



Historic England

FAO:
The Planning Policy team
Isle of Wight Council

Our ref: PL00518662

planning.policy@iow.gov.uk
by email only

19 August 2024

Dear Planning Policy team

Thank you for consulting us about the Island Planning Strategy (IPS) Regulation 19. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process.

Our detailed comments are set out in an appendix to this letter. As you will see, we have raised objections regarding the soundness of various policies, as summarised in the bulleted list below; however, in most cases our concerns focus on matters of detailed wording, which hopefully can be resolved in discussion prior to submission.

Comments on IPS Environment section

- Policy EV1: Conserving and enhancing our historic environment
- Paragraphs 4.8 – 4.18 supporting EV1
- EV17: Facilitating relocation from Coastal Change Management Areas
- EV18: Improving resilience to coastal flooding and coastal risks

Comments on IPS Community section

- C1: High quality design for new development
- Paragraphs 5.3 and 5.14 supporting C1
- C10: Supporting renewable energy and low carbon technologies
- Paragraphs 5.64 – 5.66 supporting C10

Comments on IPS Housing section

- KPS1: Key priority site 1 – HA39 Former Camp Hill*
- KPS2: Key priority site 2 – HA44 Newport Harbour*
- H6: New homes in the countryside outside of the settlement boundaries

Comments on IPS Economy section

- E7: Supporting and improving our town centres
- E11: Ryde tourism opportunity zones



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Comments on IPS Transport section

- T2: A better connected Island

Comments on Appendices 1-6

- Housing allocation: HA006*
- Housing allocation: HA020
- Housing allocation: HA022*
- Housing allocation: HA025*
- Housing allocation: HA031*
- Housing allocation: HA036*
- Housing allocation: HA037*
- Planning permission: HA038*
- Housing allocation: HA110
- Housing allocation: HA084

* A concern common to all of the policies marked with an asterisk above relates to wording associated with archaeological assessment.

Heritage at risk

In this cover letter to our response, I highlight to the Council our broader strategic concern regarding heritage at risk, which clearly poses a serious challenge on the island. Currently there are 28 designated heritage assets within the Isle of Wight on the national Heritage at Risk Register. While EV1 does mention heritage at risk, it appears to place the onus for action on potential applicants. We assert that that policy EV1 is unsound – failing to be a positive strategy as required by NPPF paragraph 196 - without reference to the Council’s own approach to heritage at risk.

To address this concern, we recommend adding more on heritage at risk within the plan and we append several suggestions in this regard, most importantly beginning with the Council’s own commitment at the outset of EV1. Furthermore, we take this opportunity to flag two related steps that merit consideration:

A) It would seem there’s an evidence gap on local buildings at risk. Given the number of entries on the national Heritage at Risk Register, and the fact that the Register does not include Grade II buildings other than Places of Worship, it is likely that there are a significant number of the island’s historic buildings at risk which are not on the national Register. This concern is also borne out by anecdotal feedback regarding the many churches built in the 19th century, a proportion of which face an uncertain future. We recommend integrating a commitment to develop a local buildings-at-risk register within the IPS as an important step in tackling this issue.

B) We advise adding a commitment in the IPS to strengthen the heritage component of the island’s Cultural Strategy to connect with not only with intangible heritage (as it currently does), but also with the island’s heritage assets, especially those at risk. This step would help to provide a focus for action in the years ahead.



Integrated Sustainability Appraisal (ISA)

We do not envisage challenging the soundness or legal compliance of the Integrated Sustainability Appraisal; however, for future SA work on the local plan we wish to emphasise the value of more detailed heritage input to inform such assessment.

The cultural heritage summary on page 34 includes minimal information on archaeological remains other than Scheduled Monuments, missing a key point about known and undiscovered remains across the island.¹ Also, while it acknowledges some important risk factors, it appears not to draw from data on heritage at risk.

Also of concern is that the proforma for site assessment on page 42 takes purely an approach based on proximity to heritage assets, rather than one rooted in heritage significance. Knowing that a site is less than 250m from a heritage asset conveys limited information, and there is significant risk of failing to consider potential impacts on sites of greater significance a little further away, where their setting makes an important contribution to their significance. On related matter, the ISA's approach is predicated on the notion that located development near to assets will result in harm, rather than offer opportunities to support effective place-shaping. As a result, for example, the ISA concludes that the outcome for developing Newport Harbour site (IPS371) is negative for cultural heritage, but this should NOT be the case. Looking at the other strategic site, the detailed assessment of the former Prison site is poor, inaccurately stating only that "The Site borders Parkhurst Prison Grade II listed building".

