

Economy Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 22:23:03

Name/Organisation

Christopher Jarman

Email Address

[REDACTED]

1. What type of respondent are you?

Councillor

2. What Economy policy you are commenting on

E1 - Supporting and Growing our Economy

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

No

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

No

5. Please give details to support your answer to question 4

- **No, Failure to comply to Duty to Cooperate**
- **No - not legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **Not consistent with national policy**
- **not effective**
- **not justified**
- **not positively prepared**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

- **There is very little in the IPS that seeks to promote investment which might provide local employment, dealing with the West Wight where the local economy is not even mentioned, or to provide the infrastructure to support remote working, either for existing residents or for incomers of working age.**
- **Transport / roads / infrastructure is often needed for people to get to their site of employment (if not a remote worker). IPS mention in section 6.7 as a 'multi user route between the West Wight and Newport' providing equestrian, cycling and walking facilities between Yarmouth (not in the Freshwater settlement) to Newport is not sufficient, and increasing the rural West Wight settlement will increase the carbon footprint of the Island by increasing the number of road users, in particular cars.**
- **Grade 2 agricultural land is rare on the Island, as stated in IPS 4.75 'The highest grades of agricultural land are a scarce resource on the island with most land classed as grade 3....an important contributor to the Island's economy and food security'.**
- **Implementation of IPS without removing the proposed greenfield sites will impact these treasured global environmental awards, directly affecting our vital tourism economy through the negative cultural and visual impact on the landscape, one of the main attractions for those who visit the Island.**
- **"Freshwater is a rich and highly diverse rural area, offering considerable potential for growth with regards to landscape and eco-tourism.**
- **The local environment, flora and fauna must be protected as it is this rural tranquillity that residents and visitors appreciate [...] Conserve and, where possible, enhance the views referred to in the evidence document "Most Valued Views".**
- **Any development within these areas must ensure that key features of these views can continue to be enjoyed' Freshwater Neighbourhood Plan (2017-2027).**
- **The Council must consider the implications of urbanising a treasured rural landscape and the impacts this will have on the tourism economy as these are intrinsically linked. Large scale developments will have the greatest of impacts and the greatest risk of negative impacts on both the landscape, biodiversity and tourism. Sensitive and small developments should be prioritised on brownfield sites, that are in need of improvement, and have the least risk of detrimental impacts.**

9. Do you have any comments on the policies map?

No

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

To represent the serious concerns of my residents.

Environment Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 22:15:18

Name/Organisation

Christopher Jarman

Email Address

[REDACTED]

1. What type of respondent are you?

Councillor

2. What Environment policy you are commenting on

EV4 - Water Quality Impact on Solent Marine Sites (Nitrates)

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

NA

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

No

5. Please give details to support your answer to question 4

- **No, Failure to comply to Duty to Cooperate**
- **No - not legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **Not consistent with national policy**
- **not effective**
- **not justified**
- **not positively prepared**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

- **The plans are contrary to maintaining our UNESCO Biosphere status, and the significance of the landscape in the West Wight is emphasised by the fact that 60% of the area is within an AONB (now known as Isle of Wight National Landscape) and 80% of the coastline is Heritage Coast.**
- **How will developments in DIPS, such as sites in Freshwater that are within risk zones of SSSI sites and the SAC at Afton Marshes, impact on these precious habitats? The NPPF states that “development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted”....**
- **The Island gained UNESCO Biosphere status in 2019: "The intimate mix of landscape types, from small hedge-lined fields to wide farmable vistas, is a testament to how the combined forces of nature and man have influenced the Island over time. Here, the development pressures experienced on the south-east of England have had less influence on the Island's natural and cultural heritage."**
- **Natural England reported that farming and agriculture, artificial fertilisers and animal waste, and domestic and industrial sewage contribute to the emission of nitrogen oxides and ammonia. These are powerful airborne air pollutants and raise acidity levels in the water – this is having a detrimental impact on the ecosystems and the organisms that depend on them. The report found that nitrogens in the water are accelerating green algae growth in protected areas of the Solent. The Solent and Southampton Water special protection area (SPA), which includes estuaries, mud-flats, coastal habitats, saline lagoons and shingle beaches is protected by law under the Conservation of Habitats and Species Regulations 2017.**
- **Our estuary and streams flow into the Solent and Southampton Water special protection area (SPA) which is protected by law under the Conservation of Habitats and Species Regulations 2017. A recent report by Natural England stated that “domestic and industrial sewage contribute to the emission of nitrogen oxides and ammonia. These are powerful airborne air pollutants and raise acidity levels in the water – this is having a detrimental impact on the ecosystems and the organisms that depend on them. The report found that nitrogen in the water is accelerating green algae growth in protected areas of the Solent.”**

9. Do you have any comments on the policies map?

No

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

To represent the serious concerns of my residents.

