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**Council of the
ISLES OF SCILLY**

**ISLES OF SCILLY LOCAL PLAN
2015-2030
Pre-Submission
Regulation 19 Consultation**

**Sustainability Appraisal (SA) Report
incorporating
Strategic Environmental Assessment
(SEA)**

January 2019

by

enfusion 

Isles of Scilly Local Plan: Pre-Submission Regulation 19 Consultation

Sustainability Appraisal (SA) Report incorporating Strategic Environmental Assessment (SEA)

January 2019

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1.0 INTRODUCTION

Sustainability Appraisal (SA) & Strategic Environmental Assessment (SEA)

- 1.1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan, as required by planning legislation¹ and the National Planning Policy Framework (2018)². The purpose of SA is to promote sustainable development through assessing the extent to which an emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives³.
- 1.2 Local Plans must also be subject to Strategic Environmental Assessment⁴ (SEA) and Government advises⁵ that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail. The Council of the Isles of Scilly has commissioned independent specialist consultants Enfusion Ltd to undertake the SA process (incorporating SEA) of the Isles of Scilly Local Plan. This SA Report is part of the evidence base for the Draft Isles of Scilly Local Plan and it accompanies the Pre-Submission Draft Plan on Regulation 19 public consultation.

Equality Impact Assessment (EqIA) & Health Impact Assessment (HIA)

- 1.3 The Council has chosen to integrate Health Impact Assessment (HIA) and Equality Impact Assessment (EqIA) processes, as well as SEA, within the overarching SA process. HIA is not a statutory requirement for Councils but is good practice in plan-making; health considerations are a requirement of the SEA process and thus the overall SA process. Public bodies have a duty⁶ 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.
- 1.4 For the SA of the Draft Isles of Scilly Local Plan, the integration of health and equality considerations has focused on ensuring that these issues are well represented in the SA Framework (through objectives and thresholds of significance) against which the developing options, policies and sites are being assessed. Health and equality issues have been addressed iteratively as the appraisal process has progressed. Details of the EqIA are presented separately to demonstrate compliance with the Equality Act (2010) in Appendix VII to this SA Report.

¹ Section 19(5) of the 2004 Act and Regulation 22(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012

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

³ DCLG (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal <http://planningguidance.planningportal.gov.uk/blog/guidance/>

⁴ EU Directive 2001/42/EC, and, Environmental Assessment of Plans and Programmes Regulations, 2004

⁵ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

⁶ UK Equality Act, 2010

Habitats Regulations Assessment (HRA)

- 1.5 The Council is also required to undertake a Habitats Regulations Assessment⁷ (HRA) of the Local Plan. The aim of the HRA process is to assess the potential effects arising from a plan against the conservation objectives of any site designated for its nature conservation importance. The HRA screening considers if the potential impacts arising as a result of the plan are likely to have significant effects on these sites either alone or in combination with other plans and projects; the Appropriate Assessment stage takes into account mitigation measures.
- 1.6 The HRA process has its own legislative drivers and requirements and, while 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 with the SA process but the detailed methods and findings are reported separately. Summary HRA findings are incorporated into the integrated SA Report.

The Isles of Scilly Local Plan Review 2015-2030

- 1.7 In 2005 the Council of the Isles of Scilly adopted their current Local Plan for the Plan period up until 2020. The Local Plan provides the spatial strategy for the islands, and includes core policies relating to infrastructure, housing, sustainable development and transport, as well as site proposals for new development. The Local Plan is supported by non-statutory supplementary planning documents, including the Isles of Scilly Design Guide, the Strategic Transport Framework and the Sustainable Energy Strategy.
- 1.8 The Council is undertaking a review⁸ of the existing Local Plan. The policies from the 2005 Local Plan have been saved until the new Local Plan has been adopted. The new Local Plan will provide updated policies that will determine the type and scale of development on the islands, and also includes sites for housing development to help meet the identified housing needs of the population. Future planning applications will be required to comply with the planning policies provided in the new Local Plan.
- 1.9 The Draft Local Plan has been prepared in accordance with national planning requirements and informed by various technical studies, the Sustainability Appraisal, and consultation with the public, stakeholders and the regulators. The Local Plan comprises an Introduction and explains what has influenced its preparation. The Spatial Portrait for the Isles of Scilly is then described with the physical context, an overview of constraints such as the internationally and nationally designated environmental and heritage assets, the population and demography, and economy and employment. The next section explains the key challenges and issues for plan-making and the Isles of Scilly.

⁷ Conservation of Habitats & Species Regulations 2010 <http://www.legislation.gov.uk/uksi/2010/490/contents/made>

⁸ <http://www.scilly.gov.uk/planning-development/local-plan-review>

- 1.10 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.

- 1.11 Development in the Local Plan will be supported through its Policies that are guided by the Strategic Aims and Objectives, as follows:

Table 1.1: Strategic Aims & Objectives for the IOS Local Plan

1. 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	Ensure new development is appropriately located, sited and designed to mitigate any environmental impacts, including the reuse of previously developed land and the more efficient and effective use of all sites and buildings
	Improve the quality of the environment, including coastal waters, through the provision of better infrastructure.
	Promote the prudent and sustainable use of resources and the minimisation of waste and pollution.
	Protect the distinct identities and characteristics of individual islands and settlements.

appropriate, enhanced.	
2. Ensure the provision of infrastructure and utilities to create a more sustainable, resilient and self-sufficient Isles of Scilly.	Support improvements and secure investments to modernise and improve the islands drinking water, sewerage and waste management operations and infrastructure to ensure that it is affordable and complies with the appropriate legislation and regulations.
	Engender a planned and coordinated approach for securing infrastructure provision as part of and in step with new development and investment opportunities.
	Support clean, innovative and flexible energy technologies (including renewable energy generation, energy storage) and more efficient grid technologies) that move the islands towards a low carbon economy.
3. Creating a balanced local housing market that provides housing choice and meets the existing and future needs of the community enabling economic prosperity.	Provide affordable, decent and well-designed homes to meet the range of needs for current and future generations.
	Support a range of affordable housing types and tenures appropriate to meeting the needs of the existing and changing community, including a more rapidly aging
	Permit open market housing only where it enables the delivery of affordable homes through cross-subsidisation
4. 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.	Provide a wider choice of better paid and skilled jobs through the creation of a more competitive and diverse economy.
	Encourage research, innovation and entrepreneurship through enhanced ICT opportunities.
	Provide sustainable growth in tourism in response to changing markets with a focus of improving the quality and value of its product, particularly tourist accommodation, in assets and where it complements the exceptional and outstanding environment.
	Permit new development that supports agriculture and horticulture in recognition of its cultural and economic importance and its essential contribution to sustainably managing the islands outstanding environment
5. Engender and support a strong, vibrant and healthy island community with an improved quality of life for its residents.	Facilitate growth that improves the sustainability and self-sufficiency of the islands communities through the provision and retention of viable services and facilities that supports its cultural, health and social well-being.
	Support proposals that facilitate modern and integrated health and social care services to meet the requirements of the community.