Next steps

We would welcome the opportunity liaise with the Council prior to submission, including on a Statement of Common Ground. If it is not possible to reach agreement on any or all of the issues, we would wish to participate in the relevant hearing session to explain and clarify our concerns, if necessary; to take part in any discussions on the matter; and to answer any questions the Inspector may have.

I hope that these comments are helpful. If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely

Guy Robinson, BSc, RTP1
 Historic Environment Planning Adviser
 Development Advice – London and the South East Region

[REDACTED]

¹ While mentioning this topic, as stated in the appendix to this letter, we assert the need to include more information on the island's archaeological resource in the local plan in the text supporting EV1.



Appendix A: Table of Historic England’s comments on the Pre-Submission Draft of the Island Planning Strategy

Page	Section	Sound/ Unsound	Comments	Suggested Change
10	Paragraph 2.11	Sound	It is great to see from the outset an approach to the environment that integrates the historic environment with the natural environment (continued also on pages 31 and 36, for example).	
23	CC1: Climate change	Comment	We welcome the plan’s emphasis on climate change as a key topic, and strongly recommend (as mentioned in my informal written comments in September 2023) adding retrofit of the island’s existing building stock to the plan. The text supporting CC1 provides an opportunity to acknowledge in the local plan the role of heritage in climate change mitigation and adaptation. For retrofit of traditionally constructed buildings, a “whole building approach” is needed, informed by heritage expertise (as opposed to a fabric first approach for the retrofit of more recent buildings). The retrofit and maintenance & repair of buildings can help the Council to achieve several of its strategic priorities listed in paragraph 3.4. We would be happy to work with the Council on relevant content that could be added to the plan.	
37	EV1: Conserving and enhancing our historic environment and its supporting text	Unsound	<p>While we broadly support most elements of this strategic policy, especially its strong support for the maintenance, repair and reuse of historic buildings, I encourage more detailed articulation of the Council’s strategic commitments beyond its approach to development management. Without this, we assert that the IoW’s positive strategy for the historic environment (as required by the NPPF paragraph 196) is compromised.</p> <p>A key aspect connects with scope for heritage-led regeneration and the Council’s approach to heritage at risk. We suggest wording for consideration.</p> <p>Looking at other elements of the policy, I am not sure that the word positively is needed in the opening sentence. Can “conserving and enhancing” be done in a way that is not positive?</p>	<p>“The council will <u>promote heritage led regeneration where appropriate, develop a positive strategy toward any heritage assets that are considered “at risk” and support proposals that positively conserve and enhance the significance and special character of the Island’s historic environment and heritage assets.</u>”</p>



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			<p>I am not totally clear what is meant by criterion b) and wonder how an applicant would demonstrate alignment with this aspect of the policy. Should any related wording changes be considered to the criterion or the supporting text, to help applicants to consider this matter, we highlight relevant advice notes we have published such as:</p> <p>https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/</p> <p>One related matter relates to the case for the retrofit of traditionally constructed buildings (i.e. historic buildings, not only listed buildings) where impacts on heritage significance must be considered alongside carbon. This topic is currently missing from the local plan, a significant omission, given the importance of climate change on the Council's agenda. As stated above, typically we recommend reference to a "whole building approach" to the retrofit of traditionally constructed buildings, informed by heritage expertise. This could be made clear in the policy's supporting text. I would be happy to work with the Council on relevant text, if that is useful. Relevant advice published by Historic England includes:</p> <p>https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/</p>	



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38	Paragraph 4.8		The line at the end of paragraph 4.8 risks conflict with the definition of heritage assets in the NPPF. I suggest clarifying the final line.	“The historic environment encompasses all aspects resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped with planted or managed flora. These surviving physical remains are referred to as heritage assets <u>where they have a degree of significance meriting consideration in planning decisions.</u> ”
39	Paragraph 4.11		I am not sure that the following sentence makes sense: “The Isle of Wight benefits from the following, the location of these can be seen in greater detail on the policies map, except for the non-designated sites, on the Historic Environment Record, and the protected wreck sites:” Also, are there definitely 13,501 non-designated sites on the Historic Environment Record, or simply 13,501 entries on the HER, a proportion of which are non-designated heritage assets? To a degree this also connects with how heritage assets are defined i.e. many structures or places have heritage interest, but only a proportion have a degree of significance that merits consideration in planning decisions.	
40	New paragraph 4.12		We assert the need to include more information on the island’s archaeological resource in the local plan, to support the Council in delivering a positive strategy for the historic environment. This could be done by inserting one or more new paragraphs after paragraph 4.11. The island has a rich archaeological resource, both designated and undesignated. This should be recognised in the IPS beyond the basic statistics of Scheduled Monuments and NDHAs, achieved in collaboration with the Council’s archaeological advisers. It would also provide an opportunity to acknowledge the need to notify Historic England in cases where Scheduled Monument Consent (SMC) will be required and encourage early engagement with Historic England where SMC is going to be required.	
40	Paragraph 4.14		There is an additional resource on building stone on the Isle of Wight, which could be referenced in the main text (as suggested opposite) or in a footnote.	“Buildings which are constructed in a traditional vernacular style and of traditional materials (for example natural stone) should be retained and restored wherever possible. <u>For more information on the use of building stone on the Isle of Wight, refer to https://historicengland.org.uk/images-books/publications/building-stones-england-isle-of-wight/”</u>



