

ISLES OF SCILLY LOCAL PLAN 2015-2030 Regulation 18 Consultation

Sustainability Appraisal (SA) Report incorporating SEA

Appendix I	SEA Statement of Compliance
Appendix II:	SA Scoping Report (Final July 2016) [available at http://www.scilly.gov.uk/planning-development/local-plan-review]
Appendix III	SA Framework Amended
Appendix IV	SA of Draft IOSLP Vision, Strategic Objectives & Spatial Strategy
Appendix V	SA of Policy Options
Appendix VI	SA of Site Options

Appendix I: Statement on Compliance with SEA Directive & Regulations

The EU SEA Directive¹ (Annex 1) requires certain information to be provided in the Environmental Report. This requirement is implemented into UK legislation through the SEA Regulations (2004)². This is Appendix I of the Sustainability Appraisal Report that constitutes the Environmental Report as required by the SEA Directive and the UK SEA Regulations.

This Appendix I sets out how the requirements for SEA have been met and signposts where this information is found in the Sustainability Appraisal Report (February 2018) accompanying the Draft Isles of Scilly Plan on Regulation 18 consultation –and in accordance with paragraph 165 of the National Planning Policy Framework (2012)³.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
 An outline of the contents, main objectives of the plan and relationship with other relevant 	Section 1 Introduction	 Sets out the vision and main objectives of the Draft Isles of Scilly Local Plan.
plans	Section 3 Context & Baseline	 Summarises the relationship with other relevant plans and the implications for the Draft Isles of Scilly Local Plan.
 The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan 	Section 3 Context & Baseline	 Summarises the relevant baseline conditions for sustainability (including the state of relevant environmental aspects) in the Plan area, and likely evolution without the Plan.
 The environmental characteristics of the area likely to be affected 	Section 3 Context & Baseline	 Summarised in Section 3 of Main SA Report.
 Any existing environmental problems which are relevant to the 	Section 3 Context &	 Summarises existing sustainability (including environmental problems) for the Isles of Scilly Local Plan area.

¹ http://ec.europa.eu/environment/eia/sea-legalcontext.htm

² http://www.parliament.uk/documents/post/postpn223.pdf

 $^{^3\,\}underline{\text{https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf}$

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
plan including, in particular, those in relation to any areas of a particular environmental importance	Baseline	
 The environmental protection objectives relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation 	Section 2 SA Methods Section 3 Context & Baseline	 Provides the summary of objectives for sustainability in the Isles of Scilly Plan area (including environmental objectives) and the implications of these objectives for the Draft Isles of Scilly Local Plan. Detailed SA Framework guiding assessment of effects against the Objectives.
 The likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological 	Section 2 SA Methods Table 2.1	Presents the SA Framework of objectives that shows which of the issues listed by the SEA Regulations are progressed by which SA objectives. This ensures that all of the issues are considered during the assessment of each element of the Draft Local Plan. All policies and site allocations are assessed against the SA objectives.
heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects	Section 5 Appendices IV to VI	 Summarises the likely significant effects of implementing the Draft Isles of Scilly Local Plan with details provided in the appendices. Where possible, an indication is given of whether the effect is likely to be cumulative, short, medium and long term
 The measures envisaged to prevent, reduce and as fully as possible offset any significant 	Section 5 Appendices IV to VI	 Where potential significant negative effects are predicted the SA has sought to provide suggestions for mitigation possibilities. These are provided in Section 5 of the SA Report and in the

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents					
adverse effects on the environment of implementing the plan		appraisal matrices (appendices).					
 An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken 	Sections 4 & 5 Appendix VI	 The potential site allocations were appraised through SA (Appendix VI). The reasons for progressing options & not taking others forward is set out in Table 5.1. 					
including any difficulties encountered in compiling the required information	Sections 2 & 3 Methods & Context, Baseline	 Outlines how the assessment was undertaken – the appraisal methodology and difficulties encountered in compiling information are noted. 					
 A description of the measures envisaged concerning monitoring 	Section 6	 Provides measures proposed for monitoring the sustainability (and environmental) effects of the implementation of the Draft Isles of Scilly Local Plan. 					
 A non-technical summary of the information provided under the above headings 	Report preface (available separately)	Provides a non-technical summary.					

Isles of Scilly Local Plan 2030: Regulation 18 Consultation SA Appendix III: SA Framework Review & Proposed Amendments

SA Objective Number in SA Scoping Report (July 2015) in (parenthesis)

Text changes in red & movement of decision-aiding questions between SA topics in blue

Proposed amendments were developed to avoid duplication & provide clarity for assessments, particularly for appraising site options, by placing the decision-aiding question with the SA Topic where the primary effects are associated. The inter-relationships between SA topics, including indirect, secondary, cumulative & synergistic effects, will still be considered and any such significant effects identified will be reported.

SA No.	SA Objective	Sub-Objectives/Decision-Aiding Questions	Comment/Explanation for change
1	Prevent Loss of and	Prevent loss of habitat	
	Enhance Habitats	Prevent pollution	Removed to avoid duplication as pollution is dealt with in Air Pollution (SA6) and Water Pollution (SA5)
		Maintain and enhance access to sites whilst avoiding and reducing adverse impacts	
		Maintain agricultural activities whilst avoiding and reducing adverse impacts	Agriculture is addressed in SA10 Resources - removed to avoid duplication
		Maintain or increase area of habitat	
		Improve management, linkage and condition of designated habitats	
		Create opportunities to enhance biodiversity in building design and open space	
		Prevent the introduction of non-native invasive species and support their detection and removal	
		Protect Geodiversity	Moved from SA8 as NPPF considers geodiversity with biodiversity
	Support Sustainable	Ensure the provision of affordable housing	2A
	Communities	Secure services and accommodation for an ageing population	2A & 2B- moved from SA4 Health to avoid duplication

	2A-Housing	Secure the provision of care and services for young people	As above				
	2B- Services and	Improve access to services for all islanders	2B				
	Facilities	Improve access to employment for all islanders	Moved to SA3 Economy to avoid duplication				
		Improve access to education and skills for all islanders	2B				
		Improve access to open space for all islanders	Moved to SA4 Health as the primary effects of open space & recreational facilities are associated with human health				
		Improve access to outdoor recreation and sports facilities for all islanders	As above				
		Retain and enhance transport between the islands and to the mainland	Moved to SA6 Air Quality & Transport to avoid duplication				
		Secure higher skilled and higher paid employment	Moved to SA3 Economy to avoid duplication				
		Promote art, craft and cultural interests	Moved to SA8 Heritage & Culture to avoid duplication				
3	Support Sustainable Economic Development &	Support the diversification and long term viability of commercial activities, including agriculture, fishing, the marine industry and tourism					
	Employment	Secure adequate provision of employment land					
		Support the provision of infrastructure, including ICT and transport					
		Support improved business productivity and innovation					
		Support enterprise to address climate change					
		Secure higher skilled and higher paid employment	Moved from SA2 Communities				
		Improve access to employment for all islanders	Moved from SA2 Communities				
4		Reduce and avoid noise pollution					
		Reduce and avoid light pollution					

	Safeguard and	Deliver adequate provision of infrastructure (physical.	Water Infrastructure is addressed in SA5,				
	Enhance Human	social and green) including compliant drinking water,	moved to avoid duplication				
	Health	sewage disposal and waste management	'				
		Improve safety					
		Ensure the appropriate management of coastal					
		erosion					
		Secure the provision of care and services for young					
		people					
		Increase availability of locally sourced food					
		Reduce and avoid fuel poverty	Although an equity issue, moved to SA10 Sustainable Resources as primary effects are associated with energy resources				
		Secure services and accommodation for an ageing	Moved to SA2 Communities to avoid				
		population	duplication				
		Increase the provision of allotments					
		Improve access to open space for all islanders	Moved from SA2 Communities to avoid				
			duplication				
		Improve access to outdoor recreation and sports facilities for all islanders	As above				
5	Maintain and improve	Prevent pollution	5A				
	water quality and use	Protect and improve drinking water to ensure					
	water efficiently and	compliance with Drinking Water Inspectorate					
	protect water	Protect existing groundwater abstractions from	5B				
	resources	derogation by new abstractions					
		Protect Controlled Waters from adverse abstraction	5B				
	5A- Water Quality	impacts					
		Increase use of sustainable drainage systems					
	5B- Water Resources	Improve efficiency and conservation in use of water	5B				
		Ensure sufficient water supply for agriculture	5B				
		Protect woodland and promote timber production					

		Compliance with the Water Framework Directive in relation to groundwater status (quantitative and chemical)	5A
		Prevent saline intrusion adversely impacting groundwater and groundwater supplies	5A
		Improve efficiency and effectiveness of sewerage system	Added from SA10 Resources
		Deliver adequate provision of infrastructure (physical, social and green) including compliant drinking water, sewage disposal and waste management	Added from SA4 Health
6	Maintain Air Quality &	Meet national air quality standards	
	Improve Sustainable	Deliver a more sustainable pattern of transport	
	Transport	Increase cycling and walking to access services,	
		employment and education	
		Retain and enhance transport between the islands and to the mainland	Added from SA2 Communities
		Improve public transport (includes taxis)	Added from SA7 Climate Change
7	Address the causes	Reduce greenhouse gas emissions	
	and consequences of	Ensure tourism is compatible with the climate change	
	climate change with	agenda	
	particular focus on improving	Improve energy efficiency	Moved to SA10 Resources to avoid duplication
	resilience and adaptation	Improve public transport (includes taxis)	Moved to SA6 AQ & Transport to avoid duplication
		Increase the use of sustainable design and	
	Climate Change:	construction techniques	
	Coastal Change; Greenhouse Gas	Ensure access to services during and after severe weather events	
	Emissions	Ensure access to food during and after severe weather events	

		Maximise the role of soil as a carbon store prevent soil erosion	Moved to SA10 Resources to avoid duplication
		Ensure communities, infrastructure and services are resilient against flood risk, coastal change and drought.	
		Provide space for habitats to migrate inland in response to rising sea levels, this should include sand dunes (especially those that act as flood defences), wetlands and ponds.	
8	Maintain and enhance cultural and heritage assets; including	Protect and enhance architectural heritage Protect and enhance archaeological heritage (including unknown)	
	architectural and archaeological heritage	Protect and enhance cultural heritage Reduce risks to heritage Improve access to historic buildings for residents and	
		visitors Enhance local distinctiveness Protect geodiversity	Move to SA1 as NPPF considers geodiversity together with biodiversity
		Promote art, craft and cultural interests	Moved from SA2 Communities
9	Protect and Enhance the Landscape	Protect and enhance visual amenity Protect and enhance landscape character Protect and enhance seascape character Coastal erosion	Already addressed in SA7 Climate Change – removed to avoid duplication
10	Support a more sustainable means of production and use of resources	Increase recycling and composting Promote sustainable timber production Increase the renewable energy capacity Improve efficiency and effectiveness of sewerage	10A 10A 10B Sewerage is addressed in SA5 Water -
	10A- Waste & Minerals	system Ensure the efficient use of developed land	moved to SA5 to avoid duplication 10C

		Ensure the sustainable use of mineral resources	10A
10B- E	Energy	including the use of recycled and secondary	
		aggregates	
10C-	Soil and	Increase local food production	10C
Agric	culture	Maintain agricultural activities whilst avoiding and	Added from SA1 Biodiversity to SA10C as
		reducing adverse impacts	this is a resources factor
		Reduce and avoid fuel poverty	Added from SA4 Health to SA10B as the
			primary effects are associated with
			energy resources
		Improve energy efficiency	Added from SA7 Climate Change to
			SA10B Resources to avoid duplication

