

# **DRAFT ISLAND PLANNING STRATEGY DEVELOPMENT PLAN**

## **Freshwater Parish Council formal consultation response 20<sup>th</sup> Feb. 2019**

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The public consultation on the draft Island Planning Strategy Development Plan Document and accompanying documents will run from **Monday 3 December 2018** until midday **Monday 25 February 2019**. The consultation period will run for eight weeks (longer than the statutory requirement of six weeks), to take into account the Christmas period. Representations received after this date may not be taken into account. More information can be found at [www.iow.gov.uk/islandplanningstrategy](http://www.iow.gov.uk/islandplanningstrategy).

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Recognising the importance and significance of the draft Plan, since publication in early December 2018, Freshwater Parish Council has undertaken the following local action.

- Published details on the council's website and Facebook page
- Had agenda items on planning meetings on 4<sup>th</sup> and 18<sup>th</sup> December 2018, 15<sup>th</sup> January 2019 and 5<sup>th</sup> and 19<sup>th</sup> February 2019.
- Held a Consultation Day on 9<sup>th</sup> January 2019 at which details of the draft Plan were available (along with several other issues)
- Displayed details in the parish office and discussed this with members of the public
- Put a question on Survey Monkey. From 69 responses 62% did not agree with the strategy and 76% had concerns over specific sites identified in the draft Plan.

**Comments made by the general public are attached to this document as an appendix**

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### **1. INTRODUCTION**

1.1 The strategic overview and overall vision and suchlike are discussed below as being fundamental to the draft Plan and the impact that it may have on the Island, the West Wight and, in particular Freshwater. It is inevitable that **the real concern will always be 'how does this affect the area where I live?'** and, as a consequence, we feel obliged to concentrate on local aspects rather than the wider picture. In essence this is about planning for the future and focussing on your area, which is unique for a number of reasons. **We have tried to develop a collective approach that reflects the consensus view in our community and the very genuine concerns held by an overwhelming number of people who fear for the future of the area and the likely impact on the character and appearance as well as the way of life over the next ten to fifteen years.** This is not intended to be an obstructive or negative response but due regard and appropriate weight has to be given to the problems we are facing and the future proposals for the area and whether these will improve or overcome these difficulties.

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### **2. INITIAL OBSERVATIONS**

2.1 We fully understand that what we are looking at is commonly referred to as the plan led approach and recognise that it is vitally important when developing policies for the future development of our area and those with the objective of protecting the character and appearance of a special environment that makes the area so attractive to residents and visitors alike. We take the view that the serious nature of the present situation has not been properly evaluated in the draft Plan and that the specific policies (or absence of policies) and allocations for new development do not offer the best solution.

2.2 When examining the document in some detail we have posed the question to ourselves as to why do we need to have an approved development plan and strategic and local planning policies? We are

clear that, in terms of a general principle, there is a need to direct development to key areas; a need to control development in sensitive areas recognised for their natural/built environment; to enable Local Authorities and statutory undertakers to make their own plans in terms of the provision of infrastructure (roads and other means of public transport, water supply, mains drainage, schools etc.); to introduce a degree of 'certainty' to the system for the benefit of developers, industrialists, other major employers and the general public; a need to increase/decrease expectation; a framework for continuity and consistency in decision making and a means of monitoring development and expansion of villages, towns and cities and the preservation/conservation of protected areas.

2.3 The main document, the Island Planning Strategy (Development Plan) which can be viewed online, is part of a whole host of documentation collected/collated over the last few years culminating in this latest plan which from a practical viewpoint consists of strategic/local policies, specific designations and the need to protect and enhance the built/natural environment.