	Support investment in social, sports, recreational, leisure and cultural services and facilities to meet the requirements of the community.
	Ensure that new development and the built environment is designed to promote healthy living and support an ageing population.
	Support proposals that strengthen or support transportation links on each inhabited island and between the islands and the mainland, including connecting transport systems.
	Support proposals that provide everyone with the opportunity to have access to a wide range of high quality education, learning and training.
6. 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.	Promote high quality sustainable building and construction to minimise the risks arising from climate change and ensure new development is designed and located to mitigate and adapt to the effects of climate change and extreme weather conditions including coastal flooding.
	Reduce the causes of climate change by minimising carbon emissions in new development and supporting the transition to a low carbon economy through permitting proposals that promote clean, innovative and flexible energy technologies.
	Reduce the environmental and social impacts of transport by reducing the need to travel by petrol and diesel car through the siting and design of new developments and encourage sustainable travel options, including the use of car sharing and electrical vehicles (40% of vehicles being low carbon or electric by 2025).
7. Minimising carbon dioxide and other greenhouse gases and support measures that contribute to carbon neutrality and mitigate against the effects of climate change.	Ensure the sustainable use of natural resources and the full benefits of eco systems are understood and harnessed.
	To mitigate against the inevitable local impacts of climate change to ensure the environment, its community and businesses are conserved for future generations and help sustain the islands into the future.

1.12 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**

1.13 The Draft Local Plan then comprises Sections with Policies as follows:

Section 1: Promoting a Sustainable Scilly

- SS1: Principles of Sustainable Development
- SS2: Sustainable Quality Design & Place-Making
- SS3: Re-Use of Buildings
- SS4: Protection of Retailing & Community Facilities
- SS5: Infrastructure Improvements
- SS6: Water Management
- SS7: Flood Avoidance
- SS8: Renewable Energy Developments
- SS9: Managing Movement
- SS10: Travel & Transport

Section 2: Our Outstanding Environment

- OE1: Protecting & Enhancing the Landscape & Seascape
- OE2: Biodiversity & Geodiversity
- OE3: Managing Pollution
- OE4: Protecting Scilly's Dark Skies
- OE5: Waste Management
- OE6: Minerals
- OE7 Development affecting Heritage

Section 3: Building a Strong Living Community

- LC1: Isles of Scilly Housing Strategy to 2030
- LC2: Occupying Affordable Homes
- LC3: Balanced Housing Stock
- LC4: Staff Accommodation
- LC5: Removal of Occupancy Conditions
- LC6: Housing Allocations (H1-H7)
- LC7: Windfall Housing
- LC8: Replacement Dwellings
- LC9: Residential Extensions & Ancillary Accommodation
- LC10: Homes in Multiple Occupation

Section 4: Building a Strong Working Community

- WC1: General Employment Policy
- WC2: Home-Based Businesses
- WC3: New Employment Development

WC4: Alternative Uses for Employment Land & Buildings
WC5: Visitor Economy & Tourism Developments
WC6: Safeguarding Serviced Accommodation

1.14 A final Section 5 covers Monitoring & Implementation. The Plan is further supported by five Appendices with Proposals Maps as follows:

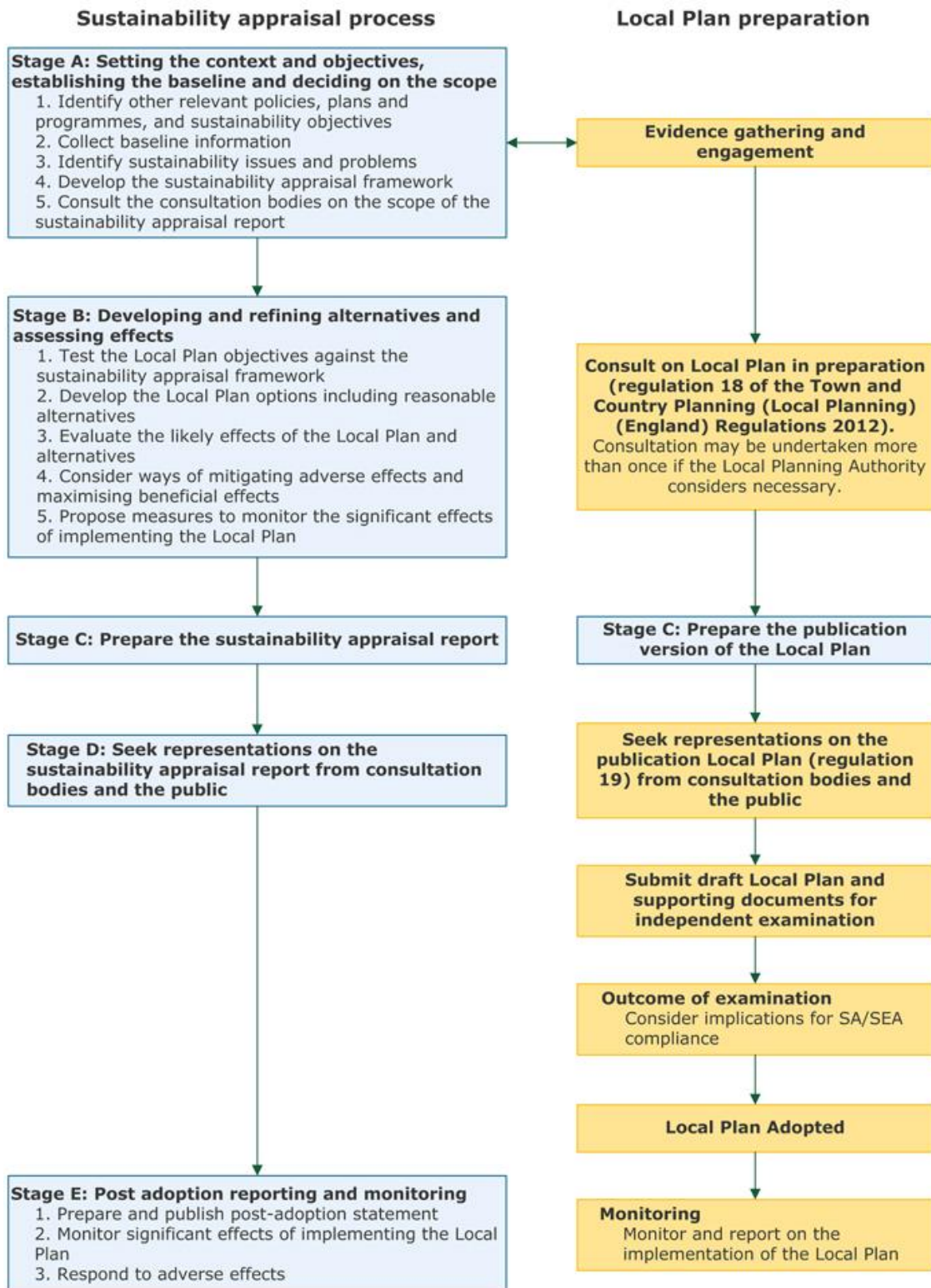
A: Housing Allocations
B: Settlement Boundaries
C: Retail Frontages/Town Centre
D: Employment/Industrial Land
E: Known Flood Risk Areas St Mary's

Inter-Relationships between SA & Plan-Making Processes

1.15 National Planning Practice Guidance⁹ sets out the key stages and tasks for SA and their inter-relationships with plan-making stages and tasks – as set out in the diagram following:

⁹ <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

Figure 1.1: SA and Plan-Making Stages and Tasks



1.16 Sustainability Appraisal is an iterative and ongoing process that informs plan-making by assessing developing elements of the Plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. As the plan develops, stages and tasks in the SA

process may be revisited, updated or refreshed in order to take account of updated or new evidence, as well as consultation representations. In practice, the evidence base for both SA and HRA processes can be shared, as well as with the evidence base for the plan-making process.

