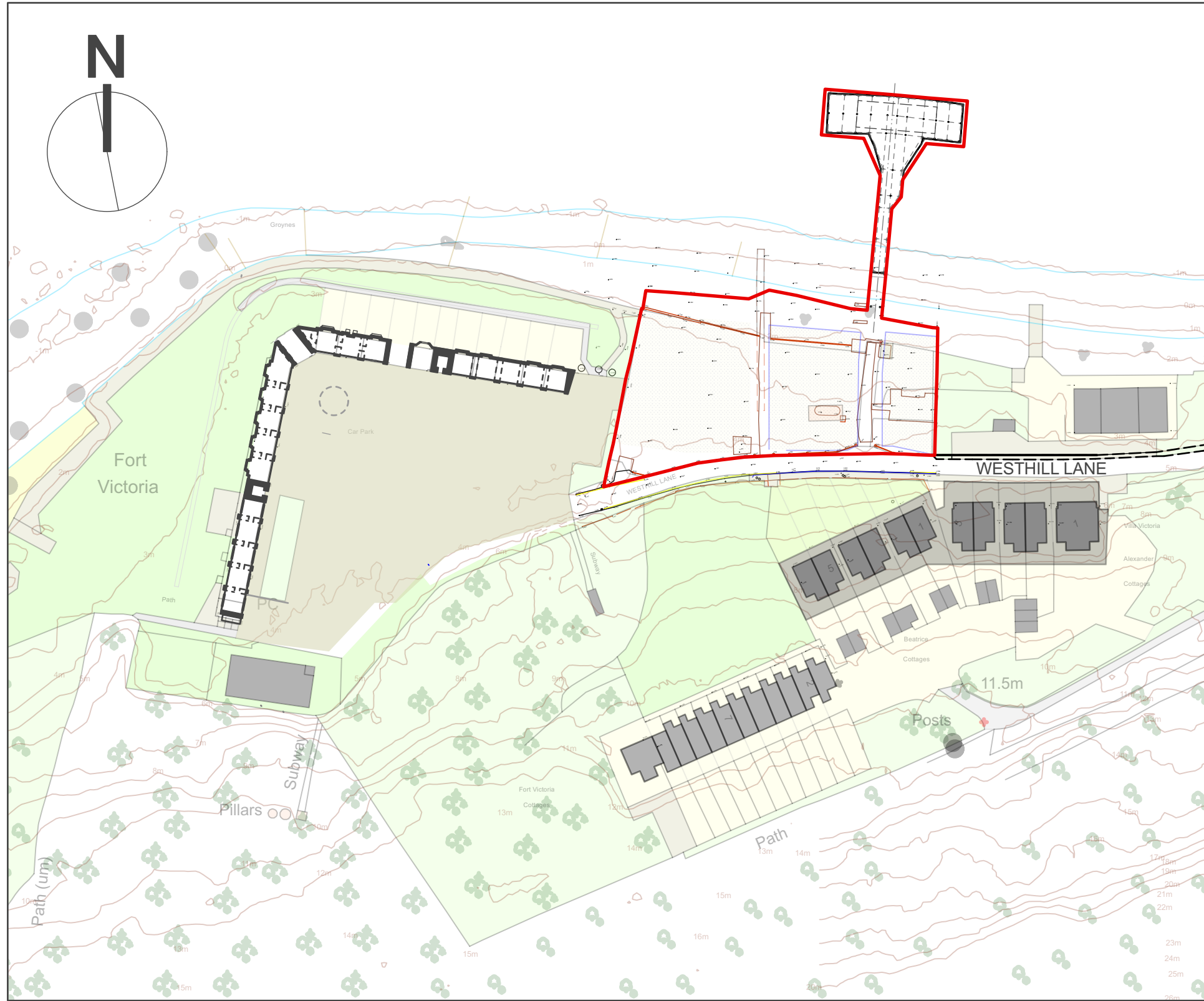


Location plan for Land Adjacent to Fort Victoria Pier

MILES BLAMIRE

07931 721172 07968 400076
 office@milesblamire.co.uk
 www.milesblamire.co.uk



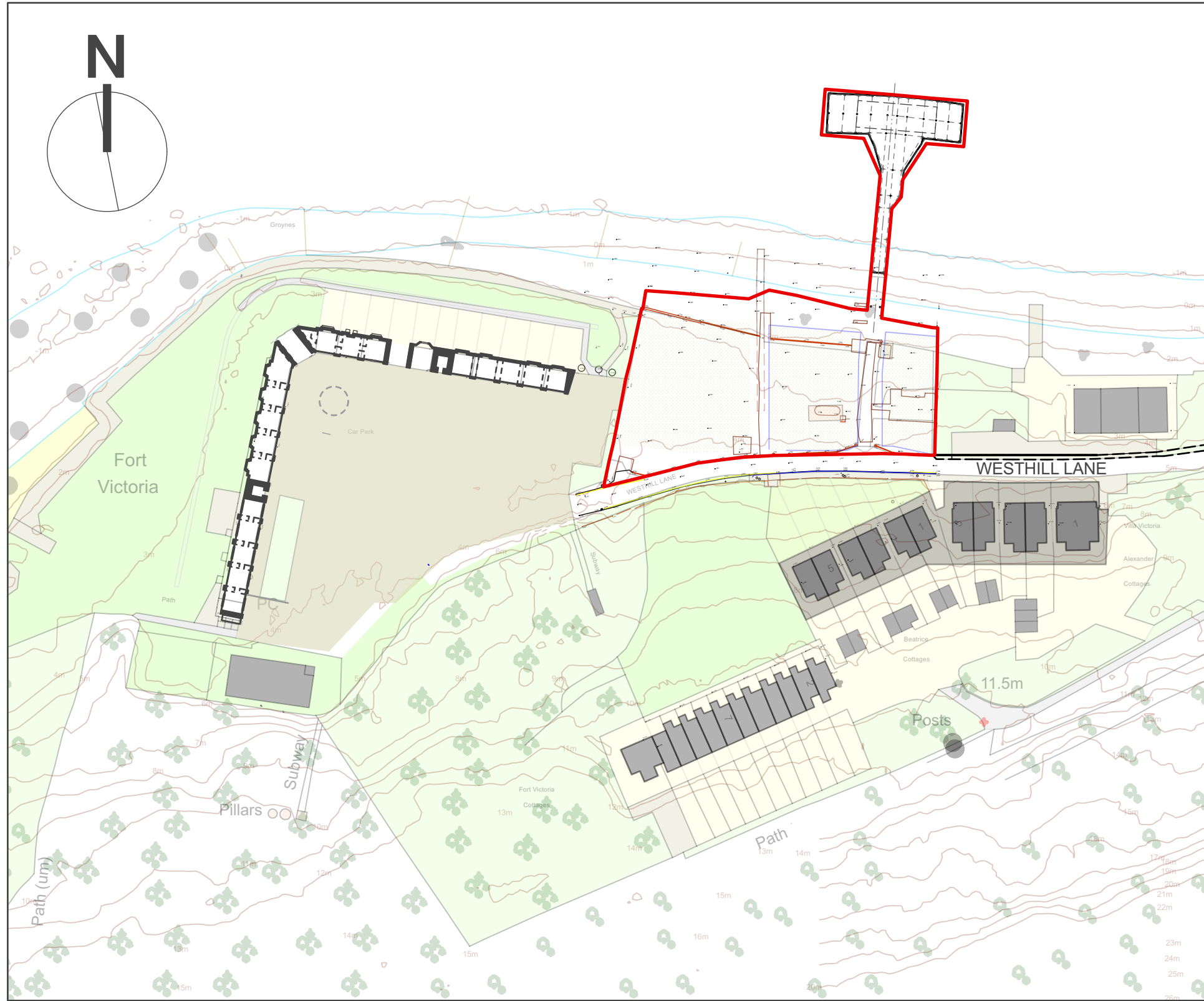


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Environment Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 20:21:23

Name/Organisation

Fort Victoira Pier Company

Email Address

[REDACTED]

1. What type of respondent are you?

Business, Landowners and Developers

2. What Environment policy you are commenting on

EV6 - Protecting and Providing Green and Open Spaces

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

No, the full EV6 policy.

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 - legally compliant**
- **Yes, complies with Duty to cooperate**

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 justified**

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

The site owned and used by Fort Victoria Pier Co (referred to as The Land Adjacent to Fort Victoria) off Westhill Lane, Norton, Yarmouth (see attached location plan titled Land_Adjacent_FV_Location_Plan) is subject to various policies in the Regulation 19 Submission version of the Island Planning Strategy (IPS) 2022-2037, including EV6: Protecting and providing green and open spaces.

