Affordable housing must be affordable by Islanders on or below the average Island income.
- h) Rural and First Home Exception Sites (H7) should be amended to ensure that they are small sites that reflect a 'local need'.
- i) H4 Infill Opportunities outside settlement boundaries should be amended to reflect a local need.
- j) The DIPS should contain greater reference to the Island's Designation as a UNESCO Biosphere, and in particular the relationship between the DIPS and the biosphere. The Council should apply for UK Biospheres to be added to the designated sites protected by the NPPF.
- k) The DIPS should place greater emphasis on ensuring that infrastructure (particularly the public sewage system) is in place before development commences/is occupied.
- l) Southern Water should be consulted on all major developments (i.e. 10 or more units) and a requirement to that effect should be included in the DIPS.
- m) Consideration should be given to reducing the reliance in Section 4 Environment on mitigation/compensation and higher priority given to avoidance.
- n) NPPF paragraph 180 a) should be added to EV2: Ecological Assets and Opportunities for Enhancement.
- o) Subparagraphs b) and c) of EV3 should be deleted.
- p) EV4: Water Quality Impact on Solent European Sites (Nitrates). The provision whereby new developments that connect to the Sandown Waste-Water Treatment Plant do not have to demonstrate Nitrate Neutrality should be given further consideration.
- q) EV11 AONB should be amended to include paragraph 177 NPPF.
- r) Consideration to be given to extending the area of the Dark Skies Park: EV11
- s) EV14 Managing Flood Risk in New Development should be amended to include para 161 b) NPPF.

INTRODUCTION

5. This Task and Finish Group (“the Committee”) was appointed by the Corporate Scrutiny Committee to consider the Draft Island Planning Strategy (DIPS). We have convened on four occasions, each of which were between 1.5-2 hours duration. We have heard from Bob Seely MP, Diana Conyers, Chair of IWALC, Cllr Paul Fuller, Cabinet Member for Planning, Cllr Bacon, Cabinet Member for the Environment, Heritage and Waste Management, Ollie Boulter, Strategic Manager for Planning and Infrastructure Delivery, James Brewer, Planning Team Leader, and Chris Ashman, Director of Regeneration. We would like to thank them all for having taken time from their busy diaries, and for the insight that they have given us.
6. Given the relatively short number of hours sitting the extent of the subject matter, and the responses to the 2019 consultation, we have concentrated, in the main, on the housing and environment/loss of greenfield sections of the DIPS.
7. The first consultation closed on 25 February 2019. Participation was high with 3,800 people taking part, making a total of 9,355 comments. The comments made re housing and the environment are summarised below:
 - i) Object to the amount of housing proposed.
 - ii) The level of housing is undeliverable and unrealistic.
 - iii) The housing will be filled by second home-owners and retirees from the mainland. It will not benefit Islanders nor meet their needs.
 - iv) All the development will destroy the character of the island and threaten the tourism industry
 - v) The housing development will threaten towns and villages as separate entities. The Plan will spoil the character, tranquillity, heritage, rural nature of the island and its uniqueness.
 - vi) The island has overcrowded roads that will not be able to cope with this scale of development.
 - vii) There is insufficient infrastructure and services to support the existing population which will not cope with the proposed scale of development. Any infrastructure needed should be provided before or alongside the development.
 - viii) There will be an adverse impact on wildlife and ecology.
 - ix) Brownfield sites should be built on before greenfield sites. Housing should be for the islanders already here before providing more for retired people or second home-owners. Should limit second home ownership.
 - x) More provision should be made for the elderly to free up larger houses. The wrong type of housing is being built on the wrong type of land.
 - xi) Better use should be made of empty houses and buildings and any derelict buildings should be redeveloped.
 - xii) Building more housing just creates profit for developers.
 - xiii) The focus should be on providing affordable homes for island people.
 - xiv) Any new development should be small scale and not create large housing estates.
 - xv) Object to up to 2000 houses at Wellow (Garden Village).
 - xvi) The consultation draft IPS included a list of proposed allocated sites in Appendix 1. Of the 113 sites listed, 73 received objections. There was one site that received considerably more objections than any other, being Housing Allocation Number 40, *Land adjacent and including land at New Fairlee Farm, Newport*, with 136 comments of objection (the next highest number of objections was 62 for Housing Allocation Number 65, *Land east of Hillway Road and south of Steyne Road, Bembridge*).

