

Brading Neighbourhood Plan.

In accordance with the procedure document I advise for your perusal my comments in regard to the Brading Neighbourhood plan as issued for consultation.

2.11 Emphasis has been placed upon the town of Brading with small regard to the surrounding countryside. A considerable number of walkers, cyclist and general countryside lovers of wildlife visit the area around Brading. In turn they bring tourist revenue into the town. The plan should provide encouragement for development which allows more people to visit and stay within the area. Future employment will be based upon the tourist industry being strong.

4.1 The statement of meeting National Planning Policy and Guidance is not met by the details as referenced in 9.5. The ability to provide residential and business use of existing farm buildings has already been addressed and permitted by Government Planning Rules. It should be accepted within the plan that the ability to reuse existing farm buildings, into non agricultural use, can provide additional employment and revenue into the area.

4.2 The plan should detail, in specific terms, as to where the 35 identified dwellings are proposed to be build. To generalise in such a manner is not democratic as the public need to understand the reasons for the inclusion. The housing survey did not identify such a number, in fact only 21 persons provided notice of any housing need. Furthermore 48% of residents indicated a need for affordable housing, at the starting point of the housing ladder. If there is a real need for 35 dwellings then they should meet the needs of the survey and therefore be low priced affordable dwellings. We need to ensure that the younger members of the Parish do not have to move to other areas of the island, or in fact have to move off the island, in order to obtain affordable housing.

8.9 Has a proposal for a major development been identified, if so why has it not been listed.

12.5 Very little detail has been given to the aspects of Flood Risk within the area. This is going to be an ongoing problem, increasing in intensity each year and requires major consideration and emphasis upon reducing the risk factors. Combined with the flood risk factors of rainwater coming down from the hills consideration must be given to the possible effects of rising sea levels which will either overload the 4 control gates at Bembridge station 1080 or prevent them being opened for sufficient time frames thus preventing rainwater to flow out to sea thereby creating further flooding of the flood plain. The resulting effect of river flooding of the land above Brading Parish will have a direct consequence upon the properties of Brading Town.

The risk of continued flooding is perhaps the greatest threat to the well-being of Brading in regard to the damage to business and properties that can be generated. The causes and means of control have not been addressed.

K J Elderfield

6<sup>th</sup> October 2014.

# Comments on the Draft Neighbourhood Development Plan for Brading

by Fanny Oglander, October 2014

## 2 Introduction

**Comments on 2.1:** Typo: 13 years, in paragraph 2.1, becomes 15 years in paragraph 2.11

- Brading is the name of a Rural Service Centre (as defined in the Island Plan) and also of a parish for which the Town Council is responsible. The Neighbourhood Plan relates to the whole parish of Brading, yet the 1<sup>st</sup> sentence focuses on the historic town. The 2<sup>nd</sup> sentence attempts to broaden out the scope of the document but the problem is that it is impossible to describe the whole geography of Brading in one sentence. I suggest as a simple replacement:

Brading Neighbourhood Development Plan reflects the views of local people on protecting, conserving and wherever possible enhancing the heritage and natural environment of both the historic town and the wider parish of Brading.

- **4<sup>th</sup>/5<sup>th</sup> sentences:** “The Plan” is the subject of both the 3<sup>rd</sup> and the 4<sup>th</sup> sentences; also the text of the 5<sup>th</sup> sentence runs into trouble because Brading Town Council is singular. I suggest replacing the 4<sup>th</sup> and 5<sup>th</sup> sentences with:

“It was initiated and will be monitored by Brading Town Council whose application for designation of a neighbourhood area was approved on May 29th 2012.”

- **6<sup>th</sup> sentence up to the end of the paragraph:** I suggest deleting this text because it is repeated in Chapter 4 the Planning Process, at paragraph 4.4.

**Comment on 2.6:** ‘Results’ is plural, so the corresponding verb should be ‘were’ not ‘was’

**Comment on 2.11:** This seems to be a repetition of what has been said already at 2.1. There is a possible confusion over the meaning of the phrase “surrounding areas of natural beauty”. Does that mean the designated AONB? Does it mean the wider parish, whether it is naturally beautiful or not?

## 4 The Planning Process

**Comment on 4.1:** Typo: ‘bought’ should be ‘brought’

**Comment on 4.2, item 4, Community referendum:** This information was given in the Introduction, paragraph 2.1. It does need to be in this chapter but did it need to be in the Introduction?

**5 A Vision for Brading :** Typo: Residents’ Survey, not Resident’s Survey.

## 6 Objectives of the Plan

**Comment on 6.1, 3rd sentence:** I think that “equating to a response rate of 25.4%” should be deleted. The Residents’ Survey was aimed at all residents over 14 years old. Multiple copies of the survey were offered to each household. Based on the size of the sample frame, the rate of return would have been considerably less than the rate quoted. A simple statement of the number of completed returns received would avoid uncertainty and would not devalue the survey results.

**Comment on 6.3:** The objectives are good. The final one could be expressed as:

“To ensure that new development does not increase flood risk.”

**Comment on 6.4, final sentence:** I suggest:

“They are not intended to be read in isolation and should be considered collectively. Developers need to consider the appropriateness of combining policies and to demonstrate how these policies will be addressed.”

## 7 Local Character and History

**Comment on 7.1:** The north western area is not around Brading Marshes.

**Comment on 7.2:** There are no villages surrounding Brading Town. I suggest replacing: “surrounding villages and hamlets” with “surrounding rural hinterland”

- Has the Neighbourhood Development Plan’s Equality Impact Assessment got anything to do with Brading being a Rural Service Centre? Could this information go in Chapter 4?

**Comment on 7.4:**

- 4<sup>th</sup> sentence: “Brading was an important medieval parish and medieval remains of hamlets, the manor house and the town of Brading itself can still be seen.”

What medieval remains of hamlets are meant here? What is meant by “the manor house”?

Medieval Brading town had its own borough court, it was therefore independent of any manor court although it may well have originally been part of the Royal Manor of Whitefield, hence its name “The Kyngs Town”.

- 5<sup>th</sup> sentence: “The 17<sup>th</sup> Century Nunwell House also includes its 17<sup>th</sup> Century parkland and gardens.”

Nunwell House has 16<sup>th</sup> century origins; the parkland and gardens are not 17<sup>th</sup> century.

Maybe the text of Chapter 7 would be simpler if the 4<sup>th</sup>, 5<sup>th</sup>, and 6<sup>th</sup> sentences were deleted. Detailed history is well documented in the Heritage Audit.

**Comment on 7.6:** I suggest replacing the words: “that comprise” with “at the heart of”.

**Comment on 7.13:** I suggest caution in the use of the term “central core” because the Historic Landscape Characterisation Report Data defines the Historic Core (area 2602) as the medieval settlement; here, I think, the writer is referring to the whole of the present-day town.