Fort Victoria Pier Company objects to the inclusion of the site under EV6: Protecting and providing green and open spaces due to the use of factually incorrect and flawed evidence. We would like the inspector to evaluate the soundness of the Isle of Wight Council's evidence in this regard.

The following is an overview of the historic land use of the site and the lack of justification in the Isle of Wight Council's evidence.

1. Historic Land Uses

1.1 The Land Adjacent to Fort Victoria is private land and affords no permitted public access.

1.2 The land was originally part of the wider Fort Victoria military site, initially a defensive 'glacis' and then developed by the Royal Engineers into a narrow-gauge tracked marshalling and storage depot for arming/loading torpedos and other military equipment.

1.3 After the decommissioning of the military fort in 1962 it formed part of a boatbuilding yard with boat sheds, tracked slipway, fuel storage depot and boat storage. It was also used to process shellfish landed at the pier head.

1.4 During the late 1990s the boatbuilding yard was redeveloped into 11 residential dwellings, tourism accommodation and a cafe (under planning applications TCP/19356F/IW/P64295 and TCP/19356/R/P/134/99). Under planning application TCP/19356/R/P/134/99 the Land Adjacent to Fort Victoria was allocated for uses that included a large boat shed, sewage treatment plant, pier access road, slip way and boat storage.

1.5 Since the 1999 approved development a number of different schemes have been developed for the site and pier, including application 22/00634/FUL which is currently subject to a planning enquiry. During this period the site has remained private land with no permitted public access and has been used for a sewage treatment plant and boat and related marine storage.

2. Lack of Justification

2.1 The allocation of 'Green and Open Spaces' (EV6) in the draft Island Planning Strategy (IPS) is based on evidence compiled through the Isle of Wight Open Space Assessment. However the IPS does not state which specific Isle of Wight Open Space Assessment (2022, 2020 or 2010) has been used to justify the sites identified on the IPS policies map.

2.2 It is presumed the most recent assessment (2022) has been used to justify IPS policy map. Having reviewed the 2022 Isle of Wight Open Space Assessment it falls completely silent about Fort Victoria, which is not included in the assessment. Therefore there is no justification for the Land Adjacent to Fort Victoria to be defined by policy EV6.

2.3 Furthermore, the 2020 Open Space Assessment solely references Fort Victoria in a single reference when citing Freshwater Neighbourhood Plan (2017-2027). FNP15 seeks to support improvements to 11 community facilities and notes that "the plan will oppose any loss of facilities such as these and the open spaces at Fort Victoria and Golden Hill Country Parks, Afton Marsh and the allotment site, unless there are special circumstances". Importantly, the plan within the Freshwater NP (to define Fort Victoria Country Park) does not include the Land Adjacent to Fort Victoria. It frames itself to the built form of Fort Victoria, its car park and the Country Park (spanning west).

2.4 Finally the IoW Council's 2010 assessment dissects five types of open space including (1) allotments, (2) green corridors, (3) multifunctional green spaces, (4) outdoor sports facilities and (5) children and young people facilities. For the purpose of Fort Victoria Country Park this is a Multifunctional Green Space. The Council's audit does not provide any mapping to define the extent of the formal area surveyed or covered. The appendices are, in part, missing

and contain no mapping. Without such information (which cannot be accessed) then it is difficult to appreciate if the previous Island Plan map is correct. There is no evidence to support it.

2.5 Irrespective, the IoW Council define a Multifunctional Green Space to “include parks and gardens, public golf courses, natural and semi-natural green spaces, churchyards and cemeteries and Civic Spaces” and “natural and semi-natural green spaces and the remainder parks, churchyards and cemeteries or amenity spaces in housing areas”. None readily seem to apply to the Land Adjacent to Fort Victoria as it is not a Multifunctional Green Space.

3. Conclusion

3.1 The Land Adjacent to Fort Victoria has been subject to a number of uses since its development by the military during 1850s and is currently defined for use as boat storage, slipway, sewage treatment plant and large boat shed.

3.2 It is privately owned, previously development land, with no defined public access.

3.3 Based on the 2022 Open Space Assessment there is no inclusion of Fort Victoria and thus no justification to define the Land Adjacent to Fort Victoria as a ‘Green and Open Space’ under EV6 in the IPS.

