

Island Planning Strategy

Duty to Co-operate: Statement of Common Ground

1.0 Introduction

- 1.1 The *Localism Act 2011* places a legal duty on planning authorities and other prescribed bodies to cooperate with each other on strategic planning issues that cross administrative boundaries. It is expected that engagement and cooperation will be constructive, active and ongoing.
- 1.2 In accordance with the NPPF (paragraph 24), public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities. This forms part of each local planning authority's evidence for their emerging Local Plans.
- 1.3 The NPPF states that the Government expects joint working on areas of common interest and paragraph 20 lists four key areas: housing, infrastructure provision, community facilities and the environment. All of these are relevant to the Isle of Wight.

2.0. List of parties involved

- 2.1 In line with paragraph 27 of the National Planning Policy Framework (NPPF), this Statement of Common Ground (SoCG) is a jointly agreed statement between **Historic England** and Isle of Wight Council in relation to the Pre-Submission Draft (Regulation 19) Island Planning Strategy (IPS) 2022-2037 and the representations submitted by **Historic England** in response to that consultation (dated 19 August 2024).
- 2.2. The SoCG documents the planning matters being addressed between these parties and sets out the progress in co-operating to address these and where agreement has been reached.
- 2.3. The Isle of Wight Council are required to publish 'Duty to Cooperate (DtC) Statements' setting out how this legal duty has been fulfilled in the preparation of their respective Local Plan and this SoCG should be read in conjunction with the Duty to Cooperate Statement that accompanies the Isle of Wight Council's Submission version of the Island Planning Strategy.

What does this document include?

- 2.4. Section 4 sets out the matters covered by this SoCG and sets out where agreement has been reached on these issues.
- 2.5. Appendix 1 includes out the Regulation 18 and Regulation 19 representations received from **Historic England**.

Background

- 2.6. A new local plan, the Island Planning Strategy (IPS), is being prepared to replace the Island Plan Core Strategy which was adopted in 2012. The Council began the process of preparing the Draft IPS in 2017 to give it the policies it needs to deal with the challenges, such as the delivery of affordable housing and climate change, it now faces.
- 2.7. Since 2018 the local planning authority (LPA) has determined planning applications under the statutory test having regard to the tilted balance of the policy presumption in favour of sustainable development as set out in the National Planning Policy Framework (NPPF). This is because the LPA has either not been able to demonstrate an adequate Housing Land Supply (HLS) or is below the Housing Delivery Test (HDT) threshold for delivery of new homes.
- 2.8. Adopting the IPS with a new island realistic housing requirement will reset the HDT calculation and the LPA will then be able to meet the minimum HDT threshold, whilst also demonstrating an adequate HLS in relation to the planned growth within the IPS. Adopting a new plan will also allow the council to use the suite of new policies in planning decision making that cover multiple topics that align with corporate priorities.
- 2.9. The draft IPS has been through extensive public consultation, including two separate periods at Regulation 18 in 2018/9 and 2021, both of which incorporated a full draft plan and proposals map.

3.0. Strategic Geography

- 3.1 This Statement of Common Ground (SoCG) is an agreed statement between **Historic England** as the Government's advisor on the historic environment and statutory consultee in the local plan making process and the Isle of Wight Council as the Local Planning Authority in relation to issues and matters associated with the emerging Island Planning Strategy. The key matters and areas of common ground are set out in the following section.

4.0 Matters and areas of common ground

- 4.1 The Isle of Wight Council and Historic England agree that the following overarching statements of support for the Island Planning Strategy are common ground:

Subject to the proposed wording changes set out in the remainder of this section, Historic England do not object to the Island Planning Strategy and do not recommend that the plan is found unsound.

- 4.2 The Isle of Wight Council and **Historic England** agree that the list below represent the key matters for the two parties, each of which will be set out in more detail in this section.

