

Appendices 1-6 - Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 20:08:49

Name/Organisation

Sustainable Freshwater Community Group

Email Address

[REDACTED]

1. What type of respondent are you?

Resident Group

2. Which appendix are you commenting on

Appendix 2 – List of Allocated sites

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

- The proposal to redesignate areas outside of the Freshwater boundary settlement simply provides more homes in an area without improving employment prospects, amenities or affordability. The IPS makes no proposals to improve transport links nor basic infrastructure. This will simply attract more of an ageing population, thus perpetuating an already unbalanced and ultimately untenable position.
- The IPS rightly identifies an ageing population but makes little attempt to promote strategies which might rebalance the population. Retaining younger Islanders and attracting skilled incomers with good employment opportunities would seem to be the way forward. This also means providing for younger members of the community with schools, and sporting and leisure facilities. There are no firm proposals on these matters. The IPS appears to be more inclined to promote a strategy of managed decline.
- Freshwater is a rural village, with exceptional challenges some of which are caused due to our proximity to the coast, and flooding of the Western Yar, regularly returning us to “Freshwater Isle”.
- 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.
- By re-designating greenfield land as “urban development land” by way of a quietly introduced hardened settlement boundary. This re-designation seeks to subvert many of the protections given to them by their current designation as “Greenfield Sites” of maybe varying, but significant agricultural and ecological value.
- The revised settlement boundary, and the SHLAA process itself perhaps, has not been subject to public consultation, and due process. It therefore cannot be referred to within DIPS as the ‘revised settlement boundary’ and should be changed to ‘proposed’. Scrutiny of this point has been widely misunderstood and overlooked by the communities and local public bodies that you are consulting.
- The settlement boundary revisions have not been consulted on and do not factor other options, including ‘Exceptional Circumstances (see NPPF Section 5: Delivering a sufficient supply of homes: Paragraph 61)’, National Park status and other options which would lead to a lower, more realistic and achievable target for housing growth.

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 proper and fair consultation:

- **The consultation period is expected to be six weeks.**
- **Eleven days in to the consultation period, the IPS was made available.**
- **Four days before the end of the consultation period, a new 'compliant form' was made available**
- **The consultation period was also poorly advertised**
- **Little support was offered for residents to allow them to read the IPS and associated documents, and respond within the deadline. The Island has an aging demographic with little or no access to computers, and completing complex online forms could be a challenge.**

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

Freshwater is not a secondary settlement, it is a rural village

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 ensure the voices of the Island residents are heard, and due process is followed

IPS visions and objectives - Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 19:19:34

Name/Organisation

Sustainable Freshwater Community Group

Email Address



1. What type of respondent are you?

Resident Group

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

Policy CC1 Climate Change

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

- **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.**
- **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.**
- **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.**
- **How will the Council meet these demands, and which spaces have been allocated to fulfil this requirement? With an increase in development, will it realistically be feasible to achieve this when there will be fewer areas where planting could take place due to the finite nature of our Island?**

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No

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

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- **No - not legally compliant**

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

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Yes

12. Please outline why you would like to attend?

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Community Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 19:06:07

Name/Organisation

Sustainable Freshwater Community Group

Email Address

[REDACTED]

