

Savills Comments to Neighbourhood Plan policies only pages 7-18	Bembridge Neighbourhood Plan Working Group Response/Actions
<p>Comments on the Vision & Purpose</p>	
<p>TF notes the proposed vision and laudable objectives. It is important to note that the vision seeks to “maintain and enhance the unique self-contained character of Bembridge Village”. This will best be achieved through a positive planning framework, which seeks good urban design and architecture, and crucially which plans positively for new development sites to meet identified needs. The vision then says - “permitting small scale sustainable growth that is in line with the needs and wishes of the community”. TF does not dispute the requirement for development to meet needs, and wherever possible the wishes of the community. Inevitably conflicts of opinion occur. What typically achieves good development is early stakeholder and community engagement and buy-in to proposals.</p>	<p>TF may consider that a larger scale development meets the objective better but the view of the community is that small scale development is the only acceptable way forward. Savills recognised (at the meeting on 27th November 2013) that the working group had done well to get the community to agree to any development at all.</p> <p>Neighbourhood plans are intended to reflect the wants and needs of the local community. All members of the community (and this includes all the landowners) have had every opportunity to make their views known throughout the process. They have had the chance to attend all consultations, respond to questionnaires and attend any of the working group meetings which were advertised and open to the public. Disagree with comments – no action.</p>
<p>It is important to recognise that post implementation of the plan, planning decisions will continue to be made by the Isle of Wight Council. The Neighbourhood Plan must therefore be robust and credible, and recognise that due planning process inevitably has to balance competing or conflicting opinion.</p>	<p>The working group is fully aware of the post plan process and believes that the Bembridge Neighbourhood Plan is robust. Agreed and strengthening of our policies is being undertaken as a result of informal consultation responses. No action.</p>
<p>TF also objects to the assertion in the purpose statement in respect of the Island Plan. The statement of purpose outlines that the Neighbourhood Plan will have (only) ‘particular regard’ to the Island Plan Core Strategy. This is potentially at odds with the Localism Act (2011) and the National Planning Policy Framework (NPPF). TF are of the view that the Neighbourhood Plan must be consistent with and in general conformity to the Island Plan. This is the recently adopted, and tested development plan, supported by evidence.</p>	<p>IWC has not raised a comment here therefore the NP is in general conformity – no action.</p> <p>The Neighbourhood plan must be totally (not generally) consistent with the Island Plan.</p>
<p>The NPPF places a presumption in favour of sustainable development at the heart of plan making and decision taking. Sustainable development is about positive growth, and the role of the planning system is to help make this happen by plan-making that positively seeks opportunities to meet local development needs.</p>	<p>This does not mean large scale development. Our plan supported by the Housing needs survey identifies sustainable development needs. Furthermore, Island Plan specifies “smaller scale” development in RSCs. No action.</p>
<p>Paragraph 15 of the NPPF confirms that all plans should be based upon and reflect the presumption in favour of sustainable development. Paragraph 16 explains that the presumption will have implications for how communities engage in neighbourhood planning, stating: <i>“Critically, it will mean that neighbourhoods should:</i></p>	<p>The NP plans to develop a minimum of 12 units per annum over the next 5 years and if this formula continued for the plan period 168 units minimum could be delivered therefore do not understand the intention of this comment.</p> <p>Again sustainable development does not mean that small scale development is not</p>

