

# PLAN RESEARCH

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30<sup>th</sup> May 2024

Russell Chick  
Planning Services  
Seaclose Offices  
Fairlee Road  
Newport  
Isle of Wight  
PO30 2QS

Our ref: BPC-2.1

Dear Russell,

**Re: 23/01920/FUL | Proposed Residential Development of 130 dwellings, Means of Access, Ancillary Garages and Garage/Studios, Associated Landscaping and Ancillary Infrastructure (revised plans relating to means of access and multi-use access facilities, repositioning of plots 76, 77, 78 & 79 and associated parking areas, new build out crossing onto Steyne Road, revised layout plans and highway information) (readvertised application) | Land North Of Steyne Road And Land Served Off Mill Road And High Street Bembridge Isle Of Wight**

Plan Research has been engaged to write a second letter of objection on behalf of Bembridge Parish Council regarding the proposed development above. The 198 objections currently on the Council's application portal demonstrate the strong feelings against this application. Bembridge Parish Council has reviewed all of the revised plans uploaded by the Council on the 22<sup>nd</sup> to the 24<sup>th</sup> of April 2024. The Parish Council remains strongly opposed to this application, for the following reasons:

- No evidence of positive effects on the character of the area
- Over-development of the site
- Housing in the shade of trees/landscaping plan
- Inappropriate housing mix
- Adverse impact on the Grade I listed building
- Drainage and flooding

## **No evidence of positive effects on the character of the area**

As the applicant has apparently not yet amended its Landscape and Visual Impact Appraisal of October 2023, we are commenting on the latest revisions to the plans, comparing them to that earlier appraisal.

We note that within the LVIA the applicant conceded that the built form of the proposed housing estate will only be partially screened by new tree cover after a period of fifteen years, and that there will be unavoidable adverse visual effects. This is an admission that the new housing would have a significant negative impact when viewed from key vantage points, including from the open fields around Bembridge Windmill and from public bridleway BB36. As the windmill is a Grade I listed building, this potential for negative impact causes great concern to the Parish Council.

The Landscape and Visual Impact Appraisal states on page 30 and 31: “Visual receptors most likely to be affected by the Proposed Development are those in close proximity of the Site. The significance of effect on receptors immediately alongside the Site (RG1 / VP1-6) is expected to be substantial adverse at completion. Large sections of roadside hedgerow will either be removed or layed and the Proposed Development is located close to the roadside edge and will be highly visible.”

“The Proposed Development would occupy the whole of these open fields and it is anticipated that its presence would alter this largely rural visual experience. The significance of effect is expected to reduce to moderate adverse after a 15-year establishment period following the maturing tree and hedge planting, which will help conceal views... the development approach does not attempt to conceal but to seeks to create a positive, outward-facing settlement edge, which unavoidably would lead to adverse visual effects from these locations...”

The applicant has stated their intention to create a new settlement edge in the open countryside, which will inevitably urbanise this greenfield site. There has been no evidence submitted suggesting enhancement of local character. This means the application does not accord with local plan policy SP1, or policy DM12 which states that “The Council will support proposals that conserve, enhance and promote the landscape, seascape, biodiversity and geological interest of the Island.”

The adopted Bembridge Neighbourhood Development Plan Policy BNDP.EH.1 – Built Environment states: “New development will be expected to respond positively to the local character of its environment by demonstrating an understanding of the qualities which make up this character.” Arguably, the applicant has partially complied with this policy in the submitted Landscape and Visual Impact Appraisal by noting those qualities, but this document concludes that the proposed scheme will have unavoidable adverse effects on that environment. This could not be considered a positive response to local character, and so the application is not compliant with Neighbourhood Plan policy BNDP.EH.1.

