

Isle of Wight Council**Island Planning Strategy – Regulation 19 Submission version: COMMENTS FORM**

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Please read the [guidance notes](#) carefully before completing this form.

Responses **MUST** be received **by midnight on Monday 19 August 2024** for your comments to be taken into account. Any representations received after this will not be forwarded to the inspector for the examination.

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Name/Organisation: *

Country Land & Business Association (CLA)

Email: *

[Redacted email address]

Address and Postcode:

South East Regional Office
Suite 3, Fosse House, East Anton Court, Icknield Way
Andover, Hampshire, SP10 5RG

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.)

Membership Organisation (representing landowners and rural businesses)

2) What policy are you commenting on? *

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

C10 - Renewable Energy & low Carbon Technology

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

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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?*

(a plan is legally compliant if it is consistent with [national planning policy](#) and the council have complied with the [Duty to Co-operate](#))

Yes

No

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

Yes, consistent with national policy

Yes, complies with Duty to cooperate

No, Failure to comply to Duty to cooperate

No, not consistent with national policy

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

Yes – Positively prepared

Yes – Justified

Yes – Effective

Yes – Consistent with national policy

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 is needed to make the Island Planning Strategy legally compliant and/or sound? *

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We support this policy and would encourage policy makers and technology developers to engage with rural businesses and communities who may offer available sites for such schemes

C10 Should be amended to include a policy to support energy production /low carbon tech for rural businesses and heritage assets rather than just for communities

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? *

Yes

No

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

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E4 Supporting the rural economy

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

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Yes

No

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

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Yes, complies with Duty to cooperate

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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

- Yes – Positively prepared
- Yes – Justified
- Yes – Effective
- Yes – Consistent with national policy
- 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 is needed to make the Island Planning Strategy legally compliant and/or sound? *

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The draft plan includes a specific policy on Supporting the Rural Economy, which we do not believe is sufficient or realistic. Our views are as follows:

E4 b. Farm diversification, where farming remains the principle land use.
Farm diversification should be supported within the planning strategy but the current wording of E4 b. will limit what is possible and will not result in the delivery of projects. Farming business and land management are ever changing and requiring farming to remain the principle land use is too ambiguous. It is unclear this condition will be assessed. For example, is it done on a time basis, or profit basis or area basis? This is too limited and we would suggest that the policy simply read, "Farm Diversification will be supported".

E4 c. The intensification/expansion of existing rural industrial estates or employment sites.
Again we support the intention of this policy but it could go further in acknowledging any potential requirement for additional housing. Support should be given where this the case. In order to provide this support, reference should be made in subsequent housing policy extracts within the planning strategy that rural housing developments within proximity of intensified sites will be encouraged.

E4 d. The conversion of existing redundant buildings to employment uses where this expansion/ change of use would not impact on the rural character of the area.
National planning policy has made it abundantly clear that farm buildings can now be converted into a number of uses including employment, leisure, tourism, education and residential (including through Class Q of the General Permitted Development Order). The above statements seeks to limit such conversion, which the CLA deems unnecessary and does not reflect national policy. The reuse of farm buildings (and in fact any rural buildings) should be encouraged and policy E4 should support the reuse of farm buildings wherever possible and enable this type of development.

Policy E4 does not recognise the need for the reuse of historic redundant farm buildings, which are no longer suitable for modern day farm practices. Particularly for agricultural workers dwellings where evidence is provided to demonstrate that there is a need/ requirement for such a dwelling on site. Historic farm buildings are a part of the legacy that agriculture provides to the landscape but their use in modern agriculture invariably ends and this has been the case for the past 20 years due to the modernisation of agricultural machines and equipment. Whilst reuse is essential, the CLA sees no reason why the only reuse should be limited to that of the provision of employment uses. Within Historic England's "adapting traditional farm buildings", it makes clear the complexities and additional costs that are involved in the conversion of such buildings. It is unduly restrictive to limit the proposed use; as in most scenarios, the economic argument will not be sufficient to justify a landowner converting the building for such a purpose. Again, outside of the AONB, permitted development rights exist which this policy seems to omit. The policy needs to recognise that these buildings exist and their conversion can provide for the rural economy and for rural housing.