<p>☑ <i>develop plans that support the strategic development needs set out in Local Plans ,including policies for housing and economic development;</i></p> <p>☑ <i>Plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan ...”</i></p>	<p>correct.</p> <p>The working group believe that the Bembridge plan satisfies this statement. Our plan is Island Plan compliant which envisages smaller scale development in RSCs. No action.</p>
<p>Paragraph 17 of the NPPF sets out 12 core planning principles that underpin both plan making and decision taking. This includes the principle that planning should: <i>“Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business, and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of wider market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities”</i></p>	<p>Local land owners and developers have supported the draft plan clearly expressing development of affordable units within the NP policies.</p> <p>Again our plan meets this criteria</p> <p>Bembridge is a Rural Service Centre</p> <p>Island Plan envisages smaller scale development. BNDP provides policies to guide this form of development. Both these documents accord with NPPF.</p>
<p>Further guidance on Neighbourhood Plans is provided at paragraphs 183 to 185 of the NPPF, which includes the following:</p> <p><i>“The ambition of the neighbourhood 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. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them”.</i></p>	<p>The Island plan has been adopted. The Bembridge plan is consistent with the Island Plan and is in general conformity.</p>
<p>The Neighbourhood Plan also outlines various Community Objectives. TF objects to the first objective <i>“to protect the village from uncontrolled expansion beyond its current built up boundaries”</i>. There is evidence from which to justify an amendment to the village settlement boundary and allocate land west of Bembridge. This has been set out in the SHLAA representations submitted on behalf of TF, and in promoting the sites (LDF088A&B) outlined in the Appendix 2 either side of Steyne Road. These sites form a logical sustainable extension to the village.</p>	<p>The settlement boundary could only be amended by Isle of Wight Council. The SHLAA does not allocate land for development but merely assesses the land that may be developable.</p> <p>The settlement boundary is well defined and no evidence has been presented to suggest that it should move.</p> <p>The amendment of the settlement boundary can only be done when the Island Plan Core Strategy is reviewed at the end of its life (2027). BNDP could not extend the boundary as this would not be CS compliant.</p> <p>The community objective reflected the majority wish to prevent a large scale expansion of the village beyond its boundaries. Inclusion of land in SHLAA does not guarantee planning permission.</p>

	There is no requirement to extend the village settlement boundary.
TF supports the next two objectives <i>“to ensure any new development within the wider rural area is restricted to uses which benefit the rural landscape and economy”</i> and <i>“to ensure all new development and payments derived from development schemes benefit the parish”</i>	Noted
TF notes the fourth objective <i>“to protect the village and surrounding countryside from inappropriate large scale development schemes but to support small scale sustainable growth”</i> . The protection from inappropriate large-scale development in the surrounding countryside has no related policy proposed in the plan. Furthermore, the meaning of this largely hangs on the definition of ‘small scale’. This will be discussed later. Evidence has been prepared as outlined in Appendix 1, in respect of local housing needs, and a fair apportionment to Bembridge.	<p>Evidence prepared by Savills differs from the housing needs survey results of Bembridge</p> <p>The planning flow diagram seeks to determine whether or not the application meets a local need – this implies that it must satisfy the Housing Needs requirement.</p> <p>BNDP gives a definition of small scale. Our policies (OL1 and H1) (as amended) will provide the protection from large scale development.</p> <p>The IWC has informed us that there has never been any intention to apportion housing numbers to each RSC. In fact, in an early version of our plan when we did this was heavily criticised by IWC and we removed it.</p>
Overview & Location	
BNDP.OL.1 – Scale of Development	
TF objects to the proposed policy.	
It is not sufficient to purely base a definition of smaller scale on the standard Development Control definition of ‘minor’ and ‘major’ development proposals.	<p>The definition of small scale is supported by Bembridge Housing Needs Survey</p> <p>We defined small scale as 12 based upon housing needs survey – IW planners suggest 10.</p> <p>This policy and justification has now been amended as a result of consultations.</p>
A definition of scale is relative. In respect of the overall delivery of development in the Island, development in the period to 2027 in Bembridge is by its nature smaller scale, as it would be to any of the Rural Service Centres. However, when viewed on the basis of the 980 dwelling housing apportionment to Rural Service Centres, Bembridge is demonstrably the largest and most sustainable (see the Planning & Housing Report – Appendix 1).	<p>IWC previously advised that housing provision should not be calculated in this way</p> <p>IWC has confirmed that majority of housing on the IW is to be directed to key regeneration areas and smaller regeneration areas. There is no intention of the IWC to apportion numbers to any individual RSC.</p>
The policy is also ineffective, as it is overly restrictive. It also likely repeats wider policies contained within the Island Plan and also the NPPF in respect of design and density. Of greater use would be a design and character assessment of the village, which could inform design and density related policies, and perhaps more importantly, inform development control planning	<p>We believe that the policy is effective. We have a design statement/policy in place. It does not include density as that is covered elsewhere.</p> <p>Our policy as amended is effective and not overly restrictive but provides clear guidance on the type of development which will be supported.</p>