2.4 The Isle of Wight Council (IWC), as the Local Planning Authority, needs to fully appreciate and understand that the draft Plan, in our opinion, in its present form, has not achieved certain aims or our own aspirations for the area and for that reason can only have a detrimental impact on the area because it has failed to recognise the unique character and charm of interlinked settlement areas that have developed over a considerable period of time within a rural setting that is so vital to our future prosperity. The draft Plan proposes a major expansion in terms of homes but without investment/policies to provide (and protect) jobs and social and technical infrastructure. The latter point, by definition, must be the principal consideration and, for very obvious reasons, needs to be balanced in terms of the provision of new development and the need to protect and enhance the integrity and general attractiveness of our area and the economic well being of current and future residents. **In this particular context Freshwater PC support and endorse the assessment that in the West Wight people want more transport links; along with better healthcare facilities and better protection for the natural environment (negatives included the quality of secondary education, affordable housing and employment opportunities)**

*To see the West Wight's environmental assets celebrated and appropriately protected and the housing and employment needs of residents are met.*  
(Paragraph 3.15)

**2.5 As the elected local body we would submit that the draft Plan by allocating large tracts of undeveloped open space demonstrably fails to achieve this goal (above) and will have seriously adverse effect on the area eroding its unique environment and creating even more problems for the area. Our view is that the 'one size fits all' plan approach is not appropriate or sustainable for our type of area as the problems we are facing are unlikely to be resolved by excessive new house building when we already have serious social and technical infrastructure problems that are unlikely to be addressed by public investment or developers by 'bolt on' Section 106 requirements as, in some cases, they would be likely to render schemes as non-viable.**

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**3. OUR POSITION AND DETAILED COMMENTS**

3.1 We have adopted the position that the Island Plan should have been reviewed (and approved) two years ago; it is, in effect, in our view, out of date. That, in itself, in combination with the National Planning Policy Framework (2018) known as the NPPF, the failure at the time to designate (or allocate) any residential sites and the established and well evidenced housing need means that the Island is vulnerable to opportunist applications and challenges that has led to, what can best be described, as an 'unplanned' approach, especially if you give due regard to the fact that now all land within or immediately adjacent to the development envelope is, in principle deemed to be suitable for development. Effectively the LPA is not in full control of planning and development in our area and people have noted in the local media news of appeals lost for quite major developments and the award of costs against IWC. This is highly unsatisfactory and should not be allowed to continue but unlikely, for various reasons, to be met by the allocation of 100+ sites, seemingly almost quite randomly, across the Island in order the 'share the pain' or 'spread the load'. Housing need is constantly a topic for discussion, paragraph 2.9 of the draft Review says.

*There has been a shortfall in delivery against the identified objectively assessed need figure on the Island during the life of the Island Plan Core Strategy (adopted March 2012). Monitoring indicates that there seems to be a ceiling when it comes to the delivery of housing, as it has averaged around the 400 dwellings per year mark over this period and this might indicate a saturation point for the Island's housing market.*

3.2 If the assertion about a saturation point is to be believed then it has to be properly challenged (not by canvassing/lobbying) and/or dealt with in a more innovative fashion because simply allocating all this land for development, seemingly arising from the SHLAA exercise, clearly is not identifying the most suitable sites in terms of location or specific characteristics/constraints. The widespread location in the simple hope that some of these may come forward at times over the plan period to meet the identified demand is hardly a planned approach. We also take the view that the approach to (new) consents that are not implemented and phasing are impractical, not feasible and unlikely to be overly successful.

3.3 To be fair there are many reasons for the low building rate/completions here on the Island including the recession, ongoing austerity, house prices, financial 'penalties' placed on developers to cover for lack of public investment and suchlike. The Council through this new Plan hopes to reverse this trend but there is no guarantee of success, or even partial success.

**3.4 In lay terms, for almost any Island resident, this number of new homes required is a frightening prospect if you take into account the need to provide employment and the necessary technical/social infrastructure, which includes access, energy, water supply, foul/surface water disposal, flood protection, community facilities, healthcare, education and suchlike with all of that included in an overarching need to protect and enhance the urban/rural environment; especially the latter if due regard is given to the importance of the tourist industry. In our area this is unlikely to be achieved by allocating space for another 400 or more homes that, in theory, could be built over the next fifteen years.**

3.5 That said, as the local Parish Council we support the view that there is a very clear need for more affordable housing in our area. Hopefully 35% of new units could be affordable, in some shape or form, but ideally the majority for a rent that respects the average household income in this part of the Island. Unfortunately, that is only part of the problem as in our area, with an ageing population (33.4% of our population are over 65); an equally important requirement is to make adequate provision for the elderly in all the various forms of accommodation guises including community care, assisted accommodation and residential/nursing homes all within a sustainable distance of local facilities and with the appropriate level of medical support. With 65% of new development being new housing to be sold on the open market, with the majority of those units being taken by the middle aged, early retired or retired persons some living locally but many others relocating from the mainland because of the attractiveness of the area and, depending where you currently live, cheaper house prices that, in due course, will only add to the burden placed on local public facilities although it should be a boost for the village centre in terms of retailing, restaurants, cafes, drinking establishments and suchlike.