Policy BNDP.D.1 – Design Criteria states “New development proposals will be expected to be of a design which... (b) demonstrates that the development reflects the existing character of the locality as defined in the Bembridge Design Character Appraisal document...” In this case, the applicant has argued repeatedly in their Landscape and Visual Impact Appraisal that “highly intrusive holiday parks” have harmed the character of the locality, and so it is claimed that the proposed housing estate of 130 units on a greenfield site could not harm it any further. However, holiday parks tend to be medium-term, low-rise developments with minimal hard surfacing. The proposed development would be permanent, prominent and would feature extensive hard surfaced areas, including new roads and 343 new vehicle parking spaces, according to the planning application form submitted.

Within the newly submitted information, the applicant has not addressed the impact of the proposal on the character of Bembridge. With this in mind, the Parish Council is of the opinion that the application does not accord with either local plan policy SP1 or Bembridge neighbourhood plan policies BNDP.EH.1 and BNDP.D.1.

### **Over-development of the site**

The Parish Council recognises the application site is allocated within the SHLAA and the emerging local plan. In the SHLAA 2018, the site is listed as being suitable for 80-100 units. The current scheme squeezes in 130 units, a significant proportion of 30% to 62.5% over-development, which would not be in keeping with the density of built form in the surrounding area.

The key on the plans called ‘Storey heights and active frontage plan’ sheets 1 and 2, uploaded on the 22<sup>nd</sup> April 2024, is unclear, as the two shades of green that the applicant has chosen for single storey and three storey dwellings are very similar. We request that this colour key is amended for clarity. The three storey buildings appear to be proposed at key junctions throughout the site, including either side of the entrance road into the site. Bembridge Parish Council notes and supports the comments of Historic England, which raised concerns about the proposed two-and-a-half and three storey buildings being scattered to the western end of the site, nearest to the windmill and other listed buildings. Historic England noted that new buildings at this end of the site are most likely to have the greatest impact on the individual and group settings of these listed buildings.

Over-development is demonstrated in the layout of the proposed housing estate, with the landscaping pushed to the margins of the site, resulting in a scheme that is heavily urbanised. This is especially highlighted with the properties proposed to the east of the site, which would have a significant amount of hardstanding, and very little landscaping. These properties appear incongruous compared to the rest of the site, and the village of Bembridge, when viewed as a whole on the plans. In addition to the amount of hardstanding, which is heavily urbanising, these properties would be even more cramped than the other proposed units on the site. As the scheme is objectively and quantitatively over-development, compared to the SHLAA standard, it does not accord with Island Plan policy DM2 Design Quality for New Development or Neighbourhood Plan policy BNDP.D.1 – Design Criteria.



*Image 1: Showing the hardstanding proposed on the site, which would have an urbanising impact*

### **Housing in the shade of trees/landscaping plan**

Bembridge Parish Council is concerned that a number of the proposed houses would be shaded by trees, which might result in later pressure to remove these trees, especially in areas on the site where the proposed housing is the most dense, with the smallest gardens. Units 96, 97 and 98 in particular would have significant overshading, which would result in a less than ideal living environment for potential occupants.

### **Inappropriate Housing mix**

In the letter of objection that we wrote on behalf of the Parish Council in January regarding this scheme, we raised concerns about the housing mix, which do not appear to have been addressed in the revised plans. Table 75 in the Isle of Wight Council's Local Housing Needs Assessment (May 2022) detailed the required housing needs mix for market housing as:

- 5% 1 bedroom
- 35% 2 bedroom
- 40% 3 bedroom
- 20% 4 bedroom

and for affordable home ownership as:

- 20% 1 bedroom
- 40% 2 bedroom
- 30% 3 bedroom
- 10% 4 bedroom

The applicant has not adequately explained why it proposes that 33% of the units on the site would have four to five bedrooms, greatly in excess of the housing mix proportion specified by the local planning authority for large and therefore less affordable dwellings. This means that the scheme does not meet the identified housing need in the area, and does not accord with Island Plan policy DM3 Balanced Mix of Housing, or Neighbourhood Plan policy BNDP.H.1 – New Housing Development.