<p>decisions.</p>	
<p>It is also of importance to note that Island Plan Policy SP1 does not mention small-scale but mentions that development is acceptable in principle within or immediately adjacent to a settlement boundary. This is noted as the starting point.</p>	<p>Noted SP1 <u>does</u> mention small scale (para 5.15). Our flow chart (as amended) gives a clearly demonstration that SP1 is the starting point for establishing whether development is acceptable or not in principle.</p>
<p>There is a need for plans and planning decisions to accord with both the NPPF presumption in favour of sustainable development and also for plans to be positively prepared. The proposed chart demonstrating the decision making process on page 10 of the Neighbourhood Plan risks being perceived as overly negative. It is notable that the majority of decision making 'paths' lead to a development not being supported. An alternative approach is required.</p>	<p>We believe that the flow diagram represents a very effective process which supports developments that are in accord with the Island Plan need local needs.</p> <p>Explanation of chart has been improved and flow chart amended in respect of development which is supported. This is simply a visual explanation of how policies flow from the overall strategic policy of the Island Plan (SP1) which is the starting point.</p>
<p>It is also proposed that this policy restriction, as currently written, will stop the delivery of the necessary housing to meet the housing need. Appendix 2 illustrates sites that would potentially accord with the Neighbourhood Plan policies. With applications of over 12 units restricted, it is apparent that few schemes will come forward; those illustrated in Appendix 2 do not include allowance for site constraints and assume willing landowners, and so many will not be delivered or delivered at the quantum proposed on the plan in Appendix 2. Hence it is unlikely that the housing delivery required for Bembridge could be delivered through the current policy BNDP.OL.1.</p>	<p>Some local land owners and developers have supported the draft plan clearly expressing development of affordable units within the NP policies.</p> <p>The working group chose not to allocate sites as this was felt to be restrictive.</p> <p>The community is confident there is sufficient land within the settlement boundary to deliver the numbers expected in the Housing Needs Survey.</p>
<p>In addition to this, Appendix 2 illustrates the unintended consequences where sites do come forward. These will be back land, infill garden development, which as windfall developments would not count towards supply and would likely be to the detriment of the character of Bembridge and therefore conflict with the Vision Statement.</p>	<p>We are fully aware windfall is not included in calculations of housing delivery. The community would clearly see back land development take place before the expansion of the settlement boundary.</p> <p>Again it is a matter of opinion as to whether or not development as described will be in conflict with the Vision statement. The working group believe that the policies derived support the Vision Statement.</p> <p>Consultation responses indicate the majority of the community is happier with piecemeal/ad hoc development (including garden land and sites of large houses) as a means of housing supply rather than expanding the size of the village beyond existing boundary.</p>
<p>On these schemes, it is unlikely that affordable provision would be included and there will instead be piecemeal, ad hoc development that might even involve the loss of community facilities.</p>	<p>Community facilities would not be lost as detailed in your evidence as they are all owned or controlled by the Parish Council as detailed in our Local Green Spaces Audit.</p> <p>Evidence suggests that this is not true. Vectis Housing are proposing affordable units and as stated earlier another landowner is more than happy to comply with</p>

