

ISLE OF WIGHT COUNCIL - DRAFT ISLAND PLANNING STRATEGY

REPRESENTATIONS ON THE REGULATION 19 PRE-PUBLICATION VERSION OF THE PLAN

Introduction

This document has been prepared by BNP Paribas Real Estate (“BNPPRE”) on behalf of BAE Systems to make comments on the pre-publication version of the Draft Island Planning Strategy, which is currently at Regulation 19 consultation.

BAE Systems and BNPPRE have made a number of previous representations in relation to both the Gurnard Neighbourhood Plan and the earlier stage consultations for the Island Strategy. However, not all of the representations have been satisfactorily addressed in the Regulation 19 plan, hence this submission restates those previous comments and raises a number of new points.

It is vitally important to highlight that the BAE Systems Cowes site is the last site in the UK with a radar testing license. Any development to the west or east of this site risks BAE’s ability to operate, which would have serious implications for the sector.

Background

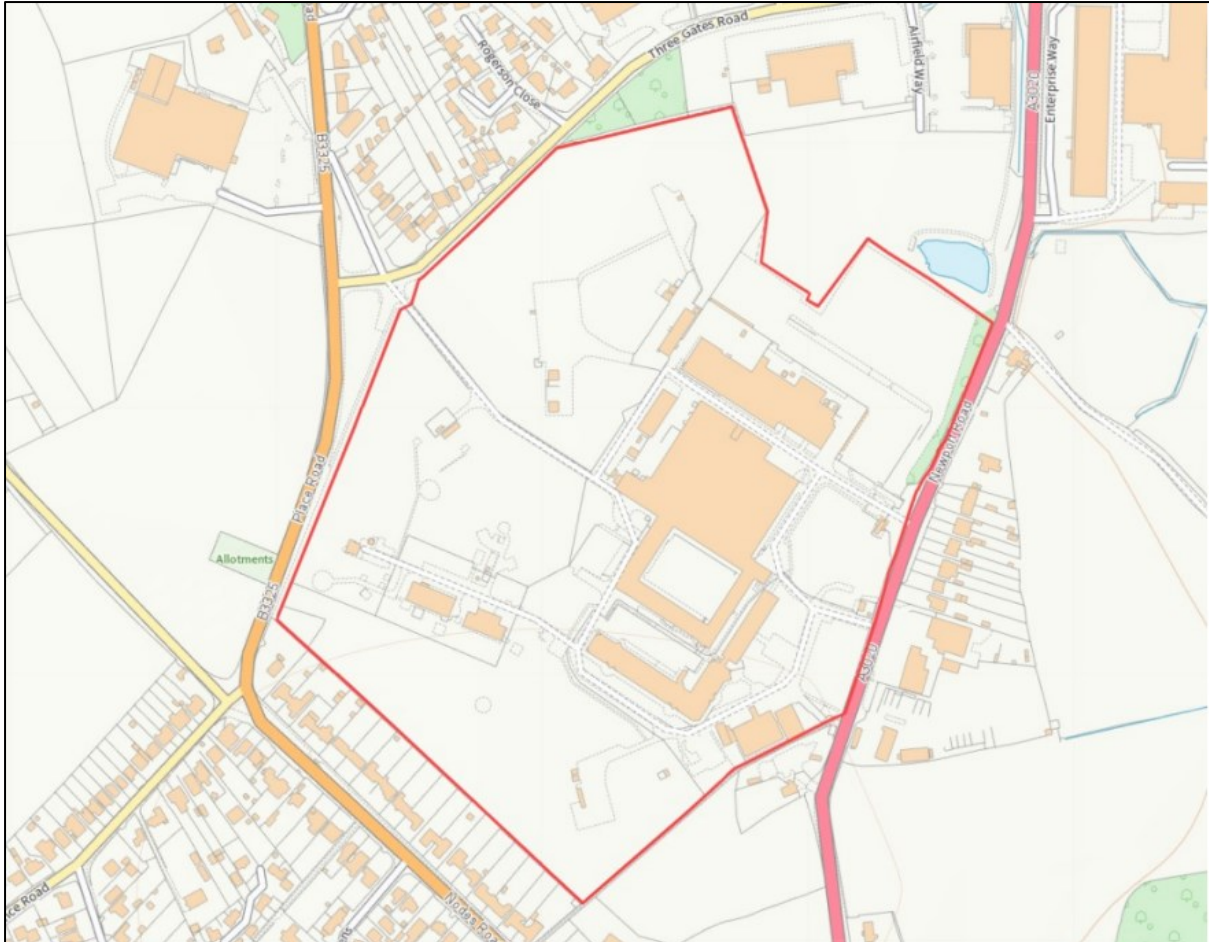
BAE’s Cowes site comprises circa 42 acres of land and property (indicatively edged red in Figure 1 below), including circa 275,000 sq. feet (25548 sqm) of office space and industrial / testing facilities.