Environment Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 22:07:52

Name/Organisation

christopher jarman

Email Address

[REDACTED]

1. What type of respondent are you?

Councillor

2. What Environment policy you are commenting on

EV6 - Protecting and Providing Green and Open Spaces

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

4.62

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

No

5. Please give details to support your answer to question 4

- **No, Failure to comply to Duty to Cooperate**
- **No - not legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **Not consistent with national policy**
- **not effective**
- **not justified**
- **not positively prepared**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

- **Building on green fields opposes the policy of protecting our UNESCO status, the Solent from sewage, our Carbon neutral plan and other key environmental factors directly impacted through exponential property development. Stronger protection for greenfield sites is required and such should only be an absolute last resort and then only to the lowest quality of agricultural lands.**
- **Carbon Neutral Pledge: The IoW Carbon Neutral plan. In the Climate Environment Strategy 2021-2030 it is stated: "The Isle of Wight has a stated aim to achieve net zero emissions by 2030, in both the council's own activities and the wider Isle of Wight environment." The IoW Council has declared an aspirational goal of being Net Zero by 2030 but this development will contribute to additional CO2 through the build, increased household CO2 emissions and removing greenfield sites that absorb CO2 being destroyed forever once developed upon. Full satisfaction of 100% of build, lifetime and termination CO2 must be offset and all properties to maximise solar energy gain preferably with mandated solar tiles.**
- **If the council were to offset (plant trees or create new woodland, for example) the entire 2017 carbon footprint, approximately 2.5 million trees would have to be planted. If the council were to eliminate 85 percent of emissions by 2030, and offset the further 15 per cent approximately, 760 hectares (or 760 rugby pitches) worth of tree coverage would need to be planted. Developers must be responsible for all carbon offsets using certified providers and underwritten by insurance.**

9. Do you have any comments on the policies map?

No

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

As a Councillor to ensure transparency and to represent by residents and their representations via me.

Environment Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 22:12:58

Name/Organisation

Christopher Jarman

Email Address

[REDACTED]

1. What type of respondent are you?

Councillor

2. What Environment policy you are commenting on

EV10 - Preserving Settlement Identity

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

EV10

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

No

5. Please give details to support your answer to question 4

- **No, Failure to comply to Duty to Cooperate**
- **No - not legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **Not consistent with national policy**
- **not effective**
- **not justified**
- **not positively prepared**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

This suggested movement of the settlement boundary ignores the neighbourhood community led planning that exists within Freshwater Neighbourhood Plan . The allocation of sites has been changed without consultation and does not serve local community needs.

The original settlement boundary for Freshwater should be re-established and hardened, to remove the constant threat to Grade 2 agricultural land (Camp Road, Freshwater), in accordance with the Freshwater Neighbourhood Plan. The Settlement Coalescence Study highlights the gradual erosion of gaps across Freshwater. Specifically, the Settlement Coalescence Study recommends the following:

- **Retain open views from roads to wider rural gaps: there is negligible separation between settlement areas along connecting roads, but roadside gaps in development, permitting views across the wider gaps that exist away from the roads, make an important contribution to retention of distinctions between different settlement areas.**
- **Avoid large-scale buildings: Any new buildings visible from more than one settlement area would diminish the sense of separation between those areas.**
- **Moving the settlement boundary for Freshwater is a significant proposed change which needs socialisation with communities and Parish Councils alike, and if agreed to by the community - approval from proper authority.**

9. Do you have any comments on the policies map?

No

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

As a local Councillor to represent residents and their views as they requested.

Housing Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 22:18:00

Name/Organisation

Christopher Jarman

Email Address

[REDACTED]

1. What type of respondent are you?

Councillor

2. What Housing policy you are commenting on

H1 - Planning for Housing Delivery

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

113

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

No

5. Please give details to support your answer to question 4

- **No, Failure to comply to Duty to Cooperate**
- **No - not legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If no to question six is this because?

- **Not consistent with national policy**
- **not effective**
- **not justified**
- **not positively prepared**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

Continued pursuit of nationally imposed housing numbers will perpetuate the decline of our young population and accelerate our ageing population. The Island is already 44% older than the UK average, and Freshwater is more than double.