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40 / 41	Paragraph 4.16		<p>Aside from addressing a minor typo, I advise going into more detail on heritage at risk.</p> <p>One way in which could be organised is to connect with the 6 areas of the island mentioned in paragraph 3.47, thereby more explicitly linking the Council's regeneration agenda with the island's heritage.</p> <p>Alternatively, or in addition, we note the Cultural Strategy 2023-2022 refers to cultural clusters, which clearly offers an additional framework into which heritage at risk could be interwoven.</p> <p>The current iteration of the Cultural Strategy refers to heritage at a high level, but it does not connect with the island's heritage assets. An integrated cultural and heritage strategy, including consideration of the island's assets (especially those at risk) could be invaluable as mentioned in our cover letter.</p> <p>A commitment to develop a local buildings-at-risk register is merited (see comment below).</p>	<p>"Furthermore, the use of national guidance documents like the Government's planning practice guidance, Historic England's good practice guidance and advice notes, and Historic England advice notes will assist in the assessment and outcome of development proposals. Consideration of the Island's heritage at risk should also form part of early engagement and assessment of proposals. There are <u>28 designated heritage assets currently on the Heritage at Risk Register⁴ spread across</u> on the island. <u>One such asset is Ryde Town Hall, the focus of a feasibility study within the Heritage Action Zone programme, which explored potential options for alterations based on local need and financial viability within the constraints of its status as Grade II listed building.</u></p> <p><u>From a wider perspective, there are other heritage assets not on the national register, which nonetheless are of heritage interest and are at risk from harm to significance due to neglect or other pressures.</u></p> <p><u>A strategic approach to heritage, including heritage at risk, offers scope to support regeneration and distinctive place-shaping. The Council will take positive action to make the most of identified opportunities, including (but not limited to) expansion of the heritage component within The Isle of Wight Cultural Strategy 2023–2033 (Goal 1 of which is "Become known for our heritage and creativity")."</u></p>
41	Paragraph 4.18		<p>As mentioned above, we are concerned by the outlook for heritage at risk on the island. While the commitments in paragraph 4.18 are welcome, we encourage the Council to go further in committing also to prepare a local "buildings-at-risk" register, informed by a survey of such assets.</p>	<p>"The council will monitor buildings or other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk through discussions with owners, related charities and local community groups and a willingness to consider positively development schemes that would ensure the repair, reinstatement and maintenance of the asset, and, as a last resort, using its statutory powers. <u>The council will develop a local buildings-at-risk register to support this endeavour.</u>"</p>



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41	Other relevant documents and information	Comment	We strongly recommend adding the IoW Historic Environment Record to this bulleted list.	
41	EV2: Ecological Assets and Opportunities for Enhancement	Comment	We encourage the addition of a new paragraph in the supporting text highlighting that the natural environment and the historic environment are integral to each other. As a result, there is scope for an integrated approach to land management, which delivers multiple benefits.	
48	Paragraph 4.43	Comment	This paragraph provides another opportunity to reinforce that the natural environment and the historic environment are integral to each other i.e. take account of the historic environment when considering the provision of alternative natural greenspace.	
50 / 51	EV5: Trees, woodland and hedgerows	Comment	We recommend adding reference to the connection between trees, woodland and hedgerows and the historic environment. We suggest wording for consideration.	“This policy seeks to protect the landscape character and amenity value afforded by trees, woodlands and hedges on the Island. <u>Trees, woodland and hedges</u> provide an important green infrastructure function; <u>they connect with historic landscape character</u> and contribute significantly to the health of the environment and people.”
52	EV6: Protecting and providing green and open spaces	Comment	We recommend adding reference to the historic environment and suggest wording for consideration.	“Open space typologies include parks and gardens, natural and semi-natural areas, green corridors, amenity green space, provision for children and young people, outdoor sports facilities, allotments, cemeteries and churchyards and civic spaces. <u>Many are of heritage interest, including those that are designated or known principally for their natural environment.</u> It is accepted that...”