Isles of Scilly Local Plan 2015-2030 Regulation 18 Consultation: Sustainability Appraisal (SA) Appendix IV: SA of Vision & Strategic Objectives

Key:

Symbol	Meaning
+	Compatible
-	Not Compatible
0	Neutral
?	Uncertain

Draft Vision	No 1: Prevent loss of and enhance habitats	No 2A: Housing	No 2B: Services and Facilities	No 3: Sustainable economic development & employment	q	No 5a: Maintain and improve water quality	No 5B: Use water efficiently and protect water resources	No 6: Maintain air quality/ improve sustainable transport	No 7: Climate Change: Coastal Change; GHG Emissions	No 8: Maintain and enhance cultural & heritage assets	No 9: Protect and enhance the landscape	No 10A: Waste & Minerals	No 10B: Energy	No 10C: Soil and Agriculture
Communities, Services & Facilities	+	+	+	+	+	+	+	+	+	+	+	+	+	+
Sustainable Development	+	+	+	+	+	+	+	+	+	+	+	+	+	+
Housing	0	+	0	0	+	0	0	0	0	0	0	0	0	0
Economy & Employment	0	0	+	+	0	0	0	0	0	0	0	0	0	0
Energy, Water & Waste Infrastructure	+	0	0	0	+	+	+	0	+	0	0	+	+	0
Transport links within and between islands	0	0	+	+	0	0	0	+	0	0	0	0	0	0

Strategic Aims and Objectives	No 1: Prevent loss of and enhance habitats	No 2A: Housing	No 2B: Services and Facilities	No 3: Sustainable economic development & employment	No 4: Safeguard and enhance human health	No 5a: Maintain and improve water quality	No 5B: Use water efficiently and protect water resources	No 6: Maintain air quality/ improve sustainable transport	No 7: Climate Change: Coastal Change; GHG Emissions	No 8: Maintain and enhance cultural & heritage assets	No 9: Protect and enhance the landscape	No 10A: Waste & Minerals	No 10B: Energy	No 10C: Soil and Agriculture
				Aim: M	aintain c	Word C	lass Env	ironmen	t					
Mitigate environment impacts	+	+	0	+	+	+	+	+	+	0	+	0	0	+
Environmental and coastal improvements	+	0	0	0	+	+	+	+	+	0	+	0	0	+
Sustainable use of resources & waste	+	0	0	0	+	+	+	+	+	+	+	+	+	+
Protect the identities of settlements	+	0	0	0	0	0	0	0	0	+	+	0	0	0
				Ai	m: Provi	sion of Ir	frastruc	lure						
Water & waste water infrastructure	+	0	+	0	+	+	+	0	0	0	0	+	0	0
Secure infrastructure provision	0	0	+	+	+	0	0	+	+	+	+	0	+	0
Move towards a low carbon economy	+	0	0	0	+	0	0	+	+	0	0	0	+	0
					Α	im: Hous	ing							
Provide affordable well-designed housing	0	+	0	0	+	0	0	0	0	0	0	0	0	0
Range of housing tenures to meet needs	0	+	0	0	+	0	0	0	0	0	0	0	0	0

Strategic Aims and Objectives	No 1: Prevent loss of and enhance habitats	No 2A: Housing	No 2B: Services and Facilities	No 3: Sustainable economic development & employment	No 4: Safeguard and enhance human health	No 5a: Maintain and improve water quality	No 5B: Use water efficiently and protect water resources	No 6: Maintain air quality/ improve sustainable transport	No 7: Climate Change: Coastal Change; GHG Emissions	No 8: Maintain and enhance cultural & heritage assets	No 9: Protect and enhance the landscape	No 10A: Waste & Minerals	No 10B: Energy	No 10C: Soil and Agriculture
Permit open market housing	0	+	0	0	+	0	0	0	0	0	0	0	0	0
Aim: Economy & Employment														
A more competitive and diverse economy	0	0	0	+	0	0	0	0	0	0	0	0	0	0
Promote ICT opportunities	0	0	0	+	0	0	0	0	0	0	0	0	0	0
Sustainable tourism growth	0	0	0	+	0	0	0	0	0	0	0	0	0	0
Support agriculture & horticulture industries	+	0	0	+	0	0	0	0	0	0	0	0	0	+
			Δ	im: Stror	ng, Vibro	int and H	lealthy (Commur	nity					
Improve self- sufficiency of islands	0	0	+	+	+	0	0	0	0	0	0	0	0	0
Facilitate investments in health & social care	0	0	+	+	+	0	0	0	0	0	0	0	0	0
Social, sports, recreational & leisure	0	0	+	0	+	0	0	0	0	0	0	0	0	0
Healthy living; ageing population	0	+	+	0	+	0	0	0	0	0	0	0	0	0
Strengthen transportation links	0	0	+	+	+	0	0	+	+	0	0	0	0	0

Strategic Aims and Objectives	No 1: Prevent loss of and enhance habitats	No 2A: Housing	No 2B: Services and Facilities	No 3: Sustainable economic development & employment	No 4: Safeguard and enhance human health	No 5a: Maintain and improve water quality	No 5B: Use water efficiently and protect water resources	No 6: Maintain air quality/ improve sustainable transport	No 7: Climate Change: Coastal Change; GHG Emissions	No 8: Maintain and enhance cultural & heritage assets	No 9: Protect and enhance the landscape	No 10A: Waste & Minerals	No 10B: Energy	No 10C: Soil and Agriculture
Access to high quality learning and training	0	0	0	+	+	0	0	0	0	0	0	0	0	0
					Aim: C	Climate (Change							
Climate change adaptation	+	+	0	0	+	0	0	0	+	0	+	0	0	0
Support a low carbon economy	+	+	0	0	+	0	0	+	+	0	0	0	+	0
Promote sustainable transport	+	0	+	0	+	0	0	+	+	0	0	0	0	0
					Aim: C	arbon N	eutrality							
Sustainable use of natural resources	+	0	0	0	+	+	+	+	+	0	+	+	+	+
Climate change mitigation	+	+	0	0	+	0	0	0	+	0	+	0	0	0

Isles of Scilly Local Plan 2015-2030 Regulation 18 Consultation: Sustainability Appraisal (SA) Appendix IV: SA of the Spatial Strategy

		1	2	3	4	5	6	7	8	9
SA Objectives	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	Landscape, heritage and nature protection	Build at least 105 affordable homes by 2030	Concentrate new homes in Hugh Town and Old Town	Competitive, diverse and resilient economy	Smart Islands Programme implementation	Infrastructure and Utility improvements	Support the needs of the off island communities	Support new tourist accommodation and facilities	Climate change and transport
1: Prevent loss of and enhance habitats	The Spatial Strategy will have positive effects on the natural habitats of the Isles of Scilly by concentrating growth in existing towns and ensuring the protection of the natural environment. This will promote the use of brownfield land where possible and prevent the degradation of rural habitats in other parts of the islands. Adapting and mitigating against climate change will also have positive effects through preventing future loss of habitat.	+	0	+	0	0	0	0	0	+
2A: Housing	Spatial Strategy Aims 2,3 and 7 will provide housing during the Plan Period, with major positive effects. Neutral effect for other Spatial Strategy Aims.	0	++	++	0	0	0	++	0	0
2B:	Spatial Strategy Aim 2 and 3 will result in houses being built in Hugh Town and Old Town which will support existing	0	+	+	0	0	++	++	0	0

Services and Facilities	services/facilities, with associated positive effects. Aims 6 and 7 will improve existing and potentially provide new services/facilities, with major positive effects.									
3: Sustainable economic development	Potential for minor positive effects for Aim 4 which will support development that creates a competitive, diverse economy. Further positive effects on economic development will result as Aim 8 will provide new tourist facilities. Aim 7 will support the economic needs for off island communities, with positive effects.	0	0	0	+	0	0	+	+	0
4: Human Health	The provision of affordable housing through Aim 2 will have positive effects on human health. Furthermore, reducing the social impacts of climate change and transport will have positive effects for the health of local residents.	0	+	0	0	0	0	0	0	+
5a: Water Quality	Water quality will be protected through the Spatial Strategy as protection of the natural environment. The promotion of infrastructure to support the Smart Islands Programme will have benefits through improvements to waste water treatments, which will reduce potential pollution risks.	+	0	0	0	+	+	0	0	0
5B: Water Resources	The Spatial Strategy will have potential positive effects on water resources by proving upgraded infrastructure.	0	0	0	0	0	+	0	0	0
6: Air Quality & Sustainable Transport	The Spatial Strategy Aim 9 will have positive effects on both air quality and traffic. The reduction is use of petrol and diesel vehicles will reduce negative associated air pollution, with positive effects on air quality. The Spatial Strategy will also encourage sustainable transport options which will have positive effects on transport for the islands.	0	0	0	0	0	0	0	0	+
7: Climate Change	The investment in cleaner energy sources and the promotion of a low carbon economy as part of the spatial strategy will have positive effects through reducing GHG emissions.	0	0	0	0	+	0	0	0	+

8: Cultural & Heritage Assets	Spatial Strategy Aim1 will protect the cultural heritage and the historical heritage of the Isles of Scilly from negative effects as a result of development, with positive effects.									
9: Landscape	The Spatial Strategy ensures the protection of the distinctive landscape character of the Isles of Scilly from negative effects from development, with a positive effect.	+	0	0	0	0	0	0	0	0
10A: Waste & Minerals	The Spatial Strategy is not considered to have any significant effects on this SA Objective.	0	0	0	0	0	0	0	0	0
10B: Energy	The Spatial Strategy will have positive effects on energy by ensuring sites are available for a new power plant, and will promote clean energy technologies.	0	0	0	0	+	0	0	0	0
10C: Soil & Agriculture	Potential for positive effects on soils as a result of focusing development in the existing settlements of Hugh Town and Old Town.	0	0	+	0	0	0	0	0	0

The Spatial strategy is considered to have major positive effects on housing and services & facilities by providing 105 affordable homes through the Plan period, and the support and provision of new services/facilities. Further positive effects include benefits for human health as a result of housing and service/facility improvements.

The Spatial Strategy will have positive effects on the economy, water and air quality, transport, climate change, landscape, heritage energy and soil. No significant negative effects were identified through the SA of the Spatial Strategy.

Isles of Scilly Local Plan 2015-2030 Regulation 18 Consultation: Sustainability Appraisal (SA) Appendix V: SA of Policy Options

Key: Ca	tegories of Si	gnificance
Symbol	Meaning	Sustainability Effect
++	Major Positive	Proposed development encouraged as would resolve existing sustainability problem
+	Minor Positive	No sustainability constraints and proposed development acceptable
0	Neutral	Neutral effect
?	Uncertain	Uncertain or Unknown Effects
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive

Strategic Policy Options Investigated through SA

Policy Name & Number	Options
Option 1 Policy SS4: Protection of Retailing & Community	1A Define a town centre boundary or areas of retail frontage where unnecessary loss of ground floor retail or ancillary retail could be resisted, unless sufficient justification on viability is provided.
Facilities	1B Do Nothing – continue as previous plan with no town centre boundary defined and apply Policy SS4 to any existing ground floor retail or ancillary retail.
Option 2 Policy LC1:	2A Permit open market homes as a means to deliver affordable homes to meet the needs of the community. Seeking to impose a principal residence condition on any open market.

