



BRADING TOWN COUNCIL

This report has been considered by the Brading Town Council Planning Committee, and subsequently Full Council and has been unanimously approved as Brading Town Council's official comments to the Local Planning Authority regarding planning application P/01584/11.

Although the report highlights some of the views and concerns expressed by local residents at a Public Meeting held on Monday 26 June 2017, in conjunction with BRAG this report reflects the views of the Planning Committee and Full Council only. Notes of the Public Meeting are attached to the end of this report.

Representatives from the applicants, agents, RSPB, Local Planning Authority, IW Councillors, and the IW County press were invited to the meeting, and all declined to attend apart from the local ward Councillor (Mr B Tyndall) and the IW County Press. The Town Council are disappointed that the applicants have decided not to engage in a public consultation exercise.

Brading Town Council has been aware of the deterioration of the site over a number of years, and Members are not surprised of the alleged existence of Japanese Knotweed. Whether Planning Permission is or isn't granted, the owners of the site are legally responsible for the professional removal of this invasive weed, and this should be carried out with immediate effect by approved contractors, the relevant authorities notified and requested to intervene if proven.

BRADING NEIGHBOURHOOD PLAN - the proposed development should comply with the objectives of the Plan:

1. To conserve and enhance the historic and the rural character of the Parish.
2. To develop economic activity that will help provide jobs for local people.
3. To protect the natural environment and the species that inhabit it.
4. To seek to improve transport links and traffic management within the Parish
5. To ensure that new development does not increase flood risk in the parish by being placed in inappropriate locations.

These objectives are not meant to be considered in isolation but collectively, and developers need to consider the combined policies and how they will be addressed.

In addition, a Heritage Audit carried out to inform the Neighbourhood Plan gives details of all "Heritage Assets" within the Parish. These assets are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions because of its Heritage interest.

Policy HE1 – development proposals should respect conserve and enhance the historic environment comprising the heritage assets, both designated and undesignated, and their settings.

Policy HE2 – Development proposals should demonstrate how they have considered any impact on important views and skylines.

Policy JE1 – Proposals that sustain and create economic growth and jobs in the parish should be located within or immediately adjacent to the Rural settlement Centre settlement boundary of Brading. Proposals that achieve the provision of tourism-related development will be supported. Sustainable rural tourism and leisure development that benefit rural businesses, communities and visitors, will be supported provided that they are in keeping with, and do not harm, the character of the countryside.

Policy E1 – development proposals that respect, conserve, and wherever possible enhance the natural environment and the important views within the Parish, will be supported.

The Council will encourage developers to take account of energy and efficiency conservation systems, sustainable drainage systems and prevention of flooding, appropriate level of off-road parking, provision of safe and appropriate access, increasing the number of footpaths, cycleways, bridleways and safe routes to school.

OUR CONCERNS

1. The Town Council is fully aware that there is an extant permission for a golf course and clubhouse which could be implemented at any time – provided it is constructed entirely in accordance with the approved plans and conditions complied with. It appears to the Council however, that this proposal is unlikely to proceed, and therefore the land will continue to deteriorate in the forthcoming years.
2. The Town Council does not accept that any improvement to the condition of the area, and the benefits to wildlife would be dependent on some form of development on the site.
3. The applicants have proposed a tourism related development, which is not contrary to policy, however, the Town Council are concerned that the holiday lodges will become a permanent residential out-of-town village in the future. Should planning permission be granted by the Local Planning Authority, safeguards against this by the entering into to a Legal Agreement supported by the imposition of conditions, is essential. Occupants of the lodges should not be able to occupy the holiday lodges for periods in excess of 2-3 weeks continuously, and a Register should be kept to verify this requirement. A Legal Agreement is necessary to prevent a future application being made to have the conditions varied or removed. The IW Core Strategy aims to promote all year round tourism and if the aforementioned Legal Agreement is entered into, then this could sustain all year round local employment.
4. Should planning permission be granted for this “Year round high quality destination” then the applicants should also agree, by Legal Agreement, that none of the holiday lodges will be sold off separately from the site, to prevent occupancy breaches.
5. The site today, due to past lack of maintenance and care and extensive dumping, is in a regrettable condition, and adds little benefit to important views in the surrounding area. However, the construction of 60 lodges, a reception and Health suite building, and an RSPB Centre, would have a serious impact on the rural character of the area. Should planning permission be granted it is essential that an approved landscaping scheme, with appropriate screening of the holiday lodges and associated buildings, be implemented prior to any construction being carried out, regardless of the proposed phasing scheme submitted with the application. It must not be forgotten that the site is designated as a SINC, SPA, and also a RAMSAR site, an area internationally regarded as an important wetland habitat.
6. In the past when “inert” materials were dumped on the site, it has been alleged that some spoil originated from the old Sandown gasworks site, developed as part of the Seaclean Wight scheme. This spoil and the watercourses should be rigorously tested for contaminants throughout the entire site, and should planning permission be granted, then conditions imposed requiring any contamination to be removed, prior to development commencing.
7. The plan submitted shows building on the site at current levels. The Town Council suggests that should planning permission be granted, that a condition is imposed, and strictly enforced, to prevent any further waste material including soil, rock, cement, concrete, sand, stone or hardcore of any sort being brought onto the site for disposal or for the levelling, reclamation or infill of the land. The only materials excepted from this should be necessary building materials.
8. There is a vast variety of protected species of wildlife, fauna and flora that are present on the entire site and surrounding landscape – not just birds that have been attracted to the area by the ideal conditions provided in the adjacent RSPB Reserve. It is essential that any wildlife, birds, animals and plants, are recorded, protected/relocated and preserved during the construction and landscaping process, by condition if appropriate, should planning permission is granted.
9. The land is very low lying and Brading suffers with regular localized flooding, especially in the Coach Lane / Vicarage Lane area, where the watercourse continues towards and through the application site. There are universal concerns that site drainage and management will impact