3.6 For the reasons outlined in the preceding paragraph we are keen to advocate not just an increase in the amount for affordable housing but also a number of small rural exception sites, or something very similar, irrespective of whether these are inside, immediately adjacent or outside the development envelope boundary, in isolation or as part of a larger development; solely for local people in combination with more innovative solutions in terms of elderly care in terms of accommodation and support services.

3.7 Prior to analysing the respective merits of the allocated sites it is important to understand that, in all likelihood, we are not dealing with a 'blank canvas' even at this early consultation stage. For this reason we have taken into account following factors (in no particular order) that have clearly influenced the drafting of this Plan.

- The Island Plan is out of date and has to be reviewed to comply with the relevant legislation. In short, whatever happens, in due course, there will be a new Plan. The absence, at present, of an up to date approved Plan means that the Local Planning Authority (LPA) is somewhat vulnerable to opportunist applications and this can lead to permission being

granted in less sustainable locations as well prejudicing the chance to phase new more appropriate development. In effect, it has become planning on a piecemeal basis.

- The new Plan has to comply with the NPPF, which was recently reviewed and approved just last year. If it doesn't or the correct procedures haven't been followed it simply won't be approved by the government.
- There has been a substantial amount of work undertaken in recent years in connection with housing need. The target figures for completions in the Island Plan have not been achieved and this one of the reasons, arguably the main reason, why the target figures have been increased in the new draft Plan to 641 new homes per annum. At this moment in time, it seems unlikely that this annual figure will be reduced or, for that matter be achieved.
- Freshwater (area) will be part of the West Wight Regeneration Area, which is one of a number of areas where there will be a focus on growth and promoting development.

3.8 The aim '*to see the West Wight's environmental assets celebrated and appropriately protected and the housing and employment needs of residents are met*' is unlikely to be achieved unless the current draft Plan is radically amended before it is approved.

3.9 Notwithstanding the comments in the preceding paragraphs this is why, in our view, it is important to take a realistic approach while still looking ideally to reduce the number of new sites or homes and/or, wherever possible, achieving appropriate mitigation in the form of some sort of 'planning gain' or even provision of essential services to offset the loss of open land, the increase in the number of new homes/population and potential erosion, in whatever form, of the integrity of the area. The overarching objective for the area is recorded in the following terms '*to see the West Wight's environmental assets celebrated and appropriately protected and the housing and employment needs of residents are met*'. Regrettably we do not see how over provision of housing protects the local environment and there seems to be precious little coming forward in terms of maintaining and increasing employment opportunities. In similar terms clarification would be welcomed where it says in paragraph 3.21

3.10 Paragraph 3.21 (part) says, '*Freshwater's role as the main convenience shopping offer in the West Wight will continue, with support being given to strengthening the 'high street' and retail offer*' and we would welcome clarification on exactly how this will be achieved. There are numerous aspects of the draft Plan that are welcomed by Freshwater PC and have our support including reference to West Wight Cycle Way although inevitably there are questions about how this will actually be delivered.

3.11 It is important not to lose sight of the fact of how important local employment is in our area because those jobs that are available are often temporary, part-time or seasonal and invariably connected with elderly care and tourism and, as consequence, can be low paid or even minimum wage. Disappointingly there is scant reference to employment in our area in any detailed format or detailing of ideas to expand Golden Hill Fort and land at Afton Road, just the 'principle of intensification and/or expansion of existing employment uses'. This is unfortunate as it is critical to the future well being of our area and the rest of West Wight as there should be detailed proposals for the protection of existing jobs, further diversification and employment opportunities on established sites and through start-up units. If this is not pursued there can be little point in a house building programme focusing on low-cost and affordable units if prospective owners/tenants cannot afford to buy or find the rent out of reach because of low income.