	<p>the policies.</p> <p>We have clear evidence affordable housing schemes will come forward. Present community facilities are protected by policies in the BNDP.</p>
The policy does not allow a larger site to come forward in a phased approach to deliver the infrastructure necessary or affordable provision on-site.	Bembridge is a village. Large site development is simply not appropriate. Affordable will be delivered on school site. Phased development (12 units or less) is supported – this could deliver affordable housing.
An alternative approach to Policy BNDP.OL.1 is required to deliver the Vision of the Plan and to make a plan that will deliver the housing need.	Not agreed.
BNDP.OL.2 – Rural Exception Development	
TF has no specific comment to make on the policy. The wider principle of altering the settlement boundary of Bembridge to incorporate land west of Bembridge is made. The land has a logical defensible boundary to the west, Mill Road and Hillway Road.	<p>The settlement boundary could only be amended by Isle of Wight Council. The SHLAA does not allocate land for development but merely assesses the land that may be developable.</p> <p>The Neighbourhood plan specifically recognises the defined settlement boundary.</p> <p>The settlement boundary is set until 2027. It is not within the remit of the BNDP.</p>
BNDP.OL.3 – Community Infrastructure Payments	
In order to attract Community Infrastructure Levy (CIL), the items of infrastructure, by defined project or type, need to be included in the 'Regulation 123 List'. These items may then not attract a Section 106 contribution or for relevant junctions a Section 278 agreement. The parish will therefore have to align its Neighbourhood Action Plan with the Isle of Wight Council's proposed Regulation 123 List. This will be important so that the 'double counting' of infrastructure contributions is avoided. As CIL is yet to be implemented on the Island these decisions are still pending. Given that these matters are already controlled by the CIL Regulations and will be tested via the Isle of Wight charging schedule examination, TF questions whether policy BNDP.OL.3 is necessary.	<p>As CIL is developed the Parish Council will work with IWC to 'align' our action plan and ensure double counting doesn't take place.</p> <p>In consulting with the planning policy department at the IW Council we have been advised that CIL is planned to be implemented and therefore it was decided to include the policy.</p> <p>The policy will only be implemented when CIL has been adopted but when it is it gives clear guidelines on how it is to be directed.</p>
In the context of infrastructure provision, Appendix 1 provides justification, in respect of development scale, for enabling development to deliver affordable housing priorities, and also wider infrastructure priorities through the additional gross development value (GDV) generated. These economies are more likely to be generated on allocated sites, such as land west of Bembridge, than through small, piecemeal, ad hoc infill development.	Disagree if CIL is to be implemented the levy received is the same for 1-60 units.
Housing	
BNDP/H.1 – New Housing Development	
TF objects to the proposed policy.	
The objectives of the Parish Council as outlined in the supporting text are	Noted

<p>noted, and broadly supported, notably the need to ensure a more balanced community and to identify and deliver homes to meet local needs. It is also notable that protection to existing garden land is cited as important to the community. The Neighbourhood Plan outlines the objectives of the Island Plan toward Rural Service Centres, notably that development should:</p> <ul style="list-style-type: none"> ☑ <i>Meet an identified local need</i> ☑ <i>Demonstrate that deliverable previously developed land is not available within the settlement boundary</i> ☑ <i>Be commensurate to the size, scale, design and character of the settlement;</i> ☑ <i>Not significantly adversely change the size, scale, design and character of the settlement;</i> <p><i>And</i> <i>Be sustainably situated close to local services and facilities.</i></p>	
<p>All of these objectives can be met through positive planning and hence the allocation of land west of Bembridge. As outlined in Appendix 1, there is an extreme lack of available sites identified in the Strategic Housing Land Availability Assessment (SHLAA) within the existing settlement limits of all of the RSCs. Well proportioned, and sustainable extension to the settlement limits of some/ all of the RSCs is therefore inevitable, in order to meet local needs, and the housing apportionment of the Island Plan. Bembridge, as the most dominant and sustainable of all of the RSCs, needs to take a fair share.</p>	<p>The settlement boundary could only be amended by Isle of Wight Council. The SHLAA does not allocate land for development but merely assesses the land that may be developable. The NP does not allocate land for development.</p> <p>It is true that SHLAA identifies little land that has been put forward for potential development. It is not possible to predict what land may become available – e.g. Staddlestones garage site, hence the logic for not allocating sites as this would be restrictive.</p> <p>BNDP does not allocate land but is relying on hierarchy of Island Plan and SP1. Small scale development on land adjacent to the settlement boundary is appropriate.</p>
<p>The Appendix 1 evidence has assessed a number of factors, including the housing land supply, sustainability in respect of the settlement hierarchy, housing demand/ needs and development viability. This concludes that a fair apportionment to Bembridge is likely to be in excess of 200 dwellings over the period 2011-2027. TF are of the opinion that the figure is nearer 300 dwellings, given the status of Bembridge, the implications arising from the ONS 2011 population projections and once a further apportionment from Brading is taken into account (which has a lack of available development sites).</p>	<p>IWC previously advised that housing provision should not be calculated in this way so fair share is Savills opinion. The population is decreasing according to Census data 2001 to 2011. Bembridge housing needs survey identifies the local housing need.</p> <p>If the housing needs survey results (12 per annum) were applied across the duration of the Island Plan (15 years) a total of 180 would be needed. This would seem to be a fair apportionment for Bembridge.</p> <p>Bembridge is not required to satisfy Brading needs.</p> <p>IWC does not support apportionment of numbers to RSC.</p>
<p>Further evidence has been prepared at Appendix 2 (Alternative Sites Appraisal) to demonstrate the potential implications of the Neighbourhood</p>	<p>The NP does not allocate land for development as it would have become restrictive for developers and land owners. In a hierarchy the settlement boundary is more</p>

