

## Isle of Wight Council

### Island Planning Strategy – Regulation 19 Submission version: **COMMENTS FORM**

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**Name/Organisation: \***

Freshwater Parish Council

**Email: \***

**Address and Postcode:**

Memorial Hall, Avenue Road, Freshwater, PO40 9UU

Telephone:

██████████

**1) What type of respondent are you? \***

(Member of the public, statutory consultee (excluding Councillors and Parishes) Business (Landowner and Developers), Councillor, Parish Council, other Local Authorities, Resident Group.)

Parish Council

**2) What policy are you commenting on? \***

(Please complete a separate form for each policy you are commenting on)

C1

**3) Does your comment relate to a specific paragraph(s)? If yes which paragraph does this relate to? \***

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Having read sections 5.3 to 5.13 the conclusion is that focus is to build sustainable homes that enhance the Island ethos reflecting the character of the different areas of the Island.

**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?\***

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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? \***

There are four 'tests of soundness' set out in [paragraph 35 of the NPPF](#) – (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy

No

**7) If you answered no to question six is this because? \***

Not, Justified

**8) What modifications do you think is needed to make the Island Planning Strategy legally compliant and/or sound? \***

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**9) Do you have any comments on the polices map? \***

[\(click here to go to the Regulation 19 Island Planning Strategy Map\)](#)

**10) Do you wish to request to appear at the hearing sessions that will take place? \***

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**11) Please outline why you would like to attend? \***

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Alterations to the IPS since 2021 have not progressed the interests of the West Wight in any meaningful way. The requested upgrading of Golden Hill Industrial Estate, Freshwater, in E1 has not in FPCs opinion been given any real consideration by the IW Council and they have not given any reason for their decision. FPC did not receive any feedback from the IW Council as part of the process.

How can section 8 be sound if it ignores half the Island’s economic future.  
Please see question 10 for additional supporting information.



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No



## 10) Do you wish to request to appear at the hearing sessions that will take place? \*

Yes

### E1 Supporting and growing our economy

FPC continues to support our position for upgrading the Golden Hill Industrial Estate with some additional land, to a specific and detailed employment allocation, we supply the following as additional evidence:

In 2021 when FPC was asked to participate in a DIPS consultation we recognised the lack of inclusion within this policy for support or growth in the economy for the West Wight and we submitted comments to support our concerns. FPC requested an upgrading of the Golden Hill Industrial Estate in Freshwater Parish to become EA7 making it a key area for supporting and growing the local economy in Freshwater. This would have been an addition to the six sites chosen by the IW Council and the only one in West Wight. The Industrial Estate benefits from its proximity to Yarmouth Ferry Port and we believe that there is sufficient under use of the land within that site and immediate surrounding area to make a real difference to the local economy.

Should FPC's proposal be included in the IPS as EA7 we envision the site would include Golden Hill Industrial Estate (approximately 4 hectares) and the area to the north east Norton Green Industrial Estate. The IW Council owns a small number of buildings within the second site.

EA7 would be larger in size than the existing employment allocations EA1, EA3, EA5 and EA6. The combined site is currently largely in private ownership. FPC considers that the ownership of the land should not be a bar to the IW Council being proactive in designating the site to support and grow the economy. The designation would encourage the redevelopment and investment into the West Wight area.

FPC believes that the IW Council is choosing to primarily promote sites in which it owns the land. EA1, the majority of the land is owned by the IW Council. EA2 is under IW Council ownership. EA4 is council owned. EA5 is council owned. FPC asks the question, is the IW Council promoting those sites due to its own financial interests? Rather than the economic interests of the wider community.

