

# Isle of Wight Council: Draft Island Strategy: Matter 3 Statement

Prepared by Fisher German  
on behalf Jacton Properties



### Project Title

Land at New Fairlee Farm, Newport, Isle of Wight

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# 01 Introduction

- 1.1 This Matter Statement has been prepared on behalf of the on behalf of Jacton Properties Ltd. in respect of their land interests at New Fairlee Farm, Newport, as illustrated at Figure 1 below. The land above forms part of a site known as ‘Land at and adjacent to New Fairlee Farm’ (Ref: HA040), which was previously identified in the November 2018 Draft Island Planning Strategy as a proposed allocation site.
- 1.2 The below site was included within the 2018 Draft Plan as a proposed allocation for a residential led mixed-use development. It was identified as being capable of accommodating at least 880 dwellings, a mix of green, open and recreational space, a range of small-scale community uses (which could include a multi-purpose community building and a convenience shop) and an improved road network including a park and ride hub. Representations were made that that time to support the proposed allocation of the site. The allocation was however removed in a subsequent Regulation 18 Consultation (July 2021). Representations were submitted on behalf of our client requesting the sites re-inclusion and objecting to the approach adopted in respect of housing growth on the island.

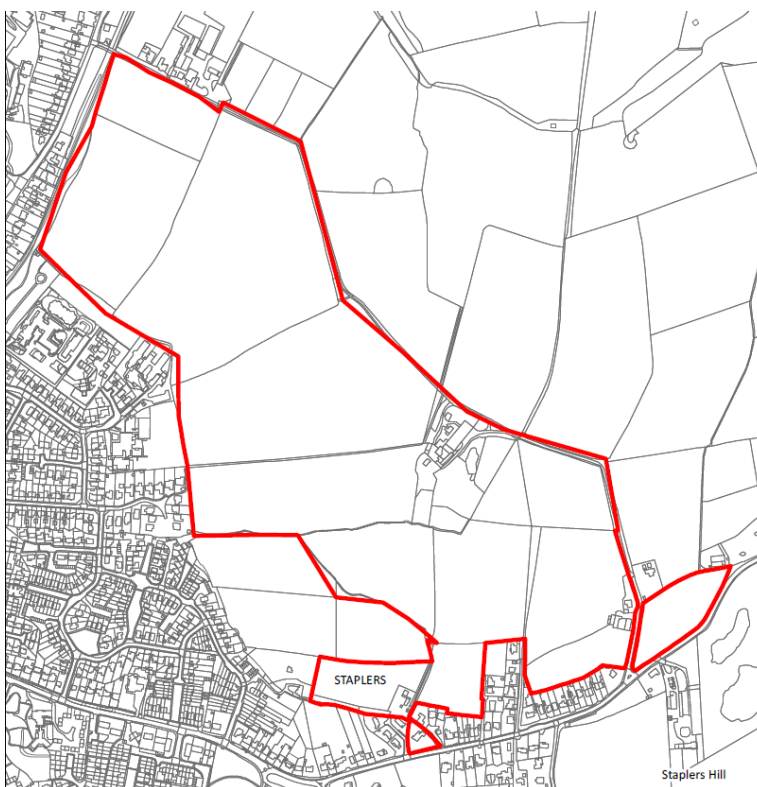


Figure 1: Land at and adjacent to New Fairlee Farm (HA040) (Source: IoW Council)

# 02 Matter 3 – Spatial Strategy

## Issue 1 – Whether the Spatial Strategy is sound

Q3.1 Is the proposed spatial strategy for the Island in Policies G1 and G2, including the settlement hierarchy, soundly based on a proportionate and up to date evidence base, including, amongst other things, the Rural Sustainability Matrix Review 2022 [Document GR3]?

- 2.1 No, as per our Regulation 19 response and as per our responses in relation to Matter 3, the Council's utilisation of an 'Island realistic housing requirement' is not an appropriate strategy, therefore Policy G1 is not sound.
- 2.2 We broadly support the spatial hierarchy insofar as it relates to Newport, being identified as one of the Island's primary settlements. Newport is the island's capital and second largest settlement, and located at the heart of the island contains a range of higher order services. As such, it is clearly primarily located to drive sustainable growth on the Isle of Wight. As such if there was to be amendments to the spatial strategy, this should be to differentiate Newport from the other primary settlements in its own spatial tier to reflect these advantages. Logically this could also be extended to include Ryde.
- 2.3 We make no comment in respect of the ranking of the lower order settlements, however if an increase in housing supply was required, it is entirely logical for that to be delivered in the most sustainable settlements in the first instance, both purely in terms of sustainability, but also reflecting concerns relating to inward migration.

