

# IPS visions and objectives - Reg 19

Submitted by: Anonymous user

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Name/Organisation

**Peter Spink on my behalf as IW Councillor for Freshwater North and Yarmouth and for and on behalf of the Steering Group of the West Wight Villages Residents' Association**

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?

**Comments relate to paras:**

**7.78 should be deleted as inconsistent with NPPF definition of rural exception sites: The NPPF glossary describes rural exception sites as: "Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. A proportion of market homes may be allowed on the site at the local planning authority's discretion, for example where essential to enable the delivery of affordable units without grant funding". Paragraph 7.78 DIPS allows for large developments to be treated as rural exception sites. This would, for example, allow more developments of similar size to Burt Close, Shalfleet, (70 houses i.e. 7x definition of a major development). This is contrary to the para 82 NPPF, and the wishes of the Parish Council and residents.**

**The outcome that I am seeking is for rural exception sites on the Island to comply with para 82 NPPF, and the wishes of the Parish Council and residents.**

**G2. includes Calbourne, Shalfleet, and Wellow as 'sustainable rural settlements'.**

**Planning applications in the above areas have been found by the IoW Planning Authority, and by the Planning Inspector, not to be in sustainable locations. Accordingly, it is wrong in principle for these areas to be listed as sustainable rural settlements.**

**App 2 Freshwater HA005 Land to the east of Football Club Camp Rd. The development site is 'best and most versatile' agricultural land (grade 2), its inclusion as an allocated site is inconsistent with NPPF 180(b) as is the extension of the Freshwater Settlement boundary to assist its development i.e. by ensuring that an identified local need is not a prerequisite to planning consent.**

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 - 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**

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

**The revisions referred to in para 3 above should be implemented.**

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

**I am unable to answer this as have found the map to be unfathomable.**

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 wish to address and expand upon the submissions made in this form, including that the R19 Consultation has not been properly carried out. Firstly, the link to the consultation on the IW Council website did not link to the consultation for the first 11 days of the consultation period. Although this was accepted by the Council to be a fault, a request for the consultation period to be extended was [wrongfully] denied. Further there are unresolved issues which I would wish to comment upon as evidenced in an email exchange by Cllr Jarman with the LPA as set out below:**

**As the ver 1 of the Reg19 form was not legally correct, does this invalidate the legality of submissions made with it?**

**No – the comments forms (online and downloadable version) available from Monday 8 July 2024 included all of the questions that require answering. The error related to a hyperlink and line of supporting text beneath Q4 which would not affect the validity of submissions made.**

**3. Do earlier submissions using a non-legally compliant form need to be resubmitted on the revised form?**

**No – the planning policy team will review all of the submissions received during the Regulation 19 period and should there be a need to seek clarification from respondents they will be contacted directly.**

**4. As FPC concluded that neither the Duty to Cooperate or Legal Compliance can be affirmed, are there are implications for the process forward or representations with the inspectorate?**

**If FPC's view is that the IPS does not meet the Duty to Co-operate or is not legally compliant, then those views of FPC submitted during the Regulation 19 period will be reviewed and assessed by the Planning Inspector as part of the examination process that will determine whether the IPS has met the Duty to Co-operate and is legally compliant.**

**5. As FPC is unable to provide positive affirmations, the view of residents is to mirror the signification of FPC in Q5. They being, in most cases, even less able to provide such regulatory or legal compliances. Again for residents, are there any implications for the process forward or their representations with the inspectorate?**

**Again, if residents are mirroring FPCs views that the IPS does not meet the Duty to Co-operate and/or is not legally compliant, then as above those residents views will be reviewed and assessed by the Planning Inspector as part of the examination process that will determine whether the IPS has met the Duty to Co-operate and is legally compliant.**