Consultation: Statutory, Public & Stakeholder Engagement

- 1.17 As part of the early preparation of the Plan, there was wide public consultation in the summer 2015 on the proposed scope of the Local Plan Review. A summary¹⁰ of comments and responses is available on the Council's website. The second stage of this Regulation 18 consultation was undertaken during March to May 2018.
- 1.18 In 2015, the proposed scope of the SA of the Plan was sent to the SEA statutory consultees – Historic England (previously English Heritage), Environment Agency and Natural England and made available on the Council's website for wider consultation (October- November 2015). The SA Scoping Report was amended to address comments made and issued as a Final Scoping Report¹¹ in July 2016.
- 1.19 The Sustainability Appraisal studies and findings will continue to inform the ongoing development of the IOSLP and comprise part of the evidence base for the emerging plan. SA Reports will accompany the subsequent stages of the Local Plan as set out in the following table with the chronology of the IOSLP preparation, consultation and the accompanying SA/SEA stages:

Table 1.1: Isles of Scilly Local Plan and SA/SEA Stages and Documents

IOSLP Stage and Documents Consultation	SA/SEA Stage and Documents Consultation
IOSLP Scoping Issues	SA Scoping Report (Draft July 2015) Final (July 2016)
Public Consultation 8 June – 24 July 2015	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

¹⁰http://www.scilly.gov.uk/sites/default/files/document/planning/IOS%20Local%20Plan%20Scoping%20Report%20Officer%20Responses%20FINAL%20FOR%20PUBLICATION_1.pdf

¹¹<http://www.scilly.gov.uk/sites/default/files/document/planning/SA%20SCOPING%20REPORT%20post%20consultation%20and%20officer%20responses%20JULY%202016.pdf>

Submission IOSLP To Secretary of State for independent examination Later in 2019	Submission SA Report
Independent Examination	Independent Examination
Adoption	SA Adoption Statement

Compliance with SEA Directive & Regulations

- 1.20 The Strategic Environmental Assessment Regulations set out certain requirements for reporting the SEA process and specify that, if an integrated appraisal is undertaken (i.e. SEA is subsumed within the SA process), then the sections of the SA Report that meet the requirements set out for reporting the SEA process must be clearly signposted. The requirements for reporting the SEA process are set out in Appendix I of this SA Report.

Structure of this SA Report

- 1.21 Following this introductory Section 1, Section 2 describes the methods used to appraise the draft Local Plan and Section 3 provides the sustainability context and characteristics of the Plan area. Section 4 explains how options in plan-making and alternatives in SA have been addressed and reported explicitly to demonstrate compliance with the requirements of the SEA Directive. The findings of the SA of the draft Local Plan (Regulation 18) are discussed in Section 5 including summary findings for the HRA and EqIA. The development of the plan from Regulation 18 to Regulation 19 is introduced in Section 6, and the SA findings of the revised plan are reported. The approach to monitoring is introduced in Section 7, and Section 8 explains the next steps and the requirements for consultation.
- 1.22 Technical Appendices provide the detailed findings of the SA. Appendix I comprises the Statement of Compliance with the SEA Directive and provides signposting to where key aspects of the SA are located in the SA Report. Appendix II is the SA Scoping Report, available separately, and including the details of the baseline evidence and the development of the SA Framework for assessment, and as amended (Appendix III). Appendices IV-VI present the details of the SAs of the Vision & Objectives, the options considered for strategic policies and the local site allocations. Appendix VII details the findings of the EqIA and provides a separate document to demonstrate compliance for the Council with the requirements of the Equality Act, 2010. Appendix VIII details the consultation representations and responses made.
- 1.23 The Habitats Regulations Assessment (HRA) Report (January 2019) is a separate report to accompany the Draft Plan on the Regulation 19 consultation. A summary of the initial HRA findings is provided here in this SA Report in Section 5; a summary of the revised HRA and updated with the revised Draft Plan is discussed in Section 6.

2.0 SUSTAINABILITY APPRAISAL METHODS

Introduction & the SA/SEA Process

- 2.1 Sustainability Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of SA is to inform the Council as the planning authority; the SA findings do not form the sole basis for decision-making – this is informed also by other studies, feasibility and feedback from consultation. SA is a criteria-based assessment process with objectives aligned with the issues for sustainable development that are relevant to the plan and the characteristics of the Plan area.
- 2.2 There is a tiering of appraisal/assessment processes (and see also later Figure 4.1) that align with the hierarchy of plans – from international, national, regional and through to local. This tiering is acknowledged by the NPPF (2018) in paragraph 35 that states that evidence should be proportionate; and further supported by planning guidance¹² that advises the SA and SEA should be proportionate and relevant to the plan being assessed. The findings of the SEA process can help set the scope for the lower tier project level EIA process.

SA Scoping & the SA Framework

- 2.3 The first stage of the SA/SEA process is scoping (and please see Figure 1.1 previously). Relevant plans and programmes (PP) were reviewed; baseline information was identified, collated and analysed to help identify the key issues, problems and opportunities for the Plan area. The details of this analysis are presented in the SA Scoping Report (Final July 2016) and a summary is provided in the following Section 3 of this SEA/SA Report. The Draft SA Scoping Report was published for consultation, and comments received were considered in the Final Scoping Report.
- 2.4 A Framework of SA Objectives and sub-objectives/decision-aiding questions was developed from the key issues identified. This framework aims to promote and/or protect sustainability factors that are relevant to the Isles of Scilly area and its timescale for implementation in the period up to 2030. It forms the basis against which emerging elements of the IOSLP are appraised using both quantitative and qualitative assessment from the evidence base and professional judgment.
- 2.5 In October 2016, Enfusion were appointed by the Council as specialists in SA/SEA and commissioned to undertake an initial compliance review of the SA work that had been carried out to date. Overall, the review confirmed that the SA scoping was in line with the requirements of the SEA Regulations.

¹² <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#sustainability-appraisal-requirements-for-local-plans>

The review noted that the proposed SA Framework included some sub-objectives that were duplicated across the main objectives and that this might lead to inconsistencies and replication of assessments. It is understood that effects of new development can range over a number of topics – and indeed, the SEA Regulations require the assessment to consider inter-relationships.

- 2.6 Accordingly, some amendments to the SA Framework were suggested – principally reorganisation to avoid replication and help clarity/consistency in assessment – and the details are presented in Appendix III of this SA Report. For example, transport had been included as a sub-objective to support sustainable communities (SA Objective No 2), whilst sustainable transport for walking/cycling was included in Air Quality (SA Objective No 6). Equality is addressed directly through specific decision-aiding questions in various SA Objectives – numbers 2A, 2B, 3, 4, and 10B. The revised SA Framework of Objectives and Sub-Objectives/Decision-Aiding Questions is as follows:

Table 2.1: SA Framework

SA No.	SA Objective	Sub-Objectives Decision-Aiding Questions
1	Prevent Loss of and Enhance Habitats	Prevent loss of habitat
		Maintain and enhance access to sites whilst avoiding and reducing adverse impacts
		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
2	Support Sustainable Communities	Ensure the provision of affordable housing
		Secure services and accommodation for an ageing population
		2A-Housing Secure the provision of care and services for young people
		2B- Services and Facilities Improve access to services for all islanders
		Improve access to education and skills for all islanders
3	Support Sustainable Economic Development & Employment	Support the diversification and long term viability of commercial activities, including agriculture, fishing, the marine industry and tourism
		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

