

Community Reg 19

Submitted by: Anonymous user

Submitted time: 5 Aug 2024, 14:38:25

Name/Organisation

National Trust

Email Address



1. What type of respondent are you?

Business, Landowners and Developers

2. What Community policy you are commenting on

C1 - High Quality Design for New Development

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

C1: Criterion C

The National Trust supports the council's commitment to creating sustainable, strong and healthy communities and the need for high quality design in all new development. Whilst we support policy wording within criterion (b) which requires developments to 'takes account of and protects and enhances where appropriate views, water courses, hedgerows, trees, incidental green space, wildlife corridors or other features which significantly contribute to the character of the area', in order to better align with paragraph 212 of the NPPF, which requires LPAs to look for opportunities for new development within Conservation Area and the setting of heritage assets, to enhance or better reveal their significance, it is recommended that policy wording to criterion (c) is strengthened to '(c) respect and enhance the character of the area, particularly in historic places (such as conservation areas) and the National Landscape'.

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

No

5. Please give details to support your answer to question 4

- **No_not_consistent_with_National**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **Not consistent with national policy**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

In order to better align with paragraph 212 of the NPPF, which requires LPAs to look for opportunities for new development within Conservation Area and the setting of heritage assets, to enhance or better reveal their significance, it is recommended that policy wording to criterion (c) is strengthened to '(c) respect and enhance the character of the area, particularly in historic places (such as conservation areas) and the National Landscape'.

9. Do you have any comments on the policies map?

No

11. Do you wish to request to appear at the hearing sessions that will take place?

No

12. Please outline why you would like to attend?

NA

Community Reg 19

Submitted by: Anonymous user

Submitted time: 5 Aug 2024, 14:32:02

Name/Organisation

National Trust

Email Address

[REDACTED]

1. What type of respondent are you?

Business, Landowners and Developers

2. What Community policy you are commenting on

C10 - Supporting Renewable Energy and Low Carbon Technologies

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

Policy C10 criterion (g) and (h)

The National Trust has a duty to protect and care for special places so people, nature and culture can thrive. We believe that climate change poses one of the greatest threats to them. We believe strongly in the need to grow renewable energy and reduce the UK's and the Trust's use of fossil fuels.

The UK needs to meet at least carbon net zero by 2050 or earlier. The National Trust is targeting carbon net zero across our whole value chain by 2030 and as part of our work to achieve this goal is significantly increasing our own renewable energy deployment. This involves a range of projects both in terms of scale and technologies. We are supportive of renewable energy as a matter of principle and believe that appropriate development can play an important role.

We recognise the scale and complexity of the challenge to the nation of transitioning to renewable energy and acknowledge that any impacts upon the setting and significance of special places across the country will need to be considered in light of the pressing need to deliver clean energy. We believe delivering renewable energy projects with respect for the setting and significance of places is possible and all projects should aim to do so. We will strive to ensure that our own projects achieve this. We will continue to stand up for the places we look after, and where necessary hold developers to account for good practice. The Trust supports the principle of proposed Policy C10: Supporting renewable energy and low carbon technologies. It is acknowledged that renewable energy has the potential for direct or indirect impacts on landscape character, nature conservation and heritage. We therefore support proposed policy wording which seeks to protect areas of protected and sensitive landscapes and townscapes, and particularly support requirements for development to give consideration to the impacts on the setting of designated areas, such as the National Landscape and Heritage Coast.

Whilst we support criterion (g) and (h) within proposed Policy C10, these considerations could be applied to all development, whether outside a settlement boundary or site allocation or not, and as such it is recommended that policy wording is changed to the following: 'Proposals should demonstrate they have taken account of: (g) the visual impact on the character of the area; and (h) the consistency of the proposal with nature conservation and heritage asset objectives'.

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

Yes

5. Please give details to support your answer to question 4

- **Yes_consistent_with_national_po**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

Yes - consistent with national policy

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

Whilst we support criterion (g) and (h) within proposed Policy C10, these considerations could be applied to all development, whether outside a settlement boundary or site allocation or not, and as such it is recommended that policy wording is changed to the following: 'Proposals should demonstrate they have taken account of: (g) the visual impact on the character of the area; and (h) the consistency of the proposal with nature conservation and heritage asset objectives'.

