



Council of the
ISLES OF SCILLY

ISLES OF SCILLY LOCAL PLAN 2015-2030

**Sustainability Appraisal (SA)
incorporating
Strategic Environmental Assessment (SEA)
Adoption Statement**

March 2021

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Isles of Scilly Council Local Plan (2015-2030)

Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) SA Adoption Statement

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This SA Adoption Statement

- 1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan relating to development – as set out in Section 19 of the Planning and Compulsory Purchase Act 2004 and in paragraph 32 of the National Planning Policy Framework (NPPF¹, revised 2019).
- 2 SA incorporates the requirements for Strategic Environmental Assessment (SEA) that seeks to provide a high level of protection of the environment and to contribute to promoting sustainable development by integrating environmental considerations into the process of preparing certain plans and programmes. The EU Directive is implemented in the UK through the SEA Regulations (2004)².
- 3 In addition, the Council chose to integrate the Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA) processes within the overarching SA/SEA process. HIA is not a statutory requirement for Councils; however, health considerations are a requirement of the SEA process and thus the overall SA process. Public bodies have a duty³ to assess the impact of their policies on different population groups to ensure that discrimination does not take place and where possible, to promote equality of opportunity. The SA, SEA, HIA and EqIA therefore all form part of the SA process for the Isles of Scilly Local Plan (IOSLP). For this Statement that complies with planning and environmental assessment Regulations, the integrated appraisal will be referred to as the Sustainability Appraisal (SA).
- 4 The Council is also required to undertake a Habitats Regulations Assessment (HRA) of the IoS Local Plan. The HRA process has its own legislative drivers and requirements; whilst the different processes can inform each other, it is important that the HRA remains distinguishable from the wider SA process. The HRA process has been undertaken in parallel to the SA and its findings have informed the SA but the details have been reported separately.
- 5 The SA process comprises a number of stages that are designed to comply with the requirements of the SEA Regulations and as guided through Government Planning Practice⁴. This SA Adoption Statement satisfies the SA/SEA requirements for post adoption (Stage E) and demonstrates compliance with the requirements of the SEA Regulations as follows:
 - (a) *how environmental considerations have been integrated into the plan or programme;*
 - (b) *how the environmental report has been taken into account;*

¹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made>

³ Equality Act, 2010

⁴ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

(c) how opinions expressed in response to— (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;
(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

- 6 SA should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

Development of the Isles of Scilly Local Plan 2030

- 7 Considerable work and consultation have been undertaken since early preparation in 2015 to develop the new Local Plan. Various studies were undertaken to provide the evidence⁵ base to inform decision-making, including housing survey/market assessments, land availability, and energy and infrastructure assessments. Other Plans informed decision-making including AONB Management Plans, the Strategic Transport Framework and Tourism Strategies. Systematic assessments of potential site options for possible allocation for new development were also undertaken. There has been significant public engagement in the plan-making process, particularly at the early stages during the scoping event in 2015, and also through formal public consultations on draft versions of the plan in 2018 and 2019.
- 8 In accordance with the Council's adopted Statement of Community Involvement (SCI) (2015, 2018, 2020)⁶, at each stage of the development of the Local Plan, formal and public consultation was undertaken to help ensure that stakeholders' views were taken into consideration in the next steps of plan preparation. Issues raised, and responses prepared have been documented during the development of the Local Plan and published on the Council's website⁷.

⁵ <https://www.scilly.gov.uk/planning/local-plan-local-planning-policies/local-plan-evidence-base-library>

⁶

<https://www.scilly.gov.uk/sites/default/files/document/planning/Statement%20of%20Community%20Involvement%20to%20INTERIM%20AUG%202020.pdf>

⁷ <https://www.scilly.gov.uk/planning/local-plan>

- 9 The proposed IoS Local Plan was submitted to the Secretary of State for independent examination by a planning inspector on 30 September 2019. Hearing sessions were held at the Council offices 21-23 January 2020). The Inspector advised that he considered the IoS Local Plan to be a plan that could be found sound subject to Main Modifications (MMs). Following additional work, the proposed MMs to the Local Plan were published for public consultation between 25 September and 6 November 2020. Key MMs related to making it clear that no more than 105 new dwellings will be permitted and clarifying that minerals extraction on the islands is to be minimised rather than prohibited.
- 10 The Inspector in his final report (23 February 2021) concluded that with the recommended main modifications, the Isles of Scilly Local Plan 2030 satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework. Thus, the Plan is capable of being adopted.
- 11 The Spatial Planning Vision sets out how the Isles of Scilly could develop as a place to meet the future needs of its local residents, businesses, and visitors. The **Vision** is as follows:

