IPS ISA Stage A Scoping Report 2021 - Review 2025

The actions identified by the council¹ to address the concerns raised by the Planning Inspectors for Stage A (Setting the context, objectives, establishing baseline and scope) of the Integrated Sustainability Assessment (ISA) of the Island Planning Strategy (IPS) are:

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

The Scoping Report formed part of the environmental assessment work carried out in 2021, alongside development of the IPS. The 2021 ISA Scoping work carried out by Hampshire County Council can be viewed online in the <u>Island Planning Strategy examination</u>, Examination Documents, <u>ED10 Draft IPS SEA Interim Environmental Report</u>, July 2021, (pages 31 to 53).

When carrying out these actions the council have considered the significance of potential changes and omissions in the context of the criteria for determining the likely significance of effects on the environment, as set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004. This is upon the basis that "The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the plan." (National Planning Policy Guidance, Strategic environmental assessment and sustainability appraisal, Paragraph: 009 Reference ID: 11-009-20140306, Revision date: 06 03 2014)

Table 1 below provides an update on Table 3.1 in the Isle of Wight Council Local Integrated Sustainability Appraisal Scoping Report, Hampshire County Council 2021 (subsequently referred to as the 'Scoping Report'). In place of stating where the scoping requirements of the SEA Regulations have been met, for the purposes of this exercise Table 1 provides:

- Column 1 a summary of the key tasks required for Environmental Reports (in the
- SEA Directive);

• Column 2 - the checks the council have carried out to fulfil the ISA tasks of this stage of assessment (as set out in Appendix 2 of ED28); and,

Column 3 - provides a judgement based upon the checks, of any change (that
is likely to lead to significant environmental effects) to the baseline since the
Scoping Report.

Table 1 summarises the details of the information used to test against the checks (questions in column 2) to provide the status update. This is then followed by the detailed screening assessment with the information considered in the checks to support the judgements made in the status update. The detailed assessment has been carried out to provide an evidenced assessment and has been set out under each of the SEA tasks (a - e) relevant to scoping.

¹ ED28 IWC response to Post Hearings letter 16.6.25 with Appendix 2: Scope of ISA work

Table 1: SEA Roadmap Check 2025 Summary Assessment Table

Task	Check	Status
(a) An outline of the contents; and	1. Has the vision for the	1. No change
main objectives of the plan or	(IPS) plan changed?	2. Yes, but no change to
programme; and	2. Have the Corporate	ISA baseline.
the relationship with other relevant	Objectives changed?	3. Yes, but no change to
plans and programmes.	3. Changes to the NPPF	ISA baseline.
b) the relevant aspects of the	1. Has there been any	1. No change
current state of the environment and	update to the local list	2. Additions and
likely evolution thereafter without	and HER?	amendments to ISA
implementation of the	2. Scoping Report	baseline, resulting in
plan or programme.	Appendix A Tables A1 – A4	change to ISA issues or
	update check.	environmental
		objectives.
c) the environmental characteristics	Any changes to the	Yes, amendments and
of areas likely to be significantly	environmental baseline	additions to the key
affected.	(as set out in section 4.3	messages on Climate
	Key Messages from	Change and
	Review of Legislation	Environmental
	Plans and Policies)?	Protection.
d) any existing environmental	Any changes to	Yes, additions and
problems which are relevant to the	environmental issues (as	amendments to
plan or programme including, in	set out in Table 5.1:	Rationale for Scoping.
particular, those relating to any	Rational for Scoping)?	
areas of a particular environmental		
importance, such as		
areas designated pursuant to		
Directives 79/409/EEC (The Birds		
Directive) and 92/43/EEC (the		
Habitats Directive).	1 Have any	Voc. there are changes to
(e) the environmental protection	1. Have any	Yes, there are changes to
objectives, established at international community or member	environmental objectives changed since 2021?	the assessment criteria of the <i>Biodiversity</i>
state level which are	2. Are there any new	objective to reflect new
relevant to the plan or programme	environmental objectives	requirements with
and the way those	since 2021?	regards to Local Nature
objectives and any environmental	31100 2021:	Recovery Strategies.
considerations have been taken into		11000vory otratogios.
account during its preparation.		
account during its preparation.		

Conclusion and next steps

This report has detailed how the 'Review March 2021 scoping report in light of any relevant evidence and strategies and Reg 19 consultation responses' has been carried out. The detailed screening to check the 2021 scoping report against any subsequent changes in the baseline, key messages and issues have led to proposed revisions to the objectives in the ISA assessment framework, under topic 6. Biodiversity.

Historic England (HE) were the only statutory consultee to provide any specific comments in relation to the ISA through their <u>Regulation 19 consultation response</u>. The comments, whilst not challenging the soundness of legal compliance of the ISA, identified that certain specific elements of cultural heritage could be included within the ISA site assessments. Our <u>Statement of Common Ground</u> with HE recognised that in future ISA work we will ensure there is a more granular appraisal at this stage of the process.

As a result, when applying the assessment criteria under Topic 5. Cultural Heritage, the council will consider the potential benefits / harm to the historic environment and different scales of sensitivities of the assets/receptors when making assessments on the potential impact of options, policies and potential allocations. For the latter, whilst a proximity approach will remain in the ISA (given the nature of the document in that it is not making planning judgements or assessing site specific designs), the assessment will use the ISA Objective scoring of 'Unknown' (?) to reflect the potential for an allocation to have both positive and/or negative effects..

The next step will be to action the 2nd identified action (above), 'Update June 2024 ISA to reflect any changes coming out of the scoping report review' with the outcomes from this 1st step, before then moving to ISA Stage B: Developing and refining alternatives and assessing effects.

Detailed Screening Assessment

Table 1 summarises the details of the information used to test against the checks (questions in column 2) to provide the status update. This section covers the detailed screening assessment with the information considered in the checks to support the judgements made in the status update. The detailed assessment has been carried out to provide an evidenced assessment and has been set out under each of the SEA tasks (a - e) relevant to scoping.

