

This letter is sent by email only



Isle of Wight
Examination of the Island Planning Strategy
Regarding: Inspectors' Matters, Issues and Questions
(MIQs)

Louise St John Howe
Programme Officer,
PO Services
PO Box 10965,
Sudbury, Suffolk CO10 3BF
Email: louise@poservices.co.uk

05/02/2025

Hearing Statements from the Royal Society for the Protection of Birds (RSPB) regarding Matter 1, Issue 2: Habitats Regulations Assessment.

Dear Inspectors,

The RSPB wishes to respond in writing to question 1.10 from the MIQs.

Question 1.10 Is the Habitats Regulation Assessment (HRA) – May 2024 [Document EA1] robust in concluding, after carrying out an appropriate assessment including the consideration of mitigation, that the policies and proposals in the plan (alone or in combination with other plans/projects) would not have an adverse effect on the integrity of protected sites on or around the Island?

RSPB Response

The RSPB has concerns over the construction of the IPS policies with respect to the Habitats Regulations. Our concern is that utilisation of the IPS draft policies, as currently worded, may have an adverse effect on the integrity of protected sites on or around the island. Text referring to policy EV2 should fully reflect the requirements of Habitats Regulations 63, 64 and 68. Additionally, draft policy EV2 does not include any tests for development which might impact on non-NSN (National Sites Network) sites, including national and local sites such as SSSI's and SNCI's. Policy wording for NSN sites should refer to Regulation 64 derogation tests in full and in sequence, including alternative solutions.

RSPB Headquarters
RSPB The Lodge
Potton Road
Sandy
SG19 2DL

Tel: 01767 680 551
@TheRSPB
@natures_voice
@rspb
rspb.org.uk



The RSPB is part of BirdLife International, a network of passionate organisations, working together to save nature across the world.

Regulation 64(2) requires a more stringent test for adverse impacts on priority national habitats than the IPS draft policies currently state.

Draft policy text EV3 (b) and (c) do not provide an adequate strategic approach to mitigation and risk poorly-designed, implemented and monitored bespoke mitigation schemes. For developments within 5.6 km of the Solent SPA, and for those that will result in loss of areas identified in the Solent Wader and Brent Goose Strategy, we recommend that policy EV3 (b) and (c) are omitted. This is because we are not satisfied that IOWC has the capacity to ensure 'appropriate alternative areas' would be designed and monitored in such a way as to be effective.

Yours sincerely,



Julie Sims
Senior Conservation Officer
Dorset, Wiltshire, Hampshire & Isle of Wight
Email: Julie.Sims@rspb.org.uk
Phone: 07761 331 016

RSPB Headquarters
RSPB The Lodge
Potton Road
Sandy
SG19 2DL

Tel: 01767 680 551
f @TheRSPB
@natures_voice
@rspb
rspb.org.uk



The RSPB is part of BirdLife International, a network of passionate organisations, working together to save nature across the world.