

# PLAN RESEARCH

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1<sup>st</sup> February 2024

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

Our ref: BPC-1.2

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, Land North Of Steyne Road And Land Served Off Mill Road And High Street, Bembridge**

Plan Research has been engaged to write a letter of objection to the above scheme on behalf of Bembridge Parish Council. The 197 objections (at the time of writing) already submitted to the Council's website by local residents and groups demonstrate the strength of feeling about this planning application within the community. The Parish Council strongly opposes this application for the following reasons:

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

The application site is currently greenfield land, and so the developer is required to demonstrate how the scheme would enhance the character of the area in order to comply with Island Plan strategic policy SP1. The evidence provided by the developer includes a Landscape and Visual Impact Appraisal, which 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 significance of effect on close views from the southwest, adjacent to Bembridge Windmill (RG3 / VP9) are expected to be moderate adverse at completion. The Proposed Development is expected to rise above the surrounding hedgerow cover and be visible between trees.”

The applicant has 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 the windmill and from public bridleway BB36.

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.

The images provided in the visualisation booklet submitted by the applicant resemble Poundbury in Dorchester, rather than Bembridge, with their depictions of wide avenues, a central square and mock-Georgian three storey townhouses, far taller than most of the existing housing in the village. The proposed housing estate does not reflect the existing character of the locality and therefore does not comply with Neighbourhood Plan policy 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.

This 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.

In addition, the Parish Council raises concerns about the proposed three-storey units, which would be more suitable in a large town than a village like Bembridge. As this is a full rather than outline application, the proposed density and unit design is not for later negotiation, and could be final if granted permission.

Therefore 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.

### **Inappropriate housing mix**

Table 75 in the Isle of Wight Council's Local Housing Needs Assessment (May 2022) detailed the Island's 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 they propose that 33% of the units on the site would have 4-5 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 Bembridge Windmill and its setting**

The Parish Council notes and fully supports the comment from the National Trust of the 11<sup>th</sup> January 2024. The National Trust raised concerns that the proposed housing would adversely impact the setting of the windmill and encroach on the open landscape, a key feature of this designated heritage asset with the highest grade of national protection for listed buildings.

The National Trust has stated that the proposed housing scheme does not accord with policy DM11 of the Island Plan, or paragraph 206 of the NPPF, and the Parish Council agrees.

### **Adverse impacts on the highway**

Recent changes to the NPPF in paragraph 114 c) (December 2023 edition) add new weight to the National Design Guide: Planning practice guidance for beautiful, enduring and successful places (January 2021).

Paragraph 80 of this Guide states: "A clear layout and hierarchy of streets and other routes helps people to find their way around so that journeys are easy to make. Wider, more generous spaces are well-suited to busier streets, including streets served by public transport. They have enough space to create an attractive place for all users. Narrower streets are more suitable where there is limited vehicle movement and speeds are low. Mews, courtyards and culs-de-sac will generally only be appropriate at the most local level where there is little vehicular movement."

The 'Middleton' housing development proposes a series of culs-de-sac, which would create a scheme not in accordance with the National Design Guide. This guide states in paragraph 82 and 83 on Active Travel that: "Priority is given to pedestrian and cycle movements, subject to location and the potential to create connections. Prioritising pedestrians and cyclists mean creating routes that are safe, direct, convenient and accessible for people of all abilities." The National Design Guide also confirms in paragraph 82 that public rights of way should be "protected, enhanced and well-linked into the wider network of pedestrian and cycle routes."

Paragraph 83 of the Guide states that "In well-designed places, people should not need to rely on the car for everyday journeys, including getting to workplaces, shops, schools and other facilities, open spaces or the natural environment. Safe and direct routes with visible destinations or clear signposting encourage people to walk and cycle."

The current highway network at the proposed location for the new housing estate has no street lights or pavements, and would not provide a safe route for pedestrians. In addition, Island Roads has confirmed that the uncontrolled crossing at Steyne Road is not in compliance with the Crossing Design Requirements of Chapter 6 of the Traffic Signs Manual.

As Island Roads has stated that the information provided by the applicant in relation to trip rates and distribution are insufficient, the scheme does not comply with Island Plan policy DM2, Design Quality for New Development. Island Roads has also raised concerns about the visibility splays proposed on Steyne Road. We note the information about a serious accident in this area. The added pressure created by a non-conforming entrance and egress into a major housing site would increase highway risk.

The Parish Council notes the proposed scheme does not comply with Island Plan policies SP7 Travel, DM2 Design Quality for New Development, or DM17 Sustainable Travel.

### **Drainage is inadequate to mitigate flooding and pollution risk**

The Parish Council notes and fully supports the concerns that Island Roads has raised about the robustness of the proposed drainage strategy. The Parish Council has no records of ditches around the site, other than the one near "Osney Cottage" detailed by Island Roads.

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.

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 risk to the aquatic ecosystem even if designed to connect to a suitable sewage treatment plant. Sewage which overflows cannot be treated if it never reaches that plant.

Bembridge Parish Council believes the scheme does not comply with Island Plan policy DM2 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"

### **Responses from other consultees**

The comment by Natural England dated 18<sup>th</sup> December 2023 highlights that the development of 130 additional houses in this coastal location could have a likely significant effect on the Solent SPA, in terms of both nutrient pollution and recreational disturbance to bird life. While mitigation payments can be made by the developer, the effect of hundreds of new residents on the local ecosystem does not simply disappear because of these payments.

The comment by the Council's Rights of Way officer dated 21<sup>st</sup> December 2023 regarding potentially "significant wear and tear" to Public Bridleway BB36 and Public Footpaths BB21 and BB22 if this scheme is approved and implemented is noted and supported by the Parish Council. The objection made by the Ramblers Association on the 5<sup>th</sup> January 2024 is also noted and supported by the Parish Council.

### **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.

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 MRTPI**  
**Principal Consultant**  
**Chartered Town Planner**