It is positive that Policy E4 e. supports the small scale extension of a rural area adjacent to an existing settlement or employment site and whilst it is important that any design should be sympathetic, there is a risk that this part of the policy could be used to prevent development coming forward. Further guidance on suitable design should be provided to ensure that applications that are submitted have a chance of success in line with the policy. The policy also requires that evidence is provided to support the scale of any development but there is no indication on the scope of the evidence that must be provided. This must be provided within the guidance or made clear within local validation checklists.

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? *

Yes

No

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

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E6 Future Proofing digital infrastructure

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

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N/A

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Yes

No

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

Yes, consistent with national policy

Yes, complies with Duty to cooperate

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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

Yes – Positively prepared

Yes – Justified

Yes – Effective

Yes – Consistent with national policy

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 is needed to make the Island Planning Strategy legally compliant and/or sound? *

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The CLA has supports the universal coverage of digital connectivity. This means access to all, including those who live and work in very hard to reach areas and where digital access is minimal. Policy E6 must reflect the need to increase connectivity in rural areas.

Policies that are directed at very hard to reach areas need to meet one overall objective: the provision of an effective and affordable broadband connection. As long as the bandwidths are sufficient and the connection is reliable, many businesses in very hard to reach areas may not actually require a fibre connection but can rely on alternative technologies, such as satellite or fixed wireless. There are now suitable digital products on the market that are both effective and far cheaper that the provision of a fibre connection.

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

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

Yes

No

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

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2) What policy are you commenting on? *

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

E8 - Supporting High Quality Tourism

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

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Yes – Positively prepared

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Yes – Effective

Yes – Consistent with national policy

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

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The CLA support any policy that will aid the rural economy, as it is in rural areas that significant tourism businesses are located. We would also point out that part of a successful tourism business is accommodation and therefore we see no reason why redundant farm buildings should not be converted for such enterprises. We suggest Policy E8 is amended to reflect this. This policy supports High Quality Tourism, however, mixed tourist offerings appealing to a wide cross section of visitors is vital for the island economy and should be supported within this policy. Whilst changes were made to permitted development rights associated with the temporary use of land for camping were made in 2023, these are not available in every scenario. Therefore, seasonal enterprises should be supported through the local planning process, regardless of their size.

It should also be recognised that where there is a need for accommodation for familial members through ill health or to aid succession of a business, re-purposing tourist accommodation should be deemed acceptable and policy should reflect and enable this.

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

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2) What policy are you commenting on? *

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

E9 Short Term Holiday Let accommodation

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

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We are aware that proposed changes to legislation following the general election and change of government will have a damaging effect on the furnished holiday let industry. Therefore policy E9 of the planning strategy needs to ensure there is adequate flexibility for businesses and individuals to willingly enter the market.

The short-term rental and holiday let sector contributes billions to the wider economy, supporting local shops and restaurants and creating tens of thousands of jobs.

By converting unused or underutilised properties, that may not be suitable as homes in the private rented sector, into high-quality holiday accommodations, property owners contribute to the local community's economic vitality. When considering this, locations outside the designated tourist accommodation areas should be supported and the impact on local shops, restaurants, and attractions on the island outside of the designated tourist areas needs to be recognised.

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? *

Yes

No

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

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Membership Organisation (representing landowners and rural businesses)

2) What policy are you commenting on? *

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

EV2 -Ecological Assets and opportunities for enhancement

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

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4.29

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 is consistent with [national planning policy](#) and the council have complied with the [Duty to Co-operate](#))

Yes

No

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

Yes, consistent with national policy

Yes, complies with Duty to cooperate

No, Failure to comply to Duty to cooperate

No, not consistent with national policy

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

Yes – Positively prepared

Yes – Justified

Yes – Effective

Yes – Consistent with national policy

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 is needed to make the Island Planning Strategy legally compliant and/or sound? *

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The strategy aims to set and define various buffers being;

- 8m-wide buffers either side of main rivers.
- 16m-wide buffers either side of main rivers (tidal).
- 8m-wide buffers either side of ordinary watercourses for minor development.
- 16m-wide buffers either side of ordinary watercourses for major development.