3.12 CSSHC 7 refers to Locality Hubs in the Bay and a central location. These do not appear to show on the Policies Map. It is understood by the Parish Council that a Locality Hub will also be provided in Freshwater (West Wight Medical Practice).

3.13 PSDG 1 provides for "the highest design quality" for new development. We are not clear how this will be dealt with in practice. How will town and parish councils be able to comment on this when making observations on planning applications?

3.14 HQE 5 deals with local green space. The Parish Council strongly supports the policy that development should not take place on these locations. There are small differences between the Policies Map in the Island Planning Strategy and the plans in the Freshwater Neighbourhood Plan.

3.15 Policy FNP 2 of the Neighbourhood Plan states "there will be a presumption against business uses converting to residential uses when the building or site in question is part of the Primary Retail Frontage Area (as defined in the Island Plan)." This will necessitate some change since the new plan does not refer to Primary Retail Frontage in Freshwater.

3.16 Policy BCI 2 (a) should be expanded. Paragraph (a) currently states "create sustainable routes between urban and rural areas". This should cover in urban areas, between urban areas as well as between urban and rural areas.

3.17 Hopefully these comments will be taken on board as the draft Plan should not be seen as a thankless task. Indeed this consultation is critical as we understand that once the new Plan is approved, including some or all of the proposed allocations, when planning applications are lodged it may be difficult, if not impossible, to contest the development of these sites in terms of general principle...it will all, as they say, be in detail. The view is taken that from a localised perspective the approach should be to consider the suggested sites in the usual development control terms against a background of how local people see the area developing over the next fifteen years.

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#### **4. FUNDAMENTAL POSITION**

4.1 **We have given due regard and appropriate weight to the fact that the area is now included in the West Wight Regeneration Area as a settlement hub.** This clearly implies that the area will need to 'share the pain' but the key is that, in the opinion of Freshwater PC, this should be proportionate and take into account the character of the area that is quite clearly different from places such as Ryde, Cowes and Newport, where a considered approach would suggest that most new development should take place there where there are good transport links, established infrastructure and they are the main areas of employment.

4.2 In that context, we have been appraised in terms of the Act that planning applications that accord with the policies in the Island Planning Strategy (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, the Council will grant permission unless the application of policies in the National Planning Policy Framework that protect area or assets of particular importance or any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole.

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#### **5. SPECIFIC ALLOCATIONS**

5.1 It has been assumed that these allocations came through the Strategic Housing Land Availability Assessment (SHLAA) but there has to be some doubt whether these are the best sites in terms of overall size/location, or merely the ones that are deemed to deliverable/developable. There is also some genuine concern over the ability to control phasing and the ability to enforce implementation of any extant or future consents is also, at best, dubious because although it may be possible to limit the term of the consent it seems unlikely that if a consent is not implemented whether any future application could be rejected (PSDG6). We take the view that these issues should be resolved and incorporated in to the draft Plan.

5.2 Overall the housing needs statistics are a result of the overwhelming need for sustainable affordable housing, slow building rates since the last Plan was approved (2012) and persuading landowners to develop when there are viability questions arising from achievable house prices and the various 'bolt-ons' as result of the planning process in terms of on-site and off-site works regarded as essential if development is to be permitted; usually characterised by significant financial

contributions. In the present economic circumstances that is why we are sceptical as to whether a 100+ residential allocations across the Island, with the objective of over 9,000 new housing units is realistic. Inevitably there is some scepticism and concern on the new garden communities and the vagueness about these allocations in terms of location and (eventual) delivery and the fact that although two 'general areas', West Wight and SE Wight, have been identified without identifying the precise location. The very fact that two areas have been identified means that there must be specific sites that have been considered but are yet to be revealed.

5.3 In this particular instance it is important to put the (original) settlements or constituent parts, all of them unique, that make up our area in context with its location and scale/size with other parts of the overall area and, as a consequence, the impact on the character, amenities and available facilities will have on this area should they come forward in their entirety and when this will happen as the Plan specifically cites the need for phasing over the plan period up to 2035.