**Q3.2 As set out above, the proposed housing requirement would be approximately a third lower than the standard method derived housing need figure. The submitted housing trajectory shows delivery rates in the latter part of plan period reducing significantly. Is plan making for the IPS justified in not pursuing larger sites, including possibly new settlements, as part of a spatial strategy to assist housing delivery in the medium to long term on the Island? How does this square with Housing Evidence Paper D [Document H019] and its barrier to delivery #7 regarding lack of large sites attractive to national volume housebuilders, providing a “pipeline” for sustained delivery?**

- 2.4 The falling trajectory at the end of the Plan is clearly a symptom of an inappropriate composition of allocations. As set out in respect of Matter 2, the evidence does not support that the Island cannot deliver higher levels of growth than proposed in the Plan. Larger sites, such as our client’s are ideally suited to deliver Plan needs in the middle-longer term.
- 2.5 Larger extensions to the existing towns are considered preferable to new settlements for a range of reasons. They are easier to deliver, due to the existing provision of services, utilities and facilities already present. They are more suited to the housing growth which will suit islanders rather than those coming from the mainland. They are more likely to be viable, as the presence of existing services and facilities will enable new provision to be made later in the build out which will likely improve viability and cash flow. They are also likely to have lower ecological and landscape impacts. They will be more accessible with existing public transport links and inherently more walkable, thus lowering the dependence on the private car.

**Q3.3 The Housing Evidence Paper B [Document H017] (notably at paragraph 5.32) sets out the rationale for not pursuing additional bigger edge of settlement sites and scaling back from the approach initially presented at earlier stages of plan-making, is this justified?**

- 2.6 H017 is overly vague in respect of the removal of sites such as our client’s land interests at New Fairlee Farm’ (Ref: HA040). The document provides potentially 3 reasons for exclusion, under Reason R5. This includes *“adjacent greenfield site not forming a logical extension to the settlement boundary / less certainty of delivery / site specific issues”*. There is clearly in planning terms a significant difference between a site not forming a logical extension to the settlement boundary and it having delivery or other site specific issues. Despite the comments of Housing Evidence Paper B, the reasons many of the sites were removed was the adoption of a lower housing requirement, not any sound site specific rationale, particularly given the Council considered them appropriate when targeting a higher figure. Given the reduction of housing requirement was not sound for the reasons articulated in respect of Matter 2, the removal of these sites to deliver that lower quantum is not sound. We would welcome

clarification from the Council as to which of the reasons under R5 each site was removed (if it assists the Inspector). For information the Council did confirm in relation to our client's interests it was *being an 'adjacent greenfield site not forming a logical extension to the settlement boundary' rather than the other two issues listed under R5*". Again, we do not believe this reason for refusal is tenable.

**Q2.4 Are there any reasonable alternative spatial strategies for the Island? If so, have these been appropriately considered as part of the Integrated Sustainability Assessment process?**

- 2.7 No, there is no reasons to utilise an alternative spatial strategy, and any such variation is likely to produce less sustainable results. Moreover, through increasing delivery in the island's rural settlements is likely to lead to houses with higher house pricing and also more attractive to those migrating from the mainland, which would clearly not be appropriate given the specific concerns in relation to the Isle of Wight.

**Q3.5 Is it clear in the Plan, through a combination of Policy G2, the key diagram, Policy H1, Policy E1, the indicative housing trajectory at Appendix 4, and paragraphs 3.44-3.49 how much growth is being planned for over the plan period and how this would be broadly distributed? Will Policy G2 be effective in ensuring the right amount of growth occurs in the right places?**

- 2.8 Notwithstanding our comments in relation to the inappropriateness of the quantum of growth proposed to be delivered by the Plan, there is however no real mechanisms to control the distribution other than the allocations and Policy G2. This is however not uncommon and is not considered in isolation to be unsound, but clearly this will form part of the consideration at Plan review.

**Q3.6 Would it be necessary for soundness and as part of an appropriate strategy to elevate Newport as a distinct, top tier settlement to accommodate a commensurate proportion of the Island's growth over the plan period? Does Newport have sufficiently distinct sustainability credentials to justify a different spatial role to Cowes, East Cowes, The Bay and Ryde?**

- 2.9 As set out in relation to Question 1 of Matter 3, we consider that there is clear logic in distinguishing Newport from other Primary Settlements due to its spatial role and also location. Located relatively centrally and containing a range of higher order services and facilities including retail, entertainment, education, healthcare facilities and employment, Newport is clearly suited and capable of absorbing higher levels of growth. As such, recognition of this may be appropriate for soundness, particularly depending on whether broader changes are needed to the Plan, including adoption of a more appropriate housing requirement.