

## **Examination of the Island Planning Strategy**

## Matter 4

## Historic England, Hearing Statement

05 February 2025

This statement addresses the Inspector's questions regarding Matter 4 of the Island Planning Strategy.

This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan.

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

## Matter 4. Policies for the Environment

<u>Issue 1: Whether the approach to environmental protection is justified, effective and consistent with national policy.</u>

- Q4.1 Various modifications to Policy EV1 and accompanying paragraphs in Section 4 of the IPS, are presented in Core Document 7, in light of the statement of common ground with Historic England. Are these proposed changes, covering matters such as heritage led regeneration, non-designated heritage assets and heritage at risk necessary for soundness?
- 4.1.1 Historic England asserts that these changes in document CD7 form part of the Island's positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay and other threats, required by the NPPF paragraph 196.
- 4.1.2 In our response at Regulation 19, we highlight the challenges associated with heritage at risk on the Isle of Wight. In the latest iteration of the national <u>Heritage at Risk Register</u> there are 28 designated heritage assets on the Register. This is a large number, comparatively with other local planning authority areas. There are reasons for this large number, but the challenge is one that EV1 (Regulation 19) was not fully tackling.
- 4.1.3 The extent of the challenge is wider than "just" those assets on the above Register. The national Heritage at Risk Register does not include Grade II buildings outside of London other than Places of Worship. From this, one concludes that the heritage at risk challenge on the island is likely to be greater, and thus the Council's agreement to develop a local register is a positive step forward.
- 4.1.4 The fact that the Regulation 19 plan did not fully engage with this issue means that we consider it does not align with paragraph 196 of the NPPF (as stated above) and therefore can be said not to be consistent with national policy. As a consequence, the Strategy also risks failing to be effective in conserving the heritage assets on the island.
- 4.1.5 We welcome the Council's agreement to propose changes (via CD7) and assert that this is an opportunity to connect heritage with the Council's plans for regeneration (a strategic priority of the plan).

- 4.1.6 The changes proposed to EV1 regarding heritage at risk are supported by agreed changes to paragraph 4.16 and paragraph 4.18. Historic England considers these changes in combination make a key contribution to the Island's positive strategy.
- 4.1.3 The other changes proposed in CD7 represent improvements to the plan, both individually and collectively, but they do not necessarily represent soundness concerns.