Where a change has been identified this is assessed for significance based upon the criteria from Schedule 1 of the SEA Regulations Criteria for Determining the Likely Significant Effects on the Environment (see Appendix 1).

ISA/SEA Task (a) An outline of the contents; and main objectives of the plan or programme; and the relationship with other relevant plans and programmes.

Check and assessment

1. Has the vision, "For the Isle of Wight to be an inspiring place in which to grow up, work, live and visit" for the (IPS) plan changed?

No change.

2. Have the Corporate Objectives (1 – 12 below) changed?

- 1. The environment and unique island characteristics are celebrated.
- 2. Outstanding digital and transport connectivity.
- 3. The Isle of Wight is a leading UK visitor destination.
- 4. Businesses have the confidence to invest.
- 5. All young people will have the best start in life so that they can fill their potential.
- 6. A well-educated and skilled community.
- 7. Community needs are met by the best public services possible.
- 8. The community feels safe and is the Island is resilient.
- 9. People take responsibility for their own health and wellbeing.
- 10. People have a place to call home and can live with independence.
- 11. Vulnerable people are supported and protected.
- 12. A financially balanced and sustainable council.

The latest Corporate plan 2021 – 2025 (published in late 2021 after the March 2021 ISA Scoping was prepared) has replaced the 12 corporate objectives above with 3 key areas for action and 51 aims or actions. The 3 key areas for action (A Provision of affordable housing for Island residents; B Responding to climate change and enhancing the biosphere; and, C Economic recovery) are relatively broad and generic such that they are addressed through the ISA scoping and assessment framework, and the policies of the plan. However, for the more specific 51 aims and actions it was necessary to first determine if each was relevant to the IPS (for example many are concerning corporate governance or financial conduct) and if determined relevant, whether or not they were already covered in the (2021) Scoping Report. Appendix A: Corporate plan update, sets out the screening of the 51 corporate plan aims and objectives and provides the evidence that while the Corporate plan for the Isle of Wight Council has changed, this has not led to any requirement to change the ISA baseline.

Yes, but no change to ISA baseline.

3. Have changes to the NPPF since 2021 resulted in either changes to existing policy or new policy likely to be significant to the Island in terms of environmental, economic or social impacts?

The key changes² to the NPPF published by Government on 19th December 2023 are summarised in Table 2 below with an assessment of the likely significant effects when considered against the existing the relevant areas of the IPS. National policy in itself would not normally form an ISA baseline (given the potential for national policy to be revised in minor ways on a regular basis), however for completeness reviewing whether any new or changed areas of the NPPF not currently covered by the IPS was considered appropriate as they could highlight a potential policy gap and ISA issue.

² As identified by Local Government Lawyer, *The updated NPPF: key planning and housing changes*, by Matthew Tucker & Sofiya Yerokhina of Burges Salmon, published February 8, 2024, accessed at: <u>The updated NPPF: key planning and housing changes</u>: accessed on 27/06/2025

Table 2: Key changes to the NPPF and likely significant effects on the IPS ISA

Changes to the five-year housing land supply and delivery requirements

The updated NPPF states that local planning authorities will not need to meet this requirement as long as their adopted plan is less than five years old, and that it identified "at least a five year supply of specific, deliverable sites at the time that its examination concluded".

 There is also a reduced requirement for some local authorities with an 'inprogress' Local Plan, i.e. where a Local Plan has been consulted on (under Regulation 18 or 19) or submitted for examination.

If the draft Local Plan includes a policies map and proposed housing allocations towards meeting housing need, those authorities will only have to demonstrate a four-year housing land supply. This particular change only applies for two years from the publication date, until 19 December 2025.

No change – from a plan making perspective, the housing number in the submitted IPS used the standard method as the starting point and includes, via the suite of housing allocations identified in policy H2 and Appendices 1 and 2, sufficient sites to provide at least a five year supply on conclusion of the examination, in full accordance with the updated NPPF. Following the Inspectors Post Hearings Letter, the housing requirement in policy H2 will be increased and further allocations / policy approaches included to ensure a five year supply is in place at adoption. The housing trajectory provided in Appendix 1 of IWC Hearing Statement 7 sets out this in detail.

The revisions in the NPPF that allow an LPA to use a four year housing land supply relate to decision making rather than plan making, and the IWC reflected this by publishing a 4YRHLS update as of 1 April 2024.

Changes to the assessment of housing supply

In the updated NPPF, the 5% and 10% buffers have been removed but the 20% buffer has been retained, where delivery falls below 85% of the requirement over the previous three years.

In addition, historic oversupply can be accounted for in the five-year housing land supply calculation and further guidance on this will follow. The expectation is that the removal of 5% and 10% will simplify the five-year land supply calculations for local authorities.

No change – the 20% buffer referred to in the updated NPPF relates to the calculation of housing land supply for decision making purposes rather than plan making. There is no historic oversupply on the island therefore this particular issue is not relevant for the Isle of Wight.

From a plan making perspective, in line with the NPPF, an appropriate buffer of 5% is being included in the IPS to ensure that the housing requirement, and policies and allocations to meet that, includes the buffer and will provide the correct housing land supply at the point of adoption.

Greater flexibility for local authorities in assessing local housing need

New text has been added to the NPPF at paragraph 60, clarifying that the overall aim of local authorities, in the context of delivering homes, should be to "meet as much of an area's identified housing need as possible".

Under paragraph 61, the revised NPPF also states that the standard method for calculating housing need, to establish the number of homes required, is now considered as an "an advisory starting point". Under the previous NPPF, the standard method was not classified in this way and there was no similar explanatory text.

As a result of these changes, local authorities have greater flexibility to plan for fewer or higher number of homes than the standard method indicates, and where there are specific local circumstances that justify an alternative approach to assessing housing need, that is now explicitly supported.