<p>Plan, which makes no actual allocations of development to meet identified needs, nor seeks to direct development through any form of spatial strategy. There will inevitably be a potential risk of a number of schemes, of below 12 dwellings coming forward as urban infill development. This places at risk garden land, and also potentially other land, such as open space within Bembridge. This is contrary to a key objective of the community.</p>	<p>important for retention than back land development, as indicated by preferential options via public survey.</p> <p>The working group plans to keep an open mind on potential future sites and not restrict the plan to specific restrictive sites</p> <p>Applications will be assessed on their individual merits.</p>
<p>In reality, it is likely though that such schemes will be restricted to much smaller scale infilling. The risk however is that this approach will not deliver the identified needs over the plan period. There are no substantial or jointly promoted sites presently within Bembridge.</p>	<p>The NP does not allocate land for development as it would have become restrictive for developers and land owners.</p>
<p>The proposed limit of development to 12 dwellings is therefore unsound, and certainly not positively prepared. It opens up the risk for inappropriate infill development of garden or recreation land, and will likely not deliver the homes required. There is a further risk of lower levels of affordable housing provision, and infrastructure gain from development. The evidence contained within Appendix 1 provides the justification for a positively prepared local policy for additional local growth. The obvious site for this is on land west of Bembridge.</p>	<p>Disagree –Some local land owners and developers have supported the draft plan clearly expressing development of affordable units within the NP policies.</p> <p>12 units is not unsound.</p>
<p>BNDO.H.2 – Special Housing Requirements</p>	
<p>Through positive planning and engagement, the Parish is more likely to achieve stated objectives with respect of development design and mix. The land west of Bembridge has the potential to make some provision for housing requirements to meet the needs of the elderly.</p>	<p>Housing requirements for the needs of the elderly have been met at Saddlestones site. School site will meet needs for affordable housing. Land west of Bembridge is not SP1 compliant.</p>
<p>BNDP.H.3 – Safeguarding of Development Delivered to Meet Local Need</p>	
<p>The Neighbourhood Plan must be deliverable. Evidence in Appendix 1 provides justification for development allocations as enabling development. This will achieve the provision of necessary affordable homes, which are conditioned (likely via a Section 106 Agreement) to serve a particular need.</p>	<p>There is no evidence to suggest the NP isn't deliverable</p> <p>Allocation of sites is seen as prohibitive – we can never be sure what land may become available through the life of the plan. E.g Staddlestones site</p>
<p>TF objects to the present approach of BNDP.H.3 as unduly restrictive and also unrealistic. The supporting text outlines that <i>“it is anticipated that any new housing development approved on the basis of demonstrating a local need would be for either a Bembridge resident or a person with a Bembridge connection and not for open market housing and it is important to ensure it is delivered to the specific local need which provided the justification for its approval”</i>.</p> <p>We would query how a Bembridge connection is defined and what would happen after first occupants decide to sell the houses? This policy is not enforceable as currently worded. Nevertheless, these are side points.</p>	<p>Definition of an Isle of Wight resident with a Bembridge connection is being developed to ensure the policy is enforceable</p> <p>There is evidence that this type of policy has been achieved elsewhere</p> <p>Bembridge connection has now been defined. This definition is in use by the Housing Department of the IWC.</p> <p>This type of policy has been supported in other NDPs (eg Eden Valley which has gone through examination)</p>
<p>The key issue of importance will be important to ensure that adequate and</p>	<p>Demand could be catered for from the current untenanted housing stock available</p>