The site is used for the assembly and testing of radar systems and has been operational since 1964. There has been considerable investment undertaken at the site over the years in terms of both upgrades and new development. The Cowes site currently provides jobs for circa 280 employees, the majority of whom live on the Island, with a large proportion of these being highly skilled roles.

BAE’s Cowes site is located circa 1.5 miles to the south west of Cowes town centre and has extensive frontage to and is accessed from the A3020 Newport / Cowes Road to the east, which connects Cowes with Newport circa 4.5 miles to the South. The site is predominantly surrounded by a mix of commercial and residential development, with the land immediately to the north of BAE’s Cowes site currently undeveloped, with a recently developed Aldi supermarket and car dealership beyond this.

Over the past 60 years, radar testing operations have been licensed to be undertaken at BAE’s Cowes site, including over the undeveloped land to the west (edged red on Figure 2 below). More specifically, in order to effectively develop and test radar, it is important to be able to test unencumbered by objects in the beam of the radar. The beam of the radar is not a straight line, as might be associated with a laser, but gets wider with distance from the radar, so objects which are not in a direct line of sight of a ‘target’ could still have an adverse impact on BAE’s testing functionality.

Figure 1: BAE's Systems Cowes Site



Land to the west of BAE Systems

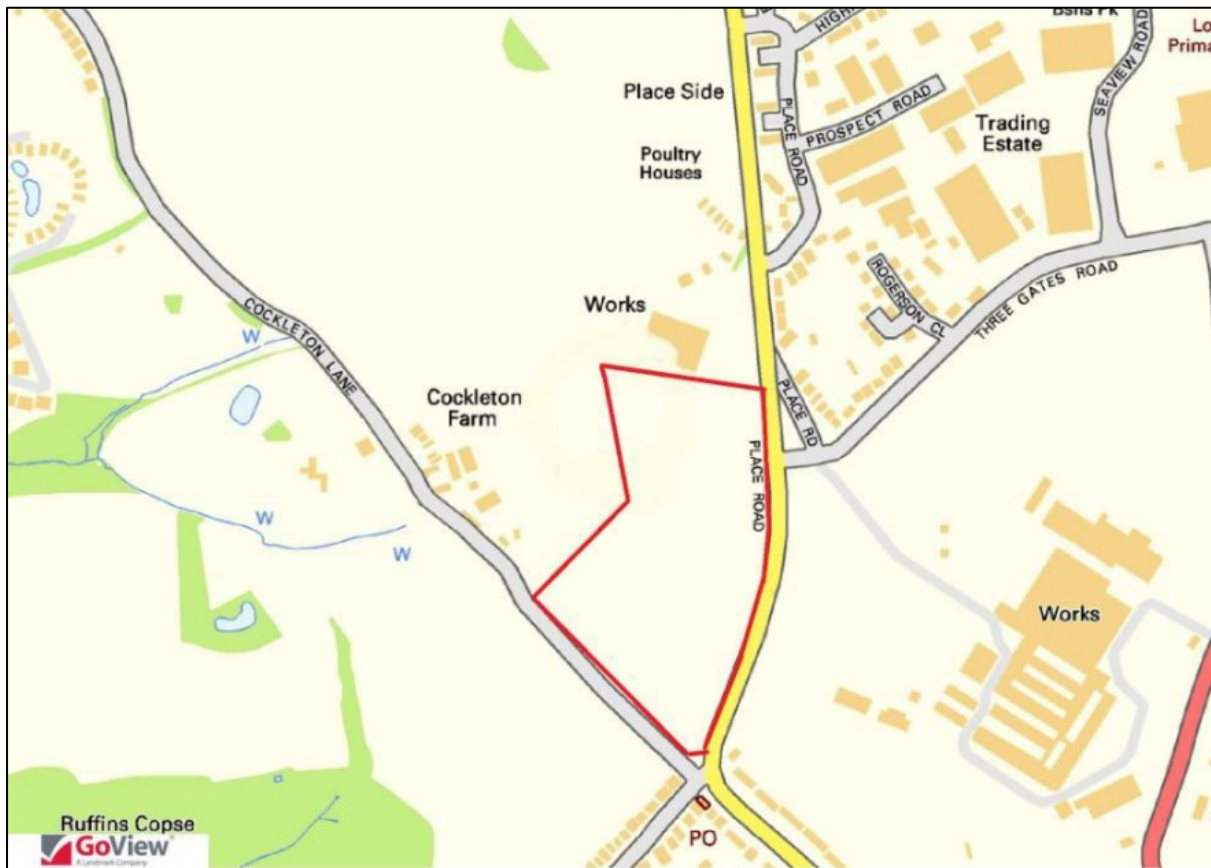
In light of the above, and as a result of the built development which surrounds BAE's Cowes site to the north, south and east, the undeveloped land to the west (edged red on Figure 2 below) is an important transmission zone for BAE. As a consequence, any future development of this area of land could have a significant detrimental impact upon BAE's ability to develop and test radars at the Cowes