Imposing further buffering requirements could lead to prohibitive conditions to affect development which is otherwise acceptable in built and ecological terms and does not comply with National Planning Policy.

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? *

Yes

No

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

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2) What policy are you commenting on? *

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

EV3 Recreation impact on Solent and Marine

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.

Yes - 4.42 Size of SANGS

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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Yes

No

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

Yes, consistent with national policy

Yes, complies with Duty to cooperate

No, Failure to comply to Duty to cooperate

No, not consistent with national policy

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

Yes – Positively prepared

Yes – Justified

Yes – Effective

Yes – Consistent with national policy

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 is needed to make the Island Planning Strategy legally compliant and/or sound? *

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Paragraph 4.42 refers to a SANG "generally agreed minimum size of 2.2Ha" but there is no evidence or reference to support this statement. There seems to be no specific minimum provision on the size of SANG, however The Land Trust indicate that SANG size "will depend on two factors: the minimum area within which a sensible circular footpath of at least 2.3km can be achieved, and/or, the total 'capacity' required within the SANG.

The capacity of a SANG is dependent on how many dwellings it can allocate. SANGs are generally provided at a ratio of 8 hectares per 1,000 new residents (Reference to Natural England Guidance). Therefore 1 hectare can allocate 125 residents; an average of 2.4 persons per dwelling is widely assumed for new developments, and so 1 hectare can allocate 52 dwellings."

Further reference and/or evidence is needed to justify the minimum size of 2.2ha at Paragraph 4.42 or an alternative should be provided.

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? *

Yes

No

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

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2) What policy are you commenting on? *

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

Section 4 ; Environment

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.

Yes- Policy EV5 Trees Woodlands and Hedgerows

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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Yes

No

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

Yes, consistent with national policy

Yes, complies with Duty to cooperate

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No, not consistent with national policy

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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

Yes – Positively prepared

Yes – Justified

Yes – Effective

Yes – Consistent with national policy

No

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

Not, Consistent with national policy

Not, Effective

Not, Justified

Not, Positively prepared

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National Planning policy and advisory services from Natural England and Forestry Commission already makes provision to protect ancient woodland. This specific request for buffering of 50m was presented to the House of Lords on 21st October 2021 and was voted down. The NPPF protects Ancient woodland Para 186. c) "development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists;"

Imposing a 50m buffer on ancient woodland may ultimately lead to a significant reduction in housing delivery for the island especially those delivering affordable and starter homes. This would impact previously allocated sites at Pennyfeathers, Camphill, Wyatts Lane and may jeopardise the overall scheme and as such the existing National Policy supporting 15m buffers should remain.

<https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions>

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? *

Yes

No

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

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N/A

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2) What policy are you commenting on? *

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

EV8 Protecting high grade agricultural land

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

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N/A

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 is consistent with [national planning policy](#) and the council have complied with the [Duty to Co-operate](#))

Yes

No

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

Yes, consistent with national policy

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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

Yes – Positively prepared

Yes – Justified

Yes – Effective

Yes – Consistent with national policy

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 is needed to make the Island Planning Strategy legally compliant and/or sound? *

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While food security is important, best and most versatile land is already protected from development through the Environmental Improvement Plan, and the NPPF. Additionally, where indicative maps are insufficient then assessments are often required at field level. As agricultural practices modernise, with better technology, vertical farming and modern horticulture, the existing land ratings may not be an appropriate method of assessment in the future.

Additionally, there are vast swathes of rural areas where most land has a land classification of grade 1, 2 and 3a (Best and most versatile) for agricultural value. The island is predominantly grade 3. If this land was given greater protection from development, there are rural areas which may never see any more development and any opportunities for brownfield development is usually limited to towns and cities. These rural areas must not be left behind. It is also worth noting that some of the food production which the government seeks to protect depends on staff, who need to be housed, as well as on the availability of suitable commercial premises for storage and processing. Both of these requirements could be jeopardised by additional restrictions.

In conclusion, valuable agricultural land has sufficient protection in the Framework as currently drafted, so it should not be given additional protection . Agricultural businesses must also be able to expand and diversify in order to continue farming sustainably.