In 2030: The Isles of Scilly is a highly desirable place where people are able to live well, work productively, move freely between islands and the mainland and benefit from excellent education, leisure, health and social care facilities within a world class environment in harmony with nature. The distinctiveness and exceptional environment and influence of the sea continue to provide a strong sense of community, identity and belonging that remain vital assets for the islands economy and well-being.

In 2030: Innovative systems and technologies have taken advantage of the islands location and environment and provided the catalyst for achieving exemplar and innovative sustainable development and a model for how other communities around the world can benefit.

In 2030: The islands communities have access to a range of homes that are more affordable, adaptable and accessible to everyone, including families and older people.

In 2030: The Isles of Scilly is strong, competitive and diverse economy that benefits from inward investment and innovation. Businesses have access to a locally based, highly skilled workforce reflecting high quality learning as well as internships and cultural exchanges through, for example, the Smart Island programme. Tourism is thriving through the year with good quality and value accommodation and services in harmony with the outstanding environment.

In 2030: The islands infrastructure is a beacon of sustainability to the UK and beyond and provide an affordable, innovative and low carbon model for managing energy, water and waste with considerable benefits to the environment and the quality of life to residents.

In 2030: Residents, businesses and visitors enjoy more affordable, resilient and reliable transport links to the mainland and between islands throughout the year following improvements to transport services and networks.

- 12 Development in the Local Plan will be supported through its Policies that are guided by the Strategic Aims and Objectives, as follows:
- **Maintaining an outstanding and world class environment and ensure its distinctive and significant landscape and seascape, heritage and nature conservation assets are protected and valued and, where appropriate, enhanced.**
 - **Ensure the provision of infrastructure and utilities to create a more sustainable, resilient and self-sufficient Isles of Scilly.**
 - **Creating a balanced local housing market that provides housing choice and meets the existing and future needs of the community enabling economic prosperity.**
 - **Create a more competitive, diverse and resilient economy based on an exceptional and inspirational environment that can adapt to change and challenges and maximise opportunities by building on its strengths and underpinned by effective infrastructure and an appropriately available and skilled workforce.**
 - **Engender and support a strong, vibrant and healthy island community with an improved quality of life for its residents.**
 - **Adapting to the effects of climate change on people, wildlife, and places by increasing resilience, matching the vulnerability of land uses to flood risk and managing surface water in the most sustainable way.**
 - **Minimising carbon dioxide and other greenhouse gases and support measures that contribute to carbon neutrality and mitigate against the effects of climate change.**
- 13 The Spatial Strategy then sets out the planning framework that underpins the Local Plan to achieve its Vision, Aims and Objectives. The key elements of the Spatial Strategy may be summarised, as follows:
1. **Protect the integrity of the distinctive and exceptional environment**
 2. **Support new development that reinforces the sustainability and viability of the Isles of Scilly**
 3. **By 2030 build 105 affordable homes**
 4. **Concentrate new homes in the settlements of Hugh Town and Old Town**
 5. **Support new development that creates a more competitive, diverse and resilient economy**
 6. **Support new development to enable the implementation of Smart Island principles**
 7. **Support development that secures improvements to the islands infrastructure and utilities**
 8. **Support new tourist accommodation and facilities of an appropriate design and scale**
 9. **Support sustainable travel options and reduce the environmental and social impacts of climate change and transport**

- 14 Policies SS1-SS10 guide new development with regard to principles of sustainable development, quality design and place-making, and management of infrastructure/resources including services and facilities, water, renewable energy, transport and movement. Policies OE1-OE7 guide new development to protect and enhance the natural environment. Policies LC1-LC10 relate to building a strong living community with guidance on housing development and including Policy LC6 with Housing Allocations H1-H8 that also provide site-specific development requirements. Policies WC1-WC6 relate to building a strong working community with guidance on employment, and the visitor economy and tourism developments. There is a section on monitoring and implementation and the text is supported by submission policies maps.