Housing Strategy to 2030	2B Accept that unfettered open market homes (that is open market without a principal residence condition) could be permitted without restriction. Policy would need to be reviewed to ensure that once affordable housing target reached, no further market homes would be permitted.
Option 3 Policy LC2: Occupying Affordable Homes	3A Revise the qualifying criteria for SLN and remove the Key Worker criteria and status and replace with a general staff accommodation policy. 3B Do Nothing – continue as previous SPD1 with no revision to qualifying criteria.
Option 4 Policy LC7: Windfall Housing	4A Define settlement boundaries on St Mary's around existing settlements defined as Hugh Town, Old Town, Telegraph/McFarlands Down, Porthloo, Holy Vale, Normandy. 4B Settlement boundaries not defined & development sites allocated together with a criteria-based policy that permits development on windfall sites that are well-related to existing dwellings & do not harm the wider landscape.
Option 5 Policy WC3: New Employment Development	5A In order to safeguard employment land the plan could define where employment protection policy would relate to, for example, Porthmellon Industrial Estate. 5B Do Nothing – continue as previous plan with no definitions for employment protection policy

 $^{^{1} \}underline{\text{http://www.scilly.gov.uk/sites/default/files/document/planning/Specific\%20Local\%20Need\%20Criteria\%20and\%20Application\%20Form.pdf}$

Policy Option 1 – Policy Number SS4

1A Define a town centre boundary or areas of retail frontage where unnecessary loss of ground floor retail or ancillary retail could be resisted, unless sufficient justification on viability is provided.

1B Do Nothing – continue as previous plan with no town centre boundary defined and apply Policy SS4 to any existing ground floor retail or ancillary retail.

SA Objectives	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5- 10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	1A Town Centre Boundary	18 Do Nothing
1: Prevent loss of and enhance habitats	Not applicable and neutral effects predicted.	0	0
2A: Housing	Not applicable and neutral effects predicted.	0	0
2B: Services and Facilities	Defining a town centre boundary or areas of retail where unnecessary loss of ground floor retail could be resisted is likely to progress positive effects with regard to minimising vacancy rates and encouraging a focus and protection for retail facilities helping to maintain or improve services for all islanders – with positive effects for communities.	+	0
3: Sustainable economic development	Protection of retail could have indirect effects on objectives for sustainable economic development and employment by helping to maintain or improve community vitality and vibrancy of town centres; some uncertainty of significance remains at this stage of assessment.	+?	0
4: Human Health	Not applicable and neutral effects predicted.	0	0

5a: Water Quality	Not applicable and neutral effects predicted.	()	0
5B: Water Resources	Not applicable and neutral effects predicted.	()	0
6: Air Quality & Sustainable Transport	Air quality is very good in the Isles of Scilly & there are no issues or Air Quality Management Areas (AQMAs) declared ² . Protecting retail facilities in the town centre could have indirect effects on objectives to promote sustainable transport but the significance of effects is uncertain at this stage.	0	+?	0
7: Climate Change	Not applicable and neutral effects predicted.	()	0
8: Cultural & Heritage Assets	The whole of the Isles of Scilly is designated as a Conservation Area ³ , and includes defined Heritage Coasts ⁴ . Any development should follow the Isles of Scilly Design Guide ⁵ , to ensure development integrates well with the existing character and style. Protecting retail in the centre is likely to protect the existing character with likely neutral effects for Option 1A. Other policies will protect the heritage assets such that neutral effects also likely for the do-nothing option.	()	0
9: Landscape	The Isles of Scilly are one of England's finest landscapes as evidenced by their national designation as an AONB ⁶ . Mitigation measures for potential negative effects from new development are possible through compliance with the Isles of Scilly design guide ⁷ , to help ensure any future development is well integrated with the existing landscape. Protecting retail frontage is likely to maintain the existing landscape/townscape with neutral effects.	()	0
10A: Waste & Minerals	Not applicable and neutral effects predicted.	()	0

² https://www.cornwall.gov.uk/media/25838697/clean-air-for-cornwall-strategy-2017.pdf

³ http://www.scilly.gov.uk/sites/default/files/document/planning/Conservation%20Area%20Character%20Statement%20CONSULTATION%20DRAFT.pdf

⁴ http://www.scilly.gov.uk/sites/default/files/document/planning/A%20Heritage%20and%20Cultural%20Strategy%20for%20the%20los.pdf

⁵ Isles of Scilly Council (2006) Isles of Scilly Design Guide

⁶ http://www.ios-aonb.info/wp-content/uploads/2016/05/IOS-AONB-Management-Plan-2015-2020-Awaiting-Ministerial-Foreword.pdf

⁷ Ibid.

10B: Energy	Not applicable and neutral effects predicted.	0	0
10C: Soil & Agriculture	Not applicable and neutral effects predicted.	0	0

Most SA Objectives are not relevant to these options 1A & B on retail protection and neutral effects are indicated.

Defining a town centre boundary or areas of protected retail frontage may have some minor positive effects on SA Objectives for maintaining/improving access to facilities by protecting retail; potential indirect positive effects on economic development/employment by helping to maintain the vitality and vibrancy of town centres by helping to reduce vacancies. Further support for employment is provided by the qualifying clause "unless sufficient justification on viability is provided".

Some further indirect minor positive effects may be likely by supporting access to town centres where sustainable transport or avoiding additional car journeys could support SA Objective for sustainable transport.

Policy Option 2 – Policy Number LC1 Housing Strategy to 2030

2A Permit open market homes as a means to deliver affordable homes to meet the needs of the community. Seeking to impose a principal residence condition on any open market.

2B Accept that unfettered open market homes (that is open market without a principal residence condition) could be permitted without restriction. Policy would need to be reviewed to ensure that once affordable housing target reached, no further market homes would be permitted.

SA Objectives	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5- 10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	2A Settlement Boundaries	28 Do Nothing
1: Prevent loss of and enhance habitats	Marine and tidal habitats and species have international significance and are designated as the Isles of Scilly Complex as a Special Area of Conservation (SAC)8; also as a non-designated Heritage coast (as defined by Natural England and IoS Council). Other policies should ensure protection of habitats, and neutral effects indicated for both options.	0	0
2A: Housing	For Option A, new homes will be delivered on land specifically allocated for such purposes in accordance with Policy LC6 and on windfall sites in accordance with Policy LC7 – and be required to ensure an appropriate mix; all residential schemes will be required to provide as much affordable homes as viably possible with open market housing only permitted to finance and fund the delivery of affordable homes. This indicates that the Council can deliver its objectively assessed housing requirements (OAHN) over the plan period – and major positive effects indicated for Option 2A. With a rural exceptions style approach only and no housing figure set, there is a risk that the housing need would not be delivered indicating only minor positive effects for the do-nothing option 2B.	++	+
2B: Services and Facilities	Allocating housing development in Hugh Town & Old Town ensures that such developments will be guided to be in locations with existing local facilities and services—with positive effects for communities. Other Policies will ensure accessibility to services and facilities but with a less coordinated approach indicating only neutral effects for the unfettered open market approach in Option 2B.	+	0

 $^{{\}small 8}\>\> \underline{\text{http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013694}$

3: Sustainable economic development	Not applicable and neutral effects predicted.	0		0
4: Human Health	Ensuring delivery to meet the OAHN by allocating a housing figure is likely to have major positive effects on human health and well-being by helping ensure that all islanders have housing to meet their needs. Delivery is less certain by reliance on other policies and no housing figure, so positive effects for Option 2B reduced to minor.	+-	+	+
5a: Water Quality	Not applicable and neutral effects predicted – managed through other policies.	0		0
5B: Water Resources	Not applicable and neutral effects predicted - managed through other policies.	0		0
6: Air Quality & Sustainable Transport	Air quality is very good in the Isles of Scilly & there are no issues or Air Quality Management Areas (AQMAs) declared. Allocating housing sites within settlement boundaries could have indirect effects on objectives to promote sustainable transport and reduce car usage, but the significance of effects is uncertain at this stage, although likely to be cumulative in the longer-term.	0	+?	0
7: Climate Change	Not applicable and neutral effects predicted.	0		0
8: Cultural & Heritage Assets	Not applicable and neutral effects predicted – managed through other policies.	0)	0
9: Landscape	The Isles of Scilly are one of England's finest landscapes as evidenced by their national designation as an AONB ¹⁰ . Mitigation measures for potential negative effects of new development are possible through compliance with the Isles of Scilly design guide ¹¹ , to help ensure development is well integrated with the existing landscape. However, directing windfall sites to areas that are well-related to existing developments – as guided by a settlement boundary – will reduce the pressures on the open countryside with likely positive effects. Therefore, likely positive effects through allocating housing within Hugh Town & Old Town.	+	,	0?

https://www.cornwall.gov.uk/media/25838697/clean-air-for-cornwall-strategy-2017.pdf
 http://www.ios-aonb.info/wp-content/uploads/2016/05/IOS-AONB-Management-Plan-2015-2020-Awaiting-Ministerial-Foreword.pdf

¹¹ Ibid.

	Other Policies will protect the open countryside with likely effect that could be cumulative for Option 2B – at least neutral effects but with some uncertainty about the extent of the significance at this stage.		
10A: Waste & Minerals	Not applicable and neutral effects predicted.	0	0
10B: Energy	Not applicable and neutral effects predicted.	0	0
10C: Soil & Agriculture	Not applicable and neutral effects predicted.	0	0

Many SA Objectives are not relevant to these options 2A & B on the Housing Strategy and neutral effects are indicated.

For Option 2A, provision of allocation sites for housing will have direct major positive effects for \$A Objectives on housing and health; directing such sites to existing settlements of Hugh Town & Old Town will have minor positive effects on \$A Objectives for access to services and facilities; also, potential minor positive effects for sustainable transport as reducing the need to travel by car. Further positive effects are indicated for protecting internationally designated (and non-designated but locally important) habitats and species, and the nationally important landscape by avoiding the open countryside and ensuring that allocated housing sites are guided to within the existing two towns.

In comparison, Option 2B may have negative effects on landscape, access to services & facilities, and will not promote sustainable transport. However, this would be protected by other Policies in the Plan to at least neutral with some uncertainty of significance at this stage as depends on precise location. Likely positive effects on housing objectives are reduced to minor compared to major for Option 2A as housing delivery is less certain without a defined housing figure and clear site allocations.

Policy Option 3 – Policy Number LC2 Local Occupancy Criteria

3A Revise the qualifying criteria for Special Local Need (SLN) and remove the Key Worker criteria and status and replace with a general staff accommodation policy

3B Do Nothing (continue with previous Supplementary Planning Document SPD¹² Specific Local Need (SLN) Criteria for Affordable Housing)

SA Objectives	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5- 10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	3A Revise Criteria for Workers	38 Do Nothing
1: Prevent loss of and enhance habitats	Not applicable and neutral effects predicted.	0	0
2A: Housing	SPDs are intended to provide greater clarity and detail to policies in the Local Plan; legally they do not form part of the Plan but they are material considerations in determining planning applications ¹³ . Both Options 3A & 3B seek to make it easier for people with a genuine need to live and work in the islands to live in restricted occupancy homes, including new affordable housing. Both are likely to have major positive effects on SA Objectives for housing, including affordable and accommodation for all with positive effects for equality.	++	++
2B: Services and Facilities	Not applicable and neutral effects predicted.	0	0
3: Sustainable economic development	Not applicable and neutral effects predicted.	0	0
4: Human Health	Providing homes to help meet genuine need for people to live and work on the islands is likely to have positive effects on human health and well-being by helping ensure that all islanders have housing to meet their needs.	+	+

¹² http://www.scilly.gov.uk/sites/default/files/document/planning/Specific%20Local%20Need%20Criteria%20and%20Application%20Form.pdf

¹³ https://www.gov.uk/guidance/local-plans--2

5a: Water Quality	Not applicable and neutral effects predicted – managed through other policies.	0	0
5B: Water Resources	Not applicable and neutral effects predicted - managed through other policies.	0	0
6: Air Quality & Sustainable Transport	Not applicable and neutral effects predicted.	0	0
7: Climate Change	Not applicable and neutral effects predicted.	0	0
8: Cultural & Heritage Assets	Not applicable and neutral effects predicted – managed through other policies.	0	0
9: Landscape	Not applicable and neutral effects predicted – managed through other policies.	0	0
10A: Waste & Minerals	Not applicable and neutral effects predicted.	0	0
10B: Energy	Not applicable and neutral effects predicted.	0	0
10C: Soil & Agriculture	Not applicable and neutral effects predicted.	0	0

Most SA Objectives are not relevant to these options 3A & B on revising criteria for Specific Local Need with a change from an SPD approach to Plan Policy, and neutral effects are indicated.