**HA004...Land south of Clayton Road (60)**

**HA005...Land to the east of WWFC, Camp Road (150)**

**HA006...Heathfield Campsite, Heathfield Road (90)**

**HA007...Land NW of Regina Road, Copse Lane (90)**

**HA008...Church Field, Copse Lane (25)**

**HA009...The Apple Farm, Newport Road (10)**

- Freshwater PC wish to know why sites that already have the benefit of extant permissions or sites where development has commenced but are not completed are not included as allocated sites and the very significant contribution that they make to the number of housing units envisaged for our area. This distorts the statistical assessment and is misleading in terms of what may, or may not, be anticipated.
- Furthermore the figure(s) in the brackets are obviously the projected number of units and this is another point that needs to be highlighted as we believe that these may be underestimated especially if appropriate weight is given to the very nature of affordable housing and the general viability of the individual proposals. Because of that factor and other inevitable constraints imposed by the grant of permission as confirmed by policy PSDG5 (Managing Viability) the resulting densities may well increase beyond these estimates.
- Of course, there may be other sites within the village that come forward over the plan period if they meet with the criteria of being inside or adjacent to the development envelope boundary, known as windfall sites. Obviously this could also add to the total number of units.

5.4 Setting aside the three points highlighted above, the 'yield', as it is called, from the six allocated sites is 425 units. This seems to be a disproportionately high number for an area such as Freshwater if due regard is given to our semi-isolated location in relation to the primary settlements (PSDG 3), the prevailing pattern of development and the current population. The issue of 'sharing the pain' is, in some respects, understood but we are some distance away from the main centres of population and therefore, in Island terms, semi-isolated and largely unsustainable in terms of transport, employment and suchlike.

5.5 The population of the parish area (2019) has to be well in excess of 5,500 (Census 2011 5,369) so even with a very low projected occupancy rate that could result in a (population) increase of say 1,000/1,500 people (higher if there is a significant amount of affordable housing in addition to natural growth with significant implications for local infrastructure and facilities). In the worst scenario (depending on your point of view), if all six sites were developed, completed and occupied this could theoretically lead to a 25% increase in population in the Parish Area; although admittedly this a crude

estimate. If weight is then given to the three highlighted points you can get into the realms of 30%+. It could be argued that an area like this is taking a disproportionate 'hit' and quite unsustainable in terms of supporting technical/social infrastructure

5.6 As we say, we are aware that there is a need for more affordable housing and views will doubtless be expressed as to whether this will be achieved on the allocated sites. An enormous amount of work was undertaken in terms of future investment/development and a sustainability under the umbrella of our Neighbourhood Plan (approved 2018) and even over a fifteen year period with benefits from (financial) contributions there will be a major impact in terms of integrity of the area and enormous pressure applied in terms of social infrastructure when we are still living in an era of austerity.

5.7 What will the area be like in 2035? Nobody really knows because of the overwhelming number of unknown factors but we are obliged to make an assessment on the basis of the proposed new development in the draft Plan

5.8 The development of these sites, especially HA005, HA006 and HA007 (330 units), may see development at a rate not seen in the West Wight for perhaps fifty years or more and in the present circumstances, in terms of both technical and social infrastructure that is simply not sustainable. **We contend that very few people would consider that a figure of an additional 400+ units or more (including extant consents and ongoing development) over a fifteen year period is realistic. As a consequence, we urge that further research is undertaken with view to reducing the number of sites/number of units.** Taking on board the public comments from our own consultation exercise there is clearly a need to revisit the situation and consider possible alternatives.

- The development of a programme of vital infrastructure improvements and job investment required for a substantial increase in the number of housing units.
- Smaller, more manageable sites that can be properly accessed.
- Use of higher density development for sites closer to the village centre and the associated facilities, helping to protect some of the large tracts of open space that are a characteristic of our area.
- An innovative approach to the delivery of affordable housing and accommodation for the elderly through government investment or funding and/or partnership with local housing associations possibly along the lines of 'rural exceptions'. There is also the issue of provision of key worker housing in order to maintain and improve support medical/care services.
- Sites developed solely for affordable housing and/or accommodation for elderly persons.
- Need to explore the possibility of similar schemes to Green Meadows.
- Possible brownfield development, conversions and making use of upper floor accommodation in centre of village.
- Tackling the issue of the large number of empty or second homes in the area.