<p>deliverable provision is made for local needs, which can equally be met through a mixture of the right types/ tenures of both market and affordable homes. It is unrealistic to seek to restrict all forms of open market housing. In reality, there is sufficient underlying demand (and needs) to ensure that a good proportion of new housing provision will serve those who either live, or work in the Bembridge area. This evidence is provided in Appendix 1. This policy is objected to as unduly restrictive and unrealistic.</p>	<p>on the open market.</p> <p>Island Plan states that development in RSC must meet a local need. Therefore, it makes sense for approved schemes to be directed to meeting that need.</p> <p>Ask estate agents how many houses/flats they have on the market add this to the new homes in the pipeline e.g. development of lane end cafe + old school site + staddlestones to show that there is no present shortage of available housing in Bembridge</p>
<p>BNDP.H.4 – Affordable Housing Contributions</p> <p>TF suggests, that in order to avoid the risk of confusion and conflicting policy objectives, matters of affordable housing policy provision are addressed solely by the Island Plan.</p>	<p>Disagree Bembridge has a right to input how affordable housing contributions are allocated</p> <p>We believe that the N plan is the appropriate place</p> <p>Community has a right to influence the provision.</p>
<p>Working & Shopping</p>	
<p>BNDP.WS.1 – Village Core Retail Centre and Lane End Retail and Business Centre</p>	
<p>Evidence has been provided by TF in respect of the vitality and viability of the village, notably the opportunity to sustain and enhance the village retail provision through the additional spend that new development will bring. This is outlined in a supporting appendix to Appendix 1. It is important therefore that existing retail is safeguarded, with opportunities embraced for enhancements. A negative approach to planning simply places at risk the future vitality and viability of the village</p>	<p>Additional spend (CIL) will be available whatever the development</p> <p>The W&S policies are not negative and seek to safeguard existing retail.</p>
<p>BNDP.WS.2 / BNDP.WS.3 / BNDP.WS.4</p>	
<p>TF has no comment to make on these proposed policies.</p>	<p>Noted</p>
<p>BNDP.WS.5 – Employment Opportunities</p>	
<p>Through positive planning, the Parish Council is more likely to realise the delivery of new employment opportunities. This will be achieved, in part, through the identification and allocation of sites. Land west of Bembridge has the potential to accommodate some employment uses, perhaps as part of live/ work units, or as a specific allocation. These types of initiatives can be discussed as part of design development, master planning and ongoing engagement.</p>	<p>The NP is not allocating land for development</p> <p>Key areas have been identified</p>
<p>BNDP.WS.6 – Provision of Village Centre Car Park / Improvement of Existing Parking Conditions</p>	

The allocation of development, notably land west of Bembridge, may generate sufficient development value to warrant a fair and reasonable planning contribution toward parking improvements in the village centre. The Parish Council would need to lead on the implementation of a deliverable solution.	The NP is not allocating land for development There would not any affordable land for a car park. Again any development would realise the (CIL) income This is not sufficient justification to approve large scale development outside settlement boundary.
BNDP.WS.7 – Rural Economic Development	
TF has no comment to make on this proposed policy.	Noted
Tourism	
BNDP.T.1 & BNDP.T.2	
TF has no comment to make on these proposed policies.	Noted
Getting Around	
BNDP.GA.1 – Car Parking Provision for New Development	
TF supports the principle of providing sufficient car parking to support new development. This objective needs to be considered alongside good urban design and place making principles, notably Manual for Streets.	No conflict with these documents/objectives. Government confirms communities have the freedom to set own parking requirements.(C&LG see Eric Pickles 3 Jan 11)
It is the case that Bembridge is relatively accessible. Evidence is provided in Appendix 1 in respect of the settlement hierarchy of the Rural Service Centres. This demonstrates that Bembridge is well connected by bus, and also rail; Brading station is relatively nearby. New development provides scope for modest enhancements to support sustainable transport.	A rail station in a town 6 miles away would require 3 bus journeys to get there which is not accessible and has been copied from the McCarthy and Stone application for the Staddlestones site Rail connection – how do people get from Brading to Bembridge as there is no direct bus service Bembridge is an isolated community. It is not well connected by bus and has no rail connection whatsoever. (It is ludicrous to suggest Brading Station as an option given that there is no bus link to it from Bembridge). A rail station in a town 6 miles away would require 2 bus journeys travelling via Sandown to get there.
BNDP.GA.2 – Public Rights of Way	
New development provides the opportunity for planning contributions to sustain existing public rights of way and to generate fair and reasonable planning contributions towards appropriate improvements to the public highway.	Noted Agreed but no justification for approving development which is not SP1 compliant.
Leisure & Wellbeing	
BNDP.LW.1 – Protection of Local Green Spaces	
TF objects to the proposed policy.	Noted
As outlined in representations on other proposed policies, notably housing,	The NP is not allocating land for development. Community facilities would not be