No change – the housing requirement set out in policy H1 of the IPS used the standard method as a starting point, as guided by the updated NPPF. This is explained in detail within Housing Evidence Paper A.

Retirement housing need assessment

Paragraph 63 has been added into the revised NPPF which requires local authorities to assess a local need for retirement and care housing provision. Local authorities are then required to reflect this need in their policies. These changes reflect a specific concern identified by the Government; the consultation paper makes clear that they are prioritising sufficient housing supply for an ageing population, and in this context drafting has been included to explicitly and specifically support the provision of that housing.

No change – assessment of local need for retirement and care housing is already considered and integrated into the submission IPS.

CO18 Isle of Wight Independent Living Strategy 2023 – 2038, Supply and demand profile for extra care housing.

HO13 IOW Housing Needs Assessment 2022, section 10 Older and Disabled Persons and Other Specific Groups, examines the housing need for older persons and those with a long-term health problem or disability (LTHPD).

CD1Island Planning Strategy, policy C5 Facilitating Independent Living, "The council will support the delivery of a range of accommodation types and tenures that enable people to live as independently as possible. Development proposals will be supported where they: a contribute to the delivery of the Island's Independent Living Strategy; ..."

CD1 Island Planning Strategy, policy C6 Providing annexe accommodation, "The council will support the provision of a single domestic annex related to existing dwelling houses whether within or outside of the defined settlement boundaries where it would comply with the following criteria: b the annex would be occupied by dependent relatives of the occupants of the main dwelling, or their carer; "CD1 Island Planning Strategy, policy H8 Ensuring the right mix of housing, "All proposals for residential development must demonstrate how they provide an appropriate mix of housing sizes that contribute to meeting identified needs and market demand in line with the latest Housing Needs Assessment and/or Local Housing Needs Surveys. ... The council will require 10 per cent of new private housing to be built in line with the accessible and adaptable standard for homes as set out in part M4(3) of the Building Regulations (category 3 homes)."

Support for small sites

At paragraph 70(b), the NPPF requires local authorities to support (through policies and in their decision making) small sites to come forward for community-led development for housing and self-build and custom-build housing. This reflects an objective of the Government to give greater confidence and certainty to small and medium sized builders, with a view to diversifying the housing market.

No change – from a small sites perspective, a number of policies support the principle of such sites coming forward in various circumstances, including H4 '*Infill opportunities outside settlement boundaries*', H6 '*New Homes in the countryside outside of settlement boundaries*' and H9 '*New housing on previously developed land*'. All of these policies would see small sites supported in principle. The overall housing requirement set out in the plan at policy H1 also includes a 'windfall allowance' of 100 homes per year, which as paragraph 7.10 explains, is reflective of the contribution such sites make to island housing delivery. From a self-build perspective, policy H10 provides clear policy support for the basic principle of this type of development.

Paragraph 7.12 outlines that small sites under 1 hectare form nearly 32% of the housing requirement in the submitted plan, comfortable in excess of national policy guidance.

Support for community-led development

The NPPF provides that local authorities should support the development of exception sites for "community-led development" on sites that would not otherwise be suitable as rural exception sites. This reflects the Government's ambition to emphasise the role of community-led development, with a view to supporting locally-led housing.

No change – support for the development of exception sites for local community benefit is already considered and integrated into the submission IPS. CD1 Island Planning Strategy policy C15 Community led planning, "The council will support town, parish and community councils in bringing forward Neighbourhood Plans that could provide localised policy on a number of issues, which could include: a location of development to meet the housing requirement within a designated neighbourhood area;"

CD1 Island Planning Strategy policy H7 Rural and first homes exception sites, "To help contribute to meeting the affordable housing need across the Island, the council will support the principle of affordable housing in perpetuity on rural exception sites to meet a specific local need that has been identified. ... First Homes exception sites should be located adjacent to an existing settlement (as defined in policy G2), must meet a specific local need that has been identified."

Protection against out of character residential developments

New paragraph 130 of the revised NPPF provides that a significant increase in the average density of residential development in an existing urban area may be inappropriate if it will result in developments which are "wholly out of character with the existing area."

The effect of this change is to enable authorities to describe "out of character" circumstances in the process of preparing design codes and plan-making

No change – "out of character" is already considered and integrated into the submission IPS.

CD1 Island Planning Strategy policy C1 High quality design for new development, "Development proposals will be required to: ... 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 or other features which significantly contribute to the character of the area;"

CD1 Island Planning Strategy policy H4 Infill opportunities outside settlement boundaries, "Housing outside the settlement boundaries will only be supported where it would be infilling a small gap in a row of houses, or an otherwise built-up frontage. Development proposals will need to demonstrate that: ... c the layout would respect the density/ size of surrounding plots;"

Support for mansard extensions

The NPPF provides that authorities should "allow mansard roof extensions on suitable properties" where their external appearance "harmonises with the original building". This reform will offer the ability to enable new housing by extending upwards as long as these extensions are in keeping with the local character and context, particularly in conservation areas.

No change – policy C1 'High quality design for new development' includes a number of criteria that would cover the design issues apparent in a mansard roof extension, including (b) that references adjacent buildings, (c) respecting the character of an area and (e) protecting the living conditions of existing and future residents. It is not considered necessary to have specific mention in local policy of one particular design solution.

Energy efficiency of buildings

New paragraph 164 in the NPPF requires local authorities, in determining planning applications, to give "significant weight" to the need to support "energy efficiency and low carbon heating improvements" through adaptation of buildings. This represents strong in-principle policy support for energy efficiency. When assessing applications for energy efficiency improvements, it is important that heritage protection is considered. Paragraph 164 in the revised NPPF provides for this by stating that where the proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the relevant policies, set out in detail in Chapter 16 of the NPPF.