Both options are likely to have major positive effects on SA Objectives for housing, including affordable and accommodation for all, with further positive effects for equality and human health and well-being.

Telegraph/McFarlo 4B Settlement bou	ent boundaries on St Mary's around existing settlements defined as Hugh Town, Old Town, ands Down, Porthloo, Holy Vale, Normandy. ndaries not defined & development sites allocated together with a criteria-based policy that pe vindfall sites that are well-related to existing dwellings & do not harm the wider landscape.	rmits	
SA Objectives	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	4A Settlement Boundaries	4B Do Nothing
1: Prevent loss of and enhance habitats	Marine and tidal habitats and species have international significance and are designated as the Isles of Scilly Complex as a Special Area of Conservation (SAC) ¹⁴ ; also as a non-designated Heritage coast (as defined by Natural England and IoS Council). Whilst other policies should ensure protection of habitats, the containment of possible windfall sites within a settlement boundary will provide more certainty for implementation of mitigation measures and the potential for enhancement of habitats by providing more development guidance and by avoiding open countryside and any associated risks to protected areas. Minor positive effects that are likely to be cumulative in the longer-term -	+?	0?
2A: Housing	some uncertainty at this stage of assessment. Defining a settlement boundary for windfall development is likely to support a positive approach to housing to meet the needs of local island communities as far as possible within the environmental and heritage constraints. With a settlement boundary, any windfall housing is will be well-related to existing housing. In making allowance for windfall sites, the Council can meet its objectively assessed housing requirements (OAHN)over the plan period – and minor positive effects indicated for Option 2A.	+	0?
2B: Services and Facilities	Defining a settlement boundary for windfall housing means that such developments will be guided to be in locations with existing local facilities and services—with positive effects for communities. In contrast, in the absence of settlement boundaries, there is the potential for minor negative effects on access to services and facilities.	+	-

¹⁴ http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0013694

3: Sustainable economic development	Not applicable and neutral effects predicted.	0	0
4: Human Health	Making allowance for windfall sites to help meet the OAHN is likely to have positive effects on human health and well-being by helping ensure that all islanders have housing to meet their needs.	+	+
5a: Water Quality	Not applicable and neutral effects predicted – managed through other policies.	0	0
5B: Water Resources	Not applicable and neutral effects predicted - managed through other policies.	0	0
6: Air Quality & Sustainable Transport	Air quality is very good in the Isles of Scilly & there are no issues or Air Quality Management Areas (AQMAs) declared ¹⁵ . Managing windfall sites within settlement boundaries could have indirect effects on objectives to promote sustainable transport and reduce car usage, but the significance of effects is uncertain at this stage, although likely to be cumulative in the longer-term.	0 +?	0
7: Climate Change	Not applicable and neutral effects predicted.	0	0
8: Cultural & Heritage Assets	Not applicable and neutral effects predicted – managed through other policies.	0	0
9: Landscape	The Isles of Scilly are one of England's finest landscapes as evidenced by their national designation as an AONB ¹⁶ . Mitigation measures for potential negative effects of new development are possible through compliance with the Isles of Scilly design guide ¹⁷ , to help ensure development is well integrated with the existing landscape. However, directing windfall sites to areas that are well-related to existing developments – as guided by a settlement boundary – will reduce the pressures on the open countryside with likely positive effects. In contrast, without guidance that manages windfall sites to existing settlements, negative effects are	+	-?
	possible on the open countryside that are likely to be cumulative – some uncertainty about the extent of the significance at this stage.		

¹⁵ https://www.cornwall.gov.uk/media/25838697/clean-air-for-cornwall-strategy-2017.pdf
16 http://www.ios-aonb.info/wp-content/uploads/2016/05/IOS-AONB-Management-Plan-2015-2020-Awaiting-Ministerial-Foreword.pdf

¹⁷ Ibid.

10A: Waste & Minerals	Not applicable and neutral effects predicted.	0	0
10B: Energy	Not applicable and neutral effects predicted.	0	0
10C: Soil & Agriculture	Not applicable and neutral effects predicted.	0	0

Many SA Objectives are not relevant to these options 2A & B on retail protection and neutral effects are indicated.

For Option 4A, provision of housing will have direct positive effects for SA Objectives on housing and health; directing windfall sites to existing settlements will have positive effects on SA Objectives for access to services and facilities; also, potential minor positive effects for sustainable transport as reducing the need to travel by car.

Further positive effects are indicated for protecting internationally designated (and non-designated but locally important) habitats and species, and the nationally important landscape by avoiding the open countryside and ensuring that windfall sites are guided to within settlement boundaries.

In comparison, Option 4B may have negative effects on landscape, access to services & facilities, and will not promote sustainable transport; some uncertainty of significance at this stage as depends on precise location – but will be cumulative in the longer term.

Policy Option 5 – Policy Numbers WC3 New Employment Development

5A In order to safeguard employment land the plan could define where employment protection policy would relate to, for example, Porthmellon Industrial Estate.

5B Do Nothing - continue as previous plan with no definitions for employment protection policy

SA Objectives	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5- 10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	5A Revise Criteria for Workers	58 Do Nothing
1: Prevent loss of and enhance habitats	Not applicable and neutral effects predicted.	0	0
2A: Housing	Not applicable and neutral effects predicted.	0	0
2B: Services and Facilities	Not applicable and neutral effects predicted.	0	0
3: Sustainable economic development	Both options seek to protect employment land but the current approach does not specifically mention the existing Industrial Estate. Thus, both options are likely to have positive effects on SA objectives for economic development and employment; Option 4A could provide more clarity by specific reference to the Industrial Estate but the likely effects remain the same overall.	+	+
4: Human Health	Both options support employment development with positive effects for health and well-being.	+	+
5a: Water Quality	Not applicable and neutral effects predicted – managed through other policies.	0	0

5B: Water Resources	Not applicable and neutral effects predicted - managed through other policies.	0	0
6: Air Quality & Sustainable Transport	Not applicable and neutral effects predicted.	0	0
7: Climate Change	Not applicable and neutral effects predicted.	0	0
8: Cultural & Heritage Assets	Not applicable and neutral effects predicted – managed through other policies.	0	0
9: Landscape	Not applicable and neutral effects predicted.	0	0
10A: Waste & Minerals	Not applicable and neutral effects predicted.	0	0
10B: Energy	Not applicable and neutral effects predicted.	0	0
10C: Soil & Agriculture	Option 5A could be more efficient of brownfield land use through specific reference to the existing Industrial Estate with positive effects indicated but some uncertainty at this stage of assessment.	+?	0

Many SA Objectives are not relevant to these options 5A & B on employment land and neutral effects are indicated.

Both options will have positive effects on SA Objectives for employment and human health and well-being. The specific reference to the Industrial Estate would provide more clarity and could be more efficient of use of brownfield land with some uncertainty of the extent of positive effects predicted.

Isles of Scilly Local Plan 2030: Regulation 18 Consultation

Appendix VI: SA of Site Options

Key:

Categor	ies of Signific	ance
Symbol	Meaning	Sustainability Effect
++	Major Positive	Proposed development encouraged as would resolve existing sustainability problem
+	Minor Positive	No sustainability constraints and proposed development acceptable
0	Neutral	Neutral effect
?	Uncertain	Uncertain or Unknown Effects
-	Minor Negative	Potential sustainability issues: mitigation and/or negotiation possible
	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive

HUGH TOWN

•	St Mary's Island- Hugh Town Site: Carn Thomas, Telegraph Road; Ref A7 (26 dwellings to the south of the A311) & A7a (7 dwellings to the north)		
SA Objectives	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years) term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertain		
No 1: Prevent loss of and enhance habitats	The proposed site is not located near any of the Isles of Scilly Ramsar sites, with the closest sites being 2.5km to the south and 2.5km to the north-west of \$1 Mary's, and the nearest \$PA sites being the same distance¹. The Ramsar site is designated for the presence of the European storm-petrel, the European shag and the lesser black-backed gull². The \$PA is also designated for its populations of storm-petrel and lesser black-backed gull and the assemblage of seabirds of international importance³. The European sites are located on different islands than the proposed development site and therefore major significant negative effects are not likely from a small housing development. The proposed site is located approximately 130m to the south⁴ from the Isles of Scilly marine \$AC complex which surrounds all of the Isles of Scilly islands, and that is designated for sub-tidal sandbanks, intertidal mudflats & sandflats, and reef habitats; Grey Seal & Shore Dock⁵. The \$AC is sensitive to water pollution, habitat loss and recreational activities⁴. However, due to the small size of the proposed site any recreational increase would be minimal, with a likely overall neutral effect on internationally designated sites. Potential water pollution (and please see \$A Objective No 5) can be avoided through mitigation measures provided in Policies and through requirements during construction, such as an Environmental Management Plan. The site is also the same distance from the proposed extension to the \$PA site³ however there are no existing known vulnerabilities to the site, and considering the findings of the site against the \$AC which is in the same are, no significant negative effects are considered likely.	0	

¹ Defra (2017) Magic Map

² JNCC (2008) Isles of Scilly Ramsar Information Sheet

³ JNCC Defra (2016) Isles of Scilly SPA Natura 2000 Standard Data Form

⁴ Defra (2017) Magic Map

⁵ JNCC Defra (2016) Isles of Scilly SAC Natura 2000 Standard Data Form

⁶ Ibid.