- i. Heritage at risk
 - ii. Integrated Sustainability Appraisal
 - iii. Policy specific comments
 - iv. Proposed allocations specific comments
- 4.3 In the detailed Regulation 19 representation from Historic England (see Appendix 1), a number of objections were made highlighting the plan as unsound. Historic England also made associated helpful suggestions of wording changes that could be made to overcome these objections. This section will set out in detail each of these wording changes and provides an agreed position between Historic England and Isle of Wight Council of changes that could be made to the Island Planning Strategy should the appointed Inspector consider this to be necessary. Taking each of the matters in turn:

Heritage at risk

- 4.5 The Isle of Wight Council note the concerns raised over heritage at risk and as detailed later in this statement, both parties agree that suggested revisions to Policy EV1 and supporting text could be made which would represent a move to a positive strategy as required by paragraph 196 of the NPPF.
- 4.6 The Isle of Wight Council also agrees that creating a local buildings at risk register and expanding the heritage component of the IOW Cultural Strategy will offer positive moves on this issue, albeit these commitments are outside the scope of local plan policy. Notwithstanding that, the IWC is happy to include wording in supporting paragraphs of the IPS (as detailed later in this statement) that provide relevant hooks for these pieces of work so that any progress on them can work alongside relevant adopted planning policy.

Integrated Sustainability Appraisal

- 4.7 The Isle of Wight Council notes the comments in relation to the assessment criteria used in the Integrated Sustainability Appraisal (ISA). IWC would be happy to work with Historic England in the future on revising the summary criteria to ensure a more detailed appraisal at that stage. We also recognise that for the site specific issues raised (relating to KPS1 and KPS2), both parties agree that revisions could be made to policy and supporting paragraphs (as detailed later in this statement) to ensure that heritage assets are considered in their fullest regard as and when development comes forward on those sites.

Policy specific comments

- 4.8 Policy EV1 – it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to policy EV1 could be made:

‘The council will 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.’

4.9 Policy EV1 supporting text - it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy EV1 could be made:

Paragraph 4.8: 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 where they have a degree of significance meriting consideration in planning decisions.

Paragraph 4.9: Designated heritage assets will be afforded the highest protection in line with the relevant legislation, national policy and guidance. ~~Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets. This sentence to be moved to paragraph 4.11~~

Paragraph 4.11: The Isle of Wight benefits from the following and 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 map:

- 1973 listed building entries, of which 29 are grade I listed, 68 are grade II* listed and 1876 are grade II listed
- 122 scheduled monuments
- 9 registered historic parks and gardens
- protected wreck sites
- 36 conservation areas
- 175 locally listed buildings, structures and parks and gardens
- 13,501 ~~non-designated sites~~ entries on the Historic Environment Record

The large number of entries on the Historic Environment Record reflects the significant contribution made by undesignated heritage assets across the island. We are always learning about the islands past, informed by archaeological investigation and research. Development led archaeology makes an important contribution and in many cases the heritage significant of remains have yet to be fully understood. Non-designated heritage assets of archaeological interest, which are demonstrably of

equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

Paragraph 4.12: Managing change to a heritage asset in a positive way can take many forms: for example, securing the longevity of heritage assets that contribute positively to local character and provide places of interest for visitors to the Island; ~~or~~ the suitable re-use or reinstatement of heritage assets to provide tourism accommodation or workspace for employment uses; or the sensitive adaptation of historic buildings to improve their carbon and energy efficiency (which usually requires heritage expertise).

Paragraph 4.14: ‘Buildings which are constructed in a traditional vernacular style and of traditional materials (for example natural stone) should be retained and restored wherever possible. 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/>’

Paragraph 4.16: ‘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 28 designated heritage a number of assets currently on the Heritage at Risk Register spread across on the island. 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. 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. 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”).’

Paragraph 4.18: 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. The council will develop a local buildings-at-risk register to support this endeavour.’