No change – a combination of policies C1 'High quality design for new development' (specifically criteria (a) which references an adaptable built environment) and EV1 'Conserving and enhancing our historic environment' (specifically criteria (a) to (d) that all cover development affecting heritage assets) provide an appropriate local policy framework for implementing the policy guidance set out in paragraph 164 of the NPPF.

Allocation of agricultural land for development

At paragraph 181, the revised NPPF requires local authorities to consider the availability of agricultural land used for food production when allocating sites for development. Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

It is important that developers take an evidence-based approach towards determining the condition of agricultural land, before a development scheme is proposed. This amendment means that the availability of land used for food production is now explicitly a part of that exercise.

No change – agricultural land, including a sequential approach prioritising the protection of highest quality is already considered and integrated into the submission IPS.

CD1 Island Planning Strategy policy E4 Supporting the rural economy "The council will resist development on the best quality agricultural land, unless it is required for the purposes of working the land itself and cannot be provided elsewhere (see policy EV8)."

CD1 Island Planning Strategy policy EV8: Protecting high grade agricultural land "The best and most versatile agricultural land will be protected from development not associated with agriculture or forestry ... Development which is likely to affect the best and most versatile agricultural land, should produce an agricultural land classification survey to determine the quality, quantity and accurate location of agricultural land in grades 1, 2 and 3a. Planning permission for development resulting in the loss of grade 1, 2 and 3a land will only be granted if: ..."

Planning conditions on design and materials

New paragraph 140 of the NPPF encourages planning authorities to use planning conditions to require clear and accurate drawings/details of a scheme's design and materials. This is intended to provide greater certainty for those implementing a planning permission on how to comply with the permission.

No change - CD1 Island Planning Strategy policy C1: High quality design for new development, sets out what development proposals will be required to do, including design, materials, layout and character and appearance of the surrounding area. Supporting text in paras 5.3 - 5.19 provide further detail on what's expected, including reference to an Isle of Wight model design code to provide further guidance on achieving high quality design in all new development and support for town, parish and community councils in preparing local design codes (para. 5.19).

Integration of "beauty"

NPPF revisions mean that "beauty" now features heavily as a consideration across policy. However the NPPF itself does not include substantial detail on how to assess beauty; this exercise will primarily be the role of design codes.

No change – "beauty" is already considered and integrated into the submission IPS.

CD1 Island Planning Strategy policy EV7: Local green spaces, supporting text under para.4.72 makes reference to beauty in relation to designation of land as a local green space, which must include amongst other factors, 'beauty'.

CD1 Island Planning Strategy policy EV9: Protecting our landscapes and seascapes, supporting text under para. 4.76 "This landscape and seascape are vital not only for visual beauty ..."

CD1 Island Planning Strategy policy EV11: Isle of Wight National Landscape (formerly AONB), "a conserve and enhance the natural beauty ..."

CD1 Island Planning Strategy policy H6: New homes in the countryside outside of the settlement boundaries, "Proposals within the National Landscape will also need to demonstrate how they conserve and enhance the natural beauty of the area."

ISA/SEA Task (b) the relevant aspects of the current state of the environment and likely evolution thereafter without implementation of the plan or programme.

Check and assessment

1. Has there been any update to the local list and HER?

The 2021 ISA Scoping Report identified a potential gap in the baseline, based upon the observation that, "There is a local list and an HER, but these are not monitored, and the local list has not been updated for several years." (para. 3.3.2 IOW Council Local Integrated Sustainability Appraisal Scoping Report, March 2021). There has been no change in the status of the local list and HER, and there continues to be no monitoring.

No change.

2. Scoping Report Appendix A Tables A1 – A4

The review of regulations, plans policies and guidance relevant to the IPS provided the key messages (as set out in para. 4.3.1 of the Scoping Report). The key messages and issues identified from the review of evidence then helped inform the rationale for scoping, set out in Table 5.1. Therefore, a check of the base line is required to ensure no (subsequent to the 2021 assessment work) relevant evidence informing the baseline and key messages are omitted.

Appendix B: Additions, Amendments to ISA Baseline Information, sets out the baseline review in the following tables;

Table A1: Relevant International Treaties and Conventions

Table A2: Relevant International Legislation Table A3: Relevant National Legislation

Table A4: Relevant IOW Local Plans and Policies

The review of the baseline identified a number of both additions and amendments. Of these updates 1 was identified as being significant in terms of their addition likely to lead to changes in the assessment of significant effects that had not already been accounted for in the existing (ISA) assessment framework. This was the addition of the Local Nature Recovery Strategy (LNRS) for the Isle of Wight.

Additions and amendments to ISA baseline, resulting in change to ISA issues or environmental objectives.

ISA/SEA Task c) the environmental characteristics of areas likely to be significantly affected.

Check and assessment

1. Any changes to the environmental baseline (as set out in section 4.3 Key Messages from Review of Legislation Plans and Policies)?

Following on from the review of the baseline as set out in Appendix B, updates to the key messages identified as a result of the review and to be considered whilst developing the IPS and undertaking the ISA are detailed below (amendments in <u>red</u> and <u>underlined</u>).

To encompass other natural risks (with potential to impact development):

Climate Change – a key issue for all UK plans, with relevance to the IOW due to the threat of flooding and, coastal squeeze, sea level rise, erosion and landslide reactivation. Plans need to support the Island in achieving the commitments made with respect to carbon reduction within the County including greater use of renewable sources. Development and regeneration projects must be designed to ensure resilience to climate change with respect to increased flooding, coastal change, increases in temperature and extreme weather events. Climate change will directly influence flood risk management and defence measures for the Island.

As LPAs should be going beyond protection and contributing to nature recovery:

Environmental Protection – including air quality, noise and vibration, the natural environment, biodiversity <u>and nature recovery</u>, water and coasts. The Island presents a unique environmental setting that requires protection and enhancement to ensure the continued sustainable growth of the Island. Ensuring the integrity of internationally designated sites that surround the Island are a priority. Air quality impacts are dominated by road traffic emissions which require management through effective air quality and transport related measures to ensure mandatory standards are being met and air quality is improving.