		Improve access to employment for all islanders
4	Safeguard and Enhance Human Health	Reduce and avoid noise pollution
		Reduce and avoid light pollution
		Improve safety
		Ensure the appropriate management of coastal erosion
		Increase availability of locally sourced food
		Increase the provision of allotments
		Improve access to open space for all islanders
		Improve access to outdoor recreation and sports facilities for all islanders
5	Maintain and improve water quality and use water efficiently and protect water resources	Prevent pollution
		Protect and improve drinking water to ensure compliance with Drinking Water Inspectorate
		Protect existing groundwater abstractions from derogation by new abstractions
		Protect Controlled Waters from adverse abstraction impacts
		Increase use of sustainable drainage systems
		5A- Water Quality Improve efficiency and conservation in use of water
		5B- Water Resources Ensure sufficient water supply for agriculture
		Protect woodland and promote timber production
		Compliance with the Water Framework Directive in relation to groundwater status (quantitative and chemical)
		Prevent saline intrusion adversely impacting groundwater and groundwater supplies
		Improve efficiency and effectiveness of sewerage system
		Deliver adequate provision of infrastructure (physical, social and green) including compliant drinking water, sewage disposal and waste management
6	Maintain Air Quality & Improve Sustainable Transport	Meet national air quality standards
		Deliver a more sustainable pattern of transport
		Increase cycling and walking to access services, employment and education
		Retain and enhance transport between the islands and to the mainland
		Improve public transport (includes taxis)
7	Address the causes and consequences of climate change with particular focus on improving resilience and	Reduce greenhouse gas emissions
		Ensure tourism is compatible with the climate change agenda
		Increase the use of sustainable design and construction techniques
		Ensure access to services during and after severe weather events

	adaptation	Ensure access to food during and after severe weather events
	Climate Change; Coastal Change; Greenhouse Gas Emissions	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 architectural and archaeological heritage	Protect and enhance architectural heritage
		Protect and enhance archaeological heritage (including unknown)
		Protect and enhance cultural heritage
		Reduce risks to heritage
		Improve access to historic buildings for residents and visitors
		Enhance local distinctiveness
		Promote art, craft and cultural interests
9	Protect and Enhance the Landscape	Protect and enhance visual amenity
		Protect and enhance landscape character
		Protect and enhance seascape character
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
		Ensure the efficient use of developed land
		Ensure the sustainable use of mineral resources including the use of recycled and secondary aggregates
	10A- Waste & Minerals	Increase local food production
	10B- Energy	Maintain agricultural activities whilst avoiding and reducing adverse impacts
	10C- Soil and agriculture	Reduce and avoid fuel poverty
		Improve energy efficiency

2.7 The descriptions and categories of significance of effects identified through the SA are as set out in the key following:

Table 2.2: SA Effects Significance Key

Categories of Significance of Effects		
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

Appraising the Draft Isles of Scilly Local Plan

- 2.8 Each element of the draft IOSLP was appraised against the SA Framework of Objectives using professional judgement supported by the baseline evidence and the wider Plan evidence base. The nature of the likely sustainability effects (including positive/negative, duration (short, medium or long term), permanent/ temporary, secondary¹³, cumulative¹⁴ and synergistic¹⁵) were described in the appraisal commentary, together with any assumptions or uncertainties.
- 2.9 Where possible, the SA made suggestions and recommendations to mitigate negative effects or promote opportunities for enhancement. A summary appraisal commentary was provided to set out any significant effects identified, along with suggestions for mitigation or enhancement to be made where relevant. SA is informed by the best available information; however, data gaps and uncertainties exist, and it is not always possible to accurately predict effects, particularly at a strategic level of assessment.
- 2.10 The SA was used in an iterative and ongoing way to help identify and refine reasonable alternatives for the plan-making; however, at this local level of plan-making, alternatives are limited to some strategic policies and local site allocation options and this is discussed further in Section 4.
- 2.11 The SA was structured under topic headings that have been linked to Objectives in the SA Framework as well as topics in the SEA Directive and paragraphs in the NPPF. This provides a robust framework and structure to evaluate the likely significant effects of the emerging Plan against these key factors. The appraisal under each topic considered the potential effects of the relevant policies against the objectives as well as the interrelationships between topics (and as required by SEA Regulations). This also avoids duplication as many factors are inter-related.
- 2.16 The draft Policies, and the overall likely effects of implementing the plan as a whole, were appraised by topics as follows:
- Communities: Housing & Services/Facilities
 - Economy and Employment

¹³ Any aspect of a plan that may have an impact (positive or negative), but that is not a direct result of the proposed plan.

¹⁴ Incremental effects resulting from a combination of two or more individual effects, or from an interaction between individual effects – which may lead to a synergistic effect (i.e. greater than the sum of individual effects), or any progressive effect likely to emerge over time.

¹⁵ These arise from the interaction of a number of impacts so that their combined effects are greater than the sum of their individual impacts.

- Health and Equality
- Transport and Air Quality
- Climate Change & Coastal Change: flood risk, resilience & adaptation
- Water Quality & Water Resources
- Landscape & Seascape
- Cultural Heritage
- Biodiversity & Geodiversity
- Resources: Waste & Minerals; Energy; Soil & Agriculture

Consultation

- 2.17 The SEA Directive and Regulations require early and effective public consultation. The development of the IOSLP has been subject to wide consultation since July 2015. The SA Scoping Report was subject to consultation through the Council's website in July 2015 and including formal consultation with the SEA statutory bodies (Historic England, the Environment Agency, and Natural England). Comments received on the SA scoping were taken into consideration and reported in the final SA Scoping Report (July 2016).
- 2.18 The Initial SA Report (February 2018) accompanied the second stage Regulation 18 consultation Draft Local Plan for consultation during 16 March-11 May 2018 and available on the Council's website. Comments received, and responses made are detailed in Appendix VIII of this report and discussed further in Section 6 SA of Regulation 19 Draft Local Plan. Any further comments made on the SA will be reported in the next stages of plan-making and SA/SEA – submission to the Secretary of State for independent examination.

3.0 SUSTAINABILITY CONTEXT, OBJECTIVES & BASELINE CHARACTERISTICS

Introduction

- 3.1 The SA/SEA Scoping Report was published in July 2016, and the scoping process was undertaken by the Council. Section 4 of the Scoping Report set out the identification of relevant policies, plans, projects (PP Review) and environmental protection. Section 5 detailed the baseline information and Section 7 focused on the SA Framework. Responses as a result of consultation were received and taken into consideration for the final Scoping Report.
- 3.2 The SEA Regulations require the collation of baseline information to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the Plan area. This then provides the basis for predicting and monitoring effects of the Plan. The aim is to collect only relevant and sufficient data on the present and future state of the Plan area to allow the potential effects of the draft Local Plan to be adequately predicted. Comprehensive baseline information is provided in the SA/SEA Scoping Report (July 2016).

2018 Updated Plans and Projects

- 3.3 Since the 2016 Scoping Report was published new Plans and Projects have been commissioned or published which are relevant to the Isles of Scilly Local Plan, taken into account and as follows:
- 3.4 Historic England, Action Plan 2015-2018: Details how Historic England will meet and achieve their aims and objectives, which includes protecting England's most important heritage, supporting constructive conservation and maintaining heritage assets throughout the country.
- 3.5 Air Quality Plan for Nitrogen Dioxide (2017): Sets out how the government plans to tackle levels of nitrogen dioxide in major cities where there are associated health risks with large concentrations. This includes establishing a clean air fund for local authorities and promoting low emission buses.
- 3.6 Housing White Paper (2017): Details the Government's reforms to increase housing supply whilst ensuring that the housing market is more efficient and meets the needs for all households.
- 3.7 South West Marine Plan Area Iteration1 (February 2017): The early stages of the development for the South West Marine Plan Area and details the vision and objective of the Marine Policy Statement; also contains some draft policies under development.
- 3.8 Cornwall and Isles of Scilly Shoreline Management Plan 2 – Mid Term Review (November 2016): Evaluates the progress delivered by the Shoreline Management Plan and assesses the potential actions to address areas where the Plan is not delivering expected results.

- 3.9 Energy Infrastructure Plan for the Isles of Scilly (May 2016): Outlines the existing energy infrastructure for the settlement and how the use of renewable energy sources can be increased. The Plan details the use of different energy sources to meet the targets for renewable energy use on the islands.
- 3.10 Isles of Scilly Local Flood Risk Management Strategy (March 2017): Aims to reduce the number of people at risk of flooding and increases the resilience of the Isles of Scilly to flood events through management schemes linked with national and regional approaches.