Other relevant documents and information:

- **Historic England’s Heritage at Risk register**
- **Isle of Wight Council Conservation Area Appraisals**
- **Isle of Wight Council Local List**
- **Newport and Ryde HAZ Commercial Frontages Design Guide**
- **[Isle of Wight Historic Environment Record \(HER\)](#)**

4.10 Policy EV2 supporting text - it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy EV2 could be made:

Paragraph 4.28: Planning applications are required to clearly set out any impacts associated with the proposals and the mitigation or compensation measures that make the development acceptable. This could be set out within a separate Biodiversity Mitigation Plan. A natural capital approach will be used to monitor the levels of protection and enhancement of environment. [The natural and historic environments are integral to each other and an integrated approach to land management, delivering multiple benefits, is encouraged.](#)

4.11 Policy EV3 supporting text - it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy EV3 could be made:

Paragraph 4.41: If a particular development triggers the need for a SANG the council will look to review existing open space within the 5.6km of the Solent SPA to determine if it could be enhanced to meet the SANG criteria of being suitable, natural and accessible. A SANG needs to serve its intended purpose by providing an alternative accessible area that is:

- **Coherent**
- **Integrated within the development**
- **Links with existing facilities/ public rights of ways**
- **[Takes account of the historic environment](#)**

4.12 Policy EV5 supporting text – it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy EV5 could be made:

Paragraph 4.55: ‘This policy seeks to protect the landscape character and amenity value afforded by trees, woodlands and hedges on the Island. Trees, [woodland and hedges](#) provide an important green infrastructure function; [they connect with historic landscape character](#) and contribute significantly to the health of the environment and people.’

4.13 Policy EV6 supporting text – it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy EV6 could be made:

Paragraph 4.67: 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. Many are of heritage interest, including those that are designated or known principally for their natural environment. It is accepted that....'

- 4.14 Policy EV11 supporting text – it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy EV11 could be made:

Paragraph 4.90: The Isle of Wight National Landscape is complex and comprises a range of landscape types, as defined by the West Wight and East Wight Landscape Character Assessments and the National Landscape Management Plan. The complexity of the landscape within the Isle of Wight AONB is a legacy of the centuries-old intricate relationship between people and place. The National Landscape includes undeveloped coastlines, chalk downs and hills, harbours and creeks, areas of ancient woodland, dark sky areas and farmland along with a range of villages and other rural development. The National Landscape is a finite landscape resource and new developments of all types have the potential to detract from the special qualities of the designation. The historic environment is a major contributor to the landscape character of the Isle of Wight AONB.'

- 4.15 Policy EV17: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to policy EV17 could be made:

d) not having any significant adverse impacts that would be contrary to other policies of the plan, including on the AONB, heritage assets and the Heritage Coast.

- 4.16 Policy EV18: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to policy EV18 could be made:

'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 and take account of the heritage significance of any affected heritage assets.'

- 4.17 Policy C1: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to policy EV18 could be made:

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, [historic context including the setting of any nearby heritage assets](#) or other features which significantly contribute to the character of the area;

c) respect the character of the area [through their layout and design](#), particularly in historic places (such as conservation areas) and the National Landscape, [especially in larger scale housing developments](#);

~~f) respect the diverse character and appearance of an area through their layout and design, especially in larger scale housing developments;~~

h) preserve the integrity [and heritage significance](#) of traditional shop front or building detailing;'

- 4.18 Policy C1 supporting text: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy C1 could be made:

Paragraph 5.3: Many of the towns and villages on the island have an existing strong sense of place and cultural history. [The island's rich heritage contributes significantly, from iconic castles to](#) ~~with~~ early twentieth century design being evident in many places. It is important that any new development within these respects [these positive contributors](#) ~~this~~, [many of which are undesignated](#), working with the existing character and constraints to enhance the identity of the communities living, working and visiting, for the lifetime of the development.'

Paragraph 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. [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](#). 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...'