<p>there is a real risk of unintended consequences should a negative approach to local planning be taken. Appendix 2 outlines an Alternative Sites Appraisal. This demonstrates the lack of available land capacity within Bembridge and provides an illustration of the consequences of urban infill. There is certainly limited available land capacity, as given by the SHLAA. This inevitably places at risk the development of the existing green spaces off Steyne Road. The policy, as worded, actually opens the prospect of the development of these green spaces. It does not seek to safeguard the open spaces, but instead opens up the prospect of a loss based on overriding need. This is unlikely to be sustainable.</p>	<p>lost as detailed in your evidence as they are all owned or controlled by the Parish Council as detailed in our Local Green Spaces Audit including those referred to off Steyne Road.</p> <p>Our approach is not negative, and we do not believe that it will have the unintended consequences suggested.</p> <p>The Green Space Audit 2013 does not identify the TF land as a green space. This is undeveloped agricultural land outside the settlement boundary. Any development proposal on this land would be subject to SP1 as a starting point.</p>
<p>Instead, there is the opportunity through the delivery of development west of Bembridge to enhance these green spaces and provide a positive development frontage on the western side of the grounds. By satisfying the need elsewhere in this way, loss of local green spaces can be better resisted.</p>	<p>Disagree we do not think development of land west of Bembridge would 'enhance' the existing green spaces</p>
<p>BNDP.LW.2 – Provision of New or Improved Medical Premises or Facilities</p>	
<p>TF has no specific comment to make on this policy.</p>	<p>Noted</p>
<p>BNDP.LW.3 – Protection and Improvement of Existing Community Facilities</p>	
<p>TF has no specific comment to make on this policy.</p>	<p>Noted</p>
<p>Environment & Heritage</p>	
<p>BNDP.EH.1 – Built Environment</p>	
<p>The objective to achieve good urban design and placemaking principles, notably Manual for Streets and Building for Life is supported by TF. Good design may be achieved through positive liaison and ongoing community and stakeholder involvement and buy-in to development proposals.</p>	<p>Noted</p>
<p>BNDP.EH.2 – Conservation Areas</p>	
<p>TF has no specific comment to make on this policy.</p>	<p>Noted</p>
<p>BNDP.EH.3 – Rural Landscape</p>	
<p>TF has no specific comment to make on this policy.</p>	<p>Noted</p>
<p>BNDP.EH.4 – Woodland, Trees and Hedgerows</p>	
<p>TF has updated its technical evidence base in respect of land west of Bembridge, including updated tree and ecology surveys. The existing trees and hedgerows are assets, the setting of which will be fully considered as part of the ongoing design process.</p>	<p>Noted</p>
<p>Environment & Heritage</p>	
<p>BNDP.D.1 – Design</p>	
<p>TF questions whether proposed policies BNDP.D.1 and BNDP.EH.1 are repetitive, and perhaps should be merged.</p>	<p>EH1 relates to the locality and is more general. D1 is more prescriptive. Both have their place. CS adopts a similar approach.</p>
<p>BNDP.D.2 – Extensions and Alterations to Existing Buildings</p>	