3.4 The 2020 Assessment solely references Fort Victoria when citing Freshwater NP, which clearly omits the Land Adjacent to Fort Victoria from its ‘local green space’ definition of Fort Victoria Country Park.

3.5 In regard to the 2010 Assessment there is no evidence to support the policy and the Land Adjacent to Fort Victoria clearly falls outside of what is defined as a ‘multifunctional Green Space’.

3.6 Fort Victoria Pier Company believes that in regard to the Land Adjacent to Fort Victoria as set out in this submission, the application of EV6 is based on incorrect and flawed data and thus the IPS is not sound.

3.7 Fort Victoria Pier Company requests that the EV6 green and open space designation be removed from within the Land Adjacent to Fort Victoria site boundary.

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

Yes, see question 8 submission.

10. If you wish to attach any documents please do so here

PDF [Land_Adjacent_FV_Location_Plan.pdf](#)
744.1KB

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: 19 Aug 2024, 20:30:17

Name/Organisation

Fort Victoria Pier Company

Email Address

[REDACTED]

1. What type of respondent are you?

Business, Landowners and Developers

2. What Environment policy you are commenting on

EV7 - Local Green Spaces

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

No, all of policy EV7.

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 - legally compliant**
- **Yes, complies with Duty to cooperate**

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 justified**

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

EV7: Local green spaces

The site owned and used by Fort Victoria Pier Co (referred to as The Land Adjacent to Fort Victoria) off Westhill Lane, Norton, Yarmouth (see attached location plan titled Land_Adjacent_FV_Location_Plan) is subject to various policies in the Regulation 19 Submission version of the Island Planning Strategy (IPS) 2022-2037, including EV7: Local green spaces.

Fort Victoria Pier Company objects to the inclusion of the site under EV7: Local green spaces due to the use of factually incorrect and flawed evidence. We would like the inspector to evaluate the soundness of the Isle of Wight Council's evidence in this regard.

The following is an overview of the historic land use of the site and the lack of justification in the Isle of Wight Council's evidence.

1. Historic Land Uses

1.1 The Land Adjacent to Fort Victoria is private land and affords no permitted public access.

1.2 The land was originally part of the wider Fort Victoria military site, initially a defensive 'glacis' and then developed by the Royal Engineers into a narrow-gauge tracked marshalling and storage depot for arming/loading torpedos and other military equipment.

1.3 After the decommissioning of the military fort in 1962 it formed part of a boatbuilding yard with boat sheds, tracked slipway, fuel storage depot and boat storage. It was also used to process shellfish landed at the pier head.

1.4 During the late 1990s the boatbuilding yard was redeveloped into 11 residential dwellings, tourism accommodation and a cafe (under planning applications TCP/19356F/IW/P64295 and TCP/19356/R/P/134/99). Under planning application TCP/19356/R/P/134/99 the Land Adjacent to Fort Victoria was allocated for uses that included a large boat shed, sewage treatment plant, pier access road, slip way and boat storage.

1.5 Since the 1999 approved development a number of different schemes have been developed for the site and pier, including application 22/00634/FUL which is currently subject to a planning enquiry. During this period the site has remained private land with no permitted public access and has been used for a sewage treatment plant and boat and related marine storage.

2. Lack of Justification

2.1 The allocation of 'Local green spaces' (EV7) in the draft Island Planning Strategy (IPS) is based on sites identified on the policies map as local green space that have either already been designated through neighbourhood development plans or identified to the council through consultation responses from the public and representative bodies from other planning and community supplementary planning documents.

2.2 Fort Victoria Country Park is referenced in Freshwater Neighbourhood Plan (2017-2027) as a 'Local Green Space' under policy FNP13. It is believed that this is the justification used by the Isle of Wight Council to allocate the site under policy EV7.

2.3 However, on page 20 of the Freshwater Neighbourhood Plan, map number 8, the Fort Victoria Country Park 'Local Green Space', importantly, does not include the Land Adjacent to Fort Victoria, which is outside of the red boundary line. The designation only includes the built form of Fort Victoria, its car park and the Country Park (spanning west).