site and may even prevent such activity completely. Should BAE be unable to continue with operations for technical reasons of obstructions and changes to range of radar sight, this would fundamentally and adversely impact the Cowes site and its employees thereon. This would, in turn, have a significant adverse impact upon the Island economy, including local contractors.

In light of this, BAE raised concerns in response to a Prior Notification application for a telecommunications installation on the agricultural land to the north west of BAE's Cowes site. This application was refused in 2006 (Ref. PNP/27602 P/00643/06), with one of the reasons for the refusal being that insufficient information had been submitted to determine the impact of the proposed installation on radar testing at BAE's Cowes facility, which could therefore have an adverse impact on the operation of this local employer. We fully support this approach which was previously taken by the Council and consider that it should apply to the draft policies.

BAE also raised concerns in response to a planning application for the development of 42 dwellings on the Readers site, also to the north west of BAE’s Cowes site. This application was refused in 2009 (ref. P/02759/07 - TCP/28794/A), with BAE’s concerns relating to potential restrictions on its radar transmissions and business operations at its Cowes site resulting from new residential development in such close proximity.

Notwithstanding this, the undeveloped land to the west of BAE’s Cowes site (edged red on Figure 2 below) was identified as a ‘Possible Future Development Site’ in the March 2016 Pre-Submission Draft Gurnard Neighbourhood Plan (Site D). BAE strongly objected to this due to the likely detrimental impact on operations at its Cowes site. In response to this, the adopted version of the Gurnard Neighbourhood Plan withdrew support for future development on this land due to the “importance of the BAE to the Island economy”.