Baseline Conditions & Likely Evolution without the Local Plan

- 3.11 Below is a summary of the baseline conditions for the Isles of Scilly Plan area. A more detailed version of the baseline is available within the 2016 SA Scoping Report¹⁶. Where possible the baseline has been updated to ensure accuracy with the current conditions of the Plan area.
- 3.12 **Environment & Water:** The Isles of Scilly contain a range of internationally and nationally protected biodiversity sites, including a SAC complex, a SPA complex and a Ramsar complex, all comprising individual sites spread across the archipelago. Natural England have also proposed a large extension to the existing SPA which would add the marine habitats of the islands to the designation, however this proposal has not been adopted at this time¹⁷. The archipelago contains 26 SSSI designations over 25 sites, and 16 BAP Priority Habitats, with 87% of the non-urban landscape units considered to have a high ecological value. The isles are renowned for the presence of breeding seabirds, although a number of seabird species have been identified as suffering from declining populations.
- 3.13 Overall 293 priority species in the islands have been identified as being in need of conservation action. Issues adversely affecting the islands biodiversity features include the encroachment and introduction of invasive species, agricultural practises, recreational pressure and climate change. Water quality on the islands is generally high, however groundwater sources are at risk of pollution from chemicals used in agricultural practises. Some of the island's sewerage networks, especially Hugh Town, require infrastructure upgrading to cope with capacity issues and to prevent harmful effluent entering marine waters. Water availability is key to the isles agricultural industry. There is an identified information gap with regards to the island's current freshwater resources, however, it is known that water resources are being stretched to capacity and need to be managed to ensure groundwater supplies are not adversely impacted. In the summer months especially, the desalination plant is key for supplementing freshwater supplies on St Mary's. Fluvial flooding is not an issue on the islands, however coastal flooding is, and is expected to worsen as a result of climate change.
- 3.14 **Social & Economic:** The islands have a stable but aging population as younger people leave for the mainland in search of employment and homes.

¹⁶ <http://www.scilly.gov.uk/planning-development/local-plan-review/sustainability-appraisal>

¹⁷ Natural England (January 2018) Proposals for a marine extension to the Isles of Scilly Special Protection Area

74% of the population in employment, however wages are low (average £5.18 per hour) and many jobs are part-time and only seasonal, with the cost of living being an issue for island residents. Education attainment on the islands is high, with 73% of 16 year olds achieving 5+ GCSE's at A to C level, higher than the South West average (56%). There are no educational facilities on the islands for over 16s, who have to travel to the mainland for further education, and the Five Islands School on St Mary's is currently considered as 'inadequate' by Ofsted¹⁸.

- 3.15 The Isles are considered to be least deprived with regards to crime, employment, health and education. However, they are considered most deprived with respect to barriers to housing and services, which impact the smaller less inhabited islands more. Fuel poverty is an issue, as is the lack of sustainable, healthy food being grown locally. Islanders have good access to open space and walking and cycling are popular forms of transport with positive effects on healthy living.
- 3.16 **Cultural Heritage:** The whole of the archipelago is designated as a Conservation Area, and the islands have the highest concentration of Scheduled Monuments in the UK, although 33 of the Scheduled Monuments are on the At Risk register. The built environment on the isles has a predominance of heritage buildings and the entire coastline is designated as Heritage Coast. The surrounding ocean contains a large number of ship wrecks and the isles have a substantial amount of currently undesignated archaeology. Climate change, vegetation, visitor pressure and land-use are all considered as major threats to the heritage landscape of the Isles of Scilly.
- 3.17 **Air Quality & Climate Change:** The isles are not considered to have any Air Quality issues, and no AQMA zones have been declared. Climate change is expected to have a negative impact on the local ecosystems, with extreme temperatures, drought, sea level rise, saline intrusion and stormier weather likely to occur as a result. Populations of seabirds in the islands are likely to be severely affected by climate change. The Isles of Scilly has a high per capita energy consumption compared to the rest of England, however this can be addressed by retrofitting dwellings and ensuring new development is more sustainable and increasing renewable energy sources. The Council have prepared a Climate Change Strategy (2011) to provide more information on the impacts that climate change will have on the isles and have an Energy Infrastructure Plan in place to promote renewable energy use.
- 3.18 **Landscape & Seascape:** The whole of the archipelago is designated as an Area of Outstanding Natural beauty. Hedgerows are a particularly important characteristic of the isles farmed landscape used to shelter fields from the strong Atlantic winds. The Landscape Character Study highlights the landscape of the isles being at risk from neglect, tourism, insensitive development, and a decline in traditional management. Coastal erosion is also a risk as the islands are exposed to extreme weather and strong waves, and the Shoreline Management Plan outlines priority areas where future work

¹⁸ <https://www.compare-school-performance.service.gov.uk/school/133554>

to prevent and lessen the impact of coastal erosion on the islands needs to take place.

- 3.19 **Evolution without the IOSLP:** Without the IOSLP there is the potential for water resources to be unsustainably used and contaminated through agricultural practises and septic tank seepage, and the sewerage infrastructure in the main towns will struggle to meet capacity needs without the current network being upgraded. Fuel poverty will continue to be an issue, as will the low average wage, poor access to services and facilities, and the aging population. A strong Local Plan that provides affordable houses, better access to services and better employment prospects will encourage younger residents to remain on the island. Without cohesive planning legislation provided in the Local Plan, development could result in negative impacts on the Isles landscape and heritage assets and could be placed in locations which are at risk of sea flooding as a result of climate change.

Key sustainability Issues, Problems and Opportunities

- 3.20 The collection and assessment of baseline information regarding the Plan area highlights the key sustainability issues within the Isles of Scilly. The sustainability issues are an important part of the SA process as they have informed the SA framework which will be used to assess the Draft Local Plan. The key sustainability issues can be seen below.
- High biodiversity value of the archipelago, with several European and national designated sites present, needs to be protected from adverse effects, with several species identified as being in need of conservation measures to protect populations.
 - A requirement for affordable housing to meet the needs of the islands' communities
 - Lack of access to some key services/facilities, including secondary education facilities, for the islands' populations.
 - The low average wage and lack of employment opportunities for local residents
 - Water pollution occurring from seepage of septic tanks and the run-off from agricultural land, as well as the release of untreated sewage into the surrounding marine waters
 - Waste water infrastructure suffers from capacity issues, especially during the summer months when tourism levels are high
 - The islands are at risk of rising sea levels due to global warming, and coastal change/coastal erosion puts development on the islands at risk of flooding
 - Improve transport links with the mainland and between the individual islands, and promote sustainable transport use
 - The designated heritage assets (including Listed Buildings and Scheduled Monuments) need to be protected from negative development effects, and there is the potential to enhance existing knowledge regarding undesignated heritage assets.
 - The islands have a distinct landscape/seascape character, which is at risk from negative effects if development is placed in sensitive areas

and/or is poorly designed and does not match the existing character of the area.