8. In light of the public response the DIPS was withdrawn, and reconsidered. A redrafted DIPS was prepared and went for consultation ending on the 1 October 2021.
9. The extent to which it is possible to change the DIPS to meet the comments is governed in large measure by the National Planning Policy Framework. The Government algorithm/ standard methodology (SM) dictates that 668 dwellings per annum are to be built on the Island. The DIPS seeks to reduce this figure, on the basis that unique circumstances apply to the construction industry on the Island, with the effect that 486 dwellings per annum is a more appropriate number. To be clear, therefore, the DIPS does not challenge that the SM is the correct means of calculating the Island's housing need, but simply maintains that the figure of 686 cannot be met. This contention, together with the entirety of the DIPS, requires to be approved by a planning inspector before it is adopted; approval is by no means certain.
10. The SM can be challenged as being the correct means of calculating housing need by claiming exceptional circumstances pursuant to Paragraph 61 of the NPPF. We are of the opinion that a case of exceptional circumstances, should not be ruled out as an alternative future course of the DIPS. This matter is more fully set out in paragraph 11 below.
11. The Government has recently indicated a change of direction re planning strategy. Although the detail has yet to be clarified the proposed centralisation of planning is now unlikely to go ahead. Further, it is probable that there will be greater protection of greenfield, and mandatory housing 'targets' may well be scrapped. This Committee considers that this presents an opportunity to bring about change that will benefit the Island and more closely meet the comments raised in the consultation.
12. We ask please that a cross-party working group be appointed as a matter of urgency to research the contents of a letter to be written by the Leader of the Council to the Government. We suggest, the starting point for discussion by the group should be as follows:
 - a) Mandatory minimum 'targets' determined by Government S.M. should be scrapped and replaced by an assessment of need carried out by the Council with the assistance of Parish, Town Councils, and IWALC.
 - b) More funding to be made available by Government and by way of loans, to enable local authorities to build council housing secured in perpetuity for the community. This would, in time, mean that the provision of housing for those on the housing register would no longer be reliant on developer led schemes, which history has shown does not provide affordable housing that Island residents, most in need, can afford. It would also mean that we would be building fewer homes (i.e. because market value housing would not be the vehicle for providing all affordable housing) thereby protecting the environment, our beautiful scenery, and our tourist economy.
 - c) Consideration should be given to affordable housing being redefined with reference to the average wage on the Island as opposed to a % of market value.
 - d) Biosphere designation should be protected land within the Provisions of the NPPF(paragraph 176 onwards).

- e) Local Planning Authorities should be given the power to apply a 'local condition' to prevent new market value housing being purchased/rented by second-homers, mainland retirees/and holiday let-landlords.
- f) Local Authorities should be given greater power to ensure that planning permissions are 'built out'.

13. For the purposes of this report, however, we, (as were those writing the DIPS) are bound by current national planning policy.

FINDINGS AND RECOMMENDATIONS IN GREATER DETAIL

14. **The summary of the DIPS prepared for the Consultation ending on the 1 October 2020 did not represent a clear and balanced precis of the contents of the DIPS.**

Many consultees will have relied on the summary, when deciding whether to take part in the consultation and their response thereto; it is essential, therefore, that the summary is a balanced and accurate precis of the content of the DIPS. The summary states *"How many new homes are now proposed" "As a result, the new draft IPS is planning for 7,290 net additional dwellings over the 15- year plan period of 2023-2038, or an average of 486 new homes each year...In total, 75 sites have been removed from the previous version of the draft IPS"*.