on the existing inadequate flood measures. The applicants may wish to investigate measures to alleviate the flooding potential in Vicarage Lane.

10. The applicants have not demonstrated to the Town Council how the proposal will benefit local community in Brading. If the development will not be accessible to all, locals and off-site tourists and visitors, and only allow for holiday makers resident within the site, then the local and national policies will not have been adhered to. The Town Council trusts that the area will be available to all, and that it is not the policy of the applicants and the RSPB to limit access. It is of great concern that a vehicle barrier is proposed at the entrance to the site, and gives rise to this point of view. Have the applicants considered the likely impact of traffic congestion that could occur if waiting vehicles are impeded by a barrier at the entrance to the site? It is unclear why a parking provision for 225 vehicles (with possibly 500+ people) is to be provided if access is to be restricted.
11. In promoting sustainable transport links, the Town Council notes that a footpath leading from the site to the Bus stop adjacent to "Oasis" is to be constructed. How is it then that the developers have not identified in their Transport Assessment that this bus stop is not now in use, and the nearest bus stop is located on the A3055 Ryde – Brading road, past the traffic lights? There is no continuous pedestrian footpath from the site entrance to the main road, and although there have been few accidents in the past, with an increased level of use, and pedestrians expected to walk along a stretch of road with a 50mph speed limit and no dedicated footpath, there can be no doubt that a real danger will occur. **If planning permission is granted, it is suggested that the developers enter into a Legal Agreement to construct, extend and maintain a properly upgraded pedestrian footpath, together with appropriate pedestrian crossing lights at the junction of Carpenters Road and Rowborough Lane / Beaper Shute.**
12. As the Island's only railway link runs adjacent to the western boundary of the site, there would be an ideal opportunity for a small Platform to be constructed, the cost being borne by the applicants, similar to that serving Smallbrook junction, and Havenstreet Railway, to enable visitors, both residential and non-residential tourists, to access the site by rail.
13. Should the proposal be approved by the LPA, then construction traffic could pose a significant danger, and it is suggested that measures be put in place to restrict hours of operation, together with wheel washing facilities within the site.
14. If the Brading Neighbourhood Plan is to have any influence, then consideration should be given to the applicants providing appropriate access from the town, where local businesses may benefit from the tourist related industry. A properly constructed footpath/cycleway along the existing FP4 (Vicarage Lane to St Helens, crossing the application site) would enable tourists to easily navigate their route to the town, with pushchairs or cycles. Brading itself needs more economic activity.
15. The applicants have maintained that the holiday lodges will ecologically and environmentally friendly, and show photovoltaic panels on the roof. Although an environmental strategy, these can have a serious impact on the visual impact of the site from various viewpoints within the landscape.
16. The Town Council has particular concerns with regard to the excessive car parking area, and does not consider that this degree of parking provision sits well with the applicants contention of an eco-friendly site. It is disappointing that nowhere on the plans are there any electric charging points shown which would go a little way to supporting the applicants contention. It is assumed that the car parking area would be constructed of a porous material to prevent excessive water run-off.
17. The Town Council understands that the foul waste from the lodges cannot be directed towards the Quay Lane waste water treatment site as it is no longer in use for the treatment of waste since the pipeline, under huge pressure, merely crosses the treatment site and continues to the Sandown Waste treatment site. The site in Quay Lane only takes foul waste from private septic tanks or drain clearance, which is delivered by "gulleysucker" lorries.