## 8 Housing

**Comment on 8.1:** It is misleading to summarise the proportion of privately rented/shared ownership houses as less than the supply of housing association houses. Paragraph 3.3.3 of the Housing Needs Survey Report states:

“The Office for National statistics (ONS) confirms that home ownership statistics show that 52% of homes are owned outright, 26% are owned through mortgage/loan, 8% are social rented housing, 11% are private rented (landlord) and the remaining 3% either private rented (employer) or living rent free.”

Thus census data clearly records that the private rented sector is larger than the social rented sector. In the Housing Needs Survey Report this mistake is repeated in Chapter 4 which summarises the contextual data as:

“A predominance of owner occupied properties

A smaller supply of housing association rented houses

A very small proportion of privately rented/shared ownership housing”

**Comment on 8.3**

There is confusion about which results from which survey are meant. I suggest rewriting the first three sentences as:

“Both a Housing Needs Survey, undertaken in 2006, and the 2013 Housing Needs Survey Report, showed that the average house price effectively excludes many local people on low incomes in need of housing. Both reports also showed that there was a high proportion of older families and a significantly lower proportion of younger families with children. Data based on 2011 census information evidenced that there were no overcrowding issues, but there was evidence of under occupancy, particularly from elderly residents.”

**Comment on 8.4**

- **1<sup>st</sup> sentence:** There is a discrepancy with The 2013 Housing Needs Survey Report. It states, at chapter 6 Summary of Future Housing Need: “The Housing Needs Survey tells us that there is a need for smaller homes of one to two bedroom accommodations”
- **3<sup>rd</sup> sentence:** I suggest alter “implied” to “explicit”.

- The Plan for Brading is right to consider the demographic trend towards an aging population but is there any evidence as to what extent the housing needs can be met by the market for existing housing? A more precise understanding of factors that may lead to an unmet need for downsizing would be a valuable tool for managing this aspect of development. I wonder if that is possible? Otherwise this specialised development can only follow a hit or miss approach.
- A policy requiring all homes be built to Lifetime Homes Standards would be helpful.

**Comments on 8.4 and 8.5:** The percentages from the 2013 Residents' Survey need to be qualified with the actual numbers of responses.

**Comment on 8.6:** The total of 35 homes seems to be based on the fact that in the Residents' Survey a total of 13 people said that they were currently seeking alternative accommodation which they had been unable to obtain (with only 1 of those respondents registered with a housing association) and 22 people indicated an alternative housing need in the next five years. If this total of 35 people who want to move home is to be used to justify building 35 new homes, then there is no recognition at all of the market for existing housing. I find this absurd.

**Comment on 8.7:** This paragraph is well drafted. It is perhaps right to consider the possibility of a proposal for major development but policies **HD2a)** and **HD2d)** stipulate only minor development.

**Comment on 8.9:** I think the writer may mean to say:

"Where a proposal is for major residential development located outside, and not immediately adjacent to, the settlement boundary, the applicant will need to demonstrate that there are no previously developed sites available within or immediately adjacent to the Rural Service Centre settlement boundary of Brading"

Is this not a strategic policy of the Island Plan?

**Comment on Policy HD2b):** The Island Plan does not ask for specific housing types and tenure for minor development. The 2013 Housing Needs Survey Report asks for mixed type and tenure. How will the mix be managed?

**Comment on Policy HD2c)** What is meant by :

"give consideration to the scale of future developments"?

**Comment on Policy HD2e):** The phrase needs to read:

[Proposals should] "demonstrate they are meeting a proven local need"

**Comment on Policy HD2f):** This policy would read better as:

"demonstrate that there are no previously developed sites available within or immediately adjacent to the Rural Service Centre settlement boundary of Brading."

- Do policies HD2c), e), f) or the policy for agricultural workers' dwellings duplicate the Island Plan?

**Comment on Policy HD3:** Does this duplicate the Island Plan?

## 9 Heritage

**Comment on 9.1:** I suggest deleting the 3<sup>rd</sup> sentence because the quoted definition of a Heritage Asset is sufficient for the purpose of defining Heritage Assets in Brading.

**Comment on 9.2:**

- The categorisation of Heritage Assets according to the physical nature of the remains is quoted from the analysis made in the Heritage Audit (Supporting Document 4, page 5). To the head of that list has been added:

"**Historic Landscapes** are areas which have been designated for their survival of individual elements and include the Grade II Registered Park and Garden at Nunwell and the Brading Conservation Area."

The statement has been put in quotation marks and there is no indication where the quote comes from, but the main problem, in my view, is that it limits 'historic landscapes' to designated areas whereas the Historic Landscape Categorisation (HLC) includes, but is not limited to, the designated areas.

- The category of Earthworks is said to include Bronze Age burial mounds on Brading and Nunwell Downs. There are no burial mounds on Brading Down; there is a visible mound on Nunwell Down and a large Bronze Age cemetery on Middle West Down.

**Comment on 9.3** It is rather odd to read that Brading Station has similar significance to Neolithic settlement. This paragraph must be referring to the HLC. I note that although Figure 10 of the Heritage Audit records area 2795 at the location of Brading Station, area 2795 does not feature in the Report Data ( Appendix 2 to the Heritage Audit). Is this an omission?

**Comment on 9.4: Typo 2<sup>nd</sup> line:** ‘building’ should be changed to ‘buildings’.

**Comments on 9.4 and 9.5:** The more I re-read 9.4 and 9.5 the more confusion I find.

There are two seemingly straightforward statements:

1. “Brading is unusual in that the pattern of historic settlement has been altered little by recent growth”, and
2. “The medieval origins of Brading town are understood and can still be seen today.”

So what should we conclude from the subsequent statement that:

“It is a characteristic of Medieval Island towns to sit firmly within a rural landscape and this difference between medieval urban and rural landscapes is an important characteristic which gives Brading its distinctive historic character.”?

Does that mean that any development that extends the built envelope into adjacent rural land will erode Brading’s distinctive historic character? Or is that concern not relevant because we read in paragraph 9.5 that “20th century residential development has surrounded the medieval townscape at Brading”?

In paragraph 9.5 there are the following two sentences:

1. “Future development should recognise and respect the surviving elements of the medieval town plan as well as the historic built environment”
2. “Future development proposals must therefore consider the impact on the surrounding area and setting of Heritage Assets to ensure that new development does not compromise historic landscape character of both rural and urban areas of Brading parish.”

Why are these two sentences linked with the word ‘therefore’?

At the end of the paragraph, the listed changes that might be harmful to the historic interest and character of Brading do not feature in policy HE1. Do they have relevance to the policy?

**Comment on 9.10:** The Conservation Area appraisal is to be found on the referenced website in a file called Appendix 7. This appears in a drop down menu from the tab: Heritage Documents which is a folder under the tab: Supporting Documents.

**Comment on Policy HE1:** I suggest for the 1<sup>st</sup> sentence:

“Development proposals in Brading Parish should respect, conserve and wherever possible enhance the historic environment, comprising the Heritage Assets, both designated and undesignated, and their settings.”

**Comment on Policy HE1b):** This would be better written as:

“how they contribute to individual character, local distinctiveness and sense of place.”