New text after paragraph 5.19:

[Other information / relevant documents:](#)

- [Conservation Area Appraisals](#)
- [Conservation Area Management Plans](#)
- [Newport & Ryde Commercial Frontages Design Guide](#)

- 4.19 Policy C2 supporting text: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy C2 could be made:

Paragraph 5.22: This policy seeks to ensure that development has a positive relationship with its surroundings and provides space to allow for layouts to breathe and free movement, to encourage sustainable routes and alternative means of travel to the private car where practicable. [The People First Zone in Newport town centre is an excellent example of the coordinated approach that can be taken.](#)

- 4.20 Policy C3: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to policy C3 could be made:

New criterion (d):

[d. improving access to and/or appreciation of the local historic environment.](#)

- 4.21 Policy C10: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to policy C10 could be made:

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 [in appropriate locations](#) for:

a) major development of renewable energy schemes, ~~in appropriate locations and~~ where there is appropriate grid capacity and storage;

Within areas of protected and sensitive landscapes and townscapes, development should generally be small scale or community based. It is expected that major wind and photovoltaic schemes will be located outside of the [National Landscape AONB](#) and [other protected designated](#) areas, and grade 1-3a agricultural land (for photovoltaics) and will be informed by consideration of any impacts on the setting of [protected designated](#) areas [and designated heritage assets](#).

Proposals outside the settlement boundaries or site allocations should demonstrate they have taken account of:

g the visual impact on the character of the area;

h the consistency of the proposal with nature conservation and [the conservation of heritage significance asset objectives](#).

- 4.22 Policy C10 supporting text: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy C10 could be made:

Paragraph 5.64: Furthermore, they must not cause unacceptable harm to the area's nature conservation interests or [its heritage significance](#)

assets (including direct impacts on heritage assets and impacts on their setting).

Paragraph 5.65: Applicants will be expected to undertake appropriate surveys, **assessments** and/ or site investigations as required taking account of site specific characteristics in relation to the technology being applied for...

Paragraph 5.66: Consideration will be given to any cumulative impacts on the landscape, and local amenity **and any sensitive receptors** in relation to renewable energy and low carbon technologies, particularly for wind turbines and large scale solar installations.

- 4.23 **Policy C11 supporting text:** it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy C11 could be made:

Paragraph 5.72: For example, a site may only allow for a suboptimal orientation, meaning that considerable solar gain cannot be attained and that other measures must be strengthened to compensate. **Proposals including the retrofit and adaptive re-use of buildings may offer excellent opportunities to mitigate and adapt to climate change and reduce carbon (refer to EV1 for historic buildings).**

- 4.24 **Policy G3 supporting text:** it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy G3 could be made:

Paragraph 6.21: The delivery of good quality infrastructure underpins the social, economic and environmental regeneration envisaged by the council over the plan period. It is essential for the Island's population to have confidence in the key infrastructure needed, such as safe and sustainable means of transport, access to housing for all, high quality areas for recreation and relaxation, ecological mitigation, **cultural infrastructure (e.g. securing the long term future of heritage assets 'at risk')** and other infrastructure required to support sustainable development.

- 4.25 **Policy KPS1:** it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to policy KPS1 could be made:

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, **informed by heritage expertise.**

Archaeological, historic Heritage and biodiversity assessments must be undertaken to assess potential impacts, inform design proposals (avoiding adverse impacts where possible) and provide mitigation where appropriate. **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.

- 4.26 Policy KPS2: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to policy KPS2 could be made:

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 ~~these assets~~ to reinforce the cultural connections between the site and its surroundings;”

~~Archaeological, —historic~~ Heritage, biodiversity and watercourse assessments must be undertaken to assess potential impacts, inform design proposals (avoiding adverse impacts where possible), record findings where relevant and to assess relevant impacts and provide mitigation where appropriate. 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.

- 4.27 Policy KPS2 supporting text: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy KPS2 could be made:

Paragraph 7.33: The site allocated lies within the wider area covered by the emerging Newport Harbour Masterplan (Isle of Wight Council, 2022) and will work positively with enhancements being brought forward in the Newport Heritage Action Zone area. The southern part of the allocation lies within the Newport Conservation Area, which is on the Heritage At Risk register. It would provide sustainable homes in an accessible location and provide additional footfall to help support existing and new town centre businesses, rejuvenating the town centre, and promoting a more vibrant night-time economy.

- 4.28 Policy H4 supporting text: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy H4 could be made:

Paragraph 7.56: 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. This includes consideration of impacts on historic character and the significance of affected heritage assets. 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.