The development of the Golden Hill Industrial Estate and immediate surrounding area would bring in new opportunities for investment. FPC believes the site would be suitable for a mixed-use scheme including:

- Light industrial usage
- Small scale start up units
- Storage and distribution

Upgrading the site would a number of impacts of the local area including:

- Minimal impact on existing housing once redevelopment had been completed
- Increase education and skills opportunities for the community
- Increasing employment opportunities for the community

- Businesses will have the confidence to invest
- Through careful planning BNG could be conditioned as part of planning decisions

The site is predominantly previously developed land and although some loss of flora and fauna would occur this could be mitigated through planning conditions using identified policies for biodiversity net gain. (Noting the large number of ecological sites nearby).

The site benefits from direct access onto the A3054 which leads to the Wightlink Port in Yarmouth less than 2 miles away.

### Why Freshwater?

There are no Main town centres listed by the IW Council in the West Wight. Freshwater Parish is the only settlement area in the West Wight listed by the IW Council as a “local centre”. As shown in the IPS paragraph 8.83 Table 8.2.

Demographic studies from the ONS have shown an aging population:

### **“An older Isle of Wight**

Between the last two censuses, the average (median) age of the Isle of Wight increased by five years, from 46 to 51 years of age.

“This area had the joint second-highest average (median) age in the South East (alongside New Forest and behind Rother) and a higher average (median) age than England (40 years).

The median age is the age of the person in the middle of the group, meaning that one half of the group is younger than that person and the other half is older.

The number of people aged 65 to 74 years rose by around 4,600 (an increase of 26.7%), while the number of residents between 35 and 49 years fell by just under 5,100 (18.8% decrease).”

This data clearly shows an increasing aging population.

The Island of Wight in a recent study conducted by Insurance Hero, who analyzed ONS local population data was shown nationally to have the 6th-highest population of people over 85 years of age. (Island Echo 26/07/2024).

Coupled together with a decreasing number of children in the West Wight.

The IW Council school place planning strategy 2024-2030 shows a predicted fall in school places across the West Wight for Freshwater and Yarmouth C of E Primary the strategy shows a predicted fall of 13%.

This is further evidenced with the IW Council Cabinet paper dated 18th July 2024 item 13:

“Utilising NHS Data longer term pupil trends show the decline in birth rates having a direct impact upon the number of children arriving into the primary phase. In 2027 only 920 children will be starting reception, 484 fewer than in September 2018. The overall number of primary pupils are forecast to decrease from 9300 in 2017, to 7,640 in 2027. Secondary forecasts indicate pupil numbers are starting to grow from c.6,200 in 2017 to 7,360 in 2027. However, this growth will not

be maintained longer-term and consideration will need to be given to how future surplus capacity is managed in the secondary sector.”

This trend is reflected in neighbouring Parishes.

Within the IPS regulation 19, four sites have been allocated for housing use totalling a number of 235 units.

The Parish needs to attract employment opportunities not only for its current population but for the future population, or it will result in further instability. The Parish not only needs to attract employment, but as a sustainable community needs to provide an anchor for young families.

Employment opportunities within the local area are mainly retail, tourism and care. The majority of these jobs are minimum wage or just above, with high property prices and a lack of affordable rental accommodation our young people are being driven away from the area.

The removal of employment land/opportunities through planning and other decisions by the IW Council have reduced the economic outlook for the West Wight.

Examples:

- Permission to allow 26 residential buildings within the West Bay Club site application number 22/00291/ful
- The inclusion of Heathfield Camping Site in the 5 year housing supply.
- Permission to allowing residential buildings within the Mountfield Holiday Park site Norton Green application numbers 23/01148/ful, 20/00779/ful and P/00735/17
- The Yarmouth School site is a loss of employment land (closed 2023) a scheme has been chosen that will incorporate 8 affordable homes which will reduce the amount of land available for employment. The redevelopment has not yet begun and previous experience has shown that these schemes do not always happen, despite the jobs already lost.
- Weston School Site (closed 2012) which is earmarked for housing.

FPC is concerned that the Parish is becoming nothing more than a housing estate and a dormitory for the elderly.