15. **The summary fails, however, to inform the reader that of the 75 sites removed from the DIPS, 51 are expected to return, or that the figure of 486 new homes per annum is a minimum figure.**

This, we suggest, is a significant omission, given that the number of houses to be built per annum was a central concern of the 2019 consultees. We are of the view that the summary prepared for the next consultation should remedy this omission. Further, as a minimum, the summary should contain the following:

- a) A list of areas together with their settlement status, their number of allocated sites and expected unallocated sites: with page references to the DIPS.
- b) A list of boundary extended settlements identifying green/brownfield sites; with DIPS page references.
- c) A reference to the possibility of pursuing exceptional circumstances and a brief explanation of why this has not been pursued (unless consultees are aware of EC, the absence of comments in respect thereof carry little weight).
- d) Sections 4-7 paint an overly 'rosy' picture; e.g. It should be explained whether, and how, the planning strategy will ensure that development will not be permitted/occupied before the infrastructure is ready, with particular reference to many sewers being at capacity.
- e) Section 7 Housing states: *"To help address the acute affordable housing issues the island faces the plan only allocates sites over 10 homes, all of which are required to make onsite contributions to affordable housing"*. We are of the view that this is potentially misleading; H5 of the DIPS, in fact provides that off-site affordable housing and/or financial contributions may take place in exceptional circumstances. A further overstatement of the position re Rural Exception Sites was made at the

Roadshow presentation to Shalfleet PC. The PC was left in no doubt that the sites would provide 100% affordable housing as recorded in the minutes: *Any rural sites will be subject to an exception and will have to be 100% affordable housing*". In addition, the PC was told that a development of circa 70 houses with a 35% affordable element could not come in as a Rural Exception Site. In fact, paragraphs 7.66 and 7.68 DIPS would allow for this. We suggest that comments of this nature lead to mistrust in the planning system.

- f) The extension of settlement boundaries should be/have been more fully explained and the areas listed. There was insufficient consultation with the public/councils affected. The principle of extending settlement boundaries on future occasions requires careful consideration particularly when it involves the loss of greenfield.
- g) The above points are illustrative rather than exhaustive. In principle the summary should be realistic; if not little weight can be given to comments made in the consultation and the consultation cannot be said to be 'open and transparent'

16. A case of exceptional circumstances, paragraph 61 NPPF, should not be ruled out as an alternative future course of the DIPS.

"Population growth on the Island between 2005-2019 was driven by an expansion in the number of residents aged 65 and over, with those aged under 65 decreasing over the same period" (paragraph 2.17 DIPS). This trend is expected to increase with *"more than 3 times as many arriving on the Island in 2016 than in 2012"*. However, the working age population on the Island is forecast to continue to decline by a further 4,800 during the same period to 2038: with those aged 0-15 expected to decline by 2,600 by 2038": (paragraph 2.18 DIPS). The effect of being unable to impose conditions of occupancy on market housing is a major contributor to demographic imbalance on the Island. Paragraph 61 NPPF allows for demographic imbalance to be addressed in *exceptional circumstances*: *"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals"*. The Corporate Scrutiny Committee was advised that EC could be introduced after the Consultation ending October 2021. This Committee has been advised, however, that if a case of EC were now to be pursued the consultation process would have to be repeated. This would result in a significant delay in the DIPS being adopted; during which the 'tilted balance' (paragraph 11 d NPPF) would continue to apply to the Island. The tilted balance applies to local authorities that do not have a current 5 year land supply and/or have failed to meet previously imposed housing targets; the Island is caught by both limbs. The effect of the tilted balance is to curtail the power of the Planning Committee. For example, the committee has reduced power to determine where, on the Island, housing should be built including applications on greenfield. The loss of greenfield was a significant concern raised in the first consultation. A motion has recently been passed by a meeting of Full Council that the Leader shall write to the Government requesting that the Island no longer be 'caught' in the tilted balance. Should this be acceded to, a claim of 'exceptional circumstances' could be pursued without the Island being subject to the tilted balance during the delay that would be caused. It may very well be the case that further research will show that 'exceptional circumstances' would better answer the matters raised in the consultation, including demographic imbalance.