- 4.29 Policy H6: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to policy H6 could be made:

c Secure the optimal re-use of a heritage asset ~~or would be appropriate sympathetic enabling development (as detailed in Enabling Development and Heritage Assets¹⁴ by Historic England) to secure the future of the heritage asset.~~

- 4.30 Policy E3 supporting text: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy E3 could be made:

Paragraph 8.49: ESPs also provide opportunities for contractors to be involved in providing young people and adults with relevant industry careers guidance and help them to consider the wide range of opportunities in the construction sector. This can include specialist areas, for example skills in heritage related development. They also carry the wider benefit of driving economic growth by providing jobs to local residents in need of more permanent employment. They also provide a platform to up-skill existing members of the construction workforce be they employees of the contractor or subcontracted employees.

- 4.31 Policy E4: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to policy E4 could be made:

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, or unacceptably harm the significance of a heritage asset;

- 4.32 Policy E4 supporting text: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy E4 could be made:

Paragraph 8.55: 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. Sensitive adaptation is needed that retains key features of heritage significance. 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.

- 4.33 Policy E7: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to policy E7 could be made:

Applications within ~~the~~ Newport and Ryde ~~heritage action zones (HAZ)~~ town centres will be expected to adhere to the Newport and Ryde Commercial Frontages Design Guide. Applications within other town

centre historic conservation areas across the Isle of Wight should use the guidance within the Newport and Ryde Commercial Frontages Design Guide to help inform development proposals. ~~will be expected to adhere to any design guides or other appropriate documents as part of the respective HAZ projects.~~

- 4.34 Policy E7 supporting text: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to the supporting paragraphs of policy E7 could be made:

Paragraph 8.89: Proposals within the HAZ areas will be expected to take account of this work and the documents produced as part of those projects. Proposals across the island that are outside of the HAZ areas should also use this guidance to help inform design.

- 4.35 Policy E11: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to policy E11 could be made:

Where relevant, proposals must demonstrate that they align with the Newport and Ryde Commercial Frontages Design Guide. ~~any relevant design guides prepared as part of the Ryde HAZ project~~

- 4.36 Policy T2: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes to policy T2 could be made:

The council will support proposals that:

- increase travel choice;
- provide alternative means of travel to the car;
- reduce the impact on air quality and climate change while avoiding or mitigating other environmental impacts

~~Opportunities to avoid or mitigate any environmental impacts should be considered.~~

- 4.37 Housing allocations in Appendix 3: Site specific requirements: it is common ground and the agreed position of Historic England and Isle of Wight Council that the following wording changes could be made within Appendix 3, listed in order of site allocation reference:

HA006: The layout and design of the development should take account of any impacts on the setting of Golden Hill Fort Scheduled Monument (in particular regarding massing) and where possible retain the existing trees, hedges and flower meadow. The meadow could form part of the SANGs, open and recreation space provision.

~~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. 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.

HA020: b onsite soft and hard landscaping (incorporating a suitable buffer to the cemetery on the eastern edge)

HA022, HA025, HA031, HA036, HA037 & HA038: ~~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. 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.

HA110: Add at end of current text: Development should respond sensitively to the character and appearance of the Newport conservation area.

HA084: 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.

5.0 Governance arrangements for the cooperation process

5.1 This SoCG has been prepared and agreed at officer level between the Isle of Wight Council and **Historic England** following representations at both Regulation 18 and Regulation 19 stages and in advance of the submission of the Island Planning Strategy under Regulation 22.

5.2 A number of the issues raised throughout the plan making process and the positive communication with Historic England will continue in parallel with the local plan submission and examination.

6.0 Timelines for review / updates to the Statement of Common Ground

6.1 This SoCG has been prepared for publication as part of the submission package for the Island Planning Strategy and associated evidence base under Regulation 22 so that the appointed Inspector can see how a position of agreement has been reached between Isle of Wight Council and Historic England as a key stakeholder and statutory consultee.