How environmental & sustainability considerations have been integrated into the Local Plan; How the Sustainability/Environmental Report has been taken into account

- 15 During the plan-making process, SA (incorporating SEA) has been carried out as an iterative and ongoing process to inform decision making for the developing Local Plan. The SA was undertaken in accordance with government guidance⁸ which encourages a staged approach that integrates appraisal to consider the effects of the emerging plan on socio-economic as well as environmental factors. Since 2016, independent specialist consultants were appointed to carry out the SA for the Council. They worked closely with the plan-making team in an iterative way such that the findings and recommendations from the SA were integrated into each developing stage of the Local Plan.
- 16 The SA of the Local Plan used the SA Framework developed during the SA scoping process (2016) as the basis for assessing the emerging Local Plan - and as explained in Section 2 of the submitted SA Report (January 2019). Relevant plans/programmes had been reviewed; baseline information regarding the character of the area and its likely evolution collated and analysed. Sustainability problems, issues and opportunities had been identified during the SA scoping to compile a Framework of Objectives and Sub-Objectives/Decision-Aiding Questions that seek to resolve the sustainability issues identified and relevant to the plan and the Isles of Scilly area. The assessment used both quantitative and qualitative assessments, including defined thresholds of significance, where possible.
- 17 The SA considered the likely significant effects of the implementation of the Local Plan on the sustainability objectives for the Isles of Scilly area. For each aspect of the Local Plan, the assessment against the SA Objectives was recorded with a narrative provided describing any significant effects identified, mitigation of any significant negative effects, and any suggestions

⁸ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

for enhancing potential beneficial effects. In line with requirements of the SEA Regulations, the appraisal considered effects including short, medium and long term, permanent, and temporary, positive and negative, secondary, cumulative and synergistic, wherever possible and relevant. Any gaps or difficulties were also reported.

- 18 The findings and recommendations of the SA informed plan-making and were integrated into the further development of the Local Plan - and as set out in the Submitted SA Report (January 2019) and SA Addendum Reports (July 2019 and September 2020) and accompanying the Main Modifications to the Local Plan.
- 19 Overall, the Draft Local Plan was found to have significant positive sustainability effects against a number of SA Objectives. The Vision, Strategic Aims and Objectives, and Spatial Strategy were found to either have positive effects or neutral effects on the SA Objectives, with no negative effects identified. The Strategic Options were also found to have either positive or neutral effects, with negative effects identified only for services/facilities and landscape for Option 4b where settlement boundaries would not be defined.
- 20 The Policies within the emerging draft Local Plan were all assessed against the topics for sustainable development, and generally, Policies were found to have positive or neutral effects. Major positive effects were identified for housing through the provision of sites for development, services and facilities, economy and employment, and health and equality. Policies within the Plan will protect the special characteristics of the Plan area, including biodiversity and geodiversity, historic and cultural heritage, air quality, water quality and water resources, providing strong mitigation measures with overall likely neutral effects.
- 21 The site options were mostly found to have positive or neutral effects on the SA Objectives. The sites will have major positive effects on housing, and minor positive effects on energy, sustainable transport, and human health. There is the potential for the loss of greenfield land and soil resources at a number of the site options, with potential negative effects. The site options were found to have neutral effects on the remaining SA Objectives.
- 22 Where relevant, the SA made recommendations, for example, that policy should include an explicit requirement for biodiversity net gain. Generally, the SA found that the changes proposed through MMs to the Local Plan strengthened the positive effects that had been identified and further strengthened the mitigation measures embedded in plan policies.
- 23 The Equality Impact Assessment (EqIA) found that the IoS Local Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqIA will not be required. The Habitats Regulations Assessment (HRA) found that the IoS Local Plan is considered unlikely to have significant effects on any European or internationally designated sites, alone or in-combination with other plans and projects.

- 24 The SA documents have been available on the Council's website and at each stage, the responses to comments made and issues raised have been reported. Throughout, the appraisals have been proportionate and appropriate to the stages of plan-making. Thus, environmental and sustainability considerations have been integrated and the SA Reports taken into account throughout the plan-making process.

