



Examination of the Island Planning Strategy

Matter 6

Historic England, Hearing Statement

05 February 2025

This statement addresses the Inspector's questions regarding Matter 6 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 6. Allocating Sites for Housing, including the Key Priority Sites

Issue 2: Whether the policy approach for the proposed Key Priority Sites is soundly based? (Policies KPS1 and KPS2)

Q6.12 Would it be necessary for soundness to insert additional content into Policies KPS1 and KPS2 regarding heritage as set out in Core Document 7, following the Statement of Common Ground with Historic England?

6.12.1 We asserted at Regulation 19 that policy KPS1 is unsound principally because of the proposed wording of the paragraph on the assessments needed to assess potential impacts, inform design proposals and provide mitigation. Liaison with the Council's archaeological adviser concluded that field evaluation is likely to be needed alongside an archaeological desk-based assessment. To be effective (aligning with NPPF paragraph 35 c)) and plan positively as required by NPPF paragraph 196, we assert this need should be made clear in policy, alongside the slightly more pedantic point referring to heritage assessments rather than historic assessments.

6.12.2 The additional change we suggest – requiring heritage expertise to inform decision-making on the future of Camp Hill prison buildings – also forms part of the Council's positive strategy for the historic environment. A complete picture of the heritage significance of these buildings is not yet known, thus prompting the need to recognise the role of heritage expertise in future building adaptation.

6.12.3 For KPS2, as with KPS1, we raised soundness concerns linked with the paragraph on relevant environmental assessments. Again, our views are informed by liaison with the Council's archaeological adviser, regarding the need for field evaluation alongside archaeological desk-based assessment. In this case, also there is the potential for confusion in the implied ordering of the different work phases (such as record findings, assess impacts and provide mitigation) and a lack of internal consistency within the plan (when compared with the approach in KPS1, which rightly makes explicit the role of such assessments to inform design proposals). As stated in our response at Regulation 19, we assert that the Integrated Sustainability Appraisal is incorrect to assume that development here will result in a negative heritage outcome. Providing relevant assessments are undertaken and sufficiently detailed, the outcome should be positive.

- 6.12.4 For KPS2, we have an additional concern regarding the soundness of criterion k, which appears not to consider fully the historic context of the site. The Harbour is historic and reference only to the cultural connections between the site and its surrounds omits a broader point about impacts on the setting of nearby heritage assets and the character of the conservation area. Both need more explicit consideration to align with the emphasis placed on the conservation of heritage significance in paragraphs 195 and 196 of the NPPF.

Issue 3: Whether the proposed housing allocations through Policy H2 are soundly based

- Q6.17 Is the proposed allocation and site specific requirements of site HA005, at Camp Road, Freshwater, justified and effective having particular regard to the setting of heritage asset (Farringford House – grade I listed), National Landscape and Tennyson Heritage Coast, whether it comprises grade 2 agricultural land or would adversely affect biodiversity and relationship to the settlement gap between Freshwater and Totland? Whether there is adequate access and services to support any development? Given the constraints of this site, is it viable and deliverable?**
- 6.17.1 We did not raise any objections to this allocation at Regulation 19, but – if given the opportunity to do so now – we would encourage a requirement for proportionate heritage impact assessment to be included in the site specific requirements, in common with sites HA39, HA046, HA064 and HA116.
- 6.18 Are the proposed modifications in Core Document 7 for the site specific requirements for Site HA006 Heathfield Campsite, regarding setting of the Scheduled Monument, necessary for soundness?**
- 6.18.1 We reaffirm our response at Regulation 19, adding only that without knowing the exact nature of any future scheme, the policy steering such development needs to ensure its conception takes account of potential impacts on the setting of the Scheduled Monument.

Q6.24 **The table of allocations refers to generic policy requirements on housing allocation HA046, land at Crossways, East Cowes, when there are specific policy requirements set out in appendix 3. To be fully effective, should this be corrected (subject also to the above question relating to the layout of housing allocation policies)?**

6.24.1 Historic England supports correction of this table regarding HA046, land at Crossways and the need for site-specific requirements for this site allocation.

Q6.29 **Whether the site-specific requirements at appendix 3 adequately deal with archaeology (see comments of the Isle of Wight Archaeology and Historic Environment Service – in particular in relation to HA002, HA005, HA022, HA025, HA033, HA064, HA065, HA0120 and 16 Medina Yard, Cowes)? Would the proposed modifications in Core Document 7, suggesting additional text on archaeology, be necessary for soundness?**

6.29.1 We did not raise any concerns about some of these sites listed and refer to our response at Regulation 19 for the site policies where we believe changes are needed to ensure their requirements are clear (and thus be deliverable in accordance with NPPF paragraph 35c)).

6.29.2 We highlight the current wording on assessment requirements varies in when archaeological assessments may or will be needed. Also, the description “to record where appropriate and assess the relevant impacts and mitigation aspects” gives a rather unhelpful summary of what is needed. Potential applicants need also to be aware that archaeological field evaluation is likely to be required and that early engagement with the Council’s archaeological adviser is advised.