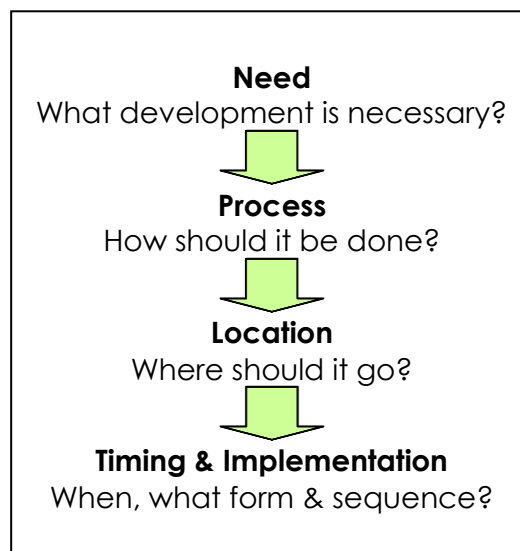
- Making the islands more self-sufficient with regards to energy, and reducing greenhouse gas emissions by using renewable energy sources and moving towards a low carbon economy

4.0 ALTERNATIVES IN SUSTAINABILITY APPRAISAL & OPTIONS IN PLAN-MAKING

Assessment of Alternatives in SA/SEA

- 4.1 The EU SEA Directive¹⁹ requires 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 Directive does not specifically define the term “reasonable alternative”; however, UK SA/SEA guidance²⁰ advises that it should be taken to mean “realistic and relevant” i.e. deliverable and within the timescale of the plan. The NPPF (paragraph 165) requires that a Sustainability Appraisal which meets the requirements of the SEA Directive should be integral to the plan preparation process.
- 4.2 Extant SEA guidance²¹ sets out an approach and methods for development and assessment of alternatives. This includes acknowledgement of a hierarchy of alternatives that are relevant and proportionate to the tiering of plan-making. Alternatives considered at the early stages of plan-making need not be elaborated in too much detail so that the “big issues” are kept clear; only the main differences between alternatives need to be documented i.e. the assessment should be proportionate to the level and scope of decision-making for the plan preparation. The hierarchy of alternatives may be summarised in the following diagram:

Figure 4.1: Hierarchy of Alternatives in SA/SEA and Options in Plan-Making



- 4.3 Case law in England has clarified and provided further guidance for current practice on how alternatives should be considered in SA/SEA of spatial and

¹⁹ <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

²⁰ <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>

²¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

land use plans. The Forest Heath Judgment²² confirmed that the reasons for selecting or rejecting alternatives should be explained, and that the public should have an effective opportunity to comment on appraisal of alternatives. The SA report accompanying the draft plan must refer to, summarise or repeat the reasons that had been given in earlier iterations of the plan and SA, and these must still be valid.

- 4.4 The Broadlands Judgment²³ drew upon the Forest Heath findings and further set out that, although not an explicit requirement in the EU SEA Directive, alternatives should be appraised to the same level as the preferred option; the final SA Report must outline the reasons why various alternatives previously considered are still not as good as the proposals now being put forward in the plan, and must summarise the reasons for rejecting any reasonable alternatives - and that those reasons are still valid. The Rochford Judgment²⁴ confirmed that the Council had adequately explained how it had carried out the comparative assessment of competing sites and that any shortcomings in the early process had been resolved by the publication of a SA Addendum Report; this was subsequently upheld at Appeal.

Assessment of Options in Plan-Making

- 4.5 Development planning issues, such as how much, what kind of development and where, are considered within the requirements of legislation and policy together with the characteristics of the plan area and the views of its communities. Potential options for resolving such issues are identified by the Councils through various studies, such as population projections and housing need, community strategies, infrastructure capacities, and environmental constraints analysis – and through consultation with the regulators, the public, businesses, service providers, and the voluntary sector.
- 4.6 At the earlier and higher levels of strategic planning, options assessment is proportionate and may have a criteria-based approach and/or expert judgment; the focus is on the key differences between possibilities for scale, distribution and quality of development. At this early stage, the options presented may constitute a range of potential measures (which could variously and/or collectively constitute a policy) rather than a clear spatial expression of quantity and quality. Each option is not mutually exclusive and elements of each may be further developed into a preferred option. As a plan evolves, there may be further consideration of options that have developed by taking the preferred elements from earlier options. Thus, the options for plan-making change and develop as responses from consultation are considered and further studies are undertaken.
- 4.7 At the later and lower levels of development planning for site allocations, options assessment tends to be more specific, often focused on criteria and thresholds, such as land availability, accessibility to services, and impacts on local landscape - and particularly informed by technical studies such as the Strategic Housing Market Assessment (SHMA 2016 & updated 2018), the

²² Save Historic Newmarket Ltd v Forest Heath District Council (2011) EWHC 606

²³ Heard v Broadland District Council, South Norfolk District Council, Norwich City Council (2012) EWHC 344

²⁴ Cogent Land LLP v Rochford District Council (2012) EWHC 2542

Strategic Housing Land Availability Assessment (SHLAA), Strategic Flood Risk Assessment (SFRA, and Infrastructure Capacity Assessment 2018)²⁵. There is a hierarchy of options assessment with sites that are not viable or deliverable or might have adverse effects on protected environmental assets rejected at an early stage.

- 4.8 The role of the SA is to inform the Council in the selection and assessment of options; SA is undertaken of those reasonable alternatives (options) identified through the plan-making process. The findings of the SA can help with refining and further developing these options in an iterative and ongoing way. The SA findings do not form the sole basis for decision making – this is informed also from planning and other studies, feasibility, and consultation feedback.

Options for Accommodating Growth in the Isles of Scilly

- 4.9 The special characteristics of the Isles of Scilly, including the important designated environmental assets, limit the number of meaningful options that could be investigated in plan-making. However, strategic options were identified for five Policies including protection of retail, housing strategy, affordable homes, windfall housing, and new employment development; the options were subject to SA using the full SA Framework of Objectives.
- 4.10 The Council of the Isles of Scilly conducted a limited 'call for sites' which meant only the Duchy of Cornwall and the Council were asked to put sites forward. This produced 26 potential housing sites across the islands. The proposed sites were then subject to a Strategic Housing Land Availability Assessment (SHLAA, 2016), and this provided information and gives an indication of how housing requirements could potentially be met. The SHLAAA identified 10 proposed sites which have the potential for future housing developments and were considered to be reasonable – deliverable within the Plan period. These site options were subject to SA using the full SA Framework of Objectives.
- 4.11 It may be noted that “doing nothing” is not a reasonable alternative for the Local Plan since the Council has a duty to plan positively for objectively identified needs for housing and employment land.

²⁵ <http://www.scilly.gov.uk/planning/local-plan/local-plan-evidence-base-library>

5.0 SA of the DRAFT ISLES OF SCILLY LOCAL PLAN (Regulation 18)

Vision, Strategic Aims & Objectives, Spatial Strategy

- 5.1 The Isles of Scilly Local Plan proposes a Vision for development in the archipelago. The Vision outlines how the Isles of Scilly will look by the end of the Plan period, and is divided into six key topics that relate to the identified key issues for the islands, including: world-class environment, housing and employment needs, services, facilities, infrastructure, and sustainable transport, as follows:

Table 5.1: Draft Isles of Scilly Local Plan Vision

<i>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.</i>
<i>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.</i>
<i>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.</i>
<i>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.</i>
<i>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.</i>
<i>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</i>

- 5.2 The SA compatibility analysis of the Draft Plan Vision is detailed in Appendix IV. The assessment found that each of the six topics in the Vision was generally compatible with the majority of the SA Objectives. Some SA Objectives were not applicable to the Vision and would have only neutral effects. The Vision recognises the distinctive and exceptional environmental character and assets of the Isles, including the sea, with overall positive effects for SA

Objectives on biodiversity and landscape. The strong wording for the first two aspects of the Vision means they are considered to have positive effects for all SA Objectives, as they will benefit communities whilst protecting and enhancing the islands natural and built environment. The Vision for exemplar and innovative technologies and as a model for other island communities, together with a strong and diverse economy, indicates positive effects for SA Objectives on economy and employment. The Vision for a beacon of sustainability with a low carbon model promotes positive effects for SA Objectives on energy, climate change, transport, water and waste management. The Vision for affordable, resilient and reliable transport links to the mainland and between islands will have direct positive effects on SA Objectives for transport and indirect positive effects for other SA Objectives by supporting the overall sustainability of the islands.

