

To

Mr David Spencer
Mr Andrew Steen

Via email to:

Louise St John Howe
Programme Officer
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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 ([ED27](#)) which sought clarity on a couple of areas. This followed our letter to you of 2nd June 2025 ([ED25](#)) 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 ([ED21](#)).

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

A handwritten signature in grey ink, consisting of a stylized 'J' and 'B' followed by a long horizontal stroke.

James Brewer
Planning Policy Manager

Enc:

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

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