The list is not comprehensive, FPC has chosen sites within our boundary or just outside. Freshwater Parish is surrounded by countryside and has a lack of previously developed land to create new employment opportunities which the IW Council has recognised. The area around the Parish is protected by various designations for example, national landscapes, Tennyson Heritage Coast, SSSIs, and the SPA and the associated buffers. These protections further reduce the possibility of new employment land becoming available and make the removal of existing or previous employment land more critical to the future economic viability of the area.

The IW Council has consistently through planning policy removed sites from employment use into residential use, in the local area, contrary to the current Core Strategy and emerging IPS these include:

- West Bay Club Yarmouth within Freshwater Parish was approved 27 residential units in June 2022

- Mountfield Norton Green within Freshwater Parish was approved for 5 residential units in June 2022 and 2 further residential units December 2023
- Weston School Site Totland, which is within a mile of Freshwater Village closed in 2015 and now earmarked for residential units
- Heathfield Farm Camp Site Freshwater site listed as allocated housing site for 90 residential units

This policy undermines the Parish's ability to be sustainable in the future. The area is rapidly becoming a housing estate where primary employment is care for the elderly. It is also contrary to the following policies in the Freshwater Neighbourhood Plan:

#### FNP 1

To encourage the future growth of Freshwater's economy, centered on a diverse range of business activities, but with an emphasis on the following key sectors:  
Retail, tourism, professional services, construction and manufacturing.

#### FNP 3

To provide additional employment sites for businesses in order to supply a wider range of employment opportunities for all.

The removal of these tourism sites are contrary to policy FNP 5

The development of high quality tourist destinations and accommodation will be encouraged across the whole Parish but in particular close to the Freshwater Bay, Colwell Bay and Fort Victoria locations.

The Parish and surrounding area has an ever reducing number of employment sites which are lost through planning decisions which appears to be IW Council planning policy. There does not appear to be any policy to increase employment sites. We believe that this is unsustainable and that the West Wight is being overlooked in favour of areas already more densely populated with a wider range of education and employment opportunities. There are no secondary schools or sites of further education in West Wight.

Poor education and employment opportunities for our children result in them being caught in the benefits trap, leaving them no option but to leave the area. The West Wight is being left behind, it is becoming increasingly unsustainable. Communities have aging populations, a lack of career prospects and unaffordable housing. This is being caused by lack of forward planning by the IW Council as demonstrated in the IPS regulation 19 and the Core Strategy.

There is an increasing need for high quality jobs in the West Wight, this would underpin the ability for people to be able to afford to live within the Parish. FPC would welcome the opportunity for the inclusion of policies to emphasize this need within the IPS.

FPC requests that our concerns are properly considered and the upgrading of Golden Hill Industrial Estate including Norton Green Industrial Estate as a key employment allocation site is reassessed by the IW Council. We further request that the IW Council reconsiders its decision not to include a single site in what is traditionally thought of as West Wight for inclusion as a key area for supporting and growing the economy. The whole of the West Wight is reduced to:

E1 Supporting and Growing our Economy Strategic below item f on page 145

The council will also support the principle of intensification and expansion of existing employment uses in the the following employment opportunity areas (as shown on the policies map), including improving the range and flexibility of commercial uses that may be located within them:

- i Golden Hill Industrial Estate, Freshwater
- li Land at Afton Road, Freshwater

FPC asks the question why no site, town or village in what is considered traditionally as the area known as West Wight is being offered these enhanced status. FPC would welcome a mixed use employment site offering a diversity of employment opportunities, as stated in the objective of policy FNP 3.

“To provide additional employment sites for businesses in order to supply a wider range of employment opportunities for all.”

If the Economic section of IPS is adopted in its current form the West Wight will remain disadvantaged, we lack sufficient numbers of Councillors at County Hall, due to our rural nature, to push through any additional resources, funding and regeneration planning support at County Hall. We need to be able to use the IPS to support our position for the next 15 years.