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56	EV9: Protecting our landscapes and seascapes	Sound		
59	EV11 Isle of Wight National Landscape (formerly AONB)	Comment	We support the policy and simply suggest adding a line or two in the supporting text that reiterates the connections between the natural and historic environment. This could be done by citing text from the AONB Management Plan, such as the lines opposite.	Quoting from the Isle of Wight Area of Outstanding Natural Beauty Management Plan 2019 – 2024: “ <u>The complexity of the landscape within the Isle of Wight AONB is a legacy of the centuries-old intricate relationship between people and place</u> ” and/or “ <u>The historic environment is a major contributor to the landscape character of the Isle of Wight AONB.</u> ”
70	EV17: Facilitating relocation from Coastal Change Management Areas	Unsound	The criterion on exceptions needs to refer to heritage assets more widely, not simply the Heritage Coast (at the exclusion of and risk to other designated or non-designated heritage assets that should be retained).	“not having any significant adverse impacts that would be contrary to other policies of the plan, including on the AONB, <u>heritage assets</u> and <u>the</u> Heritage Coast.”
71	EV18: Improving resilience to coastal flooding and coastal risks	Unsound	The local plan is well placed to support the role of flood defences in protecting heritage assets from harm or loss. Also, flood defence measures need to take account of their potential impacts on heritage significance to avoid unintentional harm, either directly or via development in the setting of a heritage asset. We suggest adding wording that would cover both points for consideration.	“Proposals for new or replacement coastal defence schemes will only be permitted where it can be demonstrated that the works are consistent with the management approach for the frontage presented in the most up to date shoreline management plan and coastal strategy and studies <u>and take account of the heritage significance of any affected heritage assets.</u> ”



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75	C1: High quality design for new development and supporting text	Unsound	<p>Criterion b needs to connect with the historic environment. We suggest wording for consideration.</p> <p>Criteria c and f cover similar ground and should be integrated to avoid confusion. We suggest deleting criterion f and integrating any additional key points from criterion f into criterion c. We assert that small or medium scale housing developments need still to respect the character of the area.</p> <p>Reference to traditional shop fronts is welcome. Importantly this is a matter of heritage significance, which needs to be made explicit. Also, it seems strange and counter-intuitive in the supporting text to avoid referring explicitly to Newport and Ryde Commercial Frontages Design Guide. We suggest wording for consideration.</p> <p>As a final point, we recommend adding a subsection at the end of this section on relevant other documents (as done for other sections in the local plan) which includes, among other entries, Conservation Area Appraisals and Management Plans and the relatively recent Design Guide for Newport and Ryde: https://iw haz.uk/project/design-guide/</p>	<p>In the policy:</p> <p>“b) maximise the potential of the site through appropriate density that has regard to existing constraints, such as adjacent buildings and topography and takes account of and protects and enhances where appropriate views, water courses, hedgerows, trees, incidental green space, wildlife corridors, <u>historic context including the setting of any nearby heritage assets or other features which significantly contribute to the character of the area;</u>”</p> <p>c) respect the character of the area <u>through their layout and design</u>, particularly in historic places (such as conservation areas) and the National Landscape;</p> <p>d) incorporate appropriate amenity or living space relative to the nature of accommodation proposed and adhering to the nationally described space standard;</p> <p>e) protect the living conditions of existing and resultant residents, by ensuring appropriate outlook and natural light is maintained and provided. Basement accommodation where limited natural light or outlook would be available to habitable rooms will not be supported;</p> <p>f) respect the diverse character and appearance of an area through their layout and design, especially in larger scale housing developments;</p> <p>g) incorporate areas of green infrastructure and incidental greenspace within housing developments to encourage healthy and active lifestyles, providing measures to support wildlife habitat and corridors which could include the use of swift bricks and bee bricks in new development;</p> <p>h) preserve the integrity <u>and heritage significance</u> of traditional shop front or building detailing;...”</p>