Yes, amendments and additions to the key messages on Climate Change and Environmental Protection.

d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (The Birds Directive) and 92/43/EEC (the Habitats Directive).

Check and assessment

1. Any changes to environmental issues (as set out in Table 5.1: Rational for Scoping)?

Additions and amendments to be made to Table 5.1 in the report are set out in Table 3 below.

Table 3: Additions and amendments to Rationale for Scoping

Receptor/Issues		Scope and Justification	
		Scoped Scoped in	
		out	
To be added			
Biodiversity, Flora & Fauna	Irreplaceable Habitat		IOW has IR (Ancient Woodland, ancient and Veteran Trees, coastal Sand dunes, Spartina Saltmarsh) many of which are outside designated sites, but are afforded high protection under NPPF and BNG framework
	Biodiversity Net Gain Sites		Habitat bank sites and development sites that have delivered significant on-site gains must be maintained and monitored for 30 years, therefore must be protected.
To be amended			
Biodiversity, Flora & Fauna	International designated sites (e.g., SAC, SPA, Ramsar site) and known supporting sites (for example sites identified in the Solent Wader and Brent Goose Strategy)		

(e) the environmental protection objectives, established at international community or member state level which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

Check and assessment

- 1. Have any environmental objectives changed since 2021?
- 2. Are there any new environmental objectives since 2021?

The additions and amendments to the ISA baseline, key messages and issues have led to the following proposed revisions to the objectives in the ISA assessment framework, under topic 6. Biodiversity.

Table 4: Additions and amendments to Environmental Assessment Framework

Topic	Objective	Assessment Criteria
6. Biodiversity	To be added	
	Support and encourage	
	nature restoration proposals	
	that align with measures	
	identified in the Local Nature	
	Recovery Strategy.	
	To be amended	
		Does the Plan support
		Biodiversity net gain?
		Does the Plan protect from
		tree, hedge, vegetation and
		Irreplaceable Habitat loss
		and degradation and support
		an increase in tree cover
		(12%by 2060)?

Yes, there are changes to the assessment criteria of the Biodiversity objective to reflect new requirements with regards to mandatory Biodiversity Net Gain (BNG) and Local Nature Recovery Strategies.

Regulation 19 Statutory Consultee responses

There have been Regulation 19 consultation responses from all of the statutory consultees (including the Marine Management Organisation). However, only Historic England provided any specific comments on the ISA, as set out below.

Table 5: Statutory consultee Regulation 19 comments on the ISA

Representer	Representer	Comments in relation to ISA
ID No.		Y/N
IPSR11	Laura Lax, Environment Agency	N
IPSR90	Guy Robinson, Historic England	Υ
IPSR92	Charlotte Stadden, Marine Management	N
	Organisation	
IPSR104	Jonathan Shavelar, Natural England	N

Historic England Regulation 19 consultation response relating to the ISA:

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"

The environmental assessment framework under Topic 5. Cultural Heritage, has the objective to "Maintain, protect and enhance buildings, sites and features of archaeological, historical or architectural interest and their settings." with the assessment criteria, "Does the Plan seek to conserve or enhance designated or locally important historic assets (including archaeological deposits)?".

While the council feels that this does sufficiently cover all known historic environment assets (no new baseline information has been identified – the Heritage at Risk register mentioned by HE above covers designated heritage assets), it is acknowledged that to date the assessment approach of the ISA to the historic environment has been protectionist. In doing so this may have missed potential positives new development can have on historic assets. As a result, going forward when applying the assessment criteria under Topic 5. Cultural Heritage, the council will be aware of the potential benefits to the historic environment and the different scale of sensitivities of the assets/receptors when making assessments on the potential impact of options, policies and potential allocations (for the latter including adjusting the scoring assessment to highlight the potential for both positive and negative effects).

Appendix A: Corporate plan update

The 2021 Scoping Report stated (para. 2.1.4) that "To ensure consistency between the Corporate Plan and the Island Planning Strategy, all the Corporate Plan outcomes have been identified as relevant to land-use planning and therefore form the objectives for the IPS ..." The latest Corporate plan 2021 – 2025 has replaced the 12 corporate objectives in the previous corporate plan (2019 – 2022) with 3 key areas for action and 51 aims or actions, these are listed below together with an assessment of their relevance to the IPS and whether they generate new baseline and objectives to be included in an updated ISA assessment framework.

Corporate plan 2021 – 2025	Relevant to IPS Y/N	New to ISA/IPS Y/N	Commentary/evidence*
1. We will ensure that we listen to people. We will do so by holding consultations in which we will have a proper discussion with residents about issues	N		
2. We will challenge the 'confidentiality culture' that inhibits the provision of information to our communities	N		
3. We aim to empower and enable parish and town councils to help and support their local communities	N		
4. Replace the current failing approach to securing an 'Island deal' including actively pursuing Government for legislation to tackle inequality with the mainland	N		
5. Support and increase the influence of Healthwatch and the voluntary sector	N		
6. Prioritise dealing with health inequalities and the resulting poverty highlighted during the pandemic	Y	N	5.10.17 considers health inequalities across the Island
7. Review and, where necessary, change the management structure of the Isle of Wight Council to better serve the needs of the council and the Island	N		
8. COVID-19 recovery will be integral to everything we do for residents and Island business	N		
9. Keep the Isle of Wight Council solvent and take all the measures we can to improve the financial position of the council	N		