1. What type of respondent are you?

Resident Group

2. What Community policy you are commenting on

General Comments for Community

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

- **Freshwater developed the Freshwater Neighbourhood Plan - FNP (2017 - 2027) in consultation with the community outlining their desire for the future of Freshwater including housing needs. IPS disregards FNP.**
- **"The Community wishes to see development prioritised to brownfield sites. The Parish is rural in character and is defined by its green spaces...Future developments should co-exist with the green open spaces." "The Parish values all rural landscapes as they form an important part of the character and definition of the Parish." (Freshwater Neighbourhood Plan)**
- **West Wight Landscape Character Assessment: "No development in the parish should have a jarring effect from the iconic viewpoint the Down's" [...] "Consultation with the local community highlighted concerns over suburbanisation of the area, loss of rural and village character, decline in farming, loss of hedgerows and increase in horse paddocks. Golden Hill Fort, Moons Hill, Farringford and Dimbola Lodge were valued as landmarks" Forces for change - Future Change: Pressures for new residential and recreational development that is unsympathetic to traditional character and form of settlement; Landscape Guidelines: Conserve the sense of a rural, small-scale landscape of winding lanes and small settlements."**
- **DIPS states that '51 per cent of the homes allocated are on sites that contain brownfield land'. This wording has changed since the previous DIPS, where there was a 60% allocation of home on brownfield sites, not on 'sites that contain brownfield land'. Regardless, this is not the case for West Wight where our precious green fields (one of which is grade 2 agricultural - a scarce and valuable source on the Island) have been 'allocated' for housing**
- **Island-wide there are many abandoned buildings/sites and areas which require regeneration, these have not been incorporated in IPS. Building on fresh green field sites may be easier for developers, but we should utilise and clean up areas which already exist, regenerating for local needs.**
- **The West Wight Landscape Character Survey (2005) describes 'Freshwater Isle' as: 'The Settled Farmland landscape [...] Gently rolling landscape [...] Highly settled but with areas of pasture and arable cultivation [...] Intricate network of rural lanes, some sunken [...] remnants of Medieval open field cultivation still evident [...] Strong literary associations and distinctive identity as Freshwater Isle.' Lets preserve this for the future generations.**

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?

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

Freshwater is not a secondary settlement, it is a rural village

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 ensure the voices of the Island residents are heard, and due process is followed

Community Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 20:11:51

Name/Organisation

Sustainable Freshwater Community Group

Email Address



1. What type of respondent are you?

Resident Group

2. What Community policy you are commenting on

General Comments for Community

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

- **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.**
- **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.**
- **"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)**

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

Freshwater is not a secondary settlement, it is a rural village

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 ensure the voices of the Island residents are heard, and due process is followed

Economy Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 18:30:49

Name/Organisation

Sustainable Freshwater Community Group

Email Address

[REDACTED]

1. What type of respondent are you?

Resident Group

2. What Economy policy you are commenting on

General Comments for Economy

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

- **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.**

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?

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

Freshwater is not a secondary settlement, it is a rural village

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 ensure the voices of the Island residents are heard, and due process is followed

Environment Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 19:48:24

Name/Organisation

Sustainable Freshwater Community Group

Email Address

[REDACTED]

1. What type of respondent are you?

Resident Group

2. What Environment 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?

- 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.
- 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 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.
- IPS (2.11) states the Island is a “distinct environment with a wide variety of natural, rural, built and historic landscapes and features. The whole Island has been designated as a UNESCO Biosphere Reserve for its environmental significance. The Island has a range of nationally and locally important heritage assets. There are sites of internationally important geology, and the Island is home to a rich variety of important habitats and species, with 70% of the Island protected by UK or European designations
- The Island’s biodiversity is very special, with key species, such as: Red squirrels; bats; Dormice; Glanville Fritillary butterfly; Field Cow Wheat; Early Gentian and Wood Calamint.
- The Island is home to 14 of the UK’s 18 species of bat which need their habitat to be protected including the Barbastelle bat spotted in Freshwater which is very rare, with only 5,000 remaining ...”few breeding sites are currently known in the UK and it is important that surrounding environments of these and winter hibernation sites are maintained. It is thought that they prefer pastoral landscapes with deciduous woodland, wet meadows and water bodies, such as woodland streams and rivers”. (Bat Conservation Trust 2010).
- “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

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?

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

Freshwater is not a secondary settlement, it is a rural village

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 ensure the voices of the Island residents are heard, and due process is followed

Environment Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 19:32:54

Name/Organisation

Sustainable Freshwater Community Group

Email Address

[REDACTED]

1. What type of respondent are you?

Resident Group

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?