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				<p>In the supporting text:</p> <p>“5.3... Many of the towns and villages on the island have an existing strong sense of place and cultural history. <u>The island’s rich heritage contributes significantly, from iconic castles to with early twentieth century design being evident in many places.</u> It is important that any new development within these respects <u>these positive contributors</u> this, <u>many of which are undesignated</u>, working with the existing character and constraints to enhance the identity of the communities living, working and visiting, for the lifetime of the development.”</p> <p>“5.14 A number of the town centres across the Island contain listed buildings or are within conservation areas. In acknowledgement of this the council wish to preserve the character of these areas and historic shop fronts. <u>The Newport and Ryde Commercial Frontages Design Guide is an invaluable resource in this regard, for the centres of both towns and other historic settlements across the island.</u> It is therefore essential that the size, design and illumination of advertisements respect the form of the shop fronts, the general character of the building and wider street scene...”</p>
79	C2: Improving our public realm, and its supporting text	Comment	Given the work done on public realm in Newport, might reference be made to this in the supporting text to exemplify a relevant programme that helps to underpin the policy: https://iwhaz.uk/project/people-first-zone/	
80	C3 Improving our health and wellbeing	Comment	There is a heritage dimension to wellbeing; relevant resources are available here: https://historicengland.org.uk/research/current/social-and-economic-research/wellbeing/	“All development proposals should demonstrate how the outcomes of the HIA have been incorporated into the design of the development, which could include:...



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			We recommend adding an explicit acknowledgement of the connection between heritage and wellbeing. This could be in the form of a new criterion to the policy, such as that suggested. Also, we recommend integrating this consideration in the work being done by the Isle of Wight's Health and Wellbeing Board to update its Strategy.	<u>...d. improving access to and/or appreciation of the local historic environment.</u>
86	C8: Facilitating a blue light hub	Comment	Historic England would be happy to comment in due course on the location of a blue light hub in the Newport area, when more detail is known about what is involved and assuming there is a heritage dimension.	
	C10: Supporting renewable energy and low carbon technologies and supporting text	Unsound	<p>We broadly support the Council's approach to renewable energy and low carbon technologies and only challenge the soundness of the policy in so far as certain phrasings create scope for confusion and thus may hamper the policy's implementation.</p> <p>All six of the technological options need to be sited in appropriate locations. As an improved formulation, we suggest moving "in appropriate locations" to the opening paragraph.</p> <p>Clearly AONBs represent a type of designation – should "other" be added to the middle paragraph? Also, should reference be made to National Landscape instead of AONB?</p> <p>Policy H7 refers to "protected areas". For consistency, I recommend amending "designated areas" in C10 to "protected areas" and use the supporting text to explain</p>	<p>"In line with the targets and objectives of the Isle of Wight Climate and Environment Strategy and to support local energy security and resilience on the island, the council will support proposals <u>in appropriate locations</u> for:</p> <p>a major development of renewable energy schemes, in appropriate locations and where there is appropriate grid capacity and storage;</p> <p>b the provision of infrastructure for the connection of projects to electricity and heat networks (including, but not limited to sub-stations and heating mains);</p> <p>c smart grid infrastructure;</p> <p>d energy storage systems, such as battery storage and hydrogen production facilities;</p> <p>e energy centres for the provision of heat and power to local communities;</p> <p>f community led initiatives.</p> <p>Within areas of protected and sensitive landscapes and townscapes, development should generally be small scale or</p>



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			<p>what is meant by “protected areas”. From a historic environment perspective, this would include Registered Parks and Gardens, Conservation Areas and Scheduled Monuments (i.e. don’t forget Scheduled Monuments within an area-based approach). This change also enables a further tweak to policy C10 in referencing the setting of designated heritage assets (without needing to repeat the word “designated”).</p> <p>Potential setting impacts include (but are not limited to) impacts on any highly significant (e.g. designed) views from heritage assets of the highest significance. Heritage impact assessment is the process through which impacts on significance are assessed.</p> <p>We recommend referring to the conservation of heritage significance in criterion h, rather than heritage asset objectives. A similar change would be merited in the supporting text (the final line of paragraph 5.64).</p> <p>Paragraph 5.65 merits at minimum minor alteration to add the word “assessments”, reflecting the above point about heritage impact assessment (and landscape and visual impact assessment).</p> <p>Finally, cumulative impacts may be relevant for certain assets, not solely in relation to landscape and local amenity. We suggest wording for consideration.</p>	<p>community based. It is expected that major wind and photovoltaic schemes will be located outside of the <u>National Landscape AONB</u> and <u>other protected designated</u> areas, and grade 1-3a agricultural land (for photovoltaics) and will be informed by consideration of any impacts on the setting of <u>protected designated</u> areas and <u>designated heritage assets</u>.</p> <p>Schemes within the National Landscape will be considered when there are no alternative sites outside of the National Landscape and where a considerable community benefit is demonstrated and considered to outweigh the landscape impact.</p> <p>Proposals outside the settlement boundaries or site allocations should demonstrate they have taken account of:</p> <p>g the visual impact on the character of the area;</p> <p>h the consistency of the proposal with nature conservation and <u>the conservation of heritage significance asset objectives</u>.</p> <p>It is accepted that a range of new technologies, other than those above are likely to emerge and these will be considered on their own merits against the policies of the Island Planning Strategy.”</p> <p>In the supporting text:</p> <p>“5.64... Furthermore, they must not cause unacceptable harm to the area’s nature conservation interests or <u>its heritage significance assets (including direct impacts on heritage assets and impacts on their setting)</u>.</p> <p>5.65 Applicants will be expected to undertake appropriate surveys, <u>assessments</u> and/ or site investigations as required taking account of site specific characteristics in relation to the technology being applied for...</p>