- Should the Neighbourhood Plan offer guidance for defining these attributes in Brading?

**Comment on Policy HE1c):** How are historic field patterns defined?

**Comment on Policy HE1d):** How are traditional/appropriate agricultural practices defined?

**Comment on Policy HE1e):** Are the waterlogged deposits mapped?

**Comment on Policy HE1f):** From this group what is meant by gardens?

**Comment on Policy HE1g):** Is this not a duplication of existing policy?

- A policy that I would like to see is one that protects the rural setting of St Mary’s churchyard.

**Comment on Policy HE2 :**

- The setting of the Roman Villa should be included amongst the important views.

- Supporting Document 15 gives the Brading Neighbourhood Plan Policies map, but the views mentioned and the justification for their importance are to be found in Supporting Document 14 Local Green Spaces and Important Views.

This chapter on Heritage deserves more precision of meaning. It needs to be a useful tool for examining the effect of development proposals on elements of the historic environment that the community particularly value in Brading. The Heritage Audit for this Plan says, on page 4:

“Brading Town Council can use this Heritage Audit to build a sense of identity and distinctiveness by identifying heritage buildings, sites, spaces and places that matter to them, and ensuring that that these values are taken into account when compiling the Brading Neighbourhood Plan.”

I think that the Neighbourhood Plan should pay more attention to this advice. We should do a better job of identifying sites, spaces and places that matter to us.

## 10 Jobs and Economy

**Comment on 10.1:** I suggest for the opening sentence:

“As home to one of the Island’s oldest towns, Brading parish is proud of its rich historical and natural environment with much to offer visitors throughout the year”

**Comment on 10.5:** I suggest this paragraph be altered to read:

“Another important tourist attraction in Brading Parish is Nunwell House which sits within its Grade II Registered Park and Gardens. It has been a family home since 1522 and its charm lies in the blend of many styles from across the subsequent centuries as well as in its beautiful setting”

**Comment on JE1 e)** I suggest: “demonstrate they are meeting a proven local need or creating a positive impact by creating jobs”

**Comment on JE1 f)** I suggest: “that there are no suitable previously developed sites available within or immediately adjacent to the Rural Service Centre settlement boundary of Brading”

**Comment on JE1 g)** I suggest: “demonstrate how they would support the economy of the parish.”

## 11 Protecting Our Environment

**Comment on 11.2:** The parkland around Nunwell is not “former”, it is still actively maintained.

**Comments on 11.7:** Typo: “There is a number of sites” should be “There are a number of sites”.

- I suggest that the map link should be to Supporting Document 15 The Brading Neighbourhood Plan Policies Map.

**Comment on 11.8 and 11.9:** The identification of areas defined as strategic gaps is to be found on Supporting Document 15.

**Comment on Policy E1:** Policy on the Natural environment could be combined with policy on the Historic environment. The views would then all be considered in one place.

## 12 Creating a Sustainable Community

This chapter sets out many of the major issues that Brading has to deal with. I think that a realistic Vision for this plan should recognise that, in the future, traffic flow on the A3055 will only get heavier (unless the Isle of Wight Council was to put a weight and size limit on Island traffic). The jobs and economy policies could usefully be considered with this Chapter as they have issues in common. How can the economy of the Isle of Wight grow without drowning Brading in traffic? The answer may lie in the railway line. A big effort to promote railway, cycle and pedestrian based tourism should be our goal in Brading. The RSPB could also do more to interpret the bird-life. We should tap into the resources of our landscape. Do the policies in this chapter or in the Jobs and Economy chapter take us in the right direction?

We must also recognise that a growing proportion of Isle of Wight visitors travel on long wheel- base coaches. These coaches certainly have difficulty negotiating Brading’s High Street but they find it virtually impossible to reach the Roman Villa. Accessibility to modern coaches is undeniably a need if the Roman Villa is to remain sustainable in its touristic and educational function. Should the Neighbourhood Plan address the need of the Roman Villa Trustees for enabling development to fund a new access road?

**Comment on 12.8:** Typo: Remove apostrophe from Resident’s

**Comment on 12.17:** For the 2<sup>nd</sup> sentence I suggest:

“Proposals should demonstrate an appropriate level of well designed off-street parking.”

## **Comments on Supporting Documents**

### **Supporting Document 1: Implementation Plan**

**Comment on 1.5:** I think that it is unnecessary to specify that the Chair and one other member of the steering group should serve on the Planning Committee. The Steering Group should be disbanded when the Brading Plan has been made. Responsibility for implementation of the Plan lies with Brading Town Council.

### **Supporting Document 2: Heritage Design Statement Information for developers**

#### **Comment:**

Tables 1 and 2 are summaries of the Conservation Area Statements for Brading Town Centre Character Area and for the Mall Character Area that were produced in 2006 by the Planning department. Why duplicate the 2006 documents? They are already part of Planning policy.

This document sets out seven additional considerations affecting Heritage Assets generally.

- I question whether No. 3 relates to development policy:  
“The Brading Haven Reclamation earthworks require conservation and management and the archaeological evidence of reclamation requires further study”
- I question whether No 6 relates to development policy:  
“All conservation management plans for historic parks and gardens and historic landscapes and structures should address climate change issues”

### **Supporting Document 3: Historic Environment and Climate Change**

**Comment:** This document states at the end:

“Guidance to reduce the impact of future climate change mitigation is included in Brading Historic Environment policies.”

The word ‘mitigation’ needs to be deleted and the word “reduce” could be replaced by “mitigate”

### **Supporting Document 4: Heritage Audit**

**On page 8:** There is a strange table at Figure 5 setting out the numbers of Brading Parish’s Heritage Assets with a legally designated status. The resulting numbers look confusing to me.

- Although there are 21 HER records associated with Scheduled Monuments, I count the total number of Scheduled Monuments as 10. Some sites are grouped in the registration.
- The table says there are 12 Listed Buildings (I, II +II\*), but I count 37 from the HER data table. Surely 12 is too few?
- There is only 1 Registered Park and Garden in Brading; the HER has a total of 5 entries associated with it.
- There is 1 Conservation Area. Surely everything within it is part of the legal designation?

**On page 12, 1<sup>st</sup> paragraph:** The former wax museum is described as dating from around 1600 but English Heritage has it listed as early 16<sup>th</sup> century.

**Also on page 12, 6<sup>th</sup> paragraph:** There is text missing from the following sentence, marked by \*:

“The continued use of Medieval farming settlement areas in the 18<sup>th</sup> Century may indicate that the historic \* suggested that the King’s 1285 grants of a weekly market and a four day fair to Brading town show either the foundation of the planned town or the start of the growth of the possible 7th Century town because of the King’s use of manor of Whitefield.”

**On page 13, 1<sup>st</sup> paragraph:** There is text missing from the following sentence, marked by \*:

“The fact that there were attempts to reclaim the majority of the harbour in the early seventeenth century probably indicates that the quay end of Wall Lane was no longer of economic \* landscape patterns in Brading Parish may have changed little in the Medieval period.”