- 5.3 The compatibility assessment of the Draft Local Plan Strategic Aims and Objectives is also presented in Appendix IV of this SA Report. Similarly, many of the SA Objectives were not relevant to the Strategic Objectives but would not be incompatible and neutral effects identified. Aims 1 and 2, and the Objectives within, were found to have mostly positive effects on sustainability objectives relating to the natural environment, biodiversity and human health. Positive effects were considered for health and housing for Aim 3, and positive effects on economy and employment for Aim 4. Aim 5 was found to have positive effects on SA objectives relating to health, services and facilities, and transport. Aims 6 and 7 will have positive effects on biodiversity, air quality and health through mitigating and adapting to climate change.
- 5.4 The emerging draft Spatial Strategy was subject to SA using the full SA Framework at an early stage of plan-making in autumn 2017 and the SA findings informed decision-making to progress the preferred options for Regulation 18 consultation. The details of the SA are provided in Appendix IV of this SA Report.
- 5.5 The Spatial strategy is considered to have major positive effects on SA Objectives for 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. The summary findings of the SA are shown in the table, as follows:

Table 5.2: The Spatial Strategy Summary SA Findings

SA Objectives	1	2	3	4	5	6	7	8	9
	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: Enhance habitats	+	0	+	0	0	0	0	0	+
2A: Housing	0	++	++	0	0	0	++	0	0
2B: Services and Facilities	0	+	+	0	0	++	++	0	0
3: Sustainable economy	0	0	0	+	0	0	+	+	0
4: Human Health	0	+	0	0	0	0	0	0	+
5a: Water Quality	+	0	0	0	+	+	0	0	0
5B: Water Resources	0	0	0	0	0	+	0	0	0
6: AQ & Transport	0	0	0	0	0	0	0	0	+
7: Climate Change	0	0	0	0	+	0	0	0	+
8: Cultural & Heritage	+	0	0	0	0	0	0	0	0
9: Landscape	+	0	0	0	0	0	0	0	0
10A: Waste & Minerals	0	0	0	0	0	0	0	0	0
10B: Energy	0	0	0	0	+	0	0	0	0
10C: Soil & Agriculture	0	0	+	0	0	0	0	0	0

Strategic Policy Options

5.6 As previously introduced in Section 4 of this report, the plan-making identified five strategic policies for which there could be reasonable alternatives, and these are summarised, as follows:

Table 5.3: Policy Options Considered through SA

Policy Name & Number	Strategic Options
Option 1 Policy SS4: Protection of Retailing & Community Facilities	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.
Option 2 Policy 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.
Option 3 Policy LC2: Occupying Affordable Homes	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 as previous SPD ²⁶ 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

5.7 Each option was subject to SA using the full SA Framework and details are provided in Appendix V of this SA Report. The preferred option for each Policy is presented in the Draft Local Plan with reasoning and a summary of the alternative option considered. These are presented as Consultation Options 1-5 and comments are specifically invited through the Regulation 18 formal

²⁶<http://www.scilly.gov.uk/sites/default/files/document/planning/Specific%20Local%20Need%20Criteria%20and%20Application%20Form.pdf>

consultation on the proposed preferred options for these Policies. A summary of the SA findings is provided in the table, as follows:

Table 5.4: Consultation Options Summary SA Findings

SA Objectives	Consultation Options in Draft Local Plan									
	Option 1		Option 2		Option 3		Option 4		Option 5	
	1A Town Centre Boundary	1B Do Nothing	2A Settlement Boundaries	2B Do Nothing	3A Revise Criteria for	3B Do Nothing	4A Settlement Boundaries	4B Do Nothing	5A Revise Criteria for	5B Do Nothing
1: Prevent loss of & enhance habitats	0	0	0	0	0	0	+?	0?	0	0
2A: Housing	0	0	++	+	++	++	+	0?	0	0
2B: Services and Facilities	+	0	+	0	0	0	+	-	0	0
3: Sustainable economy	+?	0	0	0	0	0	0	0	+	+
4: Human Health	0	0	++	+	+	+	+	+	+	+
5a: Water Quality	0	0	0	0	0	0	0	0	0	0
5B: Water Resources	0	0	0	0	0	0	0	0	0	0
6: Air Quality & Sustainable Transport	0	+?	0	+?	0	0	0	+?	0	0
7: Climate Change	0	0	0	0	0	0	0	0	0	0
8: Cultural & Heritage Assets	0	0	0	0	0	0	0	0	0	0
9: Landscape	0	0	+	0?	0	0	+	-?	0	0
10A: Waste & Minerals	0	0	0	0	0	0	0	0	0	0

- 5.8 **Policy SS4 Consultation Option 1:** The SA found mostly neutral effects for SA Objectives and little differentiation between the two options. Defining a town centre boundary/areas of retail frontage 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. 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 with likely positive effects but some uncertainty at this stage of assessment.
- 5.9 **Policy LC1 Consultation Option 2:** The SA found many neutral effects for SA Objectives but some clear comparative effects. For the preferred Option 2A, 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 SA Objectives on housing and health. 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. By allocating housing within Hugh Town and Old Town, the pressures on the open countryside will be reduced with likely positive effects for Option 2A compared to neutral for Option 2B that relies on other Policies to protect the landscape.
- 5.10 **Policy LC2 Consultation Option 3:** Most SA Objectives are not relevant to the 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.
- 5.11 **Policy LC7 Consultation Option 4:** Many SA Objectives are not relevant to the Options 4A & 4B on defining settlement boundaries for windfall housing. 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.
- 5.12 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 within or adjoining 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.

- 5.13 **Policy WC3 Consultation Option 5:** Most SA Objectives are not relevant to 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 in the preferred option would provide more clarity and could be more efficient of use of brownfield land with some uncertainty of the extent of positive effects predicted.

Options for Site Allocations

- 5.14 As previously introduced in Section 4 of this SA Report, a limited number of options for potential site allocations were identified and subject to SA with details provided in Appendix VI of this SA Report. Generally, the Council has selected those site options that best promote sustainable development and avoid/reduce any negative effects. Two site options (Bay View & Sandy Banks in Hugh Town) were not progressed at this stage in the draft Plan, because it was felt that the other options at Carn Thomas and Old Town represented the most sustainable places to achieve the five-year housing land supply. There are also some potential constraints including the low-lying land with greater risk of flooding and the proximity of the industrial estate.
- 5.15 The summary findings of the SA of the site options is shown in Table 5.5 following and summary discussion is provided for the preferred options in the following consideration of the effects of the draft Plan against sustainability themes.

Table 5.5: Options for Site Allocations Summary SA Findings

SA Objective	Hugh Town						Old Town	
	A7 & A7a		A11		A12		A13, 14, 15, 16, 17, 178	
1. Prevent loss of and enhance habitats	0		0		0		0	
2a. Housing	++		++		++		++	
2b. Services and Facilities	0?		0?		0?		0?	
3. Economy and Employment	0		0		0		0	
4. Safeguard and enhance human health	0	+	0	+	0	+	0	+
5a. Maintain and improve water quality	0?		0		0		0?	
5b. Use water efficiently and protect water	0		0		0		0	
6. Maintain air quality and improve sustainable transport	0	+	0	+	0	+	0	+
7. Coastal Change; Greenhouse Gas Emissions	0	+	0	+	0	+	0	+
8. Cultural heritage	0		0		0?		+	
9. Protect and enhance the landscape	+		0		0		0	
10a. Waste & Minerals	0		0		0		0	
10b. Energy	+		+?		+?		+?	
10c. Soil & Agriculture	0		0		-?		-	

The draft Isles of Scilly Local Plan (Regulation 18)

- 5.16 The Sustainability Appraisal (SA) of the emerging Draft Local Plan is structured under topic headings that have been linked to Objectives in the SA Framework as well as topics in the SEA Directive and paragraphs in the NPPF (as previously explained in Section 2 of this SA Report). This provides a robust framework and structure to evaluate the likely significant effects of implementing the Plan against these key topics for sustainable development.