- **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.”**

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**

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

Freshwater is not a secondary settlement, it is a rural village

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 ensure the voices of the Island residents are heard, and due process is followed

Environment Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 19:37:59

Name/Organisation

Sustainable Freshwater Community Group

Email Address



1. What type of respondent are you?

Resident Group

2. What Environment 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?

- **One of the allocated sites within Freshwater (Camp Road), currently outside of the existing boundary (see FNP), is a high grade, in-use agricultural field in the centre of the village**
- **IPS 4.75: 'Grade 2 agricultural land is rare on the Island: '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'. By moving the boundary (without consultation), IPS sacrifices one of our rare land assets which seems to oppose the spirit of IPS.**
- **DIPS states that '51 per cent of the homes allocated are on sites that contain brownfield land'. This wording has changed since the previous DIPS, where there was a 60% allocation of home on brownfield sites, not on 'sites that contain brownfield land'. Regardless, this is not the case for West Wight, where the majority of proposed land is greenfield sites, one of which is grade 2 agricultural land. There are a number of undeveloped sites on the Brownfield Register which should be considered for allocation for housing ahead of sensitive greenfield sites.**

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

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Environment Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 19:53:15

Name/Organisation

Sustainable Freshwater Community Group

Email Address

[REDACTED]

1. What type of respondent are you?

Resident Group

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?

- **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.**

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

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Growth Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 18:47:14

Name/Organisation

Sustainable Freshwater Community Group

Email Address



1. What type of respondent are you?

Resident Group

2. What Community policy you are commenting on

General Comments for Growth

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

- **Freshwater and the surrounding SSSI, AONB and other breath taking beauty spots such as Tennyson Town and Freshwater Bay are major tourist attractions on the Island with recent investments in tourism magnets such as the beautiful renovation of the Albion Hotel, and Totland Pier. The IPS plan seems to want to turn the rural village of Freshwater into a sprawling town filled with residential homes and removing green spaces - which will clearly damage tourism, let alone residents wellbeing and enjoyment of their home**
- **"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.**

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 proper and fair consultation:

- **The consultation period is expected to be six weeks.**
- **Eleven days in to the consultation period, the IPS was made available.**
- **Four days before the end of the consultation period, a new 'compliant form' was made available**
- **The consultation period was also poorly advertised**
- **Little support was offered for residents to allow them to read the IPS and associated documents, and respond within the deadline. The Island has an aging demographic with little or no access to computers, and completing complex online forms could be a challenge.**

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

Freshwater is not a secondary settlement, it is a rural village

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 ensure the voices of the Island residents are heard, and due process is followed

Housing Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 20:00:56

Name/Organisation

Sustainable Freshwater Community Group

Email Address



1. What type of respondent are you?

Resident Group

2. What Housing policy you are commenting on

H2 - Sites Allocated for Housing

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

- **West Wight has been allocated a disproportionate number of houses on greenfield sites**
- **Freshwater is a rural village, with exceptional challenges some of which are caused due to our proximity to the coast, and flooding of the Western Yar, regularly returning us to “Freshwater Isle”.**
- **IPS 2.5 states ‘Over 60 per cent of the Island’s residents live in Newport, Cowes, East Cowes, Ryde, Sandown and Shanklin. Freshwater, Totland and Yarmouth are the main settlements to the west of the Island and Ventnor is the largest town on the south coast. Outside of these main settlements there are around 30 villages and hamlets’ Freshwater is a rural village, not a main settlement.**
- **IPS 2.52 states ‘The location of the major settlements – with Cowes to the north; Ryde to the north-east; Sandown, Shanklin and Ventnor to the south-east; and Freshwater to the west’ now refers to Freshwater as major settlement. Again, it’s a rural village not a major settlement’**
- **Freshwater is also referred to as a ‘secondary settlement’ IPS Growth section 6: G2 : ‘Priority locations for housing development and growth. Secondary settlements: Bembridge, The West Wight (Freshwater and Totland), Wootton, and Ventnor.’ Again, it’s a rural village not a secondary settlement.**
- **The revised settlement boundary, and the SHLAA process itself perhaps, has not been subject to public consultation, and due process. It therefore cannot be referred to within DIPS as the ‘revised settlement boundary’ and should be changed to ‘proposed’ and follow proper consultation to revise the existing Freshwater Neighbourhood Plan**
- **One of the ‘allocated sites’ is grade 2 agricultural land which is valued and scarce on 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?