2.4 Furthermore the justification of FNP13 (FNP, page 17) clearly states that sites with 'extant planning permission' would not meet the justification criteria. The Land Adjacent to Fort Victoria retains extant planning permission for use as boat storage, boat shed, slipway, pier access road and sewage treatment plant from the approved 1999 planning application TCP/19356/R/P/134/99. Even if it had been included it would have been an invalid justification.

2.5 In regard to references in planning and community Supplementary Planning Documents the 2022 Isle of Wight Open Space Assessment it falls completely silent about Fort Victoria, which is not included in the assessment.

2.6 The 2020 Open Space Assessment solely references Fort Victoria in a single reference when citing Freshwater Neighbourhood Plan (2017-2027). FNP15 seeks to support improvements to 11 community facilities and notes that “the plan will oppose any loss of facilities such as these and the open spaces at Fort Victoria and Golden Hill Country Parks, Afton Marsh and the allotment site, unless there are special circumstances”. Importantly, the plan within the Freshwater NP (as discussed in 2.3)) does not include the Land Adjacent to Fort Victoria.

2.4 Finally the IoW Council’s 2010 assessment dissects five types of open space including (1) allotments, (2) green corridors, (3) multifunctional green spaces, (4) outdoor sports facilities and (5) children and young people facilities. For the purpose of Fort Victoria Country Park this is a Multifunctional Green Space. The Council’s audit does not provide any mapping to define the extent of the formal area surveyed or covered. The appendices are, in part, missing and contain no mapping. Without such information (which cannot be accessed) then it is difficult to appreciate if the previous Island Plan map is correct. There is no evidence to support it.

2.5 Irrespective, the IoW Council define a Multifunctional Green Space to “include parks and gardens, public golf courses, natural and semi-natural green spaces, churchyards and cemeteries and Civic Spaces” and “natural and semi-natural green spaces and the remainder parks, churchyards and cemeteries or amenity spaces in housing areas”. None readily seem to apply to the Land Adjacent to Fort Victoria as it is not a Multifunctional Green Space.

3. Conclusion

3.1 The Land Adjacent to Fort Victoria has been subject to a number of uses since its development by the military during 1850s and is currently defined for use as boat storage, slipway, sewage treatment plant and large boat shed.

3.2 It is privately owned, previously development land, with no defined public access.

3.3 The Land Adjacent to Fort Victoria is excluded from the ‘Local Green Space’ designation in the Freshwater Neighbourhood Plan (2017-2027) and could not be justified due to extant planning permission on the land.

3.4 Based on the 2022 Open Space Assessment there is no inclusion of Fort Victoria and thus no justification.

3.4 The 2020 Open Space Assessment solely references Fort Victoria when citing Freshwater NP, which clearly omits the Land Adjacent to Fort Victoria from its ‘open space’ definition of Fort Victoria Country Park.

3.5 In regard to the 2010 Assessment there is no evidence to support the policy and the Land Adjacent to Fort Victoria clearly falls outside of what is defined as a ‘multifunctional Green Space’.

3.6 Fort Victoria Pier Company believes that in regard to the Land Adjacent to Fort Victoria as set out in this submission, the application of EV7 is based on incorrect and flawed data and thus the IPS is not sound.

3.7 Fort Victoria Pier Company requests that the EV7 local green space designation be removed from within the Land Adjacent to Fort Victoria site boundary.

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

Yes, please see question 8 submission.

10. If you wish to attach any documents please do so here

PDF [Land_Adjacent_FV_Location_Plan.pdf](#)
744.1KB

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: 19 Aug 2024, 20:42:08

Name/Organisation

Fort Victoria Pier Company

Email Address

[REDACTED]

1. What type of respondent are you?

Business, Landowners and Developers

2. What Environment policy you are commenting on

EV16 - Managing our Coast

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

No, all of the EV16 policy.

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 - legally compliant**
- **Yes, complies with Duty to cooperate**

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 justified**

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

EV16 Managing our coast

The site owned and used by Fort Victoria Pier Co (referred to as The Land Adjacent to Fort Victoria) off Westhill Lane, Norton, Yarmouth (see attached location plan titled Land_Adjacent_FV_Location_Plan) is subject to various policies in the Regulation 19 Submission version of the Island Planning Strategy (IPS) 2022-2037, including EV16: Managing our coast.

Fort Victoria Pier Company objects to the inclusion of the site as a Coastal Change Management Area under EV16: Managing our coast due to the use of factually incorrect and flawed evidence. We would like the inspector to evaluate the soundness of the Isle of Wight Council's evidence in this regard.