### **Adverse impact on the Grade I listed building**

Bembridge Parish Council notes and supports the comments from Rosie Lansley, the Isle of Wight Council Archaeological Officer. The Parish Council also notes and supports the comments from Historic England, including that “The application site is c.100m from all three designated heritage assets identified above and therefore within their settings. The proposed development would harm the significance of Bembridge Windmill and the nearby heritage assets by eroding the open, rural character of its immediate setting from which it derives an important aspect of its significance.”

The revised application does not accord with the NPPF paragraph 206 “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of... b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”

In addition, the application does not accord with Island Plan policies DM2 or DM11, especially as the scheme does not “positively conserve and enhance the special character of the Island's historic and built environment.” (DM11)

### **Drainage and flooding**

Bembridge Parish Council notes and supports the comments from Island Roads in relation to concerns that it raised about the drainage proposed on the site, especially its comment uploaded on 7<sup>th</sup> May 2024 that “this office is concerned about the robustness of the drainage strategy and calculations whereby under certain storm events private surface water... discharges onto the public highway causing a highway safety concern and possible flooding issues along Steyne Road.”

This comment by Island Roads continues “The Technical Note states that it is anticipated that Scott White and Hookins will provide a separate report on the site wide drainage matters. This Office is not aware of a Drainage Report being issued.”

The scheme as submitted shows a significant amount of hardstanding, with very little soft landscaping, and there are queries raised about whether the proposed pond and tanks on the site could take the overflow of water during or after extreme weather events. The Parish Council is very concerned that the proposed drainage scheme could result in more water on the highway network, and greater flooding for the properties of nearby residents. Bembridge is already vulnerable to flooding, as we saw in the summer of 2021, events which required the Section 19 Flood Investigation published by the Isle of Wight Council in May 2022.

The report of this investigation concluded on page 55: “...a severe rainfall event caused surface water runoff above the design capacity of the highway drainage and sewer networks... The steep topography of Bembridge, along with a lack of a formal highway drainage system in several areas of Bembridge, resulted in surface water flowing along preferential pathways such as Steyne Road, High Street, Hillway Road and Kings Road... the adopted wastewater network in Bembridge is a combined system and therefore susceptible to foul flooding in a surface water rainfall event... information provided directly by Southern Water, indicates that hydraulic overloading of the sewer system happened during this event.”

The Parish Council also notes the comment from Southern Water dated 2<sup>nd</sup> January 2024 which modelled an additional 104 units of housing, concluding that “these additional flows may lead to an increased risk of foul flooding from the sewer network.” As the current proposal is for 130 units, the application represents a clear risk to the aquatic ecosystem even if designed to connect to a suitable sewage treatment plant. Sewage which overflows from the mains cannot be treated if it never reaches that plant. This known risk of sewage pollution highlighted by Southern Water means a scheme proposing 130 additional dwellings and hundreds of new residents living on the site cannot be considered ‘nitrate neutral’.

Bembridge Parish Council believes the revised scheme does not comply with Island Plan policies DM2 and SP5, as the drainage scheme proposed does not appear sufficient for the impacts created by a large housing estate of new residential units and associated hard surfacing. Island Plan policy SP5 states that “The Council will support proposals that protect, conserve and/or enhance the Island’s natural and historic environments. All development proposals will be expected to take account of the environmental capacity of an area to accommodate new development”

### **Conclusion**

Bembridge Parish Council requests that planning permission is refused for the scheme 23/01920/FUL. If this greenfield site must be developed, it should feature affordable housing of a design and at a density which is compatible with the existing built form of the village. It should also reduce the risk of flooding for the village, and ensure that the development does not introduce additional load to the inadequate combined sewer system.

If however the Isle of Wight Council is minded to grant planning permission for this 130 house scheme, the Parish Council requests that financial contributions are made by the developer towards village infrastructure, including improvements to the open space of Steyne Park, and to the safety of walking & cycling routes in the area.

Best wishes,

*Martha James*

**Martha James MRTPI  
Principal Consultant  
Chartered Town Planner**