#### **Question 11 – Please outline why you would like to attend?**

#### **11) Please outline why you would like to attend? \***

If you have answered No to Question 10 please put NA in the text box below

Our voice was not listened to, our concerns were ignored. The IPS has failed to ensure effective inclusion of the West Wight in the IPS for economic growth, we would like to speak for the community as we believe we are the appropriate body to do so.

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E2

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Priority for development should be on brownfield rather than greenfield sites. The benefits to developers are obvious, but the viability of any project must be for the long term economic benefit to the population of the Island. Justification for “why this site”, should be rigorously proven and evidenced. The Island has too many brownfield/PDL sites which in coastal areas are damaging the tourist industry, a major source of income across the Island. In order for the IPS to be sound, greater emphasis should be included in the IPS to demonstrate to developers that our policies to support Section 4: Environment and our areas of special significance, National Landscape, SSSIs, Ancient Woodland, Biosphere, etc are more than printed words. FPC would support additional policies which reflect economic growth which is sustainable in areas where the least damage to the environment can be demonstrated. This would highlight areas of brownfield/PDL and place less strain on greenfield sites, it is the rural nature of the Island that underpins our tourism sector which is a significant part of our economy.



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[\(click here to go to the Regulation 19 Island Planning Strategy Map\)](#)

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Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You can attach any files or documents with this submission. You should not assume that you will have a further opportunity to make submissions.

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The West Wight has no secondary school or further education sites. The IW Council does not provide post 16 free or subsidized transport for mainstream children. This puts children in West Wight at a significant disadvantage to those living in East Wight or the central area of Newport. The government requires that children remain in education until they are eighteen. FPC therefore would welcome the opportunity to upskill young people as there are limited educational offers locally. The causal relationship between child poverty and educational outcomes is well documented. Children from lower income households experience unequal life chances and go on to achieve lower incomes. The IW Council has shaped the education provision on the Island to disadvantage those children living in the West Wight. If the IW Council is committed to upskilling the Island then it should look more closely at ensuring that everyone has the same opportunities post 16 regardless of their postcode. In order for the IPS to be sound these disadvantages should be recognised within the IPS and policies brought forward to support people living in the West Wight..



**9) Do you have any comments on the polices map? \***

[\(click here to go to the Regulation 19 Island Planning Strategy Map\)](#)

No

**10) Do you wish to request to appear at the hearing sessions that will take place? \***

Yes

**Question 11 – Please outline why you would like to attend?**

**11) Please outline why you would like to attend? \***

If you have answered No to Question 10 please put NA in the text box below

Failure to include and acknowledge the concerns raised in this section prove that the West Wight needs a voice to ensure that we are not left behind in this critical area of economic growth, and to ensure our children are not disadvantaged. FPC believes we are the appropriate body to speak on these issues.

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**From:** [REDACTED]  
**To:** [Policy Consultation](#)  
**Cc:** [Freshwater Parish Council](#)  
**Subject:** Submission from Freshwater Parish Council  
**Date:** 19 August 2024 14:34:07  
**Attachments:** [IPS Regulation 19 comments form v2-H5.pdf](#)  
[IPS Regulation 19 comments form v2-H3.pdf](#)  
[IPS Regulation 19 comments form v2-H6.pdf](#)  
[G2 G4.pdf](#)  
[G1.pdf](#)  
[C1.pdf](#)  
[E1.pdf](#)  
[E2.pdf](#)  
[E3.pdf](#)

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To whom it may concern,

Please find attached Freshwater Parish Councils comments with regards to the IPS reg 19.

Freshwater Parish Council would just like to make the following statement.

**“Freshwater Parish Council does not have the technical and legal competence to determine whether or not the Plan is legally compliant and has fulfilled its duty to cooperate.”**

Many thanks.

*Kind Regards*

*Emma Carter*

*Deputy Parish Clerk to Freshwater Parish Council*

*Monday, Tuesday, Wednesday and Friday 9am -2pm*

*Tel Number* [REDACTED]

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## Isle of Wight Council

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Freshwater Parish Council

**Email: \***

**Address and Postcode:**

Memorial Hall, Avenue Road, Freshwater, PO40 9UU

Telephone:

██████████

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(Member of the public, statutory consultee (excluding Councillors and Parishes) Business (Landowner and Developers), Councillor, Parish Council, other Local Authorities, Resident Group.)