**On page 18:** HLC areas 2793, 2794 and 2795 feature on Figure 10: The Historic Landscape Characterisation of Brading Parish, but they do not appear in the Data for HLC areas at Appendix 2.

**On page 33, last paragraph:** There is text missing from the following sentence, marked by \*:

“There is also much potential for using the historic evidence \* if education packs for local schools, so future community project\* should also produce educational material, such as the detailed analysis of who lived in which buildings and what the landscape looked like in the 1840’s and earlier”

**On page 35, 3<sup>rd</sup> paragraph:** The parish boundary runs to the east of East Ashey Manor therefore any settlement to the west of East Ashey Manor will not be in the parish of Brading.

**On page 37, 4<sup>th</sup> paragraph:** Nunwell House is not usually referred to as a manor house. The original Domesday manor of Nunwell was sited to the west and came to be called West Nunwell. In 1522 the Oliver Ogländer bought a small property called East Nunwell; his descendants made their home there whilst retaining the land comprised in the medieval manor of Nunwell.

#### **General Comments on the Heritage Audit:**

- The 7 Appendices to the Heritage Audit are on the Brading Town Council website under the Heritage tab: <http://www.bradingtown.co.uk/brading-neighbourhood-plan/>
- It should be explained to the reader that Wall Lane is a former name for Quay Lane.

### **Supporting Document 5: Heritage Asset Renovation Report**

**Page 1:** The Tudor House is 16<sup>th</sup> century.

**Top of page 3:** The Lodges at Nunwell Park are late 19<sup>th</sup> century

### **Supporting Document 7: Consultation Statement**

**Comment on 3.1.2:** Local landowners attended the two advertised meetings but expressions of interest were invited only for land within or immediately adjacent to the development boundary. Contributions of other landowners in Brading parish seem therefore to have been irrelevant to the Consultation. The potential for land in the wider parish to be used for tourism has not been examined in the plan.

There has been no consultation at all on the enabling development proposals of the Trustees of the Roman Villa. In May 2013, at the time of the Residents’ Survey, the proposed development site near the Villa was known to be a developable SHLAA site and some respondents cited it in answer to the question “Are there any locations where houses should not be built?”, but it was in September 2013 that the development need of the Trustees was brought to the attention of the public at a Town Council meeting. The minutes note:

“The Mayor stated that there was no benefit in discussing this issue until a planning application had been received.”

That is the position that underlies the complete absence from the Neighbourhood Plan of any mention of the Villa's enabling development needs. Enabling development involves the balancing of the benefits versus the disbenefits of departing from normal Planning policy. If this is the only way forward for securing the future of the Roman Villa as a thriving touristic and educational asset, then should the issues be examined in the Neighbourhood Plan?

**Supporting Document 9: Sustainability Appraisal:** Typo: the letters np have become NDP.

**Comment on Heritage at Risk, page 20:** The medieval settlement 100 metres South East and 350 metres North East of East Ashley Manor Farm lies wholly within the parish of Havenstreet and Ashley. The parish boundary is defined by Monkton Mead Brook, shown as a blue line on the following website that gives the ancient monuments record:

<http://www.ancientmonuments.info/en22066-medieval-settlement-100m-south-east-and-35>

**Supporting Document 13: Housing Needs Survey Report:** Should a certain standard of data gathering and analysis be expected of a report that sets out to provide evidence-based interpretation of housing need?

#### **Supporting Document 14: Local Green Spaces and Important Views**

The important views of Brading should not be limited to the Conservation Area.

My suggestions for important views are:

The setting of St Mary's Churchyard.

The setting of the Roman Villa;

The setting of the Nunwell Parkland;

Paragraph 11.11 states:

"It should be emphasised that this area is particularly beautiful and large parcels of land are earmarked by the AONB. It is therefore, particularly important to preserve the views of Brading from the surrounding downland to the west, particularly Nunwell Down, and the marshes and downland from the east."

I wonder if these views risk getting overlooked as they are not noted here?

- The 3<sup>rd</sup> photograph, illustrating the range of building styles in the High Street, reveals what I think is a dilemma for decision making about the Conservation Area. Where there is such a hotchpotch, what should be the guidelines for managing change? Perhaps the Neighbourhood Plan should take the opportunity of consulting the community on the subject of the Conservation Area. What should be conserved and what could be changed?
- The text for the 6<sup>th</sup> photograph says: "New Road which was built to take heavy traffic away from The Mall" but New Road was new in 1862 when road traffic was still horse-drawn.
- Arrow 15 on the map is supposed to indicate the view shown in the last photograph but the arrow is in the wrong place. It starts at Bulley's Hill instead of at the top of Beechgrove.



## Representation Form for the Brading Neighbourhood Development Plan

Ref:
Ack:
(For internal use only)

Representations should be returned to the Isle of Wight Council by **midday** on **Monday 3 November 2014**.

In the interests of sustainability, we would encourage you to return this form electronically via email to [planning.policy@iow.gov.uk](mailto:planning.policy@iow.gov.uk).

### Part A

<b>Personal Details</b>	<b>Agent's Details (if applicable)</b>
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*If an agent is appointed, please complete only the Title, Name and Organisation boxes below, but complete the full contact details of the Agent in 2.*

Title	<input type="text"/>	<input type="text"/>
Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address and Postcode	<input type="text"/>	<input type="text"/>
Email Address	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>

If you wish to be notified of the Council's decision on whether to accept the Examiner's recommendation and future progress with the plan please tick here.

The Isle of Wight Council will acknowledge receipt of your representation(s) as soon as possible. Representations cannot be kept confidential. All representations received will be made publicly available and be identifiable by name and organisation (where applicable).

Please return completed forms to [planning.policy@iow.gov.uk](mailto:planning.policy@iow.gov.uk) or by post to:

Planning Policy, Isle of Wight Council, Seaclose Offices, Fairlee Road, Newport, Isle of Wight, PO30 2QS





Ref:  
  
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**Part B – please use a separate sheet for each representation**

**1. To which part of the Brading Neighbourhood Development Plan does this representation relate?**

Paragraph / Page Number  Policy Number  Supporting Document

**2. Do you wish to:**

Support  Support with modifications  Oppose  Make general comments

**3. Please give details of your reasons for your support/opposition here, along with any suggested modifications or general comments.**

(Please continue on a separate sheet if necessary)

Our Ref: 01/377



planning  
landscape &  
environmental  
consultants

Mr O Boulter,  
Team Leader, Planning Policy  
Isle of Wight Council  
Seaclose,  
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Isle of Wight  
PO30 2QS

23<sup>rd</sup> October 2014

Dear Mr Boulter,

## **BRADING NEIGHBOURHOOD DEVELOPMENT PLAN 2014 - 2027 SUBMISSION DOCUMENT**

These representations are made in relation to the Brading Neighbourhood Plan Submission document. Enplan made representations to the Pre Submission Plan and I attach these (letter dated 29th August 2014) and the response from Brading Parish Council for your information.