- **Social / affordable housing should be the top priority for IoW Council and yet the track record for delivery is shamefully low**
- **The Island's needs affordable housing (to rent and/or to own) enticing the essential workers we need to move, or move back to, the Island - a key priority**
- **The Island's unique situation lends itself to 'Exceptional Circumstances', NPPF P61 ('unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals') and we ask that the LPA re-examines the approach adopted in calculating the annual housing target in order to arrive at a more realistic figure which takes the above factors into account.**
- **The proposed allocation of circa 450 houses per year (for 15 years), or indeed the governments recent target changes (to over 1100 per year) are not based on the Objectively Assessed Housing Need, but on a more Island realistic housing requirement, but we consider this figure to be an overestimate for the following reasons:**
 - **The housing targets do not reflect local need which is based on a declining population. Instead, they are based on external demand which is a result of internal migration. There is no evidence to support the need to provide for internal migration by sacrificing green fields.**
 - **The Isle of Wight has grown in population by 30% in the last 50 years whilst the UK population has grown by only 20% i.e. the Island is growing twice as fast and needs 'Exceptional Circumstances' to stem this unsustainable growth which is not matched by economic growth.**
 - **House prices on the IoW are below the average for the south-east, making the Island an attractive destination for incomers from the mainland.**
 - **IoW housing completion rate over the last ten years is closer to 350 per year, which is more representative of the long-term need.**
 - **Vacant homes are double the national average (Housing Needs Assessment 2018).**
 - **West Wight has been allocated a disproportionate number of houses in relation to our available brown field capacity, social, medical and utility infrastructure. The accommodation of these numbers has been facilitated by the SHLAA process allocating large sites outside our existing settlement boundary.**

9. Do you have any comments on the policies map?

No

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

To represent the serious concerns of my residents as requested by them

IPS visions and objectives - Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 20:36:50

Name/Organisation

Christopher Jarman

Email Address

[REDACTED]

1. What type of respondent are you?

Councillor

2. What IPS vision and objectives policy are you commenting on

Section 2 The Isle of Wight and the issues we face

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

NA

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

No

5. Please give details to support your answer to question 4

- **No, Failure to comply to Duty to Cooperate**
- **No - not legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **Not consistent with national policy**
- **Not effective**
- **Not justified**
- **Not positively prepared**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

B. Data.

The project from commencement to R19 focussed on the accuracy of population datasets used by IWC, on the figures for extant permissions, on the accuracy of the housing registered and associated housing needs data. Submissions by local resident associations and by Councillors that did not support the draftIPS were routinely blocked and Councillors were left with no option in several cases but to circulate such differences of evidence directly. IWCouncil in turn sought external KC advice, without transparency of the engagement exchanges, that repeatedly sought to undermine learned expert opinions to such an extent that those counter-positional evidences could be ignored. This policy aligns with the declared planning position regarding resident funded advice which is refused formal circulation and with the note that only such evidence supporting officer positions will be included.

Lengthy delays were incurred on these data issues to the extent that even data from the Office of National Statistics used in independent submissions was rejected where it demonstrated that population and other figures had been significantly overstated. Even where overestimation was accepted, all efforts were made by IWCouncil to use misleading statistical analysis to present these as minor.

By way of example, the original estimate for mid-2010 was 140,491 persons, but this was reduced to 138,364 following the 2011 Census. Similarly, the original estimate for mid-2021 was 142,353 persons, which was reduced to 140,885 following the 2021 Census.

IWCouncil sought external representation to claim that the differentials between estimated figures they used and the actual were so minor that they would not be regarded as significant. Whilst in the first example, the reduction of 2,127 persons represents less than 2% of the total population of the Isle of Wight, it equates to 39% of the current estimate of population growth from 2001-2010. Based on the original estimate, that growth was estimated to be 7,566 persons (an average of 841 per year); whereas the revised figures identified growth of 5,439 persons (an average of 604 per year).

In the second example, the reduction of 1,468 persons represents only around 1% of the total population of the Isle of Wight, it equates to 59% of the current estimate of growth from 2011-2021. The original estimate identified growth of 3,961 persons from 2011-21 (an average of 396 per year); whereas the revised figures identified growth of 2,493 persons (an average of 249 per year).

Clearly the referral to total population rather than the actual percentage differential error sought to deflate any contrary opinion, whereas the real differential is very significant. This real differential error, already large, is compounded when extrapolated forward and presented as an argument to support a substantial future need. A completely erroneous projection from known faulty data.