9. Do you have any comments on the policies map?

No

11. Do you wish to request to appear at the hearing sessions that will take place?

No

12. Please outline why you would like to attend?

NA

Environment Reg 19

Submitted by: Anonymous user

Submitted time: 5 Aug 2024, 14:52:00

Name/Organisation

National Trust

Email Address

[REDACTED]

1. What type of respondent are you?

Business, Landowners and Developers

2. What Environment policy you are commenting on

EV8 - Protecting High Grade Agricultural Land

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

The National Trust supports proposed Policy E8: Supporting high quality tourism which seeks to develop sustainable growth of the local economy through tourism. Criterion (a) is important as it seeks to ensure proposals utilise the unique characteristics of the historic and natural environments, without compromising their integrity, this aligns with national planning policy (para. 88) which requires planning policies to enable 'sustainable rural tourism and leisure developments which respect the character of the countryside'. The Trust has recently acquired additional land in the West Wight area of the Island and has been working on a long-term strategy for Compton Bay and the Downs which seeks to secure a sustainable future for this important landscape which can be enhanced for nature and wildlife but also continue to be enjoyed by people. The Trust considers that this vision aligns with many of the objectives that the Council has for tourism, and we therefore welcome criterion (b) of proposed Policy E8 which seeks to support and develop green and new niche tourism products on the Island as this may support our long-term vision for a nature-based tourism offer at this location.

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

Yes

5. Please give details to support your answer to question 4

- **Yes_consistent_with_national_po**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

Yes - consistent with national policy

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

NA

9. Do you have any comments on the policies map?

NA

11. Do you wish to request to appear at the hearing sessions that will take place?

No

12. Please outline why you would like to attend?

NA

Environment Reg 19

Submitted by: Anonymous user

Submitted time: 5 Aug 2024, 14:43:40

Name/Organisation

National Trust

Email Address



1. What type of respondent are you?

Business, Landowners and Developers

2. What Environment policy you are commenting on

EV9 - Protecting our Seascapes and Landscapes

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

The National Trust own and are custodians of some of the most important and iconic landscapes and seascapes on the Isle of Wight including the Needles Headland and Tennyson Down, Compton Bay and Downs, Ventnor Downs as well as many other coastal beaches, countryside and woodland locations. As identified at paragraph 4.76 landscapes and seascapes are vital for people for many different reasons including beauty, natural and historic landscapes, as well as significantly contributing to the local economy and people's well-being. The Trust supports proposed Policy EV9 which seeks to conserve, enhance and promote the seascapes and landscapes of the Island, this policy approach aligns with paragraph 180 of the NPPF which requires planning policies to contribute to and enhance the natural and local environment by ensuring development (a) protects and enhances valued landscapes and (c) maintaining the character of the undeveloped coast. As set out within paragraph 182 'great weight should be given to conserving and enhancing landscape and scenic beauty in the Areas of Outstanding Natural Beauty which has the highest status of protection in relation to these issues'.

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

Yes

5. Please give details to support your answer to question 4

- **Yes_consistent_with_national_po**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

Yes - consistent with national policy

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

No

9. Do you have any comments on the policies map?

No

11. Do you wish to request to appear at the hearing sessions that will take place?

No

12. Please outline why you would like to attend?

NA

Housing Reg 19

Submitted by: Anonymous user

Submitted time: 5 Aug 2024, 15:14:11

Name/Organisation

National Trust

Email Address

[REDACTED]

1. What type of respondent are you?

Business, Landowners and Developers

2. What Housing policy you are commenting on

H2 - Sites Allocated for Housing

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

HA005 Land east of football club, Camp Road, Freshwater

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

No

5. Please give details to support your answer to question 4

- **No_not_consistent_with_National**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If no to question six is this because?

- **Not consistent with national policy**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

The National Trust owns approximately 2,100 hectares of land on the Isle of Wight making it one of the largest landowners on the Island. This includes the unspoilt chalk downlands at Tennyson Down located approximately 500m south of proposed housing site allocation HA005 for 100 dwellings on land east of Freshwater football club. Tennyson Down forms part of the iconic Tennyson Heritage Coast characterised by vast open, panoramic views along the coast and out across the English Channel stretching some 34km from Steephill Cove in Ventnor to Widdick Chine at Totland. The whole of Tennyson Down is designated as a SSSI and is of great nature conservation value with calcareous grassland, gorse and scrub providing a rich habitat supporting a diversity of species. Tennyson Down has a rich history dating back to the Neolithic and Bronze Age as well as more recent historic links with the poet laureate Lord Tennyson. The Isle of Wight National Landscape wraps around this part of the coast and across open farmland which descends as far north as Bedbury Lane.