All but one of the sites (HA004) (Clayton Road) have specific requirements in terms of eventual development.

**HA005 Land east of WWFC, Camp Road...**A greenfield site of approximately 6 hectares is allocated at Camp Road, Freshwater to deliver a sustainable, high quality residential development which shall provide:

- a) At least 150 homes providing a mix of sizes and an affordable housing contribution in line with DHWN6;
- b) road improvements to Camp Road to improve vehicle and pedestrian inter visibility;
- c) off site pedestrian pavement/walkway improvements;
- d) onsite walking and cycling routes with links to nearby routes; and
- e) a mix of onsite SANGs, open and recreation space.

Archaeological assessments may need to be undertaken by any potential applicant and early liaison with the Council's Archaeology and Historic Environment Services advised. Development and required infrastructure will be delivered on a phased basis in line with housing delivery.

Proposals will not be permitted where they would prevent a comprehensive approach to the development and infrastructure of the whole site. It is anticipated that the site will be comprehensively master planned.

**HA006...Heathfield Camp Site, Heathfield Road...** A mixed greenfield and brownfield site of approximately 4.8 hectares is allocated at Heathfield Road, Freshwater to deliver a sustainable, high quality residential development which shall provide:

- a) At least 90 homes providing a mix of sizes and an affordable housing contribution in line with DHWN6;
  - b) Improvements to vehicular and pedestrian access; and
  - c) a mix of onsite SANGs, open and recreation space.
- The layout and design of the development should where possible retain the existing trees, hedges and flower meadow. The meadow could form part of the SANGs, open and recreation space provision.
- Archaeological and biodiversity assessments may need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects

**HA007...Land NW of Regina Road, Copse Lane (Sites at Copse Lane and Regina Road), Freshwater...** A greenfield site of approximately 7.7hectares is allocated at Copse/Regina Road, Freshwater to deliver a sustainable, high quality residential development which shall provide:

- a) At least 90 homes providing a mix of sizes and an affordable housing contribution in line with DHWN6;
  - b) local junction widening as required and associated footpath widening/provision (access should be explored from Regina Road or onto Copse Road);
  - c) a financial contribution towards the management and maintenance of the adjacent nature asset or onsite SANGs;
  - d) a mix of onsite open space and recreation
  - e) green footpath links to and from the adjacent nature asset;
  - f) landscape buffers to the nature asset and to safeguard the setting of Golden Hill Fort Scheduled Ancient Monument; and
  - g) allotment provision to the south west to retain green buffer.
- Archaeological assessments may need to be undertaken by any potential applicant and early liaison with the Council's Archaeology and Historic Environment Service is advised

**HA008....Church Field, Copse Lane...** A greenfield site of approximately 1.8hectares is allocated at Church Field, Copse Lane, Freshwater to deliver high quality residential development which shall provide:

- a) At least 25 homes providing a mix of sizes and an affordable housing contribution in line with DHWN6;
  - b) vehicular access improvements and/ or consider options for access onto Kings Manor Road.
- The site is immediately adjacent to Church Place Conservation Area and the All Saints Church, a Grade II\*listed building. The site may also form part of the core of a medieval settlement; as such any development should be of extremely high quality and take account of the adjacent features when considering design and layout. Archaeological assessments may need to be undertaken by any potential applicant and early liaison with the Council's Archaeology and Historic Environment Service is advised

**HA009...The Apple Farm, Newport Road, Freshwater...** A greenfield site of approximately 0.5hectares is allocated at The Apple Farm, Freshwater to deliver high quality residential development which shall provide:

- a) Between 7-10 homes fronting and accessing Manor Road; and
- b) Landscape buffers from development towards Newport Road

5.9 The site on the southern side of Clayton Road (HA004) presents a challenge in terms of character and amenity as the appearance is dictated by a very definite 'edge' with properties having the benefit of a southerly aspect out across open land that falls away in the same direction. If it, or any part of it, is to be developed it needs to be handled sensitively to avoid eroding the integrity and ambience of this part of the village irrespective of the fact that it is adjacent to a medium density area immediately to the north. Development on the lower side of the road will detract from the character and appearance of the area when compared with the existing situation largely because of the likely orientation of the new units. This needs to be taken into account with the inadequacy of the local road system (not just Clayton Road) in the wider sense and surface water drainage in the immediate vicinity and the practical difficulties (not to mention cost) in terms of engineered solutions. This begs the question as to the suitability of this site for any form of development at all.