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				5.66 Consideration will be given to any cumulative impacts on the landscape, and local amenity <u>and any sensitive receptors</u> in relation to renewable energy and low carbon technologies, particularly for wind turbines and large scale solar installations.”
90 / 91	C11: Net zero carbon and lowering energy consumption in new development	Comment	We do not raise concerns about policy C11; but as mentioned regarding policy CC1 and EV1 we strongly encourage the plan to cover the repair and retrofit of existing buildings and note that adaptive reuse of existing buildings, which balances mitigation and adaptation for climate resilience, helps carbon and energy efficiency. Given the support for building re-use in EV1 and its supporting text (as an incidental aside, look out for spelling reuse vs re-use) it could be that the supporting text to C11 need only highlight this issue and refer to EV1, especially if the supporting text for EV1 is expanded as outlined in our comments above.	
107	G3: Developer contributions	Comment	<p>We support the policy approach and encourage – given the high number of heritage assets on the national Heritage at Risk Register (notwithstanding also any assets at risk not included on the national register) – explicit mention of heritage at risk in the context of cultural facilities in the supporting text.</p> <p>Noting NPPF paragraph 20, Historic England considers cultural infrastructure to include all heritage assets on the island. While it is hard to quantify a requirement for cultural infrastructure, it would be reasonable to expect the Council’s approach to aim at least to maintain existing levels of cultural assets that exist, and to seek improvements to secure the long-term future of assets classed as ‘at risk’.</p> <p>Following this through, we encourage charging authorities to consider identifying the ways in which the Community Infrastructure Levy and S106 agreements can be used to implement local plan policy and proposals relating to conservation of the historic environment.</p>	
119 / 120	KPS1: Key priority site 1 – HA39 Former Camp Hill	Unsound	We advise minor enhancements to the proposed wording of policy KPS1 as shown, emphasising the need for heritage expertise to inform the approach to sustainable re-use of the Camp Hill prison buildings.	“q the development conserves the significance of the heritage assets on the site and uses these assets to reinforce the cultural connections between the site and its surroundings. Ensuring a sustainable future for the Camp Hill prison buildings is encouraged, <u>informed by heritage expertise.</u> ”



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			<p>We recommend making a clearer headline requirement for heritage assessment, and subsequently explain that this needs to include a component focused on archaeological assessment.</p> <p>Also, we recommend adding a line (drawn from elsewhere in the published plan) on early liaison with the council's Archaeology and Historic Environment Service.</p>	<p>“Archaeological, historic <u>Heritage</u> and biodiversity assessments must be undertaken to assess potential impacts, inform design proposals (avoiding adverse impacts where possible) and provide mitigation where appropriate. <u>Heritage assessment will need to incorporate archaeological desk based assessment and, most likely, field evaluation. Early liaison with the council's Archaeology and Historic Environment Service is advised.”</u></p>
122 / 123	KPS2: Key priority site 2 – HA44 Newport Harbour	Unsound	<p>While we welcome what we infer to be the aims of this policy, its wording on heritage conveys a potentially confusing message. This has two aspects, and we endeavour to suggest solutions to both matters.</p> <p>By focusing only on the assets on-site, criterion k risks missing the opportunity for any scheme that comes forward to respond positively to adjacent heritage assets and be led also by the character and appearance of the conservation area. We suggest revised wording for consideration.</p> <p>As noted in our cover letter, the Integrated SA states the outcome of this site's development will be bad for cultural heritage; but this conclusion misses the idea of development that is designed to respond sensitively to the historic environment. It has the potential to result in a positive outcome for heritage.</p>	<p>“k the development conserves the significance of the heritage assets on the site, respects the character of the conservation area, responds positively to the significance of nearby assets and uses this local historic context <u>these assets to reinforce the cultural connections between the site and its surroundings;”</u></p> <p>“Archaeological, historic <u>Heritage</u>, biodiversity and watercourse assessments must be undertaken to <u>assess potential impacts, inform design proposals (avoiding adverse impacts where possible), record findings where relevant and to assess relevant impacts</u> and provide mitigation where appropriate. <u>Heritage assessment will need to incorporate archaeological desk based assessment and field evaluation. Early liaison with the council's Archaeology and Historic Environment Service is advised.”</u></p>



