

To

Mr David Spencer Mr Andrew Steen

Via email to:

Louise St John Howe Programme Officer louise@poservices.co.uk **From**

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Your Ref: ED27 Date: 16th June 2025

Dear Mr Spencer and Mr Steen

ED27: Island Planning Strategy Examination – Additional Post Hearings Work

Thank you for your letter dated 10th June 2025 (<u>ED27</u>) which sought clarity on a couple of areas. This followed our letter to you of 2nd June 2025 (<u>ED25</u>) that confirmed the council wishes to proceed with the examination process.

Taking each point within ED27 in turn:

- (i) Member approval will be sought prior to consulting on the proposed changes and this will be done via the committee system of governance that the council has recently switched to. For clarity, this approval will include changes addressing the housing shortfall (e.g. implications from the West Acre Park judgement and delivery forecasts for the site). Timing wise, the relevant committee meetings fall into the time period covered by line 13 on the work programme (late September to mid-October);
- (ii) The council would like to request that a 4 week period is added into the work programme at the end following the consultation. This additional period will allow a review of the responses and, if necessary, Member approval to be sought prior to sending on to you the council's proposed changes for consideration once the examination process 'restarts'. This is shown as line 18 on a revised work programme, submitted as Appendix 1 with this letter.

Integrated Sustainability Appraisal (ISA)

Thank you for the useful signposts to the PAS documentation and relevant PPG chapter. You are correct that the council wants to ensure it delivers an updated piece of work that addresses your concerns, as set out predominantly in Appendix A of your post hearings letter (<u>ED21</u>).

In that regard, and noting in ED27 that you helpfully state the sequencing of work and time allotted within the work programme seems practicable (including lines 7, 8 & 9 relating to the ISA), we have attached as Appendix 2 to this letter a 'Scope of ISA work' document.

This provides further detail on the proposed content of each of the relevant ISA work stages (lines 7, 8 & 9 on the work programme) and highlights the relevant extracts from ED21 that we consider each stage addresses.

We believe that carrying out the ISA process in this way will satisfactorily address your concerns and should you have anything further to highlight then this can be done through an exchange of correspondence prior to the ISA work being carried out.

I trust this letter provides the clarity you were seeking, and we look forward to hearing from you in due course.

Yours sincerely

James Brewer Planning Policy Manager

Enc:

- Appendix 1 Island Planning Strategy work programme June 2025
- Appendix 2 Scope of ISA work