17. Consultees opposition to the 2 Garden Villages have been taken into account and removed from the DIPS.

18. **The minimum number of houses to be built should be reduced to 300 or less, which is deliverable and aspirational within the meaning of the NPPF.**

A central concern raised in the 2018/19 consultation was that the level of housing proposed (i.e. then 650) was too high, undeliverable, and unrealistic. This Committee is concerned that the reduced number of 486 in the current DIPS is also likely to be undeliverable. In the period 2012 to 2020 (the period selected at paragraph 2.25 DIPS) the most dwellings built in any year was 417 in 2015/16. The least was 253 in 2019/20 and the average annual figure for the period was 325. Having granted planning permission local authorities have very little control over whether the dwellings are actually built. Despite having one of the highest rates of planning approvals in the South East, the Island has failed to meet Government imposed targets, which is one of the reasons that the 'tilted balance' (paragraph 11d NPPF) is currently engaged. The building industry in the UK is finding it difficult to source materials and the cost thereof is rising. This trend may very well continue given the effects of Brexit and the uncertainty caused by Covid 19. As far as this Committee is aware there is no evidence to support the figure of 486 other than it is the average number of dwellings built per annum for the preceding 15-year period. A more deliverable figure would be 300 or less per annum, which given the continuing effects of Brexit and Covid 19 can properly be said to be aspirational, within the meaning of the NPPF. A higher number increases the risk of undeliverability and of the tilted balance being/continuing to be, engaged. Further, given that 486 is a minimum figure, a figure of 300 or less would be more in keeping with the views expressed in the consultation.

19. **Further research into imposing conditions that prevent new developments being rented/sold to second homers and inward retirees; 'local connection condition' should be imposed re the affordable element of all private developments and social housing and strictly enforced.**

The definition of 'local connection' should be specified in the glossary of the DIPS and should include key workers moving to the Island for employment. A central theme running through the comments made in the 2019 consultation was that housing should be for, and affordable by, Islanders; new builds should not be for mainland retirees, or second homers. We have been advised by planning staff that conditions re market housing to ensure the above would be unlikely to meet with the approval of planning inspectors. The Committee raised the example of Cornwall which, we understood, had 'banned' new build for second-homers. Planning staff were uncertain of the legal basis on which this had been achieved; we ask please that further research into this be carried out when preparing the next stage of the DIPS.

20. **Affordable housing must be affordable by Islanders on or below the average Island income.**

H5: 'Delivering Affordable Housing', makes a valiant attempt at achieving this; however, we suggest the following amendments:

- a) We would prefer all affordable housing to be provided on-site. If, this is not to be the case, the current wording of 'exceptional circumstances' should be replaced with the definition in paragraph 63 NPPF: *"Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site unless: a) off-site provision or an appropriate*

financial contribution in lieu can be robustly justified; and b) the agreed approach contributes to the objective of creating mixed and balanced communities”.

- b) Paragraph 7.46 states that to be affordable by Islanders, housing needs to be circa 60% of market value. All of the routes to affordable housing in the DIPS should, therefore, be not less than 60% of market value.
- c) Paragraph 7.48 states that the focus of affordable housing provision will be centred on those currently in need on the housing register. We would prefer all affordable housing (at least until those on the housing register have been provided for) to be for rent and, if appropriate, to be secured in perpetuity for the benefit of the community. The Committee would very much like to see affordable housing being entirely council owned social housing. We are aware that Cllr Stephens is working towards this goal and that it will inevitably take some time to achieve.