Signatories



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Date: 25 October 2024
Position: Historic Environment Planning Adviser



Name: James Brewer
Date: 21st October 2024
Position: Planning Policy Manager, Isle of Wight Council



Historic England

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Date: 01/10/2021

Dear Sir or Madam

Draft Island Planning Strategy Consultation

Thank you for inviting Historic England to comment on the above document. As the government's adviser on the historic environment, Historic England is keen to ensure that protection of the historic environment is fully taken into account at all levels and stages of the local planning process.

While the plan is currently at draft stage, we have highlighted a number of areas where we believe the plan would be **unsound** if the issues we identify are not addressed, as follows:

- Sufficiency of the evidence base
- Whether the plan demonstrates a positive strategy for the conservation and enjoyment of the historic environment
- Policy EV1 (Conserving and enhancing our historic environment)
- Policy HA039 (Former HMP Site, Newport)
- Policy HA044 (Newport Harbour, Newport)

We have provided detailed comments on the above in Appendix 1. Links to our published advice and general advice on planning for the historic environment can be found in Appendix 2.

We would be very happy to discuss any of the above, or any other aspect of the plan with you, if this would be of assistance.

Yours faithfully

Edward Winter
Historic Environment Planning Adviser



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Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Appendix 1: Historic England’s detailed comments on Draft Island Planning Strategy Consultation

Location	Historic England comments
EV1	<p>Possibly unsound (evidence base): inconsistent with national policy. The plan should clearly set out, in supporting text or a background paper, what evidence has been used to inform it, in order to be consistent with NPPF paragraphs 31 (evidence base) and 190 positive strategy for the historic environment.</p> <p>In order to satisfy the above, there are some specific pieces of evidence we think the plan or background paper should set out, in addition to evidence already referred to. These include:</p> <ul style="list-style-type: none"> • Heritage assets on Historic England’s Heritage at Risk Register. • Whether the council keeps its own list of heritage at risk and the list of assets included therein. • A list of all conservation areas, whether or not these are accompanied by appraisals, the date of the appraisal, and the council’s opinion as to whether updating or review is required. • Reference to Heritage Action Zones and High Street Heritage Action Zones and any other grant or partnership-based activities in progress or planned, including any work with local heritage groups that is relevant to the development of the plan. • With the above in mind, a narrative setting out any opportunities that the development proposed in the wider plan presents and in general, how the council considers that the plans meets the NPPF requirement for it to set out a positive strategy for the conservation and enjoyment of the historic environment. For example, how development on a specific site will help to conserve or enhance the historic environment, as relevant. • Please see also Appendix 2.
EV1	<p>Unsound. Currently inconsistent with national policy: NPPF 16d. Significance is at the heart of national policy on the historic environment. This should be reflected in policy EV1 (Conserving and enhancing our historic environment), which currently refers to ‘character’, but not ‘significance’. The following amendment to the policy is suggested:</p> <p>“The council will support proposals that positively conserve and enhance the significance and special character of the Island’s historic environment and heritage assets...”</p>



Location	Historic England comments
EV1 a	Unsound inconsistent with national policy: NPPF 16d. The use of the word 'relate' is unclear. We suggest 'relate to' is replaced with 'incorporate', to clarify that heritage should be fully understood and incorporated into development proposals.
EV1 c	We support the aim of this clause and we suggest some amendments to ensure it is consistent with national policy. "demonstrate how they have been informed by sufficient evidence to reveal <u>fully assess</u> impacts upon the significance of heritage assets and their settings (including any heritage assets that have yet to be identified contribution made by their settings). <u>Proposals should also demonstrate how they have avoided, minimised and mitigated (in that order) any harm to heritage assets. and how these impacts can be mitigated</u>

Site allocations

Location	Historic England comments
HA003 Land to the rear of Lanes End, Totland	No comment.
HA005 Land to the east of Football Club, Camp Road, Freshwater	No comment.
HA006 Heathfield Campsite, Heathfield Road, Freshwater	No comment.
HA008 Church Field, Copse Lane, Freshwater	No comment.
HA018 Green Gate Industrial Estate, Thetis Road, Cowes	No comment.
HA019 Medina Road, Cowes	No comment.
HA020 Former Somerton Reservoir, Newport Road, Cowes	No comment.
HA022 Somerton Farm, Newport Road, Cowes	No comment.
HA025 Land rear of 84 Wyatts Lane, Northwood	No comment.
HA026 Land rear of Harry Cheek Gardens and Wyatts Lane, Northwood	No comment.