*Please note that a copy of my letter has been omitted from Consultation Statement Evidence O – title: Comments received from Pre-submission Public Consultation.*

We have concerns with Policy JE1 and the supporting text in paragraphs 10.10 onwards. Whilst we support the intentions set out in paragraph 10.10 that proposals for tourism development should focus on improving existing facilities or providing new higher end tourism, it is not clear what 'large scale development' means and the parameters that dictate whether a scheme falls within the large scale category.

Paragraph 10.12 states that if economic development proposals are located outside the settlement boundary then it needs to be demonstrated how the proposal contributes to meeting an identified local need. The glossary to the Neighbourhood Plan sets out what local need means but it is still not clear exactly what types of development will be supported. Do new high end tourism facilities have to comply with this statement? The last sentence of 10.12 is also unclear. Why does a development need to show how it supports the rural economy? Once again, does this apply to high end tourism projects? There is no mention of the rural economy within the Policy.

### **Policy JE1**

This policy seeks to concentrate proposals that create economic growth and jobs within or immediately adjacent to the Rural Service Centre (RSC) of Brading, and such proposals include the provision of tourism related development. For proposals that are located outside and not adjacent to the RSC boundary, Policy JE1 requires that they meet a number of criteria including demonstrating that the scheme meets a proven local need and that there are no alternative suitable development sites within

or adjacent to the RSC. This policy is contrary to the NPPF which supports sustainable development in principle, including in locations outside settlement boundaries. It is also contrary to Policy SP1 (Spatial Strategy) and SP4 (Tourism) of the Island Plan 2012. SP1 clearly states that:

*'Outside of defined settlements, proposals for tourism related development will be supported in accordance with Policy SP4'.*

Paragraph 5.16 of the Island Plan states that 'the Council will particularly support proposals that contribute to and help diversify the rural economy and higher value added tourism is likely to be a main element of this'.

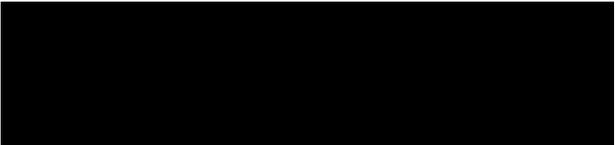
It is important to note that paragraph 184 of the NPPF states that Neighbourhood Plans *'should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan'*.

We consider the Neighbourhood Plan is not in conformity with the strategic priorities of the Island Plan and seeks to use 'identified local need' and 'support for the rural economy' as a means of restricting development. However the Island Plan is clear that tourism related development is to be supported where it maximises the benefits to the Island economy *as a whole*. The Neighbourhood Plan does not make the same strategic distinction between supporting high end, sustainable tourism development across the Island (i.e. outside of the RSC's) and locally sustainable employment opportunities being supported within the RSC and wider rural areas (see Island Plan Policy SP3 Economy).

The Neighbourhood Plan does not comply with the strategic policies of the Island Plan in that it makes no reference to Policy SP4 and the position taken within the Island Plan on Tourism development outside of the RSCs. The Neighbourhood Plan makes confusing references to rural economy and identified need which are not relevant to tourism proposals and are not policy references stated within SP4. We therefore suggest that the Plan is amended to include a separate policy on Tourism.

Please can I be notified of the Council's decision on whether to accept the Examiner's recommendation and future progress with the Plan.

Yours sincerely



Martin A Carpenter MRTPI  
DIRECTOR  
[martin@enplan.net](mailto:martin@enplan.net)

Encs.

Our Ref: 01/377



The Town Clerk  
The Brading Centre  
West Street  
Brading  
Isle of Wight  
PO36 ODR

29<sup>th</sup> August 2014

Dear Ms Chilton,

## **BRADING NEIGHBOURHOOD PLAN PRE-SUBMISSION CONSULTATION DOCUMENT**

These representations are made in relation to the Brading Neighbourhood Plan Pre-Submission Consultation.

### **Policies Map**

The Policies Map of the plan area is not available to view on the Town Council's consultation website. Accordingly, we do not know the location of a number of policy constraints' proposed within the plan area, including Local Strategic Gaps as referred to within Policy JE1. Not being able to view this document means we are unable to comment fully on the neighbourhood plan and would request that a further period of consultation be undertaken to allow us and others to consider these matters.

### **Local Strategic Gaps**

Notwithstanding the above, we note that para 11.8 of the draft plan states that there '*is a presumption against development within the areas identified as strategic gaps as identified on the Policies Map*'. This is contrary to guidance within the National Planning Policy Framework (NPPF) which supports sustainable development in principle other than in areas of national designation/protection. It is also contrary to a number of policies within the Core Strategy, including Policy SP3 and SP4, both of which support economic development including high quality tourism development across the island.

### **Policy JE1**

This policy seeks to concentrate proposals that create economic growth and jobs within or immediately adjacent to the Rural Service Centre (RSC) of Brading, and such proposals include the provision of tourism related development. For proposals that are located outside and not adjacent to the RSC boundary, Policy JE1 requires that they meet a number of criteria including demonstrating that the scheme meets a

proven local need and that there are no alternative suitable development sites within or adjacent to the RSC. This draft policy is contrary to the NPPF which supports sustainable development in principle, including in locations outside settlement boundaries, and policies within the Isle of White Core Strategy 2012.

It is important to note that paragraph 184 of the NPPF states that Neighbourhood Plans '*should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan*'. With regard to tourism related development, SP4 of the Core Strategy supports sustainable growth in high quality tourism across the island. The draft plan is currently not in conformity with this strategic priority.

I would be grateful if you would notify me of future progress of the Neighbourhood Plan.

Yours sincerely



Martin A Carpenter MRTPI  
DIRECTOR  
[martin@enplan.net](mailto:martin@enplan.net)



## BRADING TOWN COUNCIL

THE BRADING CENTRE, WEST STREET,  
BRADING, ISLE OF WIGHT PO36 0DR

Town Clerk – Mrs Sue Chilton - Email: [townclerk@brading.gov.uk](mailto:townclerk@brading.gov.uk)  
Phone 01983 401770

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To: Mr Carpenter  
Enplan

Saturday, October 18, 2014

Dear Mr Carpenter,

### **BRADING NEIGHBOURHOOD DEVELOPMENT PLAN**

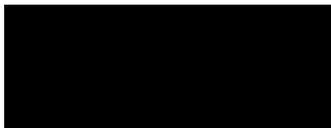
Thank you for submitting your comments on the draft Brading Neighbourhood Development Plan (BNDP). I apologise for the delay in replying to you, but we have now made the relevant changes to the Plan which resulted from the various comments we have received.

We have noted your comments about the lack of a copy of the Policies Map which has been addressed. Also we note your concerns about the Plans lack of conformity with the NPPF and the Island Plan Core Strategy. The purpose of the Neighbourhood Plan under the Localism Act 2011 is to refine and establish local differences from the NPPF and Island Plan. It adds to, rather than replaces them allowing the Brading community to have a say about future developments in the Parish of Brading.