21. **Rural and First Home Exception Sites (H7) should be amended to ensure that they are small sites that reflect a ‘local need’.** The following should be contained within H7:

- a) The definition of what constitutes a rural site.
- b) Rural Exception Sites are small sites used for affordable housing in perpetuity where sites would not normally be used for housing; save in exceptional circumstances they shall not exceed 20 units in total (exceptional circumstances should be defined in the glossary). Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Ideally, they should be 100% affordable social housing provided by the Council or a registered provider.
- c) Planning permission will only be granted if all of the below can be met:
 - I) the site shall be well related to or adjoining the defined development boundary; or where the settlement is not subject to a development boundary, the site is well related to the extent of the contiguous built form;
 - II) the development shall be proportionate to the scale and nature of the existing settlement;
 - III) there is an identified local need for affordable housing sufficient to justify the extent and nature of the proposed development; and the housing need could not reasonably be satisfied without the exceptional release of land.
 - IV) arrangements are in place to ensure that the affordable housing, remains available to the local community in perpetuity;
 - V) where it can be robustly demonstrated that an element of market housing is required to enable delivery of significant additional affordable housing, it will be supported provided the element of market housing is the minimum amount required to enable the delivery of the proposed affordable housing.
 - VI) First Home Exception Sites, in rural areas, should only be permitted where there is ‘a local need’.

22. **H4 Infill Opportunities outside settlement Boundaries should be amended to reflect a local need.**

We are of the view that infill development should only be permitted where it satisfies a ‘local need for housing’. It should not be forgotten that gaps between houses often act as a ‘green lung’ for residents and for biodiversity

THE ENVIRONMENT

23. **The DIPS should contain greater reference to the Island's Designation as a UNESCO Biosphere and in particular the relationship between the DIPS and the biosphere. The Council should apply for UK Biospheres to be added to the designated sites protected by the NPPF.**

The biosphere plays a significant role in protecting our environment and seeks to balance the relationship between community and nature. The Island's Areas of Outstanding Natural Beauty are the heartland of the biosphere, however, all of the Island and parts of the Solent are included in the designation. Development should, therefore, be consistent with our designation as a biosphere, and the Council's Climate Change Policy. Inappropriate development can result in the loss of biosphere status (as shown recently in Liverpool) which would harm eco-tourism throughout the Island. An informative report on the Island biosphere and its relationship has been commissioned by the Countryside Charity (CPRE) and will be made available in the course of a meeting to be held in the new year. The Committee is aware that Cllr Jonathan Bacon intends to make greater reference in the DIPS to the Island as a UNESCO Biosphere. We welcome Cllr Bacon's input and would be most interested to know whether in his opinion the DIPS is consistent with the Island's policy on climate change and provides sufficient protection of the Island's environment and scenic beauty. There is perhaps an argument that the Government's current planning strategy is inconsistent with its climate change and environmental strategy. Given that a modest 2 bedroom house emits 80 tonnes of CO₂ during its construction it could be said that the Island should be building the minimum number that Islanders require.

24. **The DIPS should place greater emphasis on ensuring that infrastructure (particularly the public sewage system) is in place before development commences/is occupied.**

Since the scope of this committee was determined there has been considerable public concern re the capacity of the Island's sewers to cope with the current demand, let alone the impact of new developments. We understand that Southern Water (SW) has a statutory duty to accede to a request from a developer to connect to the public sewer and that lack of capacity is not, therefore, a material ground for refusing planning permission. However, SW has advised that that if surface water were not to drain to the public sewer, new developments would have a minimal effect on capacity: we ask, therefore, that consideration be given to including a provision to this effect in the DIPS. We also ask that Grampian clauses are relied upon for new developments i.e. 'no development shall be commenced/occupied until it is confirmed that the necessary upgrades to the public sewer have been completed'. It is questionable, in the opinion of this committee, whether new developments that are not the subject of these conditions could be said to be sustainable within the meaning of the NPPF.