How the results of consultation have been taken into account

- 25 Consultation is an important aspect of SA and there was statutory and public consultation at each key stage of the Local Plan preparation and the SA as follows:

IOSLP Stage and Documents Consultation	SA/SEA Stage and Documents Consultation
IOSLP Scoping Issues Public Consultation 8 June – 24 July 2015	SA Scoping Report (Draft July 2015) Final (July 2016) Public Consultation 19 October- 30 November 2015
Evidence gathering, including the Strategic Housing Market Assessment (SHMA) & Strategic Housing Land Availability Assessment (SHLAA) 2015-2017	
Draft IOSLP Regulation 18 public consultation 16 March-11 May 2018	Draft SA Report (February 2018) Regulation 18 public consultation 16 March-11 May 2018
Draft IOSLP Pre-Submission Regulation 19 public consultation 1 February – 15 March 2019	Pre-Submission SA Report (January 2019) Regulation 19 public consultation 1 February – 15 March 2019
Submission IOSLP To Secretary of State for independent examination 30 September 2019	Submission SA Report (January 2019) 30 September 2019
Independent Examination Hearings 21-23 January 2020	Independent Examination Hearings 21-23 January 2020
Main Modifications 25 September – 6 November 2020	SA Further Addendum Report (September 2020) 25 September – 6 November 2020
Adoption (March 2021)	SA Adoption Statement (March 2021)

- 26 SA and consultation responses have been considered in an iterative and ongoing way with the plan-making process and in accordance with the

requirements of the SEA Regulations. Representations have been recorded and the responses made to issues and concerns raised have been published, including at key statutory stages, as follows:

- Appendix VIII of Pre-Submission/Submission SA Report (January 2019) summarises representations and responses to consultation at each stage
- SA Addendum Report (July 2019) summarises representations to the pre-submission stage consultation
- SA Further Addendum Report (September 2020) explains issues raised for the examination and discussed at the hearings and reports the MMs and accompanying SA findings

27 All consultation representations and responses are available on the Council's website under the Local Plan 2030 News⁹.

Reasons for choosing the Local Plan as adopted, in the light of other reasonable alternatives

28 The SEA Regulations require assessment of the likely significant effects of implementing the plan and "reasonable alternatives" taking into account the objectives and geographical scope of the plan; and the reasons for selecting alternatives should be outlined in the Report. The Government's planning practice guidance¹⁰ states that '*reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable*'.

29 The IOSLP is limited with regards to reasonable alternatives, due to the overall small area of the archipelago and the special characteristics of the islands. However, strategic options were identified for five Policies including protection of retail, housing strategy, affordable homes, windfall housing, and new employment development.

30 Twenty-six potential housing sites were identified, including through a call for sites process across the islands, and these were then subject to a Strategic Housing Land Availability Assessment (SHLAA, 2016). The SHLAA identified ten proposed sites that were considered to be reasonable – deliverable within the Plan period - and these site options were subject to SA using the full SA Framework of Objectives.

31 Overall, the reasons for choosing the Local Plan as adopted are that the adopted Local Plan progresses the overall Vision, Aims, Objectives and Spatial Strategy for supporting employment with provision of quality and

⁹ <https://www.scilly.gov.uk/planning/local-plan-local-planning-policies/local-plan-examination-library-news>

¹⁰ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

affordable housing development on the islands whilst avoiding significant change to the intrinsic character of the communities and important designated environments of the islands and the Isles of Scilly area.

**Measures that are to be taken to monitor the significant sustainability/
environmental effects of the implementation of the Local Plan**

- 32 The SEA Regulations require that the significant environmental effects of implementing the plan should be monitored with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. Local Planning Authorities are required to produce Monitoring Reports¹¹ on the progress of Local Plans. The IoS Local Plan Monitoring Framework (see Monitoring & Implementation chapter of the Local Plan 2030) includes a wide range of indicators that also relate to the SA Framework. It is considered that these indicators will be sufficient to identify any unforeseen adverse effects at an early stage and provide information on the predicted effects from the SA.
- 37 Upon adoption of the Local Plan the Monitoring Framework will be used as the basis for future annual monitoring by the Council and incorporated into the Council's Monitoring Report available to view on the Council's website.

¹¹ Isles of Scilly Authority Monitoring Reports available at: <https://www.scilly.gov.uk/planning-development/planning-policies-and-guidance>