			Month		June		lu	ly (1)	Au	gust (2)	s	eptember	(3)	Octobe	r (4)	Nove	mber (5) De	ecembe	er (6)	Jani	uarv (7)	
Appendix 1: Island Planning Strategy indica		6.25	5.6.25	23.6.25					\top	w/c 8.9.25 w/c 15.9.25	T		\neg		T	\top	\neg			19.1.26			
Task	Time period	IWC	External	w/c 2.	w/c 1	w/c 2 w/c 3	w/c 1	w/c 2	w/c 4	w/c 1	w/c 1	w/c 1	w/c 2	w/c b	w/c 2	w/c 3	w/c 1	w/c 1	w/c 8	w/c 2	w/c 5	ی ای ای	Comments / latest update
1 Confirmation letter to PINS following FC decision on 28 May	1 day	Yes	No																				IWC to write to PINS with decision of Full Council to continue or withdraw
2 PINS response to IWC setting out way forward	3 weeks	No	PINS																				Subject to item 1 being 'continue', PINS write back to IWC as per para 59 of PINS letter
Confirmation of 6 month pause to IPS examination process (plus extension)	7 months	No	PINS																				Maximum 6 month pause to formal examination to allow IWC to carry out further work
3 Local Plan Viability Report (LPVR) update	6 weeks	No	Aspinall Verdi				4																External consultants have provided a 6 week project programme for updating the LPVR
4 Review LPVR update and assess vs submitted IPS policies	2 weeks	Yes	No					8, 13															IWC to review content of LPVR and any implications on policy requirements
5 Review policy C11 and confirm deletion or revision	2 weeks	Yes	No	3			8, 1	3			\perp		\perp										IWC to confirm whether policy C11 to be deleted or revised as per para 50 of PINS letter
6 Review policy EV5 and revision to buffer	1 week	Yes	No	11, 1	3								\perp				\perp						IWC to use reduced buffer to ancient woodland as per PINS letter paragraph 55
									\perp	\perp	\perp	\perp	\perp	\perp	\perp		\perp	\perp	\perp	\perp		\perp	
7 ISA Stage A: Setting the context, objectives, establishing baseline and scope	4 weeks	Yes	No				8						\perp	\perp			\perp	\perp					
8 ISA Stage B: Developing and refining alternatives and assessing effects	8 weeks	Yes	No											\perp	\perp		\perp	\perp	\perp				All outputs from items 4, 10 & 12 to be considered in ISA process including policy options/sites not chosen
9 ISA Stage C: Prepare the ISA Report	2 weeks	Yes	No				_		\perp	\perp	\perp		13	\perp	\rightarrow		\perp	\perp	\rightarrow	_	\perp	\perp	
										\perp	\perp						\perp						
10 Review policy approach related to housing shortfall	2 weeks	Yes	No		8, 13			\perp	+	\perp	\perp	\rightarrow	\rightarrow	\rightarrow	\rightarrow	_	+	+	\rightarrow	-	\vdash	\perp	
11 Review available and deliverable sites from SHLAA / call for sites database	2 weeks	Yes	No			12			\perp	\perp	\perp		\rightarrow	\rightarrow	\rightarrow		\perp	\perp	\rightarrow		\perp	\rightarrow	Take into account output from item 6
12 Identify additional sites related to housing shortfall	2 weeks	Yes	No			\perp	8,1	3	\perp	\perp	\perp	\perp	\perp	\perp	\perp	_	\perp	++	\perp	_			Items 10, 11 & 12 to be completed prior to ISA Stage B (item 8) commencing
		_				\perp	_	+	+	+	+	\rightarrow		_	\rightarrow	+	+	+	\rightarrow	_	-	+	
13 Review output of ISA and confirm final package of council changes	3 weeks	Yes	NE			\perp	_		+	\perp	\perp	\rightarrow		14			+	++	\perp	-		\perp	Will be a combination of outputs from items 4, 5, 6, 9, 10 & 12) and include NE engagement and IWC Member approval via relevant committee
13a Comms strategy / content prep ahead of public consultation	6 weeks	Yes	No			\perp	_	-	+	+	+	\rightarrow			\rightarrow		+	++	\rightarrow	-	\vdash	++	To prepare the communications and consultation arrangements
14 HRA addendum	3 weeks	No	LUC			\perp	_	-	+	+	+	\rightarrow	+			_	+	+	\rightarrow	_	-	+	To be carried out post completion of item 13
						-	_	-	+	+	+	\rightarrow	+	+	\rightarrow		_	+	-	_	\vdash	+	
15 Review HRA addendum	2 weeks	IWC	No	-	+	+	-	-	+	+	+	\rightarrow	+	+	+	_		++	+	+	\vdash	+	
46 Public control of the control of	C	IWC		+	-	-	+	+ +	+	+	+	\rightarrow	++	+	+	_					\vdash	++	and and and trade leaves the second and trade
16 Public consultation on proposed changes to address Inspectors findings 17 HRA addendum consultation with NE	6 weeks		No NF	\vdash	+ +	+	_	+ +	+	+	+	\rightarrow	++	+	+	_	_				+	++	6 week period as advised by local plans procudure guide and ED27 NE to be consulted as part of council consultation
17 HKA addendum consultation with NE	6 weeks	No	NE	\vdash	+	+	+	+	++	+	+	+	+	+	+	_		+	+		\vdash	++	NE to be consulted as part of council consultation
18 Post consultation review of responses	4 weeks	IWC	No	\vdash	+	-	+	+ +	+	+	+	\rightarrow	+	+	+	+	++	+	+	+			To review proposed changes the IWC submit to the examination process - to include IWC Member approval via relevant committee
10 Post consultation review or responses	4 weeks	TWC	NO	-	+	+	-	+ +	+	+	+	\rightarrow	+	+	+	+	+	+	+	-			To review proposed changes the two submit to the examination process - to include two Member approval via relevant committee
	 	+	—	+	+ +	-	+		+	+	+	\rightarrow	++	+	+	_	++	++	+	-		++	
	1		<u> </u>		+ - 1	-			+	+	+	\rightarrow	+	+	+	+	+	+	+	-	\vdash		
	1		1	-			-					-		\perp	\rightarrow		\perp		\rightarrow	_	\perp		