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

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

Yes

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2) What policy are you commenting on? *

(Please complete a separate form for each 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? *

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NA

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Yes

No

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Green space and the farmed landscape are incredibly important should be cherished. We should however not forget that the current landscape is as a direct result of previous development which has enabled those farming and rural businesses to adapt and develop where sensible and appropriate, and to grow and maintain their productive and profitable businesses. It is imperative that this must be allowed to continue whilst looking after the landscape..

Policy EV10 states it will support development within settlement gaps where there is no impact on the physical or perceived separation between the settlements. This is positive but the policy as a whole cannot prevent sensible development that would be beneficial to the rural economy or rural communities. There is a need to avoid the unintended negative consequence of restricting all development (including sensible small-scale opportunities)in these locations, which could result in causing a barrier to growth and profitability within the rural economy.

Whilst the principle of protecting the open countryside is in itself positive, it must not prevent small scale settlement extensions, new services and facilities or any development to enable growth in the rural economy. Development that would adjoin built up area boundaries and is well related to the existing pattern of development should be allowed and settlement gaps must not be drawn tightly to settlement boundaries to prevent this. The wording of Policy EV10 must reflect this.

Where settlement gaps exist within Protected Landscapes, they create a double layer of protection. Whilst the protected landscape exists to enhance and preserve natural beauty and wildlife, it naturally already prevents development outside settlement envelopes. The layering of a designated settlement gap further prevents development that could be seen as sustainable and support the vitality of a settlement.

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

No

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

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. 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

How to send to us.

Email: 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

Isle of Wight Council**Island Planning Strategy – Regulation 19 Submission version: COMMENTS FORM**

Your comments on the Plan will help us and the Inspector appointed to oversee the examination process, to identify any plan issues relating to soundness, legal compliance, and compliance with Duty to Cooperate and any changes that may be needed before adopting the Plan.

Please read the [guidance notes](#) carefully before completing this form.

Responses **MUST** be received **by midnight on Monday 19 August 2024** for your comments to be taken into account. Any representations received after this will not be forwarded to the inspector for the examination.

Your comments should relate to a specific policy, paragraph number or policy map. If there are parts of the plan which you believe are not sound, not legally compliant, or fail to meet the Duty to Cooperate, please tell us why, and what changes you think are necessary. Any evidence you have to support your proposed changes can be added as an attachment in addition to this form. You are able to submit a form for each policy or paragraph you wish to comment on.

IMPORTANT: Where you are attaching a separate letter setting out your representation, please make sure that you complete the questions on the form for each representation you wish to make and NOT just refer to an attached letter. This enables comments to be assessed and processed more quickly and does not hold up the Examination process.

Any questions with an * require an answer.

Contact details:

Please complete your name and email address in the boxes below so that we can contact you if we require any additional information on any comments, you may have made, or you have shown interest in participating in a hearing session(s)

Anonymous comments will not be accepted.

Name/Organisation: *

Country Land & Business Association (CLA)

Email: *

[Redacted email address]

Address and Postcode:

South East Regional Office
Suite 3, Fosse House, East Anton Court, Icknield Way
Andover, Hampshire, SP10 5RG

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.)

Membership Organisation (representing landowners and rural businesses)

2) What policy are you commenting on? *

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

EV19 Managing ground instability in new Development

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.

N/A

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 is consistent with [national planning policy](#) and the council have complied with the [Duty to Co-operate](#))

Yes

No

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

Yes, consistent with national policy

Yes, complies with Duty to cooperate

No, Failure to comply to Duty to cooperate

No, not consistent with national policy

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

Yes – Positively prepared

Yes – Justified

Yes – Effective

Yes – Consistent with national policy

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 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.

Policy EV19 aims to prevent risk from land instability in new development, however throughout the strategy, there is no commitment to improve or support development to mitigate issues for infrastructure that has already been impacted through instability. Policy G1 makes reference to improvements to the existing highways network but doesn't mention the severely affected A3055 at Ventnor, St Lawrence and Brook. The Local Transport plan (addressing climate change) and draft planning strategy should be seeking to address these issues as a matter of urgency to support the communities and rural businesses affected.

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? *

Yes

No

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

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