The Revised BNDP will now be forwarded to the Isle of Wight Council who will undertake their own consultation on the 19<sup>th</sup> September to be advertised in the County Press and which will last for six weeks. Copies will be available on the Council website and that of Brading Town Council and hard copies will be available in the Brading Centre.

I hope you find these responses to your comments satisfactory,

Yours Sincerely,



For and on behalf of the Brading Neighbourhood Development Plan Steering Group

Dear Sirs,

Re:- Brading Neighbourhood Development Plan 2014 – 2027.

With regard to the above I would like to make the following comments:-

Firstly I have reproduced a paragraph which prefaced my comments submitted to the Brading Town Clerk during the previous consultation, as I believe they are still relevant:-

I am grateful for the opportunity to be able to comment on the draft Neighbourhood Plan. As you will be aware, originally I was part of the NH plan group but was forced to withdraw due to health issues early last year. I mention this as I think it is important to establish that I'm not just coming in at the last moment and trying to shoot down something that many people have laboured over for so long. I'm sure that many of the points I raise here would have been raised by me during the course of the last 18 months or so had I been able to remain part of the group. Please be assured that my only motive is to contribute what I can to ensure that the plan eventually adopted is the best possible one for Brading. It is also important to state that the huge amount of work undertaken by the NH plan group is greatly appreciated and that by questioning or commenting on the proposals, no disrespect or offence is intended to them.

Forward

I don't think that the Localism Act 'really puts (people) in charge of deciding where they want new homes' etc. Surely the Brading Neighbourhood Development Plan (BNDP) will simply be a 'material consideration' when IW Council Planning Department makes planning decisions? I think this sentence is therefore misleading.

The second Para. mentions 'specific areas'. Presumably 'areas' means topics as opposed to geographical areas as there are none defined.

1.2 Is it really true that 'Communities with an adopted neighbourhood plan will receive 25% of Community Infrastructure Levy revenues...'? (My underlining). Would not the correct word be 'may'? There is no explanation of this levy and its distribution and again I think this could be misleading.

2. Introduction.

With regard to the phrase '..local people are in charge..' the same comment applies as in 1.1.above.

Presumably it should read '...more than 50% of those voting..'

Objectives of the Plan

With regard to the bullet points relating to crime prevention and a place where people are proud to live etc., please may the words 'continue to' or 'continues to be' be inserted as appropriate? The current phraseology gives the impression that Brading is not at the moment a safe place where people are proud to live etc.

Local Character and History

This section is very interesting but doesn't appear to progress anywhere with regard to the BNDP.

## Housing

Unless I've got this quite wrong, reference to the Brading Housing Needs Survey Report reveals to me that 'housing needs' should perhaps read 'perceived housing needs'. It seems that the 'needs' are based on no more than the Residents' Survey respondents perceptions of need, rather than hard evidence. If I am right and assuming that respondents aren't expert in housing needs, this doesn't seem to be a good basis for planning a 13 year housing strategy.

This refers to 'major development' but Policy HD2 does not include the word 'major'. Hopefully HD2 is the correct version as we are limiting ourselves to developments of up to 9 dwellings.

8.10 & HD2. HD2 states that 'Proposals for agricultural workers' dwellings will be particularly supported...'. Para.8.10 refers me to Para. 55 of the National Planning Policy Framework (NPPF). The relevant part of which states 'Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances such as:  
the essential need for a rural worker to live permanently at or near their place of work....etc.'

I can find no reference to 'agricultural workers' dwellings' in the Island Plan of March 2012 nor does the Brading Housing Needs Survey refer to them at all.

My understanding is that the BNDP must comply with the NPPF and the Island Plan. There seems to me to be a world of difference between the NPPF's statement, which appears to discourage such development, and that of the BNDP, which, conversely, appears to actively encourage it.

Also, there is no definition of 'agricultural workers' or 'agricultural workers dwellings' either in the Glossary attached to the BNDP or in the National or Island plans. Therefore, who is to say that, for example, a 6 bedroom, triple-garaged stockbroker house isn't an 'agricultural workers' dwelling'? It may be a wealthy worker or perhaps the farm's owner. Who is to say that an owner who lives on the mainland and indulges his/her hobby of farming for the duration of August each year isn't an agricultural worker? As any dwelling could house at least twice as many people as there are bedrooms, if they share, how many occupiers would have to be agricultural workers in order to qualify? All of them? One of them? How would anyone check that the occupiers are bona fide agricultural workers and who would that person be?

I am also doubtful that in 2014 there is sufficient need for new-build agricultural workers' dwellings that they have to be 'particularly supported'. If any type of workers' dwellings are to be 'particularly supported', surely dwellings for essential

workers, such as teachers, health service workers, police, fire, ambulance etc. are far more relevant today. Please may I ask that this completely unnecessary provision be removed?

HD2a Whilst common sense dictates that what is meant by small developments, the BNDP doesn't specify the size. There is no indication given of the maximum size of the 'no more than nine new homes' or the total size of the development. Although the figure of 0.5 hectares is mentioned in passing in Para. 8.7., it isn't mentioned in the policy.

HD2c I don't understand what is meant by 'give consideration to the scale of future developments.'

## 9 Heritage

There are a number of sentences in this section in which describe what the Town Council expect etc., for example in Paras. 9.7 & 9.8 as well as 10.8. It should be made clear whether these are the expectations etc. of the Neighbourhood Plan Steering Group as a whole or just the Town Council.

HE2 Is there a need for the inclusion of examples in this policy? The impression could be given that the views specified are the only views that matter when there are other views which would also be considered as important by local people. I can find no reference to these views or justification for their importance in the BNDP Policies Map as mentioned. There are also a number of red arrows on the inset map for which I can find no explanation.

## 10 Jobs and the Local Economy

10.2 Whilst common sense provides the answer, I don't think it is necessarily clear what is meant by the 'primary business frontage of the town' when most of the former commercial buildings in Brading High Street are now exclusively residential. I cannot find the 'more detailed information provided in supporting document 15' referred to in the text.

JE1 The 'Island Plan Policies Map' is referred to which I have been unable to find.

I don't understand why commercial proposals referred to in the first paragraph 'should be located within or immediately adjacent to the RSC etc.' Surely in a rural area much of the commerce will be naturally outside of that area? This includes farming, camping and tourism, the blacksmith etc.

## 11 Protecting our Environment

E1 The phrase 'important views, noted in this plan' is used. I think the use of this phrase emphasises the point I make regarding the listing of views in HE2 above.

E1b It should be noted that the only 'strategic gap' I can find referred to in the Island Plan is that between Brading and Sandown.

12 Creating a Sustainable Community.

12.3 Whilst a little sceptical of the claim, elsewhere in the report, that Brading is 'major tourist attraction' there can be no doubt that we are fortunate to have a number of assets of interest. These include what is surely one of the finest examples of a Roman villa in the UK, set in an AONB, as well as Morton Manor (not apparently worthy of a mention in the BNDP), the Nunwell estate, a Tudor house and a 12<sup>th</sup> century church all set in an attractive rural town set in beautiful countryside, much of which is within an AONB. Despite all these treasures, according to Para. 12.3, the 'hidden gem in Brading's crown' is the railway station! There can be no doubt that the station is a gem if you want to catch a train and I it is hidden but presumably a bus stop is a gem if you want to catch a bus or the car park if you want to park your car!