⁷ Natural England (2018 Proposals for a marine extension to the Isles of Scilly Special Protection Area (SPA))

	The site is located approximately 230m from Lower Moors SSSI ⁸ , which is to the east and contains Lowland Fens Priority Habitat and Deciduous Woodland Priority Habitat ⁹ . The SSSI is designated for its range of wetland habitats and importance as a feeding site for a small number of wintering bird species ¹⁰ . Lower Moors SSSI is classified as an Important Bird Area but is not a component of the SAC complex; and is in an unfavourable but recovering condition ¹¹ .	
	The site is adjacent to the town beach and Porth Mellon beach and both are used for boating and recreation. Increased nearby residential development could increase the recreational use on the SSSI and local beaches with the potential for damage and disturbance; however, the potential housing numbers are relatively low and within an existing urban area such that no significant adverse effects are likely.	
	Development on the site may also lead to an increase in traffic on the A311 which runs parallel to the SSSI, resulting in an increase in atmospheric pollution and noise pollution. This could result in negative effects against the SSSI and the birds which use the SSSI for feeding. However, due to the size of the proposed development any increase in traffic should be comparatively small, and mitigation is provided through Draft Plan policies with no likely significant effects. Overall potential for a long-term residual neutral effect against SA Objective 1.	
No 2A: Housing	The proposed site will contribute to meeting the need for housing identified in the Draft Plan for the Isles of Scilly, and will provide affordable housing for local people, with long-term major positive effects.	++
No 2B: Services and Facilities	Inhabitants of St Mary's have access to essential services but provision of community services & facilities is poor compared to the rest of the UK. The size of this proposed housing development is unlikely to be able to contribute to community services & facilities; care will be needed to consider the cumulative effects of all the housing sites proposed on St Mary's and the capacity of existing services & facilities. Mitigation measures may be possible through site specific requirements and Policy wording – some uncertainty at this stage of assessment.	0?
No 3: Support sustainable economic development & employment development	No employment land is proposed at the site option; therefore, not applicable and neutral effects indicated.	0

⁸ Measured from the SSSI edge to the proposed development site edge

⁹ Defra (2017) Magic Map

¹⁰ Natural England (1986) Lower Moors SSSI Citation

¹¹ Natural England (2012) (https://designatedsites.naturalengland.org.uk/ReportUnitCondition.aspx?SiteCode=\$1001273&ReportTitle=Lower%20Moors%20(St.%20Mary%27s)%20SSSI)

No 4: Safeguard and enhance human health	Due to the site's location within Hugh Town and its relatively small size, any increase in noise and light pollution as a result of development will be minimal, and should not impact on the quality of the night sky due to its location in an existing urban centre – with neutral effects. As the site is located within walking distance to essential services, there are benefits for human health as this promotes walking and cycling, reducing the need to use private vehicles & minimising any potential increase in atmospheric pollutants. Easy access to the coastal path for recreational walking should also be beneficial for resident's health. St Mary's has been identified ¹² as needing investment in play & sports infrastructure, so consideration needs to be given to the cumulative effects of all housing proposed on capacity. No such infrastructure is proposed for this site but some contribution may be possible – uncertainty at this stage of appraisal. Overall potential for a long-term positive effect against human health due to easy access to open space.	0 +
No 5a: Maintain and improve water quality	Hugh Town has a formal 13 piped foul drainage system and the untreated effluent is discharged into the surrounding sea. It is understood that the sewerage system is at capacity 14 with the likely negative effects that would be mitigated through infrastructure upgrading – potential residual neutral effects but some uncertainty at this stage. The Council are currently working with the Environment Agency and Defra to address sewerage capacity. Other possible mitigation measures could include use of compost toilets but these might be more appropriate on a single dwelling development; also, greywater recycling but costs may preclude opportunities. Possible potential for an increase of surface water runoff rates due to the site's topography, which could result in an environmental pathway for pollutants to enter the ocean. This issue could be mitigated by applying a sustainable urban drainage system to any new development to help remove any pollutants from surface water runoff and reduce flooding risks. Potential pollution during the construction phase can be avoided through careful pollution controls & implementation of an Environmental Management Plan. The current chemical status of the groundwater sources is considered poor due to the concentrations of nitrogen caused by the bedrock and run-off from agricultural practises 15, however development on the site is not likely to have an impact on groundwater quality as groundwater sources are located away from the site. Overall the site is not likely to have any pollution effects with a residual neutral effect against SA Objective 5A for water quality.	0?

¹² Isles of Scilly Play Strategy

¹³ Three Dragons (for the Isles of Scilly Council) (2014) Infrastructure Plan 14 SHLAA (2016) Infrastructure Assessment

¹⁵ Natural England (2015) Isles of Scilly National Character Area Profile

No 5B: Use water efficiently and protect water resources	The island of St Mary's relies on a number of boreholes and a desalination plant with three reservoirs for storage ¹⁶ . The desalination plant helps allow groundwater sources to refill during the off-peak seasons, and helps prevent the risk of saline intrusion. The desalination plant provides a better quality of water, through diluting the effects of nitrates and arsenic when blended with the available groundwater. Development on the site will result in an increase in water demand, which could contribute to pressures on existing water supply infrastructure, but there are no capacity issues for this level of proposed development reported ¹⁷ . Mitigation measures are available through the provision & use of water efficient devices with likely residual neutral effect against SA Objective 5B Water Resources.	0	
No 6: Maintain air quality and improve sustainable transport	Air quality is good in the Isles of Scilly & there are no major air quality issues with no Air Quality Management Areas (AQMAs) declared 18. Development at this site has the potential to increase atmospheric pollutants due to an increase in private vehicle use; however, with the relatively small size of the proposed development, it is considered that the increase would only be negligible, with likely neutral effects on air quality. The site's proximity to a number of key services and facilities and the presence of roadside footpaths into the centre of Hugh Town should encourage future residents to walk or cycle rather than use motor vehicles, indicating potential for minor positive effects for objectives for more sustainable transport.	0	+
No 7: Climate Change: Coastal Change; Greenhouse Gas Emissions	As the site is located a short distance from the ocean (60m), sea level rise as a result of climate change needs to be considered. However, the proposed site is situated on higher land, with the lowest point of the site being 10m above sea level (the northern section of the site), and the highest point being 25m above sea level (southern area of the site). Therefore, it is unlikely that sea level rise, even when considered with the effects of major storms and extreme tides, will result in coastal flooding of the site. However, the SMP2 ¹⁹ recommends a realignment of sea defences along this section of coast, and this should help protect the coastline from coastal erosion. Overall the site is not considered to be at risk from sea level rise or sea flooding, with a residual neutral effect. Most greenhouse gas emissions are associated with motor vehicles. As noted in Objective No.6, the site's location within walking distance to the main services and facilities within Hugh Town should ensure people are less likely to use private vehicles, reducing the islands greenhouse gas emissions. There are opportunities to promote renewables and energy efficient devices among new development. Overall potential for cumulative minor positive effect.	0	+

¹⁶ Three Dragons (for the Isles of Scilly Council) (2014) Infrastructure Plan

¹⁷ SHLAA (2016) Infrastructure Assessment

¹⁸ Isles of Scilly AONB Partnership (2015) AONB Management Plan
19 Cornwall Council and the Isles of Scilly Council (2010) Cornwall and the Isles of Scilly shoreline management plan

No 8: Maintain and enhance cultural & heritage assets, including architectural and archaeological heritage	Although the whole of the Isles of Scilly is designated as a Conservation Area, Hugh Town has its own Conservation Area Character that is partly defined by the building styles and public spaces located within it ²⁰ . Future development is unlikely to have a major significant adverse effect on the Conservation Areas character due to its location to the east of the main centre. However, any development should follow the Isles of Scilly Design Guide ²¹ , to ensure development integrates well with the existing architectural style and the Character Area of Hugh Town – with neutral effects. The northern area of the site, north of Telegraph Road and referred to as A7A, is located in Porth Mellon Archaeological Constraint Area (ACA). The sensitivity and features of the ACA are currently not known, with effects of development on the ACA uncertain. There are no Scheduled Monuments on or adjacent to the proposed site, however around 50m to the west of the mid-point of the sites there are 4 Listed Buildings, including The Church of St Mary's. Around 25m to the west of the southern area of the site there are a further 2 Listed Buildings. Development at this site has the potential to affect the setting of the Listed Buildings in the area due to their close proximity, although some existing	0
No 9: Protect and enhance the landscape	vegetation may act as a natural visual barrier and limit the impacts of development. Potential negative effects can be mitigated through Plan Policy to ensure that the settings of designated heritage assets are considered in any planning application – with neutral effects. The site option includes unused school buildings occupying a large amount of the site. Development at this site has the potential to improve the visual amenity of the area by removing previously used buildings, and constructing new buildings meeting the design style for the Isles of Scilly. The site is located in an area which is considered to be an important skyline for the island ²² , and therefore development should respect the important skyline by limiting building height. Likely minor positive effects through redevelopment of the site - likely to be cumulative in the longer term.	+
No 10A: Waste & Minerals	All development will result in some household waste, however appropriate mitigation through Plan Policy should ensure waste is recycled where possible and non-recyclable waste is disposed of as required by legislation. Site specific requirements can help ensure space provided for recycling – and maybe composting food wastes – potential mitigation measures; overall neutral effects indicated.	0

 ²⁰ Isles of Scilly Council (2015) Conservation area character statement
 21 Isles of Scilly Council (2006) Isles of Scilly Design Guide

²² Ibid.

	There are no Mineral Safeguarded Areas on the IOS ²³ . There is the potential for recycling aggregates through site specific or general policy, as appropriate.	
No 10B:	New development on any site has the potential to be sustainably designed to reduce the need for heating,	+
Energy	with appropriate insulation and energy efficient appliances – and also reducing fuel costs for residents with positive effects through helping to address the known issue of fuel poverty for the Isles. The installation of energy efficient devices in new development, with possible links to renewable sources (e.g. solar panels on roofs) would help reduce the island's energy use. The Smart Islands Energy Programme will reduce energy bills through a Community Energy Serviced Company, increase renewable energy use and increase battery based energy storage, with positive effects on energy. Overall potential for minor long-term positive effects.	
No 10C: Soil & Agriculture	The site is largely previously developed land (PDL) adjacent to the existing urban area and so will not result in the loss of agricultural land or important soil resources. Residual neutral effect.	0

²³ Isles of Scilly Council (2005) Isles of Scilly Local Plan

St Mary's Island- H Site: Sandy Banks	ugh Town , Telegraph Road; Ref A11 (12 dwellings)	
oner carray barme,	Assessment of Effects	
SA Objectives	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	10 - 20
No 1: Prevent loss of and enhance habitats	The proposed site is not located near any of the Isles of Scilly Ramsar sites, with the closest sites being 2.5km to the south and 2.5km to the north-west of St Mary's ²⁴ , and the nearest SPA sites being the same distance. The Ramsar site is designated for the presence of the European storm-petrel, the European shag and the lesser black-backed gull ²⁵ . The SPA is also designated for its populations of storm-petrel and lesser black-backed gull and the assemblage of seabirds of international importance ²⁶ . The European sites are located on different islands than the site option and therefore, major significant negative effects are not likely from a small housing development.	0
	The site option is located approximately 250m to the south-east from the Isles of Scilly marine SAC complex ²⁷ which surrounds all of the Isles of Scilly islands, and that is designated for sub-tidal sandbanks, intertidal mudflats & sandflats, and reef habitats; Grey Seal & Shore Dock. The SAC is sensitive to water pollution and recreational activities ²⁸ . However, due to the small size of the proposed site any recreational increase would be minimal, with a likely overall neutral effect on internationally designated sites. Potential water pollution (and please see SA Objective No 5) can be avoided through mitigation measures provided in Policies and through requirements during construction, such as an Environmental Management Plan.	
	The site is also the same distance from the proposed extension to the SPA site ²⁹ however there are no existing known vulnerabilities to the site, and considering the findings of the site against the SAC which is in the same are, no significant negative effects are considered likely.	
	Lower Moors SSSI is located 50m to the south of the site ³⁰ , and contains Lowland Fens Priority Habitat and Deciduous Woodland Priority Habitat. The SSSI is designated for its range of wetland habitats and importance	

²⁴ Defra (2017) Magic Map

²⁵ JNCC (2008) Isles of Scilly Ramsar Information Sheet

²⁶ JNCC Defra (2016) Isles of Scilly SPA Natura 2000 Standard Data Form

²⁷ Defra (2017) Magic Map

²⁸ JNCC Defra (2016) Isles of Scilly SAC Natura 2000 Standard Data Form

²⁹ Natural England (2018 Proposals for a marine extension to the Isles of Scilly Special Protection Area (SPA))