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

Freshwater is not a secondary settlement, it is a rural village

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 ensure the voices of the Island residents are heard, and due process is followed

Housing Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 18:41:58

Name/Organisation

Sustainable Freshwater Community Group

Email Address

[REDACTED]

1. What type of respondent are you?

Resident Group

2. What Housing policy you are commenting on

General Comments for Housing

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

- **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.**

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?

A proper and fair consultation:

- **The consultation period is expected to be six weeks.**
- **Eleven days in to the consultation period, the IPS was made available.**
- **Four days before the end of the consultation period, a new 'compliant form' was made available**
- **The consultation period was also poorly advertised**
- **Little support was offered for residents to allow them to read the IPS and associated documents, and respond within the deadline. The Island has an aging demographic with little or no access to computers, and completing complex online forms could be a challenge.**

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

Freshwater is not a secondary settlement, it is a rural village

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 ensure the voices of the Island residents are heard, and due process is followed

IPS visions and objectives - Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 18:27:27

Name/Organisation

Sustainable Freshwater Community Group

Email Address

[REDACTED]

1. What type of respondent are you?

Resident Group

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?

- **IPS (2.9) states that: “There are some fundamental issues the Island Planning Strategy (IPS) has to address and these include protecting our precious environment and landscape”.**
- **West Wight housing targets, lack of infrastructure, sacrifice of green fields and grade 2 agricultural land, lack of consultation on proposed settlement boundary changes, lack of provision for social and affordable housing do not address these needs**
- **The proposal to re-designate areas on the periphery of the Freshwater settlement appears perverse. It's simply providing more homes in an area without improving employment prospects, amenities or affordability. The IPS makes no proposals to improve transport links nor basic infrastructure. This cannot be the way forward to achieve a sustainable community. This will simply attract more of an ageing population, thus perpetuating an already unbalanced and ultimately untenable position.**
- **The IPS rightly identifies an ageing population but makes little attempt to promote strategies which might rebalance the population. Retaining younger Islanders and attracting skilled incomers with good employment opportunities would seem to be the way forward. This also means providing for younger members of the community with schools, and sporting and leisure facilities. There are no firm proposals on these matters. The IPS appears to be more inclined to promote a strategy of managed decline.**
- **IPS 2.5 Over 60 per cent of the Island's residents live in Newport, Cowes, East Cowes, Ryde, Sandown and Shanklin. Freshwater, Totland and Yarmouth are the main settlements to the west of the Island and Ventnor is the largest town on the south coast. Outside of these main settlements there are around 30 villages and hamlets' Freshwater is a rural village, not a main settlement.**
- **'IPS 2.52 The location of the major settlements – with Cowes to the north; Ryde to the north-east; Sandown, Shanklin and Ventnor to the south-east; and Freshwater to the west' now refers to Freshwater as major settlement. Again, it's a rural village not a major settlement.**
- **Freshwater is also referred to as a 'secondary settlement' IPS Growth section 6: G2 : 'Priority locations for housing development and growth. Secondary settlements: Bembridge, The West Wight (Freshwater and Totland), Wootton, and Ventnor.' Again, it's a rural village not a secondary settlement.**

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 proper and fair consultation:

- **The consultation period is expected to be six weeks.**
- **Eleven days in to the consultation period, the IPS was made available.**
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- **The consultation period was also poorly advertised**
- **Little support was offered for residents to allow them to read the IPS and associated documents, and respond within the deadline. The Island has an aging demographic with little or no access to computers, and completing complex online forms could be a challenge.**

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

Freshwater is not a secondary settlement, it is a rural village

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 ensure the voices of the Island residents are heard, and due process is followed

IPS visions and objectives - Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 20:18:01

Name/Organisation

Sustainable Freshwater Community Group

Email Address

[REDACTED]

1. What type of respondent are you?

Resident Group

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?