Figure 2: Undeveloped land to the west of BAE’s Cowes site

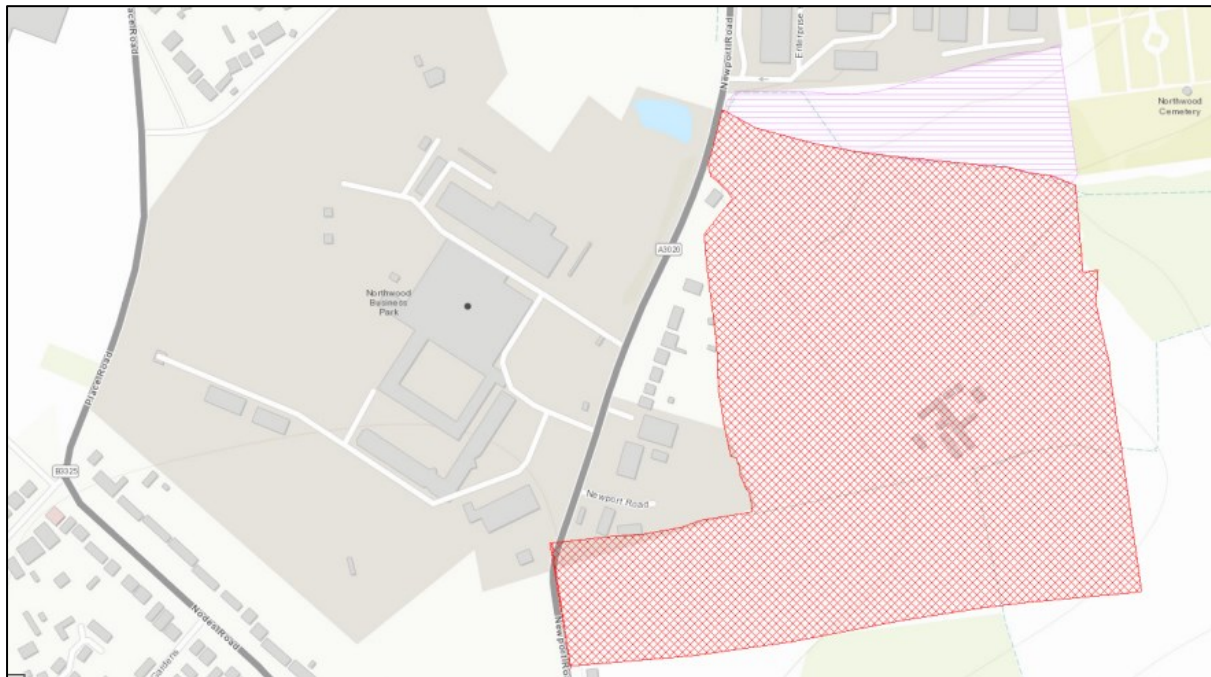


Land to the east of BAE Systems

The area of undeveloped land to the east of BAE’s Cowes site, known as Somerton Farm (hatched purple and crosshatched red on Figure 3), is proposed for development in the Draft Island Planning Strategy (see below for more detail). This land is also important in terms of BAE’s radar testing at its Cowes site. Accordingly, it is important that BAE is fully consulted prior to the approval of any

development proposals at Somerton Farm to ensure this will not result in a detrimental impact on BAE’s operations.

Figure 3: Somerton Farm (draft employment allocation in purple and draft housing allocation in red)



Draft Policy Context

The Regulation 19 version of the Draft Island Planning Strategy sets out that BAE’s Cowes site is designated under Policy E1 as set out below. Furthermore, the adjoining land to the east and west of BAE’s Cowes site is categorised under a number of Policies and Allocations:

- **Policy E1** (Supporting and Growing our Economy) – The Cowes Industrial Estate which includes BAE Systems is identified as an Employment Opportunity Area under this policy.
- **Policy EV10** (Preserving settlement identity) – The land to the west of BAE’s site is categorised as a settlement gap to preserve the open and undeveloped nature of the land between Cowes and Northwood.
- **Policy EA3** (Employment allocation at Somerton Farm) – This allocation includes 1.9 hectares of land to the north east of BAE’s Cowes Site (shown in purple in Figure 3).
- **Policy H2** (Sites allocated for housing) – Outlines a number of draft housing allocations which includes 130 dwellings to the east of BAE’s site (ref. HA022, shown in red in Figure 3).