This hyperbole, as well as the use of the station nameplate image on the front cover of the BNDP and each supplement is really just propaganda to boost Brading Town Council's controversial subsidy, at the precept payer's expense, of a loss making cafe and shop at the station. Propaganda has no place in a Neighbourhood Development Plan which should be entirely concise and evidence based.

12.6 This Para. doesn't quite make sense to me.

12.14 What is meant by 'modifying drainage and rainwater goods in historic buildings'? Similarly, 'the discreet provision of irrigation and water storage in parks and gardens'?

SC3 As I have previously commented regarding views, I would question the wisdom of specifying particular streets etc. Brading High Street is not in the list but Para 12.5 notes that it is 'already at tipping-point'. Surely the entire second sentence could be removed without losing the point of the first? All roads in our parish have 'physical limitations' and there is nothing in the body of Section 12 to point me to evidence that the specified streets should have particular consideration.

13 Crime and Disorder.

Only anecdotal evidence is referred to but no actual statistics are produced. Reference to [www.crimereports.co.uk](http://www.crimereports.co.uk) shows that although the incidence of crime and disorder in the parish isn't alarmingly high, it certainly isn't non-existent. I do hope that the gloss that is put on this topic isn't again just propaganda. It should also be acknowledged that the reduction in the reporting of incidents could well be in direct proportion to the lack of opportunity to do so. There is no longer any pretence of police foot patrols in Brading. I doubt that many residents would know when and which police stations are actually open to report in person and there can be no doubt that the 101 system is designed to deter contact with the police

Planners should be aware that there is a national scheme called 'Secured by Design' which is intended to design out crime and disorder from new build and refurbishment developments and which may have been worthy of consideration.

## General

If adopted, the BNDP will be referred to by planners for more than a decade to come. It will become part of Brading's archived heritage. I therefore feel that presentation is important and with regard to this make the following comments:

Even the greatest of writers submit their work for proof reading. There are a significant number of typographical and grammatical errors and other doubtful uses of the English language throughout the BNDP. A recurring example is the phrase residents' survey but with the apostrophe either absent or in the wrong place. There are also examples of incorrect use of verbs, the singular form being used for plural subjects etc. Please may these be corrected before final publication?

Brading is not defined by a railway station nameplate with a weed growing through the fence, as pictured on the front cover of the BNDP as well as several supporting documents. We have our own emblem or logo comprising a red rose surrounded by the words 'The Kyngs Town of Brading' which would be far more suitable. If a picture is to be used, how about a general view such as appears at the top of the Residents' Survey form (2879-12-Resident-Survey-2013-v1.pdf)?

I also continue to be astonished that the electorate is apparently to be asked to vote on the content of the entire 38 page BNDP document as well as all its appendices, supporting documents etc. and not just the policies contained in frames within the document. I just don't believe that anyone is going to read it unless they are particularly motivated or have a vested interest. It will make it a bit of a sham if people vote 'blind', that is if they bother to vote at all.

I would be grateful for notification of the Council's decision on whether to accept the examiner's recommendation and future progress with the plan.

Thank you for your attention to this matter.

Yours sincerely,

Christopher Offer.

Mr Ollie Boutler - Team Leader, Planning  
Policy, Conservation and Design  
Isle Of Wight Council  
Planning & Regulatory Services  
Seaclose Fairlee Road  
Newport  
Isle of Wight  
PO30 2QS

**Our ref:** HA/2006/000096/OR-  
09/PO1-L01  
**Your ref:** BrNDP/Reg16  
**Date:** 31 October 2014

Dear Mr Boutler

### **Regulation 16 - Submission of the proposed Brading Neighbourhood Development Plan**

Thank you for consulting the Environment Agency on Regulation 16 submission of the Brading Neighbourhood Development Plan. We are a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans.

We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.

From reviewing the Brading Neighbourhood Development Plan we understand that it was the decision of the Steering Group not to be site specific but rather determine a cap for size of future developments – in this case no more than 9 new homes. Therefore this document does not allocate any site specific areas for residential development within the Brading Neighbourhood Development Plan boundary. If we have misinterpreted this and there are to be allocations then any sites that fall within Flood Zones 2 or 3 will require to undergo the Sequential Test. In accordance with the National Planning Policy Framework (NPPF) paragraph 100-102, the Sequential Test must be undertaken when allocating sites to ensure development is directed to the areas of lowest flood risk. The Sequential Test should be informed by the Local Planning Authorities Strategic Flood Risk Assessment (SFRA). We would have concerns if development is allocated in areas of high risk flood zones without the Sequential Test being undertaken.

We are very pleased with the adoption of the sequential approach to new development as set out in Policy SC2 d). We fully support this approach to any new development. We are also pleased to see the inclusion of Part b) of the same policy (SC2) in reference to SuDs as these can provide many benefits to a development and the local area in terms of flood risk, biodiversity and water quality.

Environment Agency  
Canal Walk, ROMSEY, Hampshire, SO51 7LP.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

In addition we are pleased with the inclusion of Policy E1 a), however this could be made to be more stringent to ensure that new development does not have a detrimental impact on any designated sites.

Together with Natural England, English Heritage and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

[http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT\\_6524\\_7da381.pdf](http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf)

We will continue to work with partners to influence the Development Plan Documents in your area.

Yours sincerely

**Mr Jon Maskell**  
**Planning Advisor, Environment Agency**

Direct dial 01794 834 586

Direct e-mail [PlanningSSD@environment-agency.gov.uk](mailto:PlanningSSD@environment-agency.gov.uk)

Mrs S Chilton  
via email

**Bill Murphy, Head of Planning &  
Regulatory Services**

Isle of Wight Council, Council Offices,  
Seaclose, Fairlee Road, Newport, Isle of  
Wight, PO30 2QS

**Tel** (01983) 823552  
**Fax** (01983) 529386  
**Email** [planning.policy@iow.gov.uk](mailto:planning.policy@iow.gov.uk)  
**Web** [iwight.com/planning](http://iwight.com/planning)

**IWC Ref** BrNDP/Reg16  
**Your Ref**

**Contact** Ollie Boulter  
**Date** 3 November 2014

Dear Sue,

**IWC comments on the proposed Brading Neighbourhood Development Plan**

The Isle of Wight Council, as the local planning authority (LPA), has taken the opportunity to comment on the proposed Brading Neighbourhood Development Plan (BNDP) and accompanying background documents. The comments provided by the LPA are given under the spirit of the 'duty to support' set out in the amendments to the Town & Country Planning Act 1990.

The LPA wishes to record its support of the collaborative approach between officers and members of the Brading NDP Steering Group, on behalf of Brading Town Council as the qualifying body.

The LPA welcomes the fact that its comments (dated 29 August 2014) made during the previous consultation have been taken on board, and notes that a number of issues have emerged since the publication the Planning Inspector's report issuing planning permission for 89 dwellings at a site in Arreton.