Appendix 2: Scope of ISA work

This note provides further detail on the proposed work to be carried out as part of the review and update to the Integrated Sustainability Appraisal (ISA) supporting the Island Planning Strategy.

The ISA Stages identified below are those set out in Appendix 1: Island Planning Strategy Summer 2025 work programme.

Where relevant annotated summary extracts from Appendix A of document ED21 are provided.

ISA Stage A: Setting the context, objectives, establishing baseline and scope (4 weeks)

- Review March 2021 scoping report in light of any relevant evidence and strategies and Reg 19 consultation responses;
- Update June 2024 ISA to reflect any changes coming out of the scoping report review

ISA Stage B: Developing and refining alternatives and assessing effects (8 weeks)

All assessment work to be based upon the framework in the June 2024 ISA. Carry out an assessment of the following:

- options (reasonable alternatives) for policies reliant on the 2018 ISA;
- further detail on alternative housing requirements considered to clearly set out what the consequences of the preferred housing requirement would be against the SA objectives and how any adverse impacts could be mitigated;
- options for proposed changes to policies C11, EV5 and G2, H1 and other related H
 policies where not covered above (the council is aware of other changes that will be
 proposed through main modifications that will be considered separately, later in the
 examination process);
- key policies that give rise to significant environmental effects; and,
- site selection, to include an assessment of all sites identified as viable through the
 updated SHLAA process with a conclusion why sites should be considered a
 sustainable option for housing and how consideration against the SA objectives has
 informed the proposed individual site requirements set out in Appendix 3 of the IPS.

The above assessment work to include (and set out) the assessing of reasonable options. The assessment of all reasonable alternative site options to include an explanation as to why potentially reasonable sites (sites that the SHLAA has objectively concluded were suitable, achievable and available) were not to be preferred in terms of sustainability.

ED21 Appendix A summary extracts addressed by Stage B

- **A3**. Reassess the assessment of options (reasonable alternatives) for policies contained in the 2018 ISA in light of more up to date evidence and strategies.
- **A4.** How the ISA process since 2021 has assessed alternative housing requirements, enabling those with an interest in the plan to understand what the consequences of the proposed lower housing requirement would be against the SA objectives and how any adverse impacts could be mitigated.
- **A6.** A conclusion why the site should be considered a sustainable option for housing or how consideration against the SA objectives has informed the proposed individual site requirements at Appendix 3 of the IPS.
- **A8**. A full assessment of all reasonable alternative site options and to explain why a significant number of potentially reasonable sites (sites that the SHLAA has objectively concluded were suitable, achievable and available) were not to be preferred.

ISA Stage C: Prepare the ISA Report

(2 weeks)

Prepare an ISA document to accompany plan submission that transparently indicates where and how all reasonable alternatives have been considered, to include why a preferred option has been selected and where alternatives have been rejected. Where appropriate, this will include clearer signposting to relevant parts of previous ISA.

ED21 Appendix A summary extracts addressed by Stage C

A2. The ISA accompanying plan submission should transparently indicate where and how all reasonable alternatives have been considered, in headline terms why a preferred option has been selected and where alternatives have been rejected. Where appropriate, this should include clearer signposting to relevant parts of previous ISA