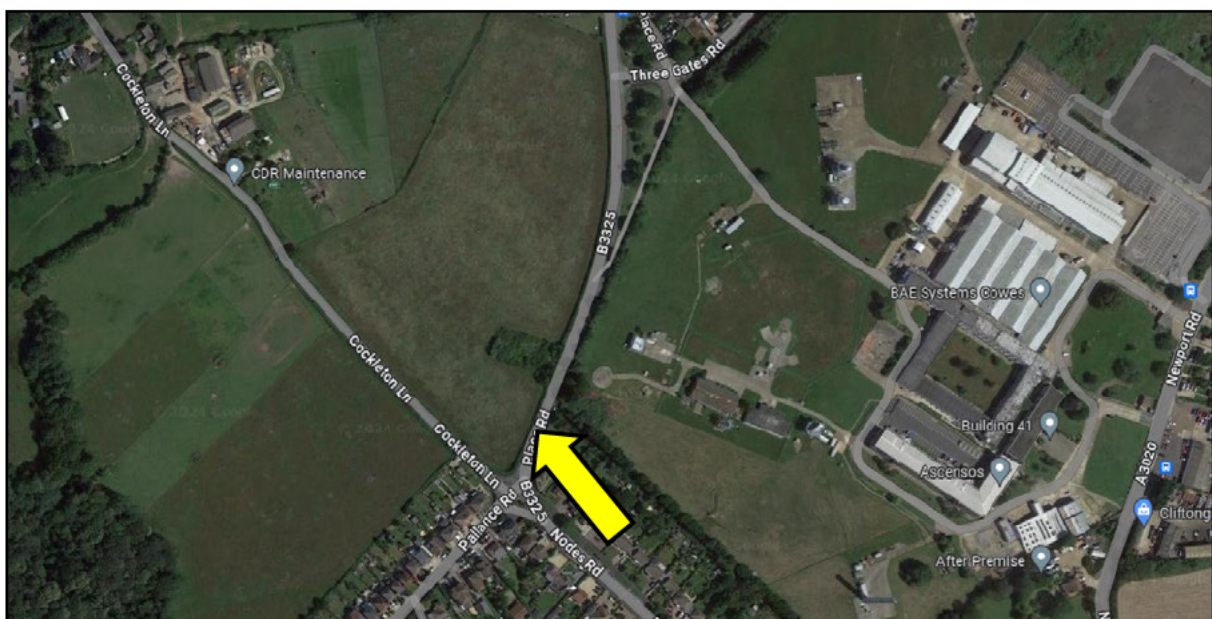
Representations

As set out in more detail in the background section above, BAE's Cowes site is an important local employer, providing jobs for circa 280 local people, a number of which are highly skilled jobs. The site also offers the potential for both new investment and further job creation going forward.

It is therefore important that the Council supports the continued operation and future growth of the facility in all of its planning decisions, including in the preparation of the new Island Planning Strategy.

Set out in the below table is our commentary on the draft policies outlined above, and recommended changes / wording to ensure these policies protect, and do not negatively impact, the BAE Systems and their wider operations as an important local business.

Figure 4: View from Place Road and Map Extract (source: Google Maps)



Draft Policy	Commentary	Recommended Changes
Policy E1	<p>It is important to note that the supporting text to draft Policy E1 states that <i>“The aim of the Island Planning Strategy is to promote a sustainable, diverse economic base that <u>delivers skilled jobs to benefit the population</u>. The Island Planning Strategy also aims to provide the certainty to attract investment and new business while promoting the upskilling of the Island’s population and a reduction in unemployment.”</i> (Emphasis added).</p>	<p>We support the continuation of the BAE Cowes site as an Employment Opportunity Area as per Policy E1 but strongly recommend that policy wording is included which explicitly states that <i>“development proposals in the surrounding area are restricted unless it can be demonstrated that there will be no detrimental impact on the operations of BAE Systems”</i>.</p> <p>It is strongly recommended that the final paragraph in the draft policy is amended to include the following text:</p> <p><i>“The council will also support the principle of intensification and/or expansion of existing employment uses in the following employment opportunity areas (as shown on the policies map), including improving the range and flexibility of commercial uses that may be located within them <u>and ensuring any new development outside these areas has no detrimental impact on them:</u></i></p> <ul style="list-style-type: none"> i. <i>Golden Hill Industrial Estate, Freshwater.</i> ii. <i>Land at Afton Road, Freshwater.</i> iii. <i>Cowes Industrial Estates, Cowes.</i> iv. <i>College Close Industrial Estate, Sandown”</i> <p>These proposed changes are incredibly important, as poorly thought-out design could impact on radar testing, noise and other operations at the BAE Cowes site (see background section above).</p> <p>Ideally, BAE Systems would like to see Policy EV10 extended to include all of the land between Cowes and Northwood, currently the land to the</p>