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			<p>We welcome the requirement for heritage assessment; but the current wording risks downplaying the role of assessment to inform the design of the scheme. I suggest drawing from the wording proposed in KPS1.</p> <p>Given the harbour's archaeological interest, field evaluation will be needed, also noting plans for district heating across the site. [As an additional reference, as the Council will know, note the Extensive Urban Survey: https://archaeologydataservice.ac.uk/archives/view/hampshire_eus_2003/metadata.cfm]</p> <p>In the supporting text we advise referring to the conservation area and note explicitly that this designated heritage asset is currently on the national Heritage at Risk register.</p>	
129	Paragraph 7.56	Comment	We recommend clarifying the language relating to consideration of the historic environment and suggest wording for consideration.	"Any proposal for infill development must respect the character of properties in the immediate area in terms of height, scale, mass, design, appearance and materials. <u>This includes consideration of impacts on historic character and the significance of affected heritage assets.</u> The nature of these developments is expected to be at a scale of a of one to three units and as such could also present good opportunities for self-build or smaller local builders."
133	H6: New homes in the countryside outside of the settlement boundaries	Unsound	While enabling development can be invaluable for securing the future of a heritage asset, in accordance with NPPF paragraph 214, it is not appropriate for a local plan policy to encourage such development. A simpler criterion is needed, as suggested.	c Secure the optimal re-use of a heritage asset or would be appropriate sympathetic enabling development (as detailed in Enabling Development and Heritage Assets⁴⁴ by Historic England) to secure the future of the heritage asset.



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156	E3: Upskilling the Island	Comment	Might reference be made to heritage skills? This is not a matter of soundness but could add welcome nuance to the text and support the Council's ambitions for development that responds sensitively to local character.	
157	E4: Supporting the rural economy and supporting text	Comment	We warmly welcome the support for re-use of historic buildings and simply recommend making the policy text and the supporting text explicitly refer to heritage significance.	<p>"d the conversion of existing redundant permanent buildings to employment uses where this expansion/ change of use would not impact on the rural character of the area, <u>or unacceptably harm the significance of a heritage asset</u>; or"</p> <p>In the supporting text (paragraph 8.55):</p> <p>"...One way that these buildings can be better utilised is by being converted to bases for rural business that need to be located in the countryside. <u>Sensitive adaptation is needed that retains key features of heritage significance.</u> Developments of this nature would also preserve these types of buildings, which are important to the history of farming and the countryside but are often lost or poorly maintained as they do not provide any economic gain."</p>
163 / 164	E7: Supporting and improving our town centres and supporting text	Unsound	While we welcome reference to the design guide in the policy, the wording is written looking backwards at the (now completed) HAZ project rather than forwards on how this guidance could be used, including its potential value in other historic parts of the island. It is important to be clear about the reference to enable the policy to be implemented effectively. If the Council has in mind to produce other design guidance or codes, this should be referenced in a different way, rather than framed by the HAZ programme. I suggest wording for consideration.	<p>"Applications within the Newport and Ryde town centres and other <u>historic conservation areas across the Isle of Wight (as appropriate)</u> will be expected to adhere to the Newport and Ryde Commercial Frontages Design Guide <u>heritage action zones (HAZ) will be expected to adhere to any design guides or other appropriate documents as part of the respective HAZ projects.</u>"</p>



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			This has the potential also to impact on the supporting text, for example meriting minor changes to the end of paragraph 8.89.	
171	Paragraph 8.115	Comment	A minor point of pedantry: we suggest amending archaeology to archaeological remains.	"The area also has high archaeological and paleoenvironmental potential and any development proposals should consider the impact on below ground archaeological remains. The Archaeology and Historic Environment Service should be consulted at the earliest opportunity."
172	E11: Ryde tourism opportunity zones	Unsound	The HAZ project has been completed and so the policy can surely be clearer about its reference to this output, to enable the policy to be implemented effectively. If the Council has in mind to produce other design guidance or codes, this should be referenced in a different way, rather than framed through the lens of the HAZ programme.	"Where relevant, proposals must demonstrate that they align with <u>the Newport and Ryde Commercial Frontages Design Guide</u> any relevant design guides prepared as part of the Ryde HAZ project. "
176 / 177	T2: A better connected Island	Unsound	"Opportunities to avoid or mitigate any environmental impacts should be considered" is not ideal phrasing and has the potential to be confusing, given the same policy encourages reducing impacts on air quality and climate change. We advise combining this line in an amended form of wording with the third bullet as suggested opposite.	"The council will support proposals that: <ul style="list-style-type: none"> • increase travel choice; • provide alternative means of travel to the car; • reduce the impact on air quality and climate change <u>while avoiding or mitigating other environmental impacts</u> Opportunities to avoid or mitigate any environmental impacts should be considered."
207	HA046: Land at Crossways	Comment	The entry here refers to generic policy, when a site specific requirements have been prepared.	Generic <u>Specific</u>
208	Housing allocation: HA002	Sound		