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Location	Historic England comments
HA031 Various land adjacent to and east of Carisbrooke College, Newport	No comment.
HA032 Land at Horsebridge Hill and Acorn Farm, Newport	No comment.
HA033 Land west of Sylvan Drive, Newport	No comment.
HA035 Land off Gunville Road (west), Newport	No comment.
HA036 Land at Noke Common, Newport	No comment.
HA037 Former Library HQ, Land Adjacent St Mary's Hospital, Newport Road, Newport	No comment.
HA038 Land of Broadwood Lane, Newport	No comment.

Location	Historic England comments
HA039 Former HMP Site, Newport	<p>Not sound. Inconsistent with national policy. NPPF paragraph 31 states:</p> <p><i>“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”</i></p> <p>No evidence has been presented as part of the local plan consultation to demonstrate site capacity and how development of this site would affect heritage assets. Prior to allocation, a proportionate heritage impact assessment should be carried out. If this demonstrates that the proposed quantum of development would harm any heritage assets, this should be justified in line with national policy. In this case, the allocation should also minimise and mitigate any harm to heritage assets.</p> <p>The final sentence of the policy is also inconsistent with national policy.</p> <p><i>“Archaeological, historic and biodiversity assessments must be undertaken to record findings where relevant and to assess relevant impacts and provide mitigation where appropriate.”</i></p> <p>As written, this sentence appears to convey that plans only need to mitigate harm to heritage assets and record details of heritage</p>



Location	Historic England comments
	<p>assets. The NPPF is clear that great weight should be given to the conservation of the significance of heritage assets and that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. This section should be rewritten to reflect this, in addition to the required evidence to demonstrate site capacity aspirations will not harm heritage assets.</p>
<p>HA044 Newport Harbour, Newport</p>	<p>Not sound. Inconsistent with national policy. NPPF paragraph 16 states:</p> <p><i>“Plans should:</i></p> <p>...</p> <p><i>(d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;”</i></p> <p>The proposed policy states:</p> <p><i>“7.30 The site allocated incorporates the area covered by the recently approved Newport Harbour masterplan (Isle of Wight Council, 2020) and will work positively with enhancements being brought forward in the Newport heritage action zone area.”</i></p> <p>However, the site boundaries for the Newport Harbour Masterplan and the proposed policy do not match. Furthermore, while the policy states that the Newport Harbour Masterplan has been approved by the council, we have only been able to locate a draft version.</p> <p>Historic England provided comments on the draft masterplan, which we endorsed in the main. The masterplan draws heavily on a well-researched historic area appraisal (2017), which is to its credit.</p> <p>Therefore, this area benefits from a strong evidence base in terms of the historic environment and some clarifications in the policy or the red line boundary or both, would help to make clear the relationship between the policy and the masterplan and help make the policy itself more robust. The adopted version of the masterplan should be listed as part of the evidence base.</p>



Location	Historic England comments
HA046 Land at Crossway, East Cowes	No comment.
HA051 Palmers Farm, Brocks Copse Road, Wootton	No comment.
HA053 Land adjoining Lushington Hill & Hunters Way, Wootton	No comment.
HA055 Old Hosiden Besson Site, Binstead Road, Ryde	No comment.
HA060 Westridge Cross Dairy and Land to the north of Bullen Road, Ryde	No comment.
HA062 Land off Quarry Road, Ryde	No comment.
HA064 Land north of Mill Road and east of High Street, Bembridge	No comment.
HA065 Land east of Hillway Road and south of Steyne Road, Bembridge	No comment.
HA077 Winchester House Sandown Road	No comment
HA078 Learning Centre, Berry Hill Lake	No comment.

