



Examination of the Island Planning Strategy

Matter 5

Historic England, Hearing Statement

05 February 2025

This statement addresses the Inspector's questions regarding Matter 5 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 5. Policies for creating sustainable, strong and healthy communities

Issue 1: Whether the approach to policies for the community is justified, effective and consistent with national policy

Q5.14 Various modifications to Policies C1, C3 and C10, are presented in Core Document 7, in light of the statement of common ground with Historic England. Are these proposed changes necessary for soundness?

5.14.1 Historic England asserts that the proposed change to criterion b) in policy C1 represents a matter of soundness. Heritage significance is an essential consideration within a policy on high quality design and cannot be said to be effectively considered as a subset of character.

5.14.2 Without editing of the policy to address this point, we assert that the plan's positive strategy for the conservation and enjoyment of the historic environment (as required by the NPPF paragraph 196) is compromised, and so the IPS could be said not to be consistent with national strategy (NPPF paragraph 35 d). Local heritage, history and culture form part of the context of a site that needs to inform the design response.

5.14.2 Integrating criteria c) and f) into one in policy C1 seems logical but is not necessarily a matter of soundness. Similarly, the proposed changes to criterion h are not necessarily a matter of soundness.

5.14.4 The proposed change to C3 in CD7 does not necessarily represent a matter of soundness but represents a more holistic approach to improving health and wellbeing, which we would encourage.

5.14.5 As we stated at Regulation 19, we broadly support the Council's approach to renewable energy and low carbon technologies and only challenge the soundness of policy C10 in so far as certain phrasings may undermine the plan's effectiveness (and thus fail to be sound according to NPPF paragraph 35 c)):

Presumably all the types of infrastructure listed in criteria a-f need to be in appropriate locations, so surely reference to appropriate locations needs to be in the opening paragraph rather than only in criteria a) on major development.

We suspect that further improvements could be made to the second paragraph on considerations for development in areas of protected and sensitive landscapes and townscapes; from our perspective the crucial point is adding reference to the setting of designated heritage assets.

Finally, criterion h refers to heritage asset objectives, but what if there is no agreed plan for the asset? It is curious phrasing that is potentially confusing to implement and merits clarification.