There is one main issue that the LPA suggests require further consideration to meet the basic conditions, and this is set out in Representation 1 below.

There is also an issue that the LPA considers may be a Basic Condition issue, which is appropriate to raise at this stage and be considered through the examination process. This is set out in Representation 2.

The LPA also suggests that there are a number of issues, outside of the Basic Conditions, that warrant further consideration to see whether the proposed Brading NDP and/or its supporting documents could be improved and/or made clearer, and these are set out Representations 3 to 6.

It is also worth confirming that the LPA considers the strategic policies in the Island Plan Core Strategy, with which the proposed Brading NDP must be in general conformity, are policies **SP1-SP9** (with the SP standing for strategic policy).

Representation 1 – approach to tourism

The LPA considers that the policy wording would (and perhaps unintentionally) restrict tourism uses to locations within or immediately adjacent the settlement boundary of Brading. There is a concern that such an approach would not be in general conformity with policies SP1 (Spatial

Cont ...

Strategy) and SP4 (Tourism) of the core strategy, which gives in principle support for tourism uses outside of the defined settlement boundaries.

#### Representation 2 – limiting the scale of development sites

The LPA is aware of the qualifying body's stated preference to deliver housing on sites of no more than 9 units, and that this approach has been established and supported through public consultation. The LPA considers that such an approach, as long as it facilitates development, is in general conformity with the Island Plan Core Strategy, which identifies Brading as a Rural Service Centre and therefore it is expected to accommodate development.

There had been a concern that by restricting the size of a site to more than 9 units, there could be unintended consequences, such as only the market housing element identified through the housing needs survey being delivered.

However, the LPA expects that the wording of Policy HD2 b) provides the necessary flexibility to ensure the delivery of housing to 'contribute to meeting the most up-to-date housing needs survey...' and also avoids the potential concerns set out above.

#### Representation 3 – approach towards residential development

The LPA acknowledges that whilst neighbourhood planning provides the opportunity for the community to make allocations, it is not a requirement to do so. In this instance the qualifying body, having considered the outcomes of public consultation and its evidence documents, has elected not to make allocations for residential development or refer to specific sites.

Instead, the proposed NDP has introduced a criteria-based policy that facilitates growth that meets the needs of the local community. The LPA considers that the principle of such an approach is in general conformity with the Island Plan Core Strategy, and will enable any type of residential proposals to be judged on their merits against the policies of the development plan, although there are concerns (as set out in Representation 1) over the implications for delivery.

#### Representation 4 – reference to the Brading Housing Needs Survey

The LPA suggests that the plan would benefit from a clearer explanation of the findings of the housing needs survey and how it has influenced the policy.

#### Representation 5 – relationship with other planning documents and national planning approaches

If made the Brading NDP will form part of the development plan. Therefore if the Brading NDP is 'silent' on an issue then the policy position on that issue will be that established in either the core strategy or the NPPF. Because of this the proposed Brading NDP doesn't need to cover (or repeat) all areas of planning policy, rather it focusses on what are believed to be locally important issues. Perhaps this could be further explained following the diagram on page 10.

It may also be useful to explain more about permitted development rights and the fact that the proposed Brading NDP does not replace them.

#### Representation 6 – typographical and factual errors

A number of typographical and factual errors have been identified by other respondents, and the LPA would support them being addressed.

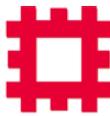
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I hope these representations are useful, and if you require any further information please don't hesitate to contact me.

Yours sincerely,

*Ollie*

**Ollie Boulter**  
**Team Leader, Planning Policy, Conservation & Design**



# ENGLISH HERITAGE

## SOUTH EAST

Planning Policy  
Isle of Wight Council  
Seaclose Offices  
Fairlee Road  
Newport  
Isle of Wight, PO30 2QS.

Our ref: HD/P6001/03/PC5  
Your ref:  
Telephone 01483 252040  
Fax

3<sup>rd</sup> November 2014

Dear Sir or Madam,

### **Brading Neighbourhood Development Plan 2014-2027**

Thank you for your e-mail of 19<sup>th</sup> September advising English Heritage of the submission of the proposed Brading Neighbourhood Plan. I apologise for not responding using the response form but I am unable to electronically copy Part B for each representation. However, we are pleased to make the following comments.

#### The Neighbourhood Plan

We welcome and support Brading's vision for the future, particularly the reference to its historic heritage being cherished and protected, and the objective to conserve and enhance the historic character of Brading (we are grateful for the amendment in response to our comment on the previous version of the Plan).

We welcome the description of the historical origins of Brading in Chapter 7.

We welcome Chapter 9 of the Plan for its extremely comprehensive consideration of the historic environment in Brading (and welcome the addition of the references to the grade II registered historic park and garden at Nunwell and the Conservation Area as we previously requested).

Paragraph 9.8 refers to non-designated assets. We still think it would be helpful if a little more was said about these; the Sustainability Appraisal indicates that the Heritage Audit refers to 10 heritage assets on the IW Council Local List, but contains no more details.

We note that the Plan still does not contain any reference to the Brading Conservation Area and the medieval settlement 100m south east and 350m north east of East Ashey Manor Farm Scheduled Monument being identified as being at risk of neglect, decay or other threats on the 2013 Heritage at Risk Register.

EASTGATE COURT 195-205 HIGH STREET GUILDFORD SURREY GU1 3EH

Telephone 01483 252000 Facsimile 01483 252001

[www.english-heritage.org.uk](http://www.english-heritage.org.uk)

Please note that English Heritage operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available



We welcome and support Policy HE1 (and are grateful for the opening sentence and factor g) being amended as requested). However, we still also suggest that factor a) should be “the retention and/or sensitive re-use.....” and factor f) should be the “conservation and enhancement of.....”. We also welcome and support Policy HE2.

As previously noted, we feel that paragraphs 10.2, 10.3 and 10.4 should really be in Chapter 9.

We welcome and support Policy SC2 and the references to our advice on energy efficiency and historic buildings in paragraph 12.13 and on flooding and historic buildings in paragraph 12.15.

### The Sustainability Appraisal

We welcome and support the amendments that have been made in response to our comments on the previous version.

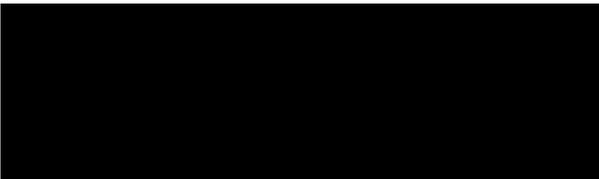
### Conclusion

Overall, notwithstanding the outstanding issues identified above, English Heritage considers that the Brading Neighbourhood Development Plan meets the basic conditions as regards the historic environment.

We hope these comments are helpful. Please contact me if you have any queries.

Thank you again for consulting English Heritage.

Yours faithfully,



Martin Small  
Principal Adviser, Historic Environment Planning  
(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)