Parish Council

**2) What policy are you commenting on? \***

(Please complete a separate form for each policy you are commenting on)

G1 Job Creation

**3) Does your comment relate to a specific paragraph(s)? If yes which paragraph does this relate to? \***

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(a plan is legally compliant if it complies with the list in paragraph 3.1 [here](#) and the council have complied with the [Duty to Co-operate](#))

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? \***

There are four 'tests of soundness' set out in [paragraph 35 of the NPPF](#) – (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy

No

**7) If you answered no to question six is this because? \***

Not, Justified

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Not utilized spaces at Golden Hill industrial park efficiently to encourage more local industry. There is a need for small starter units to facilitate growth.



**9) Do you have any comments on the polices map? \***

[\(click here to go to the Regulation 19 Island Planning Strategy Map\)](#)

No

**10) Do you wish to request to appear at the hearing sessions that will take place? \***

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Parish Council

**2) What policy are you commenting on? \***

(Please complete a separate form for each policy you are commenting on)

G2/G4

**3) Does your comment relate to a specific paragraph(s)? If yes which paragraph does this relate to? \***

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(a plan is legally compliant if it complies with the list in paragraph 3.1 [here](#) and the council have complied with the [Duty to Co-operate](#))

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? \***

There are four 'tests of soundness' set out in [paragraph 35 of the NPPF](#) – (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy

No

**7) If you answered no to question six is this because? \***

Not, Justified

**8) What modifications do you think is needed to make the Island Planning Strategy legally compliant and/or sound? \***

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Area replaces new social/rental housing for both families and single persons.  
Accommodation requires to be energy efficient, well insulated and uses renewable energy.

**9) Do you have any comments on the polices map? \***

[\(click here to go to the Regulation 19 Island Planning Strategy Map\)](#)

No

**10) Do you wish to request to appear at the hearing sessions that will take place? \***

Yes

**11) Please outline why you would like to attend? \***

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Parish Council

**2) What policy are you commenting on? \***

(Please complete a separate form for each policy you are commenting on)

H3

**3) Does your comment relate to a specific paragraph(s)? If yes which paragraph does this relate to? \***

You are able to submit a separate form for each policy / paragraph you wish to comment on. If your answer to this question (no 3) is No please put NA in the text box below.

“The use of modular housing solutions will be supported and is recognised as an efficient way of delivering housing of all types and tenures.”

**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? \***

(a plan is legally compliant if it complies with the list in paragraph 3.1 [here](#) and the council have complied with the [Duty to Co-operate](#))

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? \***

There are four 'tests of soundness' set out in [paragraph 35 of the NPPF](#) – (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy

No

**7) If you answered no to question six is this because? \***

Not, Justified  
Not, Positively prepared

**8) What modifications do you think is needed to make the Island Planning Strategy legally compliant and/or sound? \***

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The sentence above is not compliant with the Statement of Community Involvement as the public were not adequately consulted on the use of 'modular housing'.

The proposed modular housing policy is not positively prepared or justified. It would not meet the area's objectively assessed needs as there is no known recorded demand for modular housing specifically.

Putting people in converted shipping containers or prefabricated modules doesn't accord with the local plan's aspiration to deliver better design quality.

To make policy H3 sound and legally compliant, the sentence on modular housing solutions, identified above, should be deleted.

**9) Do you have any comments on the polices map? \***

[\(click here to go to the Regulation 19 Island Planning Strategy Map\)](#)

None for this policy.

**10) Do you wish to request to appear at the hearing sessions that will take place? \***

Yes

### **11) Please outline why you would like to attend? \***

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No

**5) Please give details to support your answer to question 4 \***

No, not legally compliant

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There are four 'tests of soundness' set out in [paragraph 35 of the NPPF](#) – (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy

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This sentence is not legally compliant as it does not accord with the Statement of Community Involvement. The public was not adequately consulted on the policy of focusing on current affordable housing need, rather than newly arising need.