By way of a second example, Comparing the estimates that informed the 2014-based household projections (used to set the baseline in the standard method) these averaged growth of 239 persons per year from 2009-2014 whereas the current estimates for the same period average a growth of only 108 persons per year. Had the data been correctly used and accepted, it is clearly arguable that the 2014-based population and household projections are likely to have overstated future growth due to inaccuracies in the underlying population estimates which informed the trends.

This can be demonstrated by comparing the population growth that was projected by the 2014-based projections, with the population estimates for the period 2014-2023. The projections identified growth of 5,335 persons (an average of 593 per year) whereas the estimates show actual growth to be 2,007 persons (an average of 223 per year): a very substantial error of 3,328 persons. The correct data was, and is, used by other functions within IWCouncil and by all known regulatory and government bodies including the NHS. Had the IWCouncil accepted the actual data, analysis and commentary funded by Councillors and resident groups, it would have aligned with both internal functions and other agencies. It would also have been aware from those other government datasets, that much of the difference is associated with the number of children, which accounts for 2,414 persons (72%) as the 2014-based projections are now known to have significantly overstated fertility rates which are known to IWCouncil in their school place planning.

Whilst Planning Practice Guidance states that these projections do not provide an appropriate basis for use in the standard method, there is scope for such large discrepancies to be fed into the process and, using

actual data with supportive arguments as to how the errors impact calculations, for a more rationale plan to have emerged. Ultimately, actual population growth of around 200 or so per year (and perhaps less in the future given the decline in recent years) would be a wholly irrational basis for proposing a planned need for 453 net new properties each year for the next 15 years.

The calculation and rationale for the present draft plan is fundamentally flawed and there is no clear route to correcting this but to start with correct actual data and to ensure that any revised planning strategy is solidly data driven.

9. Do you have any comments on the policies map?

No

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

I have been fully absorbed into this process since 2021 and specifically in the datasets and accurate interpretation of same in developing the DIPS and the justification of representations made therein. I have been at the forefront of resident group discussions and representations. My appearance at hearing sessions will assist in transparency of process and enable, through me, the voices of a significant number of residents and their multiple West Wight groups to be represented.

IPS visions and objectives - Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 20:42:37

Name/Organisation

Christopher Jarman

Email Address

[REDACTED]

1. What type of respondent are you?

Councillor

2. What IPS vision and objectives policy are you commenting on

Section 2 The Isle of Wight and the issues we face

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

NA

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

No

5. Please give details to support your answer to question 4

- **No, Failure to comply to Duty to Cooperate**
- **No - not legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **Not consistent with national policy**
- **Not effective**
- **Not justified**
- **Not positively prepared**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

C – Options and Analysis.

During the development of the dIPS a succession of representations were made to central government regarding the unique characteristics and challenges faced by the Isle of Wight regarding logistics, financing, materials, transport costs, skill sets and a host of other characteristics that limited effective delivery of development projects here.

There were likewise a succession of representations regarding the increasingly skewed demographics and the complexities that a predominantly aged population brings to social infrastructure and sustainable cohesion and regularity of support services. The impact of these demographics on fertility rates on educational provision is well known and these characteristics feed through into declines of working age people necessary to support same.

To include inward bound retirees in housing needs calculations in the dIPS cannot therefore be sound as this accelerated the skewed demographics and amplifies the societal stresses.

The solution, recognised in 2023, was to afford the Isle of Wight the option to claim Exceptional Circumstances and this was provide for in updates to NPPF – the Isle of Wight being in a rare position of matching both the requirement of skewed demographics and separation by water.

Here again significant efforts by Councillors to revise the dIPS to one of Exceptional Circumstances were countered by IWCouncil. Excluding this option significantly protracted the debate and ultimately resulted in a lost opportunity for the Isle of Wight to bring forward a rational plan that matched both what the Island needed and what could be practically delivered.

Exceptional Circumstances, whilst now removed as clause in the hurriedly revised NPPF, still represents a valid basis to claim exception form national formulae that are simply impractical and unnecessary on the Isle of Wight. This option should be brought forward on a more practical submission.

9. Do you have any comments on the policies map?

No

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

I have been fully absorbed into this process since 2021 and specifically in the practical deliverability of housing targets against need and the options available to the Isle of Wight to achieve same. I have been at the forefront of resident group discussions and representations. My appearance at hearing sessions will assist in transparency of process and enable, though me, the voices of a significant number of residents and their multiple West Wight groups to be represented.