TF has no specific comment to make on this policy.	Noted
BNDP.D.3 – Replacement or Additional Housing Development	
TF has no specific comment to make on this policy.	Noted
BNDP.D.4 – Balconies	
TF has no specific comment to make on this policy.	Noted
BNDP.D.5 – Houseboats	
TF has no specific comment to make on this policy.	Noted
Proposals Map	
As outlined throughout the representations submitted, TF would like to suggest that the settlement boundary of Bembridge be reviewed, as part of the wider design consultation exercise, in order that proportionate development to meet identified local needs be allocated on land west of Bembridge. The scale of the land to be allocated in respect of overall delivery and phasing is to be determined through this process.	<p>The settlement boundary could only be amended by Isle of Wight Council. This is not part of the N Plan process. Advice from LPA is that the movement of settlement boundaries is not planned.</p> <p>It is not appropriate for the BNDP to review or amend the settlement boundary as this would render plan non-compliant with Island Plan.</p>
General comments	
<p>The main thrust of the various documents is to get Thornycroft land allocated for large scale development. They seek to get the settlement boundary moved to facilitate this (which is contrary to the Island Plan Core Strategy). Their justification for this is as follows:</p> <ol style="list-style-type: none"> 1. Insufficient land currently identified land (SHLAA) to satisfy the identified need 2. Bembridge is the dominant of the 11 RSC's and should therefore attract a large share of the 980 houses required by the core strategy. (384 is mentioned) 3. Bembridge should pick up Bradings allocation of the 980 4. Large scale development including larger (4 bed) properties are needed as well as affordable homes 5. Our HNS is only a part of the logic for allocation of numbers. Demand and Migration are included in addition to local need. 6. Windfall is not allowed <ol style="list-style-type: none"> 1. Land availability The SHLAA was never meant to be a statement of the current land availability – merely a statement of those landowners that identified land for potential development. It is true that there are not many potential land areas not currently identified but it is conceivable that more could become available. The availability of the Staddlestones site was not previously identified and came as a surprise. Windmill hotel site, Bennetts yard, BT site could conceivably become available within the life of the Neighbourhood plan. Allocating land at this time is seen by the working group to be restrictive, and we prefer to keep options open. 2. Dominant RSC This is simply based upon population size and facilities available. The logic that the number of new houses to be built is based upon current population is in our opinion flawed. An alternative logic could be that those RSC's with lower populations need more houses to increase their low populations. It is true that Bembridge has many facilities to support its population. Our vision statement recognises the unique self-contained nature of the village and seeks to preserve it. However it could be considered that Bembridge is already close to full and additional population would put a severe strain on the existing facilities. For example: <ul style="list-style-type: none"> • The medical centre (an offshoot of the St. Helens Centre) would need to be extended. • The school is currently classified as full and large scale development would require additional schooling. Note that other RSC schools are not classified as full and could accommodate more children • To suggest that Bembridge is served by Brading rail station is a bit of a stretch of the imagination. Whilst Brading does have a rail station there is no 	

direct public transport from Brading station to Bembridge

- Bembridge already has a severe parking problem which would only be exacerbated by large scale development
- Large scale development would also put a strain on other services e.g. drains, which in some areas are already inadequate

3. Brading

To suggest that Bembridge should pick up Bradings allotment is dismissed for the reasons above.

4. Large scale

The Island Core Strategy clearly refers to small scale development within the RSC's

5. Demand & Migration

Savills claim that demand and migration need to be added to the identified needs when determining the total development requirement. The localism act and Neighbourhood plans are intended to give local communities the power to determine the future for itself.

Right move has been looked at and Savills concluded that larger houses (4 bed) are called for. There needs to be a clear differentiation between supply and demand. Currently a lot of the supply is larger properties – hence the identified need for smaller affordable properties. In the housing market supply often drives demand – people see what is generally available and enquire accordingly. Demand for larger properties is likely to be met by the supply of houses for sale. Note that there are always sufficient available properties to meet demand.

6. Windfall

We have recognised that windfall does not count.