³⁰ Defra (2017) Magic Map

	as a feeding site for a small number of wintering bird species. Lower Moors SSSI is classified as an Important Bird Area but is not a component of the SAC complex; and is in an unfavourable but recovering condition ³¹ . In addition, there is a band of Lowland Heathland Priority Habitat 90m to the north-west of the site. The site is adjacent to Porth Mellon beach which is used for boating and recreation. Increased nearby residential development could increase the recreational use on the SSSI and local beaches with the potential for damage and disturbance; however, the potential housing numbers are relatively low and is on the edge of an existing urban area such that no significant adverse effects are likely. As the site is partially greenfield land with some hedgerows, there is the potential for the loss of habitats and possible ecological corridor loss, with negative effects for local wildlife. However, these green assets should be protected or replaced, which can be achieved through Policy mitigation Development on the site may also lead to an increase in traffic on the A311 which runs parallel to the SSSI, resulting in an increase in atmospheric pollution and noise pollution. This could result in negative effects against the SSSI and the birds which use the SSSI for feeding. However, due to the size of the proposed development any increase in traffic should be comparatively small. The site is unlikely to have any negative effects on internationally or nationally designated sites, however some habitat loss may occur on the site which contains hedgerows which may act as ecological corridors. It is	
	advised that site level assessment is conducted to assess the importance of the hedgerows on the site. Overall likely residual neutral effects.	
No 2A: Housing	The proposed site will contribute to meeting the need for housing identified in the Draft Plan for the Isles of Scilly, and will provide affordable housing for local people, with long-term major positive effects.	++
No 2B: Services and Facilities	Inhabitants of St Mary's have access to essential services but provision of community services & facilities is poor compared to the rest of the UK. The size of this proposed housing development is unlikely to be able to contribute to community services & facilities; care will be needed to consider the cumulative effects of all the housing sites proposed on St Mary's and the capacity of existing services & facilities. Mitigation measures may be possible through site specific requirements and Policy wording – some uncertainty at this stage of assessment.	0?

³¹ Natural England (1986) Lower Moors SSSI Citation

No 3: Support sustainable economic development & employment development	No employment land is proposed at the site option; therefore, not applicable and neutral effects indicated.	0
No 4: Safeguard and enhance human health	As the site is of a small size and located on the edge of an urban centre, it is not considered that there will be significant levels of noise and light pollution, with a likely residual neutral effect. The site will have easy access to both Lower Moors SSSI to the south, and Porth Mellon Beach and the coastal footpath to the north with the potential for positive effects on human health. The site is within walking distance of essential services and any development should be connected to the waste water and clean water infrastructure. St Mary's has been identified ³² as needing investment in play & sports infrastructure, so consideration needs to be given to the cumulative effects of all housing proposed on capacity. No such infrastructure is proposed for this site but some contribution may be possible – uncertainty at this stage of appraisal. Overall potential for a long-term positive effect against human health due to the lack of pollution and easy access to open space.	0 +
No 5a: Maintain and improve water quality	Hugh Town has a formal ³³ piped foul drainage system and the untreated effluent is discharged into the surrounding sea. The SHLAA report states that the nearest connection for the sewerage network is the industrial estate which borders the site to the west ³⁴ . Potential pollution during the construction phase can be avoided through careful pollution controls & implementation of an Environmental Management Plan. The current chemical status of the groundwater sources is considered poor due to the concentrations of nitrogen caused by the bedrock and run-off from agricultural practises ³⁵ , however development on the site is not likely to have an impact on groundwater quality. Overall the site is not likely to have any pollution or contamination impacts, and so is not likely to have any impact on water quality for the islands with neutral effects.	0

 ³² Isles of Scilly Play Strategy
 33 Three Dragons (for the Isles of Scilly Council) (2014) Infrastructure Plan
 34 SHLAA (2016) Infrastructure Assessment

³⁵ Natural England (2015) Isles of Scilly National Character Area Profile

No 5B: Use water efficiently and protect water resources	The island of St Mary's relies on a number of boreholesand a desalination plant with three reservoirs for storage ³⁶ . The desalination plant helps allow groundwater sources to refill during the off-peak seasons, and helps prevent the risk of saline intrusion. The desalination plant provides a better quality of water, through diluting the effects of nitrates and arsenic when blended with the available groundwater. Development on the site will result in an increase in water demand, which could contribute to pressures on existing water infrastructure but there are no capacity issues for this level of proposed development reported, and mitigation is provided through Plan Policy to manage water resources, with an overall neutral effect ³⁷ .	0
No 6: Maintain air quality & improve sustainable transport	Air quality is good in the Isles of Scilly & they are not considered to have any major air quality issues with no AQMAs declared ³⁸ . Development at this site has the potential to result in an increase in atmospheric pollutants due to an increase in private vehicle use, although because of to the size of the site the increase would only be negligible, with a likely residual neutral effect.	0 +
	The site's proximity to a number of key services and facilities and the presence of roadside footpaths into the centre of Hugh Town should encourage future residents to walk or cycle rather than use motor vehicles, indicating potential for minor positive effects for objectives for more sustainable transport.	
No 7: Climate Change: Coastal Change; Greenhouse Gas Emissions	As the site is located a short distance from the ocean (100m from Porth Mellon), sea level rise as a result of climate change needs to be considered. The proposed site is only situated 5m above sea level and is therefore potentially at risk of sea flooding, especially when considering the effects of major storms and extreme tides. SMP2 ³⁹ outlines a number of different scenarios relating to the Porth Mellon beach, with a preference to realignment of defences through management of existing dunes. Current dune recession estimations predict the dunes could border Telegraph Road, allowing water to access the site and surrounding land including Lower Moors SSSI. This could lead to impacts on groundwater sources on Lower Moors. To avoid the site being flooded the dunes must be managed correctly, with the potential for hard defences to be deployed for secure safeguarding. The SMP2 recommend 'hold the line' as the best strategy for Porth Mellon Beach up till 2025, and 'managed retreat' thereafter. Overall, the distance of 100m from the beach should be sufficient to ensure the site is not subject to sea flooding if the shoreline is managed correctly, with the potential for a short-term neutral effect.	0 +
	As noted is Objective No.6 the site's location within walking distance to the main services and facilities within Hugh Town should ensure people are less likely to use private vehicles, reducing the islands greenhouse gas	

³⁶ Three Dragons (for the Isles of Scilly Council) (2014) Infrastructure Plan

³⁷ SHLAA (2016) Infrastructure Assessment

³⁸ Isles of Scilly AONB Partnership (2015) AONB Management Plan
39 Cornwall Council and the Isles of Scilly Council (2010) Cornwall and the Isles of Scilly shoreline management plan

	emissions. The site also presents opportunities to promote renewables and energy efficient devices among new development. Overall potential for minor positive effects.	
No 8: Maintain and enhance cultural & heritage assets; including architectural and archaeological heritage	Although the whole of the Isles of Scilly is designated as a Conservation Area, Hugh Town has its own Conservation Area Character which is partly defined by the building styles and public spaces located within it ⁴⁰ . Future development is unlikely to have a major impact on the Conservation Areas character due to its location to the east of the main town centre. However, any development should follow the Isles of Scilly Design Guide ⁴¹ , to ensure development integrates well with the existing architectural style and the Character Area of Hugh Town. The nearest Archaeological Constraint Area (ACA) to the site is 60m to the west and is Downderry ACA. 80m to the south-east is Lower Moors ACA and 85m to the north of the site is Mount Falgon ACA. It is not considered that development on the site will have any effects on the ACA in the surrounding landscape with a likely neutral effect. The nearest Listed Buildings to the site are around 300m to the west, with existing development existing between	0
	the site and the Listed Buildings. Therefore, the site is not likely to impact on the setting of any Listed Buildings. The nearest Scheduled Monument to the site is around 100m to the north, an unfinished artillery castle. Although there is existing development between the site and Scheduled Monument, as well as vegetation including hedgerows and trees, there is still the potential for negative effects against the setting of the Scheduled Monument due to the close proximity and because the castle is on higher ground overlooking the site. However, potential benefits could include raising awareness about the Scheduled Monument by providing signage to its location. Sufficient policy mitigation should prevent any adverse effects on the setting of the scheduled monument from occurring, with neutral effects.	
No 9:	Although the site is close to the island's coastline, its distance of around 150m from the beach means it is unlikely to have negative effects on visual amenity of the beach. The site option is adjacent to existing development and the potential for minor negative effects on landscape is reduced. Further mitigation	0

 ⁴⁰ Isles of Scilly Council (2015) Conservation area character statement
 41 Isles of Scilly Council (2006) Isles of Scilly Design Guide

Protect and enhance the landscape	measures are possible through site specific requirements and compliance with the Isles of Scilly design guide ⁴² will help ensure any future development is well integrated with the existing landscape and overall neutral effects.	
No 10A: Waste & Minerals	All development will result in some household waste, however appropriate mitigation through Plan Policy should ensure waste is recycled where possible and non-recyclable waste is disposed of as required by legislation. Site specific requirements can help ensure space provided for recycling – and maybe composting food wastes – potential mitigation measures; overall neutral effects indicated. There are no Mineral Safeguarded Areas on the IOS ⁴³ .	0
No 10B: Energy	Any development on any site could be sustainably designed to reduce the need for heating, with appropriate insulation and energy efficient appliances reducing fuel costs for residents. With positive effects through helping to address the known issue of fuel poverty for the Isles. The installation of energy efficient devices in new development, with possible links to renewable sources (e.g. solar panels on roofs) would help reduce the islands energy use. New development can also be sustainably designed to reduce household energy consumption. The Smart Islands Energy Programme will reduce energy bills through a Community Energy Serviced Company, increase renewable energy use and increase battery based energy storage, with positive effects on energy. Overall potential for long-term minor positive effect but uncertainty at this stage of assessment effect but uncertainty at this stage of assessment as depends on policy mitigation measures.	+?
No 10C: Soil and Agriculture	The site is greenfield land on the edge of the urban area. The agricultural classification of the site is not recorded, and as the site is not currently used for agricultural purposes there will be no loss of existing agricultural land. Residual neutral effect.	0

⁴² Ibid.

⁴³ Isles of Scilly Council (2005) Isles of Scilly Local Plan

,	ce, Telegraph Road; Ref A12 (5 dwellings) Assessment of Effects	
SA Topic	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	(10 - 20
No 1: Prevent loss of and enhance habitats	The proposed site is not located near any of the Isles of Scilly Ramsar sites, with the closest sites being 2.5km to the south and 2.5km to the north-west of St Mary's, and the nearest SPA sites being the same distance ⁴⁴ . The Ramsar site is designated for the presence of the European storm-petrel, the European shag and the lesser black-backed gull ⁴⁵ . The SPA is also designated for its populations of storm-petrel and lesser black-backed gull and the assemblage of seabirds of international importance ⁴⁶ . These sites are located on different islands than the proposed development site and therefore, major significant negative effects are not likely from a small housing development.	0
	The proposed site is located approximately 140m to the south-east from the Isles of Scilly marine SAC complex which surrounds all of the Isles of Scilly islands, and that is designated for sub-tidal sandbanks, intertidal mudflats	

Defra (2017) Magic Map
 JNCC (2008) Isles of Scilly Ramsar Information Sheet
 JNCC Defra (2016) Isles of Scilly SPA Natura 2000 Standard Data Form

& sandflats, and reef habitats; Grey Seal & Shore Dock⁴⁷. The SAC is sensitive to water pollution and recreational activities, both of which may occur as a result of development on this site⁴⁸. However, due to the small size of the proposed site any recreational increase would be minimal, with a likely overall neutral effect on internationally designated sites. Potential water pollution (and please see SA Objective No 5) can be avoided through mitigation measures provided in Policies and through requirements during construction, such as an Environmental Management Plan.