5.10 Part of the delightfully unique character of the area is the manner in which it has grown over well in excess of 100 years or more and this has left tracts of public/private open space which is integral to the ambience and feel of the area and an essential characteristic of the semi-urban/village environment that prevails today. This is the case with HA005, east of the football ground, and this will need to be carefully handled in terms of development of a lesser number of units, perhaps by concentrating on specific parts of the site, to maintain and enhance open space as a planning gain for the general public. However, in this instance, the overwhelming problem is likely to be access to the site, from whatever direction by using a single or multiple number of access points. By virtue of the fact that extensive off-site engineering works to provide a suitable access would be prohibitive and likely to render such a project in virtually any shape or form, as non-viable.



5.11 In terms of an allocation for residential development the camp site (Heathfield HA006), providing the existing use is no longer viable or could be retained in a downsized form on part of the site, has certain advantages over some of the other sites because of the better access, woodland setting and the fact that it would be likely to have less impact in visual terms providing it is dealt with in an appropriate manner and this may involve the development of part of the site for a lesser number of units concentrating on specific areas.

5.12 HA007 is another large area and the development of the whole site would bring about a significant change in the character of the area. In common with the Camp Road site there are significant access difficulties in this location as well as surface water drainage problems. If any part of the site were to be developed it will need to be dealt innovatively with large areas of open space and 'buffers' along some, if not all, the boundaries. What needs to be avoided here is anything similar in terms of layout to Regina Road, Edinburgh Road and Park Way that represents development of its time and this would now be viewed as inappropriate. Anything remotely similar would be highly unlikely to enhance the appearance of the area. Once again, the estimate in terms of the likely number of units seems very high and unsuitable for the location but the major issue, in common with some of other allocated sites, is accessing the site and the level of improvements that would be required to achieve this satisfactorily.

5.13 On the face of it, in terms of pattern/density of development prevailing in the area, Church Field (HA008) does appear to be a reasonably sensible idea. However, once again there is the issue of access using Copse Lane and the challenge created by accessing the site presumably from Redlake Gardens if there is no other alternative. Furthermore, this is clearly a very sensitive site in view of the designation as a Conservation Area, listed building and the potential for more archaeological finds that will need to be protected. These factors make it desperately difficult to envisage what might be appropriate on this land.

5.14 The extension of the ribbon development, sometimes frowned upon as a concept in planning terms, along Newport Road (HA009) appears to be appropriate in terms of modest expansion within a village setting and this factor alone would render it more appropriate than some of the bigger sites and more suitable for the area.

5.15 **We feel that we need to stress that if there are inadequate support facilities in terms of medical services and education or problems relating to technical infrastructure then it is clear that new development should not be allowed until this has been addressed and rectified.** Further development without giving these matters proper consideration will simply exacerbate the problem, so there is a clear case here for acting in a proactive fashion rather than simply reactive.

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## 6. CONCLUSION

6.1 With an out of date Plan, government edicts in terms of house building and the well documented housing need here on the Island there are obviously difficult decisions that have to be taken. However, due regard and appropriate weight has to be given to the current level of pressure on local social infrastructure; significant transport problems and the intrinsic character of the area that is valued highly by local residents and visitors alike.