Location	Historic England comments
HA079 23 Carter Street, Sandown	We note that there is a live planning application for this site. However, if the site is still being progressed through the local plan process by the time of submission, we would welcome a specific requirement for this site that the building line of the new development is kept back from the northern extent of the site, in order to avoid harm to the setting of St John's.

Location	Historic England comments
HA080 Former Sandham Middle School, Sandown	No comment.



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Appendix 2: Historic England's published guidance and general advice

Historic England has published planning advice which we recommend that you review as part of your plan preparation.

Good practice advice

- The Historic Environment in Local Plans <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>
- Managing Significance in Decision-Taking in the Historic Environment <https://content.historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2.pdf/>
- The Setting of Heritage Assets <https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>
- Enabling Development <https://historicengland.org.uk/images-books/publications/gpa4-enabling-development-heritage-assets/>

Historic England advice notes

- Conservation Area Appraisal, Designation and Management <https://historicengland.org.uk/images-books/publications/conservation-area-designation-appraisal-management-advice-note-1/>
- Making Changes to Heritage Assets <https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>
- The Historic Environment and Site Allocations in Local Plans <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>
- Tall Buildings <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/>
- Local Heritage Listing <https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>
- Sustainability Appraisal and Strategic Environmental Assessment <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

All Historic England advice should be read alongside our Conservation Principles, which underpin our work <https://historicengland.org.uk/advice/constructive-conservation/conservation-principles/>

Evidence base

The evidence base for the plan should be proportionate, comprehensive and robust. Sources include:

- National Heritage List for England www.historicengland.org.uk/the-list/
- Heritage Gateway www.heritagegateway.org.uk
- Historic environment records



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- National and local heritage at risk registers
www.historicengland.org.uk/advice/heritage-at-risk
- Non-designated or locally listed heritage assets (buildings, monuments, parks and gardens, areas)
- Conservation area appraisals and management plans
- Historic characterisation assessments e.g. the extensive urban surveys and historic landscape characterisation programmes or more local documents.
www.archaeologydataservice.ac.uk/archives/view/EUS/
- Environmental capacity studies for historic towns and cities or for historic areas
- Detailed historic characterisation work assessing impact of specific proposals.
- Heritage impact assessments looking into significance and setting
- Green Belt studies
- Visual impact assessments
- Archaeological assessments
- Topic papers
- See also, the baseline information section within sustainability appraisal, below

As set out in GPA1, this is not simply an exercise in setting out known sites but, rather, in understanding the value to society (i.e. the significance) of sites both known and unknown.



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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.



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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
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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 promote heritage led regeneration where <u>appropriate, develop a positive strategy toward any heritage assets that are considered “at risk” and support proposals that positively</u> conserve and enhance the significance and special character of the Island’s historic environment and heritage assets.”</p>



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Page	Section	Sound/ Unsound	Comments	Suggested Change
			<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: 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: https://historicengland.org.uk/images-books/publications/adapting-historic-buildings-energy-carbon-efficiency-advice-note-18/</p>	



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Page	Section	Sound/ Unsound	Comments	Suggested Change
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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Page	Section	Sound/ Unsound	Comments	Suggested Change
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>



Page	Section	Sound/ Unsound	Comments	Suggested Change
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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Page	Section	Sound/ Unsound	Comments	Suggested Change
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://iwhaz.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</u> or other features which significantly contribute to the character of the area;”</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 this, 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://iw haz.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> <ul style="list-style-type: none"> g the visual impact on the character of the area; h the consistency of the proposal with nature conservation and <u>the conservation of heritage significanceasset objectives</u>. <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 significanceassets (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 Heritage 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, <u>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;”</p> <p>“Archaeological, historic Heritage, 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 Assets¹⁴ 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.	"Applications within the Newport and Ryde <u>town centres and other historic conservation areas across the Isle of Wight (as appropriate) will be expected to adhere to the Newport and Ryde Commercial Frontages Design Guide 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> "



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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 where possible retain the existing trees, hedges and flower meadow. The meadow could form part of the SANGs, open and recreation space provision.</u>”</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 <u>onsite soft and hard landscaping (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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