This sentence is not justified because there is no evidence that newly arising need for affordable housing should not be the focus of the local authority over the 15 year lifetime of the local plan.

The policy should be made legally compliant and sound by deleting this sentence.

**9) Do you have any comments on the polices map? \***

[\(click here to go to the Regulation 19 Island Planning Strategy Map\)](#)

None for this policy.

**10) Do you wish to request to appear at the hearing sessions that will take place? \***

Yes

## 11) Please outline why you would like to attend? \*

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Parish Council

**2) What policy are you commenting on? \***

(Please complete a separate form for each policy you are commenting on)

H6

**3) Does your comment relate to a specific paragraph(s)? If yes which paragraph does this relate to? \***

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7.68 "The replacement dwelling should not be materially larger than the existing dwelling."

**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? \***

(a plan is legally compliant if it complies with the list in paragraph 3.1 [here](#) and the council have complied with the [Duty to Co-operate](#))

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? \***

There are four 'tests of soundness' set out in [paragraph 35 of the NPPF](#) – (a) positively prepared, (b) justified, (c) effective and (d) consistent with national policy

No

**7) If you answered no to question six is this because? \***

Not, Justified

**8) What modifications do you think is needed to make the Island Planning Strategy legally compliant and/or sound? \***

Please note in your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You can attach any files or documents with this submission. You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the inspector, based on the matters and issues he or she identifies for examination.**

This sentence is not legally compliant because it does not accord with the Statement of Community Involvement. The public was not adequately consulted on a policy preventing replacement dwellings in rural areas from being larger than the original dwellings, and the implications of this policy for local people who need larger homes.

This sentence is not justified because there is no evidence that a larger replacement dwelling causes harm to a rural area in principle. Local need may be for a larger dwelling, such as three bedroom house in place of a two bedroom bungalow. The local authority already has the means to refuse inappropriate designs when necessary.

To make the policy legally compliant and sound, this sentence should be deleted.

**9) Do you have any comments on the polices map? \***

[\(click here to go to the Regulation 19 Island Planning Strategy Map\)](#)

Not for this policy.

**10) Do you wish to request to appear at the hearing sessions that will take place? \***

Yes

## 11) Please outline why you would like to attend? \*

If you have answered No to Question 10 please put NA in the text box below

Freshwater Parish Council wishes to be represented at the hearing sessions because of the local knowledge it can offer, and its experience of reviewing local planning applications over many years.

## How we use your information

The Isle of Wight Council is committed to keeping your personal information safe and processing it in accordance with our obligations under the General Data Protection Regulation.

Your personal data will be securely held by the Isle of Wight Council for the purpose of assisting with the Island Planning Strategy process. To ensure an effective and fair examination, it is important that the inspector and all other participants in the examination process know who has commented on the plan. For the purposes of the examination, we will share your personal details and representation with the Inspector appointed and publish your name and representations as part of a report on our website.

The Isle of Wight Council is the data controller for the personal information you provide on this form. The council's Data Protection Officer can be contacted at [dpo@iow.gov.uk](mailto:dpo@iow.gov.uk). You can contact the council by phone on 01983 821000, or by writing to us at County Hall, High Street, Newport, IW PO30 1UD

For more information on the Isle of Wight Council's Privacy Statement, which explains how my information is used. Please visit the website: [www.iwc.gov.uk/privacy](http://www.iwc.gov.uk/privacy)

## How to send to us.

Email: [policy.consultation@iow.gov.uk](mailto:policy.consultation@iow.gov.uk)

Post: Planning policy, Seaclose offices, Fairlee Road, Newport, Isle of Wight, PO30 2QS

**Please ensure that you have answered all the questions in full.**

**The closing date for representations is by midnight on Monday 19 August 2024**