The following is an overview of the flaws in the data sets that underpin the policy.

The Land Adjacent to Fort Victoria has been classified as a 'Coastal Change Management Area' (CCMA) in the IPS.

The CCMA is defined based on the policies and principles of the adopted Isle of Wight Shoreline Management Plan (SMP) 2010 and adopted West Wight Coastal Flood and Erosion Risk Management Strategy 2017.

1. Isle of Wight Shoreline Management Plan, 2010

1.1 The Isle of Wight SMP (2010) generically places the Land Adjacent to Fort Victoria within 'soft clay cliff-lines' with a generic erosion rate of 0.3 meters per annum. However this is factually incorrect, the Fort Victoria to Norton frontage is instead a substantial single beach. The soft clay cliff-lines are located much further to the west, between Fort Victoria and Fort Albert. At the Land Adjacent to Fort Victoria the coastal slopes are located behind the Fort Victoria access road and, therefore, this rate for cliff erosion would not be relevant for the site frontage.

1.2 The rate of shingle beach retreat at this site can be clearly understood through other relevant coastal monitoring sources, and the most accurate resources are the Channel Coast Observatory's Annual Beach Monitoring Surveys, which commenced in 2003. For the section of beach fronting the Land Adjacent to Fort Victoria the survey results show that between 2003-2017 there was 'very little change' along this coastal unit and between 2016 – 2017 'Accretion took place across the whole unit (Channel Coast Observatory Annual Survey Report 2017). Furthermore, between May 2017 - June 2022 at the site frontage there was actually a small increase in accretion of 0.6% (Channel Coast Observatory Annual Survey Report, December 2022).

2. West Wight Coastal Flood and Erosion Risk Management Strategy 2017

2.1 The West Wight Flood & Coastal Erosion Risk Management Strategy recommends preferred approaches for managing flood and erosion risks along the Island's north-west coast. The Strategy draws heavily on the contents of the Isle of Wight Shoreline Management Plan (2010) and on annual monitoring surveys by the Channel Coast Observatory.

2.2 The general conclusions for the section of coast fronting the Land Adjacent to Fort Victoria are that:

This section of the coast is relatively sheltered. As a result, wave over-topping is less of an issue here (West Wight Coastal Strategy, CAPITA/AECOM,2017).

The frontage is characterised by low wave energy, which is fetch limited, whilst the whole of the more exposed coast extending west from the Fort Victoria Headland to Alum Bay experiences high wave energy (West Wight Coastal Strategy, 2017).

The sediment transport along this coast is west to east feeding a mixture of fine clays, sand and some coarser sediments along the frontage (SCOPAC Sediment Transport Study, 2012).

The shingle beach fronting the site has shown no observable retreat since annual monitoring commenced in 2003. Although volumes can fluctuate after severe storms there is no notable change over a long time period and by 2022 a modest increase in beach volume was noted (Channel Coast Observatory, 2022).

3. Conclusions

3.1 The rate of coastal erosion set out in the SMP2 (2010) and the West Wight Strategy Study (2017) suggests a coastal retreat of 0.3mpa and increasing over the next two epochs. However, this is not supported by monitoring evidence of the rate of coastal change since 2003, which has been nil.

3.2 On account of the presence of existing both natural and man-made coastal defences and the natural supply of coastal sediments through longshore drift the status-quo could continue over time without any further intervention such as the need to upgrade coastal defences.

3.3 Long-term monitoring since 2003 has demonstrated that this is not an eroding coast but a depositional shingle beach frontage, which has remained virtually unchanged over the last twenty years. This statement is supported further by site inspections and knowledge of the frontage since c.1975 thus providing evidence that this beach has been self-sustaining for half a century.

3.4 Fort Victoria Pier Company believes that in regard to the Land Adjacent to Fort Victoria as set out in this submission, the application of EV16 is based on incorrect and flawed data and thus the IPS is not sound.

3.5 Fort Victoria Pier Company requests that the EV16 Coastal Change Management Area designation be removed from the shoreline of the Land Adjacent to Fort Victoria and further section of shingle beach to the east of the site.

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

Yes, see submission for question 8.

10. If you wish to attach any documents please do so here

PDF [Land_Adjacent_FV_Location_Plan.pdf](#)
744.1KB

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