10. We will aim to spend and invest as much council money on the Island as is possible	Y	N	5.8 Economy para.s 5.8.1 – 5.8.7 discusses the Islands economy, including the role of the public sector and the inward and outward (of/off the Island) movement for work and the need for inward investment to both safeguard jobs and critical infrastructure.
11. All major short term future capital/ revenue commitments by the council will be reviewed and put on hold where appropriate. A clear timeline for this review process will be created	N		
12. We will actively look at invest to save opportunities which we can borrow to fund	N		
13. We will initiate a strategic infrastructure and capacity review of all key utility services	Υ	N	5.9 Material Assets para.s 5.9.1 – 5.9.18 considers various infrastructure across the Island.
14. There will be transparency and disclosure of council finances, debts, loans and contracts	N		
15. Provide greater support to those on low incomes, including through the local council tax support scheme	N		
16. Place the health and wellbeing of residents at the centre of all we do	Υ	N	5.10 Health, Wellbeing and Equality, para.s 5.10.1 – 5.10.17
17. Review the current arrangements in respect of the management of public health	N		
18. Promote the building of affordable supported social retirement housing to ensure residents maintain their independence for as long as possible	Y	N	5.10 Health, Wellbeing and Equality, para.s 5.10.18 – 5.10.23
19. Support the restoration of mental health support services and treat mental health support as a priority across all areas of the council	N		
20. Endeavour to reintroduce CCTV monitoring where needed to support public safety	Υ	N	5.10 Health, Wellbeing and Equality, para.s 5.10.10 – 5.10.13
21. Create a new accessible council website	N		
22. Support Island wide digital connectivity to support Island businesses and residents.	Y	N	Table 6.1 Environmental Assessment Framework, under Topic 8. Climate Change Emissions, Assessment Criteria; Does the Plan support internet connectivity?
23. Housing that is created must be housing fit for purpose. We will prioritise truly affordable housing for Island residents, meaning	Υ	N	5.10 Health, Wellbeing and Equality, para. 5.10.23

housing that is not just affordable to rent or buy but affordable to live in and maintain.			
24. Wherever possible bring appropriate empty and derelict buildings back into use for affordable housing.	Y	N	5.10 Health, Wellbeing and Equality, para.s 5.10.19 – 5.10.23
25. Listen to parents and students and work with them to develop 'needs driven' childrens services	N		
26. Work with local communities to maintain and ensure appropriate local school provision	N		
27. All council decisions must be considered with regard to their impact on young people and future generations	N		
28. Promote active engagement with the youth council and youth MP (YMP)	N		
29. Review, enhance and improve our planning department to improve outcomes and adherence to statutory obligations	Y	N	Completing an SA that includes the requirements of an SEA is one of the main statutory tasks in plan-making for a local planning authority.
30. We will reduce the current proposed housing development numbers while ensuring we meet our local housing need.	Y	N	Table A4: Relevant IOW Local Plans and Policies, for the Housing Strategy 2020 and Island-wide Housing Needs Assessment the Implications of ISA are identified as "The Plan must consider the impacts to the delivery of housing requirements on the IOW." 5.10 Health, Wellbeing and Equality, para. 5.10.18 – 5.10.23
31. Use the recent brownfield site data to identify housing opportunities.	Y	N	Table 6.1 Environmental Assessment Framework, under Topic 7. Land use, soils and agriculture, Assessment Criteria; Does the Plan encourage the remediation and reuse of contaminated and brownfield land?
32. Only develop greenfield sites when absolutely necessary.	Y	N	Table 6.1 Environmental Assessment Framework, under Topic 7. Land use, soils and agriculture, Objective 'Protect greenfield and seek to remediate contaminated land.'
33. Accelerate the completion of the Island plan. The process to be followed will include meaningful engagement with residents and town and parish councils.	Y	N	Completing the ISA to sufficient standard as to be found sound is a requirement in order to complete the local plan. Plan consultation is set out in the Statement of Community Involvement

34. Parish/town council representative(s) to sit on the Isle of Wight	N		
Council planning committee.			
35. Complete key regeneration projects to drive employment, skills and inward investment.	Y	N	5.10 Health, Wellbeing and Equality para. 5.10.19 "Regeneration areas have been identified for towns on the IOW that have a sufficient population size to create a local economy"
36. Engage with Business and communities on Island regeneration progress	N		
37. Elevate the role of creative industries as part of our regeneration strategy.	N		
38. Use available powers to deal with long term empty or derelict buildings that mar our seafront and town centre areas.	Y	N	5.10 Health, Wellbeing and Equality para. 5.10.19 "Regeneration areas have been identified for towns on the IOW that have a sufficient population size to create a local economy"
39. Focus on regenerating our High Street and visitor economy to assist post COVID-19 recovery and growth	Y	N	Table A4: Relevant IOW Local Plans and Policies, for Isle of Wight Town Centre Health Check Study 2009, the implications of ISA are "The Plan must assess any adverse impacts to the viability of the IOW town centres."
40. Promote people-oriented place planning for town centres	Y	N	Table 6.1 Environmental Assessment Framework, under Topic 10. Culture, assessment criteria, "Does the Plan support the local identities of individual settlements?" and "Does the Plan support new investment in the public realm and cultural facilities?"
41. Support and enhance our biosphere and AONB areas. Support the active management and development of biosphere status and secure dark sky status	Y	N	5.13 Landscape and Townscape para.s 5.13.1 – 5.13.10
42. Continue to develop successful waste management and increase recycling rates further	Y	N	5.9 Material Assets, para.s 5.9.6 – 5.9.7
43. Commit to develop sustainable transport options with a focus on infrastructure to encourage active travel	Υ	N	5.9 Material Assets, para.s 5.9.13 – 5.9.15 5.10 Health, Wellbeing and Equality, para. 5.10.26
44. Promote the increased use of renewable energy in all sectors	Υ	N	5.9 Material Assets para. 5.9.5
45. Embed both the biosphere and the climate change strategy into policy, including the Island plan; advanced by appropriate action plans.	Y	N	Table 6.1 Environmental Assessment Framework, under Topic 8. Climate Change Emissions, assessment criteria,