The site is also the same distance from the proposed extension to the SPA site⁴⁹ however there are no existing known vulnerabilities to the site, and considering the findings of the site against the SAC which is in the same are, no significant negative effects are considered likely.

Lower Moors SSSI is located 150m to the south of the site, and contains Lowland Fens Priority Habitat and Deciduous Woodland Priority Habitat⁵⁰. The SSSI is designated for its range of wetland habitats and importance as a feeding site for a small number of wintering bird species⁵¹. Lower Moors SSSI is classified as an Important Bird Area but is not a component of the SAC complex; and is in an unfavourable but recovering condition⁵². In addition, there is a band of Lowland Heathland Priority Habitat bordering the site to the north.

The site is adjacent to Porth Mellon beach which is used for boating and recreation. Increased nearby residential development could increase the recreational use on the SSSI and local beaches with the potential for damage and disturbance; however, the potential housing numbers are relatively low and is on the edge of an existing urban area such that no significant adverse effects are likely.

Development on the site may also lead to an increase in traffic on the A311 which runs parallel to the SSSI, resulting in an increase in atmospheric pollution and noise pollution. This could result in negative effects against the SSSI and the birds which use the SSSI for feeding. However, due to the size of the proposed development any increase in traffic should be comparatively small. Overall potential for neutral effects.

No 2A: Housing

The proposed site will contribute to meeting the need for housing identified in the Draft Plan for the Isles of Scilly, and will provide affordable housing for local people, with long-term major positive effects.

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(https://designatedsites.naturalengland.org.uk/ReportUnitCondition.aspx?SiteCode=\$1001273&ReportTitle=Lower%20Moors%20(\$1.%20Mary%27s)%20SSSI)

287ios_February 2018 AVI_15/25 Enfusion

⁴⁷ JNCC Defra (2016) Isles of Scilly SAC Natura 2000 Standard Data Form

⁴⁸ Ibid.

⁴⁹ Natural England (2018 Proposals for a marine extension to the Isles of Scilly Special Protection Area (SPA))

⁵⁰ Defra (2017) Magic Map

⁵¹ Natural England (1986) Lower Moors SSSI Citation

⁵² Natural England (2012) Online

No 2B: Services and Facilities	Inhabitants of St Mary's have access to essential services but provision of community services & facilities is poor compared to the rest of the UK. The size of this proposed housing development is unlikely to be able to contribute to community services & facilities; care will be needed to consider the cumulative effects of all the housing sites proposed on St Mary's and the capacity of existing services & facilities. Mitigation measures may be possible through site specific requirements and Policy wording – some uncertainty at this stage of assessment.	0?
No 3: Support sustainable economic development & employment development	No employment land is proposed at the site option; therefore, not applicable and neutral effects indicated.	0
No 4: Safeguard and enhance human health	As the site is of a small size and located on the edge of an urban centre, it is not considered that there will be significant levels of noise and light pollution, with a likely residual neutral effect. The site will have easy access to both Lower Moors SSSI to the south, and Porth Mellon Beach and the coastal footpath to the north, with potential positive effects for human health. St Mary's has been identified as needing investment in play & sports infrastructure, so consideration needs to be given to the cumulative effects of all housing proposed on capacity. No such infrastructure is proposed for this site but some contribution may be possible – uncertainty at this stage of appraisal. Overall potential for a long-term positive effect against human health due to the lack of pollution and easy access to open space.	0 +
No 5a: Maintain and improve water quality	Hugh Town has a formal ⁵³ piped foul drainage system and the untreated effluent is discharged into the surrounding sea. The SHLAA report states that the site will need a separate sewerage system as the site is not currently connected to the mains sewerage ⁵⁴ . This should prevent any pollution or contamination from occurring, with neutral effects. Potential pollution during the construction phase can be avoided through careful pollution controls & implementation of an Environmental Management Plan. The current chemical status of the groundwater sources is considered poor due to the concentrations of nitrogen caused by the bedrock and run-off from agricultural practises ⁵⁵ , however development on the site is not likely to have an impact on groundwater quality.	0

Three Dragons (for the Isles of Scilly Council) (2014) Infrastructure Plan
 SHLAA Infrastructure Assessment (2016)
 Natural England (2015) Isles of Scilly National Character Area Profile

No 5B: Use water efficiently and protect water resources	The island of St Mary's relies on a number of boreholes and a desalination plant with three reservoirs for storage ⁵⁶ . The desalination plant helps allow groundwater sources to refill during the off-peak seasons, and helps prevent the risk of saline intrusion. The desalination plant provides a better quality of water, through diluting the effects of nitrates and arsenic when blended with the available groundwater. Development on the site will result in an increase in water demand, which could contribute to pressures on existing water infrastructure but there are no capacity issues for this level of proposed development reported ⁵⁷ .	0	
No 6: Maintain air quality and improve sustainable transport	Air quality is good in the Isles of Scilly & they are not considered to have any major air quality issues with no AQMAs declared ⁵⁸ . Development at this site has the potential to result in an increase in atmospheric pollutants due to an increase in private vehicle use, although because of to the size of the site the increase would only be negligible, with a likely residual neutral effect. However, the sites proximity to a number of key services and facilities in Hugh Town should encourage future residents to walk or cycle rather than use vehicles, mitigating the need to provide additional public transport for any future residents. Potential for long-term minor positive effects against transport.	0 +	
No 7: Climate Change: Coastal Change; Greenhouse Gas Emissions	As the site is located a short distance from the ocean (50m from Porth Mellon), sea level rise as a result of climate change needs to be considered. The proposed site is only situated 5m above sea level and is therefore at risk of sea level rise, especially when considered the effects of major storms and extreme tides. SMP2 ⁵⁹ outlines a number of different scenarios relating to the Porth Mellon beach, with a preference to realign defences through management of the existing dunes – this will provide mitigation measures to protect the site option from sea level rise with likely neutral effects. The SMP2 recommends 'hold the line' as the best strategy for Porth Mellon Beach up till 2025, and 'managed retreat' thereafter. As noted is Objective No.6 the site's location within walking distance to the main services and facilities within Hugh Town should ensure people are less likely to use private vehicles, reducing the islands greenhouse gas emissions. The site also presents opportunities to promote renewables and energy efficient devices among new development. Potential for minor positive effects against climate change.	0 +	

⁵⁶ Three Dragons (for the Isles of Scilly Council) (2014) Infrastructure Plan

⁵⁷ SHLAA (2016) Infrastructure Assessment

⁵⁸ Isles of Scilly AONB Partnership (2015) AONB Management Plan 59 Cornwall Council and the Isles of Scilly Council (2010) Cornwall and the Isles of Scilly shoreline management plan

SA Objective 8- Maintain and enhance cultural & heritage assets; including architectural and archaeological heritage	Although the whole of the Isles of Scilly is designated as a Conservation Area, Hugh Town has its own Conservation Area Character which is partly defined by the building styles and public spaces located within it ⁶⁰ . Future development is unlikely to have any negative effects on the Conservation Areas character due to its location to the east of the main town centre. However, any development should follow the Isles of Scilly Design Guide ⁶¹ , to ensure development integrates well with the existing architectural style and the Character Area of Hugh Town. Downderry Archaeological Constraint Area (ACA) is closest to the site, being approximately 20m to the west. Roughly 30m to the north-west is Porth Mellon ACA, and 60m to the north-east is Mount Falgon ACA. Due to the small size of the proposed site it is not considered that development will have any effect on the ACA's in the surrounding landscape with a likely neutral effect.	0?
	The nearest Listed Buildings to the site are around 300m to the west, with existing development between the site option and the Listed Buildings, therefore, no adverse effects indicated. The nearest Scheduled Monument to the site is around 100m to the north, an unfinished artillery castle. Although there is existing development between the site and Scheduled Monument, as well as vegetation including hedgerows and trees, there is still the potential for negative effects against the setting of the Scheduled Monument due to the close proximity and the castle being on higher ground overlooking the site. Some uncertainty at this stage of assessment.	
SA Objective 9- Protect and enhance the landscape	The site option's location could result in loss of visual amenity as it is only a short distance (around 50m) to the south of Porth Mellon beach, with part of a coastal footpath bordering the site to the north. However, effects could be mitigated by following the Isles of Scilly design guide ⁶² and through Plan Policy mitigation; likely neutral effect.	0
No 10A: Waste & Minerals	All development will result in some household waste, however appropriate mitigation through Plan Policy should ensure waste is recycled where possible and non-recyclable waste is disposed of as required by legislation. Site specific requirements can help ensure space provided for recycling – and maybe composting food wastes – potential mitigation measures; overall neutral effects indicated. There are no Mineral Safeguarded Areas on the IOS63.	0

 ⁶⁰ Isles of Scilly Council (2015) Conservation area character statement
 61 Isles of Scilly Council (2006) Isles of Scilly Design Guide
 62 Isles of Scilly Council (2006) Isles of Scilly Design Guide
 63 Isles of Scilly Council (2005) Isles of Scilly Local Plan

No 10B: Energy	Any development on any site could be sustainably designed to reduce the need for heating, with appropriate insulation and energy efficient appliances reducing fuel costs for residents, with positive effects through helping to address the known issue of fuel poverty for the Isles. The installation of energy efficient devices in new development, with possible links to renewable sources (e.g. solar panels on roofs) would help reduce the island's energy use. New development could also be sustainably designed to reduce household energy consumption. The Smart Islands Energy Programme will reduce energy bills through a Community Energy Serviced Company, increase renewable energy use and increase battery based energy storage, with positive effects on energy. Overall potential for long-term minor positive effect but uncertainty at this stage of assessment as depends on policy mitigation measures.	+?
No 10C: Soil and Agriculture	The site option is greenfield land on the edge of the urban area & currently used for agricultural purposes. However, arable or pastoral use is not known and the agricultural classification of the site is not recorded. Potential for negative effects from the loss of agricultural land but uncertainty of significance at this stage.	-?

	f A18 (20 dwellings), Old Town, Land to the rear of Launceston Close, Ref A23 (9 dwellings) Assessment of Effects	
SA Objectives	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/lon (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	ng term
No 1: Prevent loss of and enhance habitats	The Old Town site options are located approximately 3km from the Isles of Scilly Ramsar and SPA sites ⁶⁴ . The Ramsar site is designated for the presence of the European storm-petrel, the European shag and the lesser black-backed gull ⁶⁵ . The SPA site is also designated for its populations of storm-petrel and lesser black-backed gull and the assemblage of seabirds of international importance ⁶⁶ . As the SPA and Ramsar sites are located on different islands than the proposed site options at Old Town, major significant negative effects are not likely.	0
	The Isles of Scilly SAC marine complex is approximately 100m from the urban edge of Old Town, and the closest site option (A15) to the SAC is 120m away. The SAC is designated for the presence of sub-tidal sandbanks, intertidal mudflats & sandflats, and reef habitats; Grey Seal & Shore Dock ⁶⁷ . The SAC is sensitive to water pollution and recreational activities ⁶⁸ . There may be an increase in recreational activities in the area of the SAC complex next to Old Town, however even the cumulative effect of the Old Town site options is unlikely to result in significant levels of recreational activity that could result in negative effects on the SAC. This is further assessed in the HRA.	
	The site options are also the same distance from the proposed extension to the SPA site ⁶⁹ however there are no existing known vulnerabilities to the site, and considering the findings of the site against the SAC which is in the same are, no significant negative effects are considered likely.	