		<p>west is omitted to allow for the draft allocation which we consider inappropriate (see below).</p>
Policy EV10	<p>The Council's 2018 Coalescence Study sets out the importance of maintaining views both between Gurnard and West Cowes as well as West Cowes and Northwood. Both of these settlement gaps include land to the west of BAE's Cowes site and the Northwood gap includes land to the east.</p> <p>Page 20 of the Study sets out the importance of land to the north of Cockleton Lane in maintaining the settlement gap between West Cowes and Gurnard. With this in mind, the Study also references the impact that development is already having along Baring Road, further emphasising the importance of preventing development further south towards BAE's Cowes site.</p> <p>The Council's 2018 Study also refers to the settlement gap between West Cowes and Northwood. Page 23 sets out the nature of this gap and specifically references BAE's Cowes site, stating that physical gaps between the two settlements are now limited to a small field between Aldi and BAE Systems. It does go on to reference land to the west of BAE and states that <i>"the farmland to the west of Place Road gives it a stronger rural character, and views westward give it a stronger relationship with the wider countryside. The close mown grassland and structures on the BAE Systems site and its containment by security fencing and busy roads mean that open space here is fragmented and lacks association with the wider landscape, but tree/hedge cover along the edges of the BAE site and the remaining adjacent open spaces help to retain some distinction."</i></p>	<p>We broadly support the provision of Policy EV10 but consider that the draft policy could be strengthened to ensure the long-term viability of BAE Systems and the surrounding landscape.</p> <p>We note that the supporting text to draft policy EV10 makes reference to the council's 2018 Coalescence Study. However, in our view this reference should be made within the policy text to strengthen the policy.</p> <p>An additional paragraph should be added to the end of draft Policy EV10 which states that <u>"Development proposals must take account of the Council's 2018 Coalescence Study or any subsequent updates to this evidence, specifically the guidelines for maintaining settlement gaps."</u></p> <p>The 2018 Coalescence Study specifically states that development should be avoided on high ground towards Northwood (page 21). We suggest that the supporting text to draft Policy EV10 is amended to include reference to important views.</p> <p>In this instance, the view from Place Road to the west of BAE's site (see Figure 4 above) is an important entrance into the southern part of Cowes, offering unspoilt views towards the coastline and drawing attention away from the industrial land to the east. Development in this location would erode the rural character of this location.</p>

Policies EA3 and H2	<p>It is important to note that the draft policy wording for Policy EA3 sets out that this employment allocation should be designed in conjunction with the adjoining housing allocation (ref. HA022). As such, we have considered these policies together.</p> <p>The land to the north, west and east of the BAE site is an important transmission zone. Any future development of this land could result in detrimental impacts on BAE’s ability to develop and test radars on the site and could even prevent use of this site completely.</p> <p>It is therefore imperative that substantial weight is given to these Representations made on behalf of BAE, to ensure they can continue to safely continue operations in the locality in which they have existed for decades.</p> <p>We accept that Isle of Wight Council has housing need targets to adhere to and an ambition to increase employment land. However, this should not be done at the detriment of an important local employer. The loss of BAE systems to the Island and Cowes would almost certainly make it a less attractive place to live and would result in circa 280 people having to find alternative work, with a resulting impact upon indirect and induced employment</p>	<p>Ideally, both allocations would be removed to fully ensure the long-term viability of BAE Systems. However, we accept at this stage it may be difficult to do so. As such, we recommend that Draft Policy EA3 and Appendix 2 should be amended to include the following text (identified in <u>bold underline</u>):</p> <p><i>“The site is allocated to deliver small to medium scale employment uses within the Class E Offices, B2 and B8 uses. The site is greenfield and an area of approximately 1.9 hectares should be provided for employment uses as part of a joint allocation with HA022. Development proposals should:</i></p> <p><i>...i. avoid both direct and indirect adverse effects upon the integrity of designated sites and, if necessary, provide appropriate mitigation measures; and</i></p> <p><u>j. have no detrimental impact on operations at BAE System’s Cowes site to the west.”</u></p> <p>Appendix 2: Site-specific requirements HA022</p> <p><i>“... Archaeological and biodiversity assessments will need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects.</i></p> <p><u>The proposed development should also ensure there is no detrimental impact on operations at BAE System’s Cowes site to the west.”</u></p>
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Additional Representations and Conflict with the NPPF