18. Marsh House Farm building is locally listed as a Heritage Asset, and has fallen into disrepair over the years. There is a requirement in law that this building should be retained, renovated and restored to its former condition.
19. The proposed development site lies within the strategic gap between Brading, Ryde and St Helens, and there is serious concern that this gap will be further eroded with incremental development in the future. The "Pennyfeathers" development has been approved within the last couple of years, long after this application was originally submitted in 2011, and as part of that application, an infrastructure report was submitted. Each major development, of which this is one, appears to have their own infrastructure reports, but these individual reports only take into account the immediate vicinity and requirements of that particular development. A strategy encompassing the area has not been considered as a whole.

NOTES OF PUBLIC MEETING

In conjunction with Brading Residents Action Group – Notes of Public meeting held on Monday 26 June 2017 at St Mary's Church Hall, Brading – in respect of Planning Application P/01584/11 entitled Brading Wetland Project.

In Attendance: Mayor, Deputy Mayor, Cllrs Bonsey, Bristow, Graney, Hudspith, Johnson and Ramsden. Bryn Davis (Brading Neighbourhood Plan). Richard Wright (IWCP) Clerk, and about 60 members of the public.

Mayor welcomed everyone to the meeting and explained that it had been hastily arranged to obtain the views of the public in respect of the planning application for:
Sustainable tourism and wetland enhancement project to include 60 holiday lodges, reception/health suite building, alterations to existing access, car parking, cycle and pedestrian routes and associated landscaping; RSPB visitor centre and storage barn (revised plans)(revised description)(re-advertised application)(revised plans relating to two storey holiday units, barn and RSPB visitors centre; and land levels)(additional information relating to ecology transport, landscape and visual impacts, contaminated land, phasing, flood risk, assessment and drainage, habitats regulations and non-technical summary for Environmental Statement).

The Town Council are consultees and before submitting their comments to the Local Planning Authority by 7 July 2017 wish to be aware of the information about the history of the site, and receive the views and concerns of the local residents. Speakers were asked to raise their hands and were taken in order.

1. Fanny Oglander
2. Marianne Sullivan (Bembridge PCC Chairman)
3. John Hague (IW Ramblers)
4. Christine Cooney (St Helens)
5. Nigel Pidgeon
6. Mike Cooper
7. Beverley Coulby
8. Mike James
9. George Bristow
10. John Graney
11. Richard Whiting
12. Sue Birch
13. Steve Bonsey
14. Richard Hudspith
15. Bryan Tyndall
16. Teresa James
17. Chris Meaney
18. Jeannette Edmunds
19. June Rivers
20. Bryn Davis
21. Peter Giles.

1. A) There is no footpath between the site entrance and the closest bus stop on the Brading Road, presenting a clear danger to pedestrians travelling by bus to and from the site.
b) There is evidence of Japanese Knotweed is growing profusely within the site, evidenced by photos and expert identification.
c) the site can be viewed from many viewpoints including Culver, St Helens, footpaths to Bembridge via the Old Windmill and the Old Railway line.
2. Brading is surrounded by AONB SSSI, RSPB reserve, is a Historic town and concern about this site has been ongoing since the 1980's. Original permission was for golf course, which provided facility for dumping of inert material without PP. Has developed wildlife over land over many years, but people not convinced that land is safe and free from contaminants. It is honourable however that some of the land is to be given to the RSPB.
3. A) Confirmed presence of Japanese Knotweed on top of one bund close to field adjacent to Old railway Line. It is imperative that should the development go ahead that the developer deals with this in the proper manner under Government Legislation by approved contractors.
b) The IW Ramblers have looked at the Public Footpath with a view to securing improvements, and now need to consult with the developer as it shows on the plans that there may be a diversion planned.
4. A) The lodges are described as "Eco" – just how environmentally acceptable will they be in respect of sewage disposal?
B) The IW needs commercial enterprise but not out of town residential development. There are traffic concerns and potential dangers for tourists.
c) within the strategic gap between Brading St Helens and Ryde and there is a danger of all these towns joining up.
5. Danger to visitors not only from normal traffic, but construction traffic also. Is it part of developers plan to confuse the public with so many extensive documents?
6. Whole application HAS been padded – ie the Transport assessment includes complete bus timetables! The development will become a small village on green belt land in gap between Ryde and Brading. The site is overgrown and messy, but who will pay for its' restoration? It can be seen from various viewpoints, and buildings should be maximum of one storey. Concerned that there are many Landscaping and building projects that have been started but not completed. There should be cycle access within the site to provide a link from Brading to Ryde.
7. Application documents have considered coastal flooding but there is no mention of flooding from Brading Downs and concern for residents living further down the Yar. Noted that two holes dug – one metre deep – but during summer when conditions not conducive to flooding.
8. During operation Seaclean Wight, materials were deposited from the Sandown site which was known to have contained cyanide.
9. The IW needs more attractions and the idea of an RSPB visitor centre to bring more people into Brading is good as the town needs more economic activity.
10. Farlington Marshes outside Portsmouth is unspoilt with narrow lanes for people to visit the area, and this could be brought about at Carpenters but would not be financially viable without the development. The area has become a complete mess, overgrown with weeds.
11. A) Trying to ascertain if Marsh House Farm building on the site is Listed – waiting for confirmation. The land was formerly water meadows but has degenerated into unmitigated shambles, and building in decay. Site has been walked and ditches have already filled up with debris, which will exacerbate flooding.
B) Understand that the dumped soil from the former gasworks site (Southern Water Treatment Works at Sandown) could be contaminated.
c) Any reason why EnPlan have decided not to carry out public consultation? Are they required to do so?