25. **Southern Water should be consulted on all major developments (i.e. 10 or more units) and a requirement to that effect should be included in the DIPS.**

We were surprised to learn that SW is not a statutory consultee in the planning process and ask that consideration be given to ensuring that they are consulted re all major developments (i.e. 10 or more units) and their statements published on the planning website.

26. **Recommendation: Consideration should be given to reducing the reliance in Section 4 Environment on mitigation/compensation and higher priority given to avoidance.**

The Committee is concerned that considerable reliance is placed throughout S4 of the DIPS on mitigation and compensation strategies. The Environmental Audit Committee has reported recently that these schemes, in many instances, are failing through lack of enforcement. The Committee is concerned, therefore, that it may be difficult to enforce such schemes on the Island to the detriment of the environment.

27. **NPPF paragraph 180 a) should be added to EV2: Ecological Assets and Opportunities for Enhancement.**

“if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission will be refused”.

28. **Subparagraphs b) and c) of EV3 should be deleted.**

We are concerned that developer led mitigation schemes are likely to be difficult to monitor, and in the event of breach, to enforce. Accordingly, we recommend that subparagraphs b) and c) of EV3 be deleted.

29. **EV4: Water Quality Impact on Solent European Sites (Nitrates) The provision whereby new developments that connect to the Sandown Waste Water Treatment Plant do not have to demonstrate Nitrate Neutrality should be given further consideration.**

Since the scope of this committee was determined there has been considerable publicity re the harm that is being caused by increasing discharges of sewage into the Solent. EV4 provides that if a new development connects to the Sandown Waste-Water Treatment Plant it does not have to demonstrate Nitrate neutrality (i.e. because it will not affect the Solent Sites). We are concerned, however, that new developments that connect to the public sewer and drain to Sandown may en route ‘storm discharge’ into the Solent. We have confirmation from Southern Water that this is the case in the recently allowed application re Birch Close. We have, therefore, written to Natural England requesting their opinion on the matter. We will report their response to the Corporate Scrutiny Committee (CSC). We are also concerned that increased nitrates/neutrality re greenfield development is calculated on the basis of agricultural use. However, it should not be assumed that all greenfield is in full agricultural use.

30. **EV11 AONB should be amended to include paragraph 177NPPF.**

We ask that the following extract from the NPPF be included in EV11: *“When considering applications for development within Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”.*

31. **Consideration to be given to extending the area of the Dark Skies Park: EV11.**

We commend the support in the DIPS for creating a Dark Skies Park in the South West of the Island which is consistent with the responses to the first consultation. We ask that consideration be given to extending the Park to include all AONB in the West Wight together with the areas that have an impact on the skies of the AONB. If for example the Park were to be extended to include what is often referred to as the 'Calbourne Corridor' there would be a vast area of dark skies extending the entire width of the Island. This would be of enormous benefit to the environment, biodiversity and tourism.

32. **EV14 Managing Flood Risk in New Development should be amended to include paragraph 161.b) NPPF.**

The following provision of paragraph 161.b) of the NPPF be inserted between 1&2 and the paragraph renumbered accordingly: "*safeguarding land from development that is required, or likely to be required, for current or future flood management*". This committee considers it extraordinary that we should be contemplating building in areas at such risk of flooding that it is necessary to provide "safe access and escape routes as part of the flood warning and evacuation plan" Paragraph 4.102 DIPS.

CONCLUSION

33. We have set out our findings and recommendations in some detail and little is to be gained by repetition. On the central point of 'housing numbers' we do not find that the reduction to a minimum of 486 dwellings per annum has sufficiently taken in to account the responses in the first consultation and are concerned that this figure is unlikely to be deliverable.
34. If the expected changes in national planning policy do not come to fruition it may be necessary to reconsider pursuing a case of exceptional circumstances in accordance with paragraph 61 NPPF.

CLLR PETER SPINK
LEAD MEMBER - TASK AND FINISH GROUP
DECEMBER 2021