Notwithstanding the above, we would strongly recommend that the land to the west and east of BAE Systems is protected with its own designation for radar testing on the Council's Planning Policy Map.

The proposed changes as set out above will ensure the Island Strategy adheres to the provisions of both the adopted National Planning Policy Framework ("NPPF") and the current consultation version of the NPPF. We accept that the consultation version of the NPPF holds limited weight but does show the direction of travel in terms of the new government's priorities and therefore, is an important material consideration.

Set out below are a number of important considerations from both versions of the NPPF:

- Paragraph 85 of the NPPF (paragraph 83 of the consultation version) – *“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”* (Emphasis added).
 - In this instance, BAE Systems is an innovative company, providing some of the world's most advanced technology in the defence, aerospace and security sectors. Diminishing their ability to continue this work would be in direct conflict with the economic growth objectives of the NPPF.
- Paragraph 86 of the NPPF (paragraph 84 of the consultation version) – *“Planning policies should a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.”*
 - Whilst draft Policy E1 does identify the BAE site as an Employment Opportunity Area, out outlined above, the Policy does not go far enough in terms of protecting the existing employment use from potential development nearby. Policies EA3 and H2 in their current form are considered to conflict with the NPPF objectives to encourage sustainable economic growth.
- Paragraph 87 of the NPPF (paragraph 85 of the consultation version) – *“Planning policies and decisions should recognise and address the specific locational requirements of different sectors.”*
 - In this instance, the testing of radar equipment requires a specialised site which has taken BAE Systems a number of years to develop. As outlined throughout this letter, the undeveloped land to the west, north and east of the site is crucial to BAE's operations. As such, the draft policies set out above are currently failing to take account of this unique situation and therefore, conflict with the NPPF.
- Paragraph 193 of the NPPF (paragraph 193 of the consultation version) – *“Planning policies and decisions should ensure that new development can be integrated effectively with existing”*

businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed. (Emphasis added).

- In light of the above, we consider that development in the draft allocations would result in unreasonable restrictions being placed on an established and important business. Ideally, we would seek to remove the two allocations from the Island Strategy. But on a without prejudice basis, if this is not possible, we request in-depth discussions between the Council and BAE Systems take place to ensure these allocations can be amended to include possible mitigation measures to ensure the long-term future of the business, thus adhering to the NPPF.

Summary

We appreciate the opportunity to make comments in relation to the Regulation 19 version of the Draft Island Planning Strategy on behalf of BAE Systems. We would respectfully request that the Inspector and the Council carefully consider the impact development could have on future operations at BAE Systems.

Given the constrained nature of the Isle of Wight, it is extremely unlikely that BAE Systems would be able to find a suitable alternative site on the Island, thus risking the loss of circa 280 jobs, including many highly skilled jobs, in the event they need to relocate onto the mainland. In addition, there would be a consequential impact upon indirect and induced employment resulting from the loss of BAE Systems. Development to the west or east of this site risks BAE's ability to operate which could have serious implications for key clients of national interest, in particular those in the defence sector including the UK's Ministry of Defence.

We trust the above is clear and satisfactory, however, if you require further information or would like to discuss the above, please do not hesitate to contact Conor Layton using the email address set out below.

We request to be kept up to date with the progress of this Regulation 19 consultation and would be grateful if you could acknowledge receipt of these representations.

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