⁶⁴ Defra (2017) Magic Map

⁶⁵ JNCC (2008) Isles of Scilly Ramsar Information Sheet

⁶⁶ JNCC Defra (2016) Isles of Scilly SPA Natura 2000 Standard Data Form

⁶⁷ JNCC Defra (2016) Isles of Scilly SAC Natura 2000 Standard Data Form

⁶⁸ Ibid.

⁶⁹ Natural England (2018 Proposals for a marine extension to the Isles of Scilly Special Protection Area (SPA))

	Lower Moors SSSI is located to the north of Old Town, and the nearest site option (A13) is directly adjacent to the SSSI. Lower Moors is designated for its range of wetland habitats and importance as a feeding site for a small number of wintering bird species ⁷⁰ , and is classified as an Important Bird Area but is not a component of the SAC complex; and is in an unfavourable but recovering condition ⁷¹ . Development at the Old Town site options is unlikely to adversely affect Lower Moors SSSI due to the number of developments proposed being small, and the sensitivity of the site to recreational pressure.	
	There is the potential for some small habitat loss as all of the proposed sites either contain hedgerows or are bordered by hedgerows, and these hedgerows may be acting as ecological corridors for local wildlife. Mitigation against hedgerow loss can be provided through Policy, together with any site-specific opportunities for enhancing local biodiversity through habitat provision/improvement as part of any Green Infrastructure strategy to be developed.	
	The Old Town site options are unlikely to have any negative effects on internationally or nationally designated sites with overall likely neutral effects.	
No 2A: Housing	The proposed site options will contribute to meeting the need for housing identified in the Draft Plan for the Isles of Scilly, and will provide affordable housing for local people, with long-term major positive effects.	++
No 2B: Services and Facilities	Inhabitants of St Mary's have access to essential services but provision of community services & facilities is poor compared to the rest of the UK. The size of the individual Old Town sites means they are unlikely to be able to contribute to community services & facilities; but will support the vitality of the existing services/facilities, including the local pub and local shop. Care will be needed to consider the cumulative effects of all the housing sites proposed on St Mary's and the capacity of existing services & facilities. Mitigation measures may be possible through site specific requirements and Policy wording – some uncertainty at this stage of assessment.	0?
No 3: Support sustainable economic development & employment	No employment land is proposed at the site options; therefore, not applicable and neutral effects indicated.	0

Natural England (1986) Lower Moors SSSI CitationNatural England (2012) Online

(https://designatedsites.naturalengland.org.uk/ReportUnitCondition.aspx?SiteCode=S1001273&ReportTitle=Lower%20Moors%20(St.%20Mary%27s)%20SSSI)

No 4: Safeguard and enhance human health	Individual sites in Old Town are unlikely to result in a significant increase in noise and light pollution although the cumulative effect of all 7 sites will have a more noticeable increase. However, as the site options are located on the edge of Old Town, any increase is likely to be negligible, and mitigation is available in Plan Policies, with an overall neutral effect. All of the site options will have access to a range of open spaces. Porth Minick and Old Town beaches are less than 250m from all sites, and footpaths from Old Town provide access to the coastal footpath and Lower Moors SSSI. There is also a recreational space 140m to the west of Old Town, which includes a skate park. St Mary's has been identified ⁷² as needing investment in play & sports infrastructure, so consideration needs to be given to the cumulative effects of all housing proposed on capacity. No such infrastructure is proposed for the Old Town sites but some contribution may be possible – uncertainty at this stage of appraisal. Overall potential for a positive effect against human health due to easy access to open space.	0	+
No 5a: Maintain and improve water quality	Old Town has a piped foul drainage system, and effluent is aerated in a bio-bubble treatment plant before being released into surrounding marine water, whilst excess effluent is sent to the Hugh Town sewerage system to be treated ⁷³ . Sites A13,14,16,17,18 will be able to connect to the main sewerage network, however the bio-bubble is at capacity ⁷⁴ which could lead to negative effects although these could be mitigated through infrastructure upgrading. Site A15 may not be able to connect to the main sewerage network due to ground level issues ⁷⁵ , with uncertainty at this stage around the effect this may have.	0	?
	The current chemical status of the groundwater sources is considered poor due to the concentrations of nitrogen caused by the bedrock and run-off from agricultural practises ⁷⁶ , however development on the sites is not likely to have an impact on groundwater quality as groundwater sources are located away from the sites. Overall potential for a neutral effect against the SA Objective, however uncertainty exists at this stage due to the potential capacity issues of the bio-bubble and the issues connecting site A15 with the mains sewerage network.		
No 5B:	The island of St Mary's relies on a number of boreholes and a desalination plant with three reservoirs for storage ⁷⁷ . The desalination plant helps allow groundwater sources to refill during the off-peak seasons, and helps prevent the risk of saline intrusion. The desalination plant provides a better quality of water, through diluting the effects of	(

⁷² Isles of Scilly Play Strategy

⁷³ Three Dragons (for the Isles of Scilly Council) (2014) Infrastructure Plan

⁷⁴ SHLAA (2016) Infrastructure Assessment

⁷⁵ SHLAA (2016) Infrastructure Assessment

⁷⁶ Natural England (2015) Isles of Scilly National Character Area Profile 77 Three Dragons (for the Isles of Scilly Council) (2014) Infrastructure Plan

Use water efficiently and protect water resources	nitrates and arsenic when blended with the available groundwater. The proposed sites will be connected to the mains water network and so development on the site options will lead to an increase in water demand. However, as there are no water capacity issues reported in the SHLAA infrastructure assessment, a neutral effect is given against the SA Objective.		
No 6: Maintain air quality and improve sustainable transport	Air quality is good in the Isles of Scilly & there are no major air quality issues with no Air Quality Management Areas (AQMAs) declared ⁷⁸ . An increase in private vehicle use is likely to occur as a result of development on the Old Town sites, however this increase from individual sites or the cumulative effect from all of the sites is unlikely to have a significant effect on air quality, with a likely neutral effect. Old Town's distance from the nearest supermarket and post office may result in people using cars to access these services. The community bus service for the island operates only from Easter to October ⁷⁹ , and the Buzza Bus (charity) service is only available to the over 60s ⁸⁰ There are existing footpaths to services/facilities from the site options, and cycling is also possible, with a potential minor positive effect on sustainable transport.	0	+
No 7: Climate Change: Coastal Change; Greenhouse Gas Emissions	Site A13 is located furthest from the coastline, being 250m to the north, and is not considered to be at risk of sea flooding. Sites A15, A16, A17, A18 and A23 are closer to the ocean, however all considered to be a sufficient distance from the coastline to not be at risk of coastal flooding, and SMP2 states that the nearest stretch of coastline to these sites (Porth Minick) is not considered to be at risk of flooding ⁸¹ . Overall likely neutral effect. Most greenhouse gas emissions are associated with motor vehicles. As noted in Objective No.6, there is the possibility of an increase in the use of private vehicles. However due to the size of the site options any increase in greenhouse gas emissions is likely to be negligible. There are opportunities to promote renewables and energy efficient devices among new development, with a potential for a minor positive effect.	0	+
No 8: Maintain and enhance cultural &	Although the whole of the Isles of Scilly is designated as a Conservation Area, Old Town has its own Conservation Area Character which is defined by the farmhouses and barns in the settlement and its quayside frontage82. However, the local character suffers from poor quality design. Future development on the site options is not likely to affect the character area, as the sites are largely located adjacent to more recent housing development which are of a more modern design style, but could have positive effects through high quality design which	+	

⁷⁸ Isles of Scilly AONB Partnership (2015) AONB Management Plan

⁷⁹ https://www.thisisscilly.com/isles-of-scilly-community-bus-timetable

⁸⁰ http://www.scilly.gov.uk/social-care-health/concessionary-travel/buzza-bus-0

⁸¹ Cornwall Council and the Isles of Scilly Council (2010) Cornwall and the Isles of Scilly shoreline management plan

⁸² Isles of Scilly Council (2015) Conservation area character statement

heritage assets, including architectural and archaeological heritage	could address an existing issue with the local character. Any development should follow the Isles of Scilly Design Guide ⁸³ , to ensure development integrates well with the existing architectural style and the Character Area of Old Town. Potential for a minor positive effect. There are 4 Archaeological Constraint Areas (ACAs) surrounding the Old Town sites. Old Town ACA is approximately 50m to the nearest site (A14). Old Town Harbour ACA is 40m to the west of the nearest site (A15). There is existing development between both these ACA and the site options, and so development is not considered to affect them. A17 is the nearest site to the Tolman Point/Porth Minnick ACA (approximately 10m to the north of the ACA) and is also the closest site to Higher Moor ACA (approximately 50m to the west of the ACA). However, it is not considered that development will affect these ACA sites due to the small amount of housing being proposed. The closest Listed Building to the Old Town sites is located 60m to the west of site A15, and is a former fish salting trough. Due to the small size of the heritage asset and the presence of existing development between the site options and the trough, none of the sites are considered to have an effect on the setting of the Listed Building. There are a number of Scheduled Monuments in and around Old Town, including Old Town Castle to the north and a civil war battery to the south. It is not considered that any of the Old Town site options will have any effect on the setting of the Scheduled Monuments, due to existing development existing between the site options and Scheduled Monuments, and the distance of the sites from the Monuments. However due to the high number of	
No 9: Protect and enhance the landscape	heritage assets in the immediate area it is recommended that a Heritage Impact Assessment is conducted to ensure there are no negative effects. None of the site options are likely to have an impact on the visual amenity of the area due to their location next to an existing urban centre, and their distance from the coastline. Mitigation measures are possible through site specific requirements and compliance with the Isles of Scilly design guide ⁸⁴ , which will help ensure any future development is well integrated with the existing landscape and overall neutral effects.	0
No 10A: Waste & Minerals	All development will result in some household waste, however appropriate mitigation through Plan Policy should ensure waste is recycled where possible and non-recyclable waste is disposed of as required by legislation. Site specific requirements can help ensure space provided for recycling – and maybe composting food wastes – potential mitigation measures; overall neutral effects indicated. There are no Mineral Safeguarded Areas on the IOS85.	0

⁸³ Isles of Scilly Council (2006) Isles of Scilly Design Guide

⁸⁴ Ibid.

⁸⁵ Isles of Scilly Council (2005) Isles of Scilly Local Plan

No 10B: Energy	Any development on any site could be sustainably designed to reduce the need for heating, with appropriate insulation and energy efficient appliances reducing fuel costs for residents. With positive effects through helping to address the known issue of fuel poverty for the Isles. The installation of energy efficient devices in new development, with possible links to renewable sources (e.g. solar panels on roofs) would help reduce the islands energy use. New development can also be sustainably designed to reduce household energy consumption. The Smart Islands Energy Programme will reduce energy bills through a Community Energy Serviced Company, increase renewable energy use and increase battery based energy storage, with positive effects on energy Overall potential for long-term minor positive effect but uncertainty at this stage of assessment as depends on policy mitigation measures.	+?
No 10C: Soil and Agriculture	The agricultural land classification of the sites is not known; however, all of the site options are currently used for agricultural purposes and so development would result in the loss of agricultural land and soil resources. Potential for minor negative effect.	-