12. A) Reports make no mention of flooding from downs via Coach Lane, Vicarage Lane and beyond the railway line, which can also be affected.
B) The agents describe the facility as “A year round high quality destination” and thus appear to be applying for permanent residency. How are the holiday lodges to be controlled if they are sold separately from the site?
c) Buildings show photovoltaic panels on roof – the visual effect of these can be intrusive in the landscape, as can the effect of a car park for 225 vehicles.
D) Applicants say there will be eight jobs provided – does this include the retention of the RSPB Manager’s post? Tradesmen to carry out construction – will the 45-65 jobs be to locals?
e) According to details the RSPB will control type and access of visitors with a vehicle gate at site entrance with key for resident tourists. Where is this to be located so traffic will not be compromised on public highway? Does this mean that non-residents (ie local people) will not have opportunity to visit the reserve? Is this to be their policy?
f) Important that waste water is treated and not discharged into the watercourses. However, their plan to discharge effluent to Quay Lane waste water treatment works fails, as the site is not operational or accessible since the Seaclean Wight pipe was laid across the site on towards the Sandown waste treatment works.
g) How will the protected species known to be present within the site be protected during the construction period?
h) Since 2011 when the application was first submitted, the housing development at “Pennyfeathers” has been approved, with its’ own infrastructure report. Other developments in the area have also been approved each with their own infrastructure and transport reports, however, traffic and transport infrastructure has not been considered as a whole in the locality.
i) Concern that landscaping will not be carried out primarily before laying of foundations and car parking.
13. The idea of more tourism in the area that would be beneficial to Brading is desirable, however, the infrastructure is insufficient and there are no indications that there would be a better economic value with more footfall in the town, or into St Helens. The Island needs more attractions not residential development. The Island’s views are widely renowned, and a more strategic development should be considered to reduce the impact.
14. The traffic impact for this site should be considered together with the traffic impact for the Pennyfeathers development with both assessments being applicable.
15. As local Ward Member, no opinion can be made at IW Planning Committee (application will be decided at Committee and not through delegated powers), however, questions may be asked, and happy to receive queries.
16. Can Clerk confirm which organisations were invited to attend? Confirmed – Agents on behalf of applicants, RSPB, Planning Officer and Head of Place at IW Council, local Councillors and IW County Press (IWCP). All except IW Councillor and IWCP declined to attend.
17. When the gold course was approved, together with clubhouse and hotel, tipping began – is the permission extant. Answer was yes, provided they constructed development in complete accordance with the approved plans – development could proceed at any time in the future. The flood risk assessment now shows that the land is now 2-3 metres above sea level.
18. Ownership –are the applicants the same as on pervious applications? All details of companies directors are available on Companies House website, and it is free to look at. Confirmed that at least one of the directors of the latest company to own the site, which has been transferred on at least six occasions, is constant throughout.
19. Why couldn’t the Harbour Farm property off Embankment Road Bembridge be used by the RSPB as a Visitor Centre as they own all the land there? It was confirmed that the Environment Agency have purchased the property, not the RSPB.
20. The issues in respect of the Planning application are covered in the Brading Neighbourhood Plan.

21. For development within the green belt that already has planning permission for development, does this fact change its land status?

In closing the meeting the Mayor thanked everyone for attending, and reminded all that they are responsible for submitting their own comments to the LPA, and Brading Town Council will not be responsible for submission of comments that are not specifically agreed by the Planning Committee / Full Council.