All council decisions are to have regard to the biosphere and the climate change strategy			"Does the Plan seek to reduce carbon emissions in line with meeting the government target of zero emissions by 2050?" and Topic 9. Climate Change Resilience, assessment criteria, "Does the Plan have sufficient adaptability to actively respond to changes in temperature, rainfall and flooding?"
46. We will aim to find a permanent working solution to Floating Bridge 6 (FB6) and, if appropriate, achieve this by scrapping and replacing it	N		
47. We will aim to bring forward a comprehensive Island wide parking strategy by 2024	Y	N	Table 6.1 Environmental Assessment Framework, under Topic 16. Material Assets, objective "To ensure the provision of adequate infrastructure for transport, and public facilities to meet the needs of residents and visitors."
48. Undertake an Island wide speed assessment project, including looking at all aspects of vehicle speed management, including 20mph zones and effective enforcement	N		
49. Establish a working group to consider the full range of options for appropriate charging and permits for parking	N		
50. Ensure compliance with Island Roads contract and with all other external contracts.	N		
51. Actively pursue a Government imposed public service obligation on cross-Solent services	N		

^{*}All references under Commentary/Evidence relate to the 2021 ISA Scoping Report

Appendix B: Additions, Amendments to ISA Baseline Information

Table A1: Relevant International Treaties and Conventions

Relevant	Relevance	Implications for ISA
International		
Treaties and		
Conventions		
To be added		
The Convention on Biological Diversity (CBD)	Signed by 150 government leaders at the 1992 Rio Earth Summit, the Convention on Biological Diversity is dedicated to promoting sustainable development. In December 2022 (COP15), 196 Parties to the Convention on Biological Diversity came together to agree the Adoption of the Kunming-Montreal Global Biodiversity Framework (GBF), which consists of four goals and 23 targets, with the overall mission of halting and reversing biodiversity loss globally by 2030 to put nature on a path to recovery for the benefit of people and planet.	The Plan must seek to help achieve the goals and targets set out in the Global Biodiversity Framework
To be amended		
Ramsar Convention on Wetlands of		The Plan must consider any RAMSAR sites
International Importance		within the Plan area. Ramsar Sites must be
		taken into to account to ensure impacts are
		assessed under the Habitats Regulations
		Assessment.

Table A2: Relevant International Legislation

No change

Table A3: Relevant National Legislation

Legislation	Aims/ Objectives	Where considered in ISA
To be added		
Biodiversity Net Gain (BNG) Framework (includes amendments to Section 7A the Town and Country Planning 1990 and subsequent secondary legislation within Statutory Instruments)	Habitats for wildlife will be left in a measurably better state than they were before the development. Developers must deliver a BNG of 10%, either on-site, off site or through the purchase of Statutory Credits as a last resort. On-site BNG is incentivised through the BNG Hierarchy and spatial multipliers within the biodiversity metrics used to calculate biodiversity value of sites.	ISA Objective 6
Environment Act 2021	Legislation to protect and enhance the environment for future generations. The Act seeks to clean up the country's air, restore natural habitats, increase biodiversity, reduce waste and make better use of resources. It included the creation of the Office of Environmental Protection (OEP), a strengthened Biodiversity Duty on public bodies, implementation of mandatory Biodiversity Net Gain, creation of the Local Recovery Network (underpinned by Local Nature Recovery Strategies) and a duty for local authorities to improve air quality and the requirement for the Government to review the 25 Year Environment Plan every 5 years.	ISA Objective 1, 3, 6, 7, 8
Conservation of Species and Habitats Regulations 2017	One of the pieces of domestic law that transposed the land and marine aspects of the Habitats Directive and certain elements of the Wild Birds Directive. The Regulations protect	ISA Objective 6

	European Protected Habitats and Species that	
	have a natural range within Great Britain and	
	European Sites that make up the National Site	
	Network (SACs, SPAs and Ramsar Sites).	
	Competent authorities must carry out an	
	assessment under the Habitats Regulations	
	(HRA) to test if a plan or project proposal could	
	significantly adversely impact the integrity of a	
	European site before it is adopted or approved	
	(in consultation with Natural England).	
	Proposals may still be permitted if they meets	
	the three legal tests and be granted an	
	exception, known as a 'derogation'.	
The Water Environment (Water Framework	Transpose the EU Water Framework Directive	ISA Objective 3
Directive) Regulations 2017	into UK law for England and Wales. These	
	regulations aim to protect and improve the	
	quality of the water environment by setting	
	environmental objectives and requiring the	
	implementation of measures to achieve	
	them. Public bodies are under a duty to 'have	
	regard to' the river basin management plans	
	published in 2022, in line with the Regulations.	
Natural Environment and Rural Communities	The Natural Environment and Rural	ISA Objective 6
Act 2006	Communities Act (NERC) requires that public	
	body or statutory undertaker in England and	
	Wales must have regard to the purpose of	
	conservation of biological diversity in the	
	exercise of their functions (their 'Biodiversity	
	Duty') and ensure the protection of species	
	and habitats published under section 41 of the	
	Act. The Act established the creation of the	
	Joint Nature Conservation Committee (JNCC)	
	and Natural England.	