## APPENDIX

1. Many people recognised the need for housing for local people particularly younger people.
2. Concerns were often expressed about whether housing would go to local people. The housing figures seem to be based on the Isle of Wight Council's housing needs survey so presumably should go to meet that need. There appears to be no provision in the Plan regarding this and clearly it would be difficult to legislate for this.
3. Given the limited employment in the West Wight it is difficult to see how local people will be able to purchase large numbers of new houses.
4. Housing associations should be doing more.
5. Council housing should be considered.
6. Social housing and accommodation for the elderly are the most important needs.
7. Can better use be made of empty properties?
8. Concerns about infrastructure particularly doctors, police, drainage and roads. The local health centre has a real issue recruiting GP's. Domiciliary care is also a problem. 33% of population in the West Wight are over 65. This concern is very commonly raised.
9. The Parish Council is particularly worried about drainage. Some time ago Southern Water indicated that the system was at full capacity. Much development has taken place since that time.
10. The amount of green space is limited and there is a need to protect it. Wildlife is being affected.
11. Reference to the cycle track (3.31 in the Plan) is welcomed but it is not known how this will be delivered.
12. References to Golden Hill and Afton Road in policy SGOE1 are welcomed but investment is needed (Isle of Wight Council are investing money in mainland projects).
13. Concerns about specific sites – alternative sites were proposed at Avenue Road and north of Granny's Meade. There is a real difficulty identifying new sites. When the call for sites was made Totland and Freshwater Parish Councils discussed the matter and were unable to suggest any sites which were not already on the SHLAA list.
14. Church Field – sensitive site and traffic concerns. It is understood that the site was the core of a medieval settlement. It adjoins an area of outstanding natural beauty. There is a petition in circulation against development of this site which currently has 474 signatures. The grounds of objection in the petition are set out in Appendix 2
15. Copse Lane – traffic concerns. It should be noted that this land has been identified as suitable for development for many years but has still not been developed.
16. Camp Road – traffic concerns.
17. The proposed sites at Afton Road and Highfield Campsite are generally felt to be suited to development although concern was voiced about Afton Road being dangerous because of traffic and it was also stated that the campsite would be a lost facility.
18. Traffic concerns relating to Copse Lane. Copse Lane is said to be in poor repair. There are already holds ups getting onto Copse Lane from side roads. There is always a lot of on road parking which effectively reduces Copse Lane to one carriageway. If this parking was stopped many of the properties would have no where to park their vehicles. It is felt that it is not possible to widen Copse Lane. Copse Lane is on the bus route and there are real difficulties if a bus meets a wide vehicle.
19. Properties with shared equity should be available particularly for younger people.
20. A lot of rooms are available on "Airbnb". New development might be used for this purpose instead of providing homes.
21. There should be meaningful consultation with Southern Water on any sizeable developments.
22. An education facility needs to be retained in Freshwater.
23. Concerns were expressed that roads in new developments were no longer being adopted by the highways authority.

24. Concerns were expressed about the water consumption figure of 100 litres per person per day in policy HQE 10 (the Consumer Council for Water gives a figure of 149 litres per person per day). How would measures be implemented?

### Appendix 1

(Written responses from the public consultation day)

Church Field								
AONB	Wildlife	Road	Infrastructure	Graveyard	40 year restriction	Affordable	Flooding	Archaeological
6	10	15	5	4	1	2		1
Longhalves								
		1	1					
Camp Road								
		1					1	
Land South of Clayton Road								
			1				1	
Regina Road								
	2	1						

### Appendix 2

#### Church Field Petition

1. This has until recently been designated an AONB (Area of Outstanding Natural Beauty) and this was removed without consultation or informing the local population.
2. The redesignation of the site to a brownfield is inaccurate as this is well maintained farmland and it is farmed in an organic manner. Thus it should be considered a greenfield site.
3. It is alongside a SSSI (Site of Special Scientific Interest) and this will have an impact on the protected habitat.
4. The land is well used by rare, endangered and protected species such as slow worms, little egrets, herons, a broad range of hedgerow birds, bats and owls and other raptor predators. It is also well used by migrating summer and winter birds.
5. The housing provided is likely to be purchased as second homes and not meaningfully contribute to housing local families at an affordable rate.
6. It will increase traffic within the Redlake Road and Ronson Road in order to provide a through way for residential traffic and heavy farm equipment such as combine harvesters.
7. The impact on the outlook of businesses and homes in Church Place, which is a conservation area, will be negative and change the essence of the area from a rural to an urban setting.