IPS visions and objectives - Reg 19

Submitted by: Anonymous user

Submitted time: 19 Aug 2024, 20:32:49

Name/Organisation

Christopher Jarman

Email Address

[REDACTED]

1. What type of respondent are you?

Councillor

2. What IPS vision and objectives policy are you commenting on

Section 1 Introduction

3. Does your comment relate to a specific paragraph(s)? if yes which paragraph does this relate to?

NA

4. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be legally compliant?

No

5. Please give details to support your answer to question 4

- **No, Failure to comply to Duty to Cooperate**
- **No - not legally compliant**

6. In relation to the policy or paragraph you are commenting on, do you consider the Island Planning Strategy for submission to be sound?

No

7. If you answered no to question six is this because?

- **Not consistent with national policy**
- **Not effective**
- **Not justified**
- **Not positively prepared**

8. What modifications do you think are needed to make the Island Planning Strategy legally compliant and/or sound?

A. Process.

The R19 version is materially different to versions in earlier consultations. So different that this is in effect a new document for the public to review and yet the process applied does not support the open level of public, business, parish council, town council, community council engagement or that of the very many resident groups that have been highly vocal during the development of this plan. Returning it to R18 and that open process is necessary.

When the document reaches R19, the commenting process should be followed to permit the full time period of commenting in an open and transparent way using a legally valid commenting form. This has not been the case as

(1) the consultation was not added to the council consultations page for the first 11 days of the allotted period.

(2) only to slots of a few hours each were available to the 140,000 residents of this Island to engage with planning staff and to seek clarification or discuss their concerns, and these only at the central planning offices during business hours. This necessarily limited working people from participation and provided substantial accessibility issues to residents. This was particularly true as the planning offices are some distance from a bus stop and even then require multiple buses from our West Wight to reach them. In re-running any such consultation, accessibility should be a core consideration both for those with limited mobility, limited working day availability, visual and other sensory issues. There should also be outreach support with local engagement opportunities.

(3) Even when the consultation was added to the council consultation website, the form contained admitted errors. Specifically on Q5 the questions did not meet the legally valid requirements and this was only corrected 5 days/3working days prior to the end of the consultation period which was not extended. The result was protracted debate at local parish council session and resident confusion as to the legality of earlier submissions and if these should be rapidly resubmitted on the revised document. Additionally, the explanatory link was not included in the revised Q5 but in Q4, adding to concerns regarding validity. There was no announcement of the issue by IWCouncil and revision of the form which was only identified by Freshwater Parish Council evening Thursday 15thAugust. The news regarding legality was then communicated at resident discussions on evening Friday 16August and to the community meeting on the afternoon of 18August. The closing date for submissions was unchanged at 23:59 on 19Aug2024. Given the use of a non-legally valid form and other issues under this point, the R19 cannot be considered valid.

(4) IWCouncil has accessibility policies to ensure the knowledge, comprehension and literacy capabilities required by residents is not excessive. In discussions with local resident groups during the last 4 weeks of the R19 each reported that a majority of residents were unable to access the online forms and even when they were, the regulatory and legal complexities of the form and process were completely beyond their ability. This necessitated multiple community assistance sessions by those members of resident groups with the necessary technical skill. Even then, as was the case with even Freshwater Parish Council, residents were not able to confirm that the duty to consult or the legal requirements had been met – most believing that the challenging process and material were placed to avoid their input. Given the prohibitively complex form and process, the R19 cannot be considered valid and in compliance with resident expectations regarding accessibility.

(5) The R19 process was reported by residents and IWCouncil itself to be unavailable during the allotted schedule. In all reported cases this was due to issues with the IWCouncil website accessibility. IWCouncil did admit to at least one period over a long weekend when the site was taken down for maintenance. Participating residents were not advised of this or any other outage including those planned in advance. Some reported that on the site becoming available again, there part completed forms could not be found and some therefore abandoned commenting. Given the failure to provide the full R19 consultation period, the R19 cannot be considered valid.

9. Do you have any comments on the policies map?

Not in this submission.

11. Do you wish to request to appear at the hearing sessions that will take place?

Yes

12. Please outline why you would like to attend?

I have been fully absorbed into this process since 2021 and specifically in the regularity or otherwise of the process. I have been at the forefront of resident group discussions and representations. My appearance at hearing sessions will assist in transparency of process and enable, through me, the voices of a significant number of residents and their multiple West Wight groups to be represented.