National Flood and Erosion Risk Management	As part of its stratogic avaryiow role, the	ISA Objective 3, 9
_	As part of its strategic overview role, the	I ISA Objective 3, 9
Strategy for England, 2020	Environment Agency has published a National	
	Flood and Coastal Erosion Risk Management	
	in England (First in 2011; Then updated in	
	2020).	
	The Strategy provides a framework for guiding	
	the operational activities and decision making	
	of practitioners supporting the direction set by	
	government policy.	
Flood and Water Management Act, 2010	Flood and Water Management Act 2010	ISA Objective 3, 9
	makes provisions about water, including about	
	the management of risks in connection with	
	flooding and coastal erosion. The Act provides	
	for better, more comprehensive management	
	of flood risk for people, homes and	
	businesses, helps safeguard community	
	groups from unaffordable rises in surface	
	water drainage charges, and protects water	
	supplies to the consumer. This act aims to	
	reduce the flood risk associated with extreme	
	weather.	
To be amended		
Wildlife and Countryside Act 1981 (as		ISA Objective 6
amended)		
A Green Future: Our 25 Year Plan to Improve	The 25 Year Environment Plan (25YEP) sets out	ISA Objective 1, 2, 3, 4, 6, 7, 8, 9
the Environment	the government action to help the natural	
	world regain and retain good health. it aims to	
	deliver cleaner air and water in cities and rural	
	landscapes, protect threatened species and	
	provide richer wildlife habitats. The Plan	
	incorporates the Brexit transition and the	
	change to reform agriculture and fisheries	
	management. The first review of the Plan was	
		ı

undertaken in 2023 and the resulting Environmental Improvement Plan (EIP) sets	
out a delivery plan for achieving the goals of	
the 25 Year Environment Plan.	I

Table A4: Relevant IOW Local Plans and Policies

Plan, Policies and Programs	Relevance/Summary	Implications of ISA	
To be added			
'Island Nature' Local Nature Recovery Strategy (LNRS) for the Isle of Wight (published in May 2025) Approved by cabinet Agenda for Cabinet on Thursday, 24th April, 2025, 5.00 pm - Isle of Wight Council	Spatial strategies that propose how and where to recover nature and improve the wider environment across England, helping to achieve the Government's 25 Year Environment Plan. All public authorities have a duty to have regard to relevant LNRS. LNRS's help target where Biodiversity Net Gains should be delivered and help inform planning decisions so that areas of greatest potential for nature recovery can be better reflected.	Local plans and LNRS's should work together, the latter should not be used as a tool to prevent things happening, but where things do happen, to ensure they occur in a more positive way for nature. With a published LNRS as part of the baseline, this could be added as a reference point to the site specific requirements for allocations so that schemes being designed are signposted to the LNRS content to better shape the green aspects of a proposal. For ISA, Objectives need to be checked /amended to include consideration of the LNRS.	
Isle of Wight Council Tree Management Strategy 2023 – 2033 Countryside Service - CSTREES final version	Recognises the importance of trees, the many benefits they afford and the increasingly important role they can play in mitigating the effects of climate change, risks of flooding, the reduction of the urban heat island effect and pollution control. The strategy aims to guide future planning for the Island's tree population either directly or indirectly and ensure a consistent, high-quality approach in	All trees that may be impacted by a development proposal should be considered, and any unacceptable adverse impacts ruled out and prevented. Where this is not possible and it is necessary for the proposal to be determined positively, suitable and effective mitigation for the impact is	

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West Wight Coastal Flood and Erosion Risk Management Strategy, 2017 IWC - Shoreline Plans and Strategies	compliance with the current industry best practices and methodologies are taken when considering tree management across the area. It is designed to provide guidance as to the council approach and expectations towards the management its tree stock and where they may impact on others. The West Wight Coastal Strategy was prepared and adopted by the Isle of Wight Council in 2017. It provides updated information on coastal risks on the	provided and secured by planning obligation or condition. Development proposals that include the loss of ancient woodland and ancient or veteran trees will be refused, other than in wholly exceptional circumstances and where a suitable compensation strategy is proposed. Addressed in ISA Objective 6 Biodiversity. The Plan must consider the impacts of shoreline and coastal management. Addressed in ISA Objective 2 Coasts, and 9
	western and north-western coastlines of the Isle of Wight including the towns and villages of Freshwater, Totland, Colwell, Yarmouth, Gurnard, Cowes, East Cowes and the surrounding coastlines. The Coastal Strategy recommends the preferred strategic approaches for managing coastal flood and erosion risk for an 84km frontage of the Isle of Wight coast running from Freshwater Bay clockwise round to Old Castle Point, East Cowes.	Climate Change and Resilience.
To be amended		
Health and Wellbeing Strategy	Link is broken in footnote (45) update with IOW HWB Strategy 2022-27 (6).pdf	Hyperlink update
Local Care Plan 2017 - 2021	Update with Isle of Wight Local Care Plan 2022-2025 IOW Local Care Plan (9).pdf	Hyperlink update
Isle of Wight Care Close to Home: Adult Social Care Strategy, 2017	Update with Isle of Wight Council Adult Social Care and Housing Needs Care Close to Home Strategy 2022 – 2025	Hyperlink update
Housing Strategy 2020-2025	Link is broken in footnote (50) update with <u>HO14 IOW</u> HOUSING STRATEGY 2020-2025 (1).pdf	Hyperlink update
Extra Care Housing Strategy 2017 – 2032: Island Independent Living Strategy	Update with Independent Island Living Strategy 2023 – 2038	Hyperlink update

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	https://iwc.iow.gov.uk/documentlibrary/download/isle	
	of-wight-independent-living-strategy-2023-2038	
Economic Development Action Plan, 2015	Link is broken in footnote (52) update with 1433-	Hyperlink update
	Economic-Development-Plan-Executive-Summary-	
	2019-2021.pdf	
Isle of Wight – 2027 Local Plan Transport	Link is broken in footnote (54) update with 2981-	Hyperlink update
Impacts (Transport Modelling), 2015	181016IWCLocalPlanReport.pdf	
Strategic Housing Land Availability	Update link in footnote (62) with Strategic Housing	Hyperlink update
Assessment	Land Availability Assessment	
Delivering Educational Excellence - Draft	Update with Isle of Wight Education Strategy 2024 -	Hyperlink update
strategic plan 2017-2021	2030. Education Strategy	
Isle of Wight Shoreline Management Plan	Update link in footnote (65) with	Hyperlink update
2, 2010	IWC - Shoreline Plans and Strategies; also available at	
	SMP Explorer Isle of Wight SMP14.	