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209	Housing allocation: HA005	Sound		
210	Housing allocation: HA006	Unsound	<p>Though there is intervening development between the site and Golden Hill Fort Scheduled Monument (SM) and vegetation, recognition needs to be made in policy that development of this site has the potential to impact on the setting of the SM if it is sufficiently tall. We suggest wording for consideration.</p> <p>While we welcome a requirement for archaeological work to be undertaken, the wording is rather vague, out of sequence and combines uneasily with biodiversity assessment. Also, it misses the distinction between desk-based assessment and field evaluation, as recognised in the NPPF paragraph 200. It would be clearer to list requirements separately, combined with encouragement to liaise with local advisers.</p>	<p>“The layout and design of the development should <u>take account of any impacts on the setting of Golden Hill Fort Scheduled Monument (in particular regarding massing) and</u> where possible retain the existing trees, hedges and flower meadow. The meadow could form part of the SANGs, open and recreation space provision.”</p> <p>“Archaeological and bBiodiversity assessments may need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects. <u>Archaeological investigation, including desk based assessment and, most likely, field evaluation will need to be undertaken. Early liaison with the council’s Archaeology and Historic Environment Service is advised.</u>”</p>
211 / 212	Housing allocation: HA018	Sound		
213	Housing allocation: HA020	Unsound	We recommend adding a requirement for planting in the eastern edge of the site linked with screening to the cemetery, which is locally listed.	<p>“a at least 146 homes providing a mix of sizes and an affordable housing contribution in line H5 and H8;</p> <p>b onsite soft and hard landscaping (<u>incorporating a suitable buffer to the cemetery on the eastern edge</u>);”</p>



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214	Housing allocation: HA022	Unsound	As above.	“Archaeological and b Biodiversity assessments will need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects. <u>Archaeological investigation, including desk based assessment and, most likely, field evaluation will need to be undertaken. Early liaison with the council’s Archaeology and Historic Environment Service is advised.”</u>
215	Housing allocation: HA025	Unsound	As above.	“Archaeological and b Biodiversity assessments may need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects. <u>Archaeological investigation, including desk based assessment and, most likely, field evaluation will need to be undertaken. Early liaison with the council’s Archaeology and Historic Environment Service is advised.”</u>
217	Housing allocation: HA031	Unsound	As above.	“Archaeological and b Biodiversity assessments will need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects. <u>Archaeological investigation, including desk based assessment and, most likely, field evaluation will need to be undertaken. Early liaison with the council’s Archaeology and Historic Environment Service is advised.”</u>
220	Housing allocation: HA036	Unsound	As above.	
220 / 221	Housing allocation: HA037	Unsound	As above.	
221	Planning permission: HA038	Unsound	As above.	“Archaeological and b Biodiversity assessments may need to be undertaken by any potential applicant to record where appropriate and assess the relevant impacts and mitigation aspects. <u>Archaeological investigation, including desk based assessment and, most likely, field evaluation will need to be undertaken. Early liaison with the council’s Archaeology and Historic Environment Service is advised.”</u>



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222	Housing allocation: HA110	Unsound	The site is immediately adjacent to the conservation area as shown in the policies map. This needs to be recognised in the policy. I suggest wording for consideration.	<u>“Development should respond sensitively to the character and appearance of the Newport conservation area.”</u>
223	Housing allocation: HA046	Comment	We support the policy but note the table on page 207 needs to be corrected to refer to these site specific requirements.	
224	Housing allocation: HA120	Comment	The site includes a local list entry referring to Medina view. This does not seem to be picked up in the text for this site.	
226	Housing allocation: HA064	Sound		
227	Housing allocation: HA065	Sound		
228	Housing allocation: HA116	Sound		
230	Housing allocation: HA084	Unsound	The site requirements should refer to the conservation area, noting the site lies within the Shanklin conservation area. Reference is made to character, but we would consider it unsound to omit reference to the conservation area, seeking to conserve or enhance its character.	<u>“The development should be of high quality design and reflect conserve or enhance the character of the conservation area, respecting the proximity of the buildings and uses adjacent to the site.”</u>



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