National planning policy (para. 135.) requires planning policies and decisions to 'ensure developments are sympathetic to local character and history, including the surrounding built environment and landscape setting'. The proposed housing allocation (HA005) is within the setting of the Isle of Wight National Landscape and the Tennyson Heritage Coast therefore it is essential that any development in this sensitive location is designed around the landscape and how it relates to the environmental systems and landscape beyond the site boundary. Recommend policy wording change from: 'It is anticipated that the site will be comprehensively masterplanned' change wording to 'Development proposals must be comprehensively masterplanned and should demonstrate how they conserve and enhance the natural beauty, reinforce and respond to locally distinctive features of the National Landscape'. A landscape-led approach to masterplanning which builds on the opportunities available at this location should ultimately lead to the appropriate dwelling capacity for this special place of national importance.

Development of HA005 has the potential to significantly increase recreational visitors to Headon Warren and West High Down SSSI, which is a mix of calcareous grassland with a section of lowland broadleaved, mixed and yew woodland. The Trust consider it desirable for the development to include the provision of onsite suitable alternative natural greenspace (SANG) that can be integrated into the development allowing residents alternative access to local greenspace which will help to mitigate against excessive regular wear and tear on paths and grassland along the coastal strip of SSSI.

As identified at paragraph 4.76 of the draft IOW Local Plan, people value their local landscape and seascape. The Trust therefore welcomes proposed policy criterion (d) of Policy EV9: Protecting our landscapes and seascapes which will require development proposals to reflect the aims and objectives of the West Wight landscape character assessment, and other relevant landscape assessments. West Wight Landscape Character Assessment sets out landscape guidelines for Tennyson Down, of most relevance to this proposed housing allocation is guidance to 'Conserve the open undeveloped character of Tennyson Down and the wide views across the cliffs and sea to the south and the farmland to the north'.

9. Do you have any comments on the policies map?

NA

11. Do you wish to request to appear at the hearing sessions that will take place?

No

12. Please outline why you would like to attend?

NA

Transport Reg 19

Submitted by: Anonymous user

Submitted time: 5 Aug 2024, 14:59:49

Name/Organisation

National Trust

Email Address

[REDACTED]

1. What type of respondent are you?

Business, Landowners and Developers

2. What Transport policy are you commenting on

T2 - A Better Connected Island

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

The National Trust has significant land holdings towards the western end of the road stretching for several miles of its length. This land is protected by several designations including Heritage Coast, SSSI, SAC and SPA with a Marine Conservation Zone to the southwest. As a major stakeholder, the National Trust supports the council's inclusion of criterion (h) the Military Road within proposed Policy T2 and the identified need for the council to collect financial contributions for this essential transport link from development.

The Trust will continue to collaborate and support the Isle of Wight Council, Island Roads and other major stakeholders to identify a sustainable solution for the continued use of the Military Road. It is recognised that finding a solution that avoids or mitigates any environmental impacts in this sensitive location will be challenging, but the Trust has a strong view that focus should be applied to identifying a long-term solution to the delivery of road improvements, rather than taking forward a short to medium solution that may have limited social and environmental benefits and potentially be a less efficient use of financial resources. Any scheme coming forward needs to facilitate change, deliver best value, and added benefits for the Island community and environment over the long-term.

The Trust therefore supports proposed wording within Policy T2 which states, 'The council will work with partners and landowners to understand the impacts of the future loss or truncation of the Military Road (which is recognised as an essential transport link) on the surrounding transport network, settlements and area, with the principles of a preferred approach to be set out in the local transport plan'.

The Trust welcomes the council's preparation of a new local transport plan (LTP4) which will provide a much-needed update to the existing transport strategy to guide future investment and decision making on transport for the Island. It will be important that the Implementation Plan provides flexibility so that once a preferred approach has been identified and agreed with all major stakeholders, the policy framework can be put in place without delay to provide project certainty and enable the potential to attract project specific funding. The Trust therefore supports policy wording within the draft Local Plan that seeks to prevent development prejudicing the delivery of infrastructure improvements set out in the local transport plan.

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

Yes

5. Please give details to support your answer to question 4

- **Yes_consistent_with_national_po**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

Yes - consistent with national policy

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

NA

9. Do you have any comments on the policies map?

NA

11. Do you wish to request to appear at the hearing sessions that will take place?

No

12. Please outline why you would like to attend?

NA