- **IPS (2.9) states that: “There are some fundamental issues the Island Planning Strategy (IPS) has to address and these include protecting our precious environment and landscape”.**
- **The IPS rightly identifies an ageing population but makes little attempt to promote strategies which might rebalance the population. Retaining younger Islanders and attracting skilled incomers with good employment opportunities would seem to be the way forward. This also means providing for younger members of the community with schools, and sporting and leisure facilities. There are no firm proposals on these matters. The IPS appears to be more inclined to promote a strategy of managed decline.**
- **West Wight housing targets, lack of infrastructure, sacrifice of green fields and grade 2 agricultural land, lack of consultation on proposed settlement boundary changes, lack of provision for social and affordable housing does not address these needs**
- **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.**
- **By re-designating greenfield land as “urban development land” by way of a quietly introduced hardened settlement boundary. This re-designation seeks to subvert many of the protections given to them by their current designation as “Greenfield Sites” of maybe varying, but significant agricultural and ecological value.**
- **The revised settlement boundary, and the SHLAA process itself perhaps, has not been subject to public consultation, and due process. It therefore cannot be referred to within DIPS as the ‘revised settlement boundary’ and should be changed to ‘proposed’. Scrutiny of this point has been widely misunderstood and overlooked by the communities and local public bodies that you are consulting.**
- **The settlement boundary revisions are born of a false premise on numbers of houses that need to be delivered and not factoring in other options, including ‘Exceptional Circumstances (see NPPF Section 5: Delivering a sufficient supply of homes: Paragraph 61)’, National Park status and other options which would lead to a lower, more realistic and achievable target for housing growth.**

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 proper and fair consultation:

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

Freshwater is not a secondary settlement, it is a rural village

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 ensure the voices of the Island residents are heard, and due process is followed

Transport Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 18:05:58

Name/Organisation

Sustainable Freshwater Community Group

Email Address

[REDACTED]

1. What type of respondent are you?

Resident Group

2. What Transport policy are you commenting on

T1 - Supporting Sustainable Transport

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

- **The proposal to re-designate areas on the periphery of the Freshwater settlement appears perverse. It's simply providing more homes in an area without improving employment prospects, amenities, infrastructure, travel facilities or affordability.**
- **The IPS makes no proposals to improve transport links nor basic infrastructure, making no provision to a more sustainable transport solution. This coupled with the lack of work in West Wight, will simply attract more of an ageing population, thus perpetuating an already unbalanced and ultimately untenable position.**
- **There is very little in the IPS that seeks to promote investment which might provide local employment, 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 is only mentioned 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.**
- **West Wight is not an employment hub on the Island - mainly reliant on limited retail and mostly on tourism. By increasing the residential footprint in the West Wight, you are increasing traffic to Newport, a busy stretch of road, which opposes Carbon emission reduction targets by increasing the need for vehicles on the road.**

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?

1) There should be a proper consultation period of six weeks. The draft IPS was not available for eleven days of the consultation period, and a new form was loaded up only on the 15th August, ahead of a 19th August deadline for submissions

2) Provision should be made for a green transport solution for the Island, with work 'hubs' in the major towns aligned to population need

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

Freshwater is not a secondary settlement, it is a rural village

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 ensure the voices of the Island residents are heard, and due process is followed

Transport Reg 19

Submitted by: Anonymous user

Submitted time: 18 Aug 2024, 18:13:36

Name/Organisation

Sustainable Freshwater Community Group

Email Address

[REDACTED]

1. What type of respondent are you?

Resident Group

2. What Transport policy are you commenting on

General Comments for Transport

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

- **The proposal to re-designate areas on the periphery of the Freshwater settlement appears perverse. It's simply providing more homes in an area without improving employment prospects, amenities, infrastructure, travel facilities or affordability.**
- **The IPS makes no proposals to improve transport links nor basic infrastructure, making no provision to a more sustainable transport solution. This coupled with the lack of work in West Wight, will simply attract more of an ageing population, thus perpetuating an already unbalanced and ultimately untenable position.**
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