Communities: Housing & Services/Facilities

SEA Directive Topics: Population & Human Health

NPPF paragraphs 47-68

Relevant SA Objectives:

- SA Objective 2: To support sustainable communities 2A Housing; 2B Services & Facilities

- 5.17 **Appraisal of Draft Isles of Scilly Local Plan Policies:** Policies in Section 3 of the Local Plan address housing within the Plan area. Policy LC1 sets out the overall housing strategy for the Isles of Scilly, with an identified need for 105 affordable homes being provided in the Plan period. The delivery of housing within the islands will meet the need for local communities, with a focus on providing affordable housing to promote a sustainable housing stock, with open market housing provided where required to enable the delivery of affordable housing. The delivery of housing to meet the needs of local communities, and the promotion of affordable housing to create a sustainable housing market, will have long-term positive effects for housing.
- 5.18 Policies LC2 and LC3 promote affordable and accessible homes, which will help meet the housing requirements of all groups within the community. Policies LC4, LC8, LC9 and LC10 will manage the existing housing stock, its uses and the tenures of the dwelling, which will help manage the existing housing market which will benefit local communities. Policies LC6 and LC7 allocate sites and detail criteria for windfall housing, which will support the delivery of the identified housing requirement with long-term positive effects on the topic.
- 5.19 Existing services and community facilities are protected through Policy SS4. This includes the protection of ground floor retail units, public houses and cultural facilities. These services and facilities are key for local communities, and the safeguarding of rural centres and cultural facilities will have long-term positive effects for access to key services and facilities on the islands. Furthermore, the development of new retail spaces will strengthen and enhance the existing services, with associated positive effects.
- 5.20 **Appraisal of Site Allocations:** All the site allocations within the Local Plan will have major positive effects on housing. The allocations will focus housing on the island of St Mary's, in the main settlements of Old Town and Hugh Town. The allocations will meet the identified need for 105 dwellings in the Plan

period. All site allocations will have access to some services and facilities which are available on the island and will not result in the loss of any existing services or facilities. However, due to the small size of the site options, they are not considered likely to provide new services or facilities, and the capacity of existing services or facilities is not known, with neutral but uncertain effects considered.

- 5.21 **Synergistic and Cumulative Effects:** The Isles of Scilly Local Plan will have major short to long term major positive cumulative effects on housing through the provision of new homes to meet the objectively assessed need of the Plan area during the life of the Plan. Housing will meet the needs of local communities and create a sustainable housing market on the islands through the promotion of affordable housing. Policies which manage the existing housing stock will have positive synergistic effects on Policies which allocate housing, with the Policies creating a housing market that benefits all members of the community. The protection of existing services and facilities will have cumulative positive effects with the provision of new retail facilities on the vitality of the islands' communities. There is the potential for synergistic effects between housing and services/facilities, as housing can support services and facilities and there is the potential for new development to contribute to improvements to existing services and facilities.
- 5.22 **Interrelationships with other Topics:** The provision of housing and the protection and enhancement of services and facilities has the potential for indirect positive effects on a number of other topics, which include economy and employment, health and equality, and transport and accessibility. However, the delivery of housing also has the potential for negative effects on a number of topics including biodiversity, air quality, climate change, water resources, water quality, flooding, landscapes, cultural heritage and waste and recycling.

Economy and Employment

SEA Directive Topics: Population & Human Health
NPPF paragraphs 18-22, 28

Relevant SA Objectives:

- SA Objective 3: To support sustainable economic development & employment

- 5.23 **Appraisal of Draft Isles of Scilly Local Plan Policies:** Policies in Section 4 of the Draft Local Plan focus on the economy and employment sector within the islands. The economy in the archipelago is reliant on tourism, agriculture and horticulture, and there are high numbers of small businesses that are vulnerable to shocks and downturns. However, unemployment levels are low. The Plan seeks to strengthen and enhance the islands' economy in a sustainable way, ensuring that the valued natural environment is not exploited to the extent that negative effects occur. The Smart Islands Programme²⁷ will contribute to diversifying and increasing the resilience of the

²⁷ <https://www.cioslep.com/isles-of-scilly/smart-islands>

economy through increasing renewable energy generation, reduce energy bills, and deliver internships and STEM skills for young people.

- 5.24 The Local Plan does not provide a number of new jobs to be created through the Plan period. However, Policies WC1 and WC3 will support development that strengthens, enhances and diversify the islands' economy, with long-term major positive effects. Policy WC2 will promote home based business with positive effects as businesses can grow without the requirement of new development, and Policy WC4 will safeguard existing employment land with positive effects. Policy WC5 aims to protect and enhance the tourism economy of the islands, with an aim to support the Vision of the islands being an internationally competitive visitor destination. The Policy provides criteria which new or upgraded tourist development should meet. Major long-term positive effects are considered through the support of a vital part of the islands' economy.
- 5.25 The vitality of town centres is supported through Policy SS4 which will have positive effects on the economy and employment opportunities for local residents. The safeguarding of transport between the island and the mainland in Policy SS10 is vital for the support of the tourism economy, and therefore positive effects are considered for this Policy.
- 5.26 **Appraisal of Site Allocations:** None of the site allocations are proposing employment development and will not result in the loss of existing employment land. Therefore, no significant positive or negative effects were considered on the economy or employment for any of the site allocations.
- 5.27 **Synergistic and Cumulative Effects:** Overall, the Draft Local Plan will have major short to long term positive cumulative effects on the economy and employment through the management of any new employment development to ensure it is sustainable and improves the islands economy. Furthermore, the Local Plan will aim to diversify the economy to make it more resilient, and safeguard key industries, including tourism, with cumulative positive effects.
- 5.28 **Interrelationships with other Topics:** Transport is strongly linked with economy and employment in the Isles of Scilly due to the influence it has on tourism, which is a large part of the economy. Furthermore, the topics of biodiversity, water quality, air quality and cultural heritage effect the economy as they can influence tourism levels. The agriculture industry, a strong part of the local economy, is also closely linked with the soils topic.

Health & Equality

SEA Directive Topics: Population & Human Health
NPPF paragraphs 69-78

Relevant SA Objectives:

- SA Objective 2- To support sustainable communities 2A Housing; 2B Services & Facilities
- SA Objective 3: To support sustainable economic development & employment
- SA Objective 4: To safeguard and enhance human health
- SA Objective 10B: Energy (fuel poverty)

- 5.29 **Appraisal of Draft Isles of Scilly Local Plan Policies:** Development proposed in the Draft Local Plan has the potential to affect health and equalities in a number of different ways. The construction of new development proposed in Policies LC1 and LC6 can have short-term negative effects on health through increased levels of disturbance, and noise and light pollution. Negative effects are considered to be mitigated through Policies OE5, OE6, SS1 and SS2, and through the required project level assessments. However, the delivery of housing development through Policies LC1, LC6 and LC7 will have positive effects on health, and the mixed type of development detailed in Policies LC2, LC3 and LC10 will have positive effects on equality.
- 5.30 A number of the Policies within the Draft Plan have the potential for positive effects on health and equality. Policies such as SS1 and SS2 will promote sustainable development, creating a high quality built environment which will promote healthier lifestyles through design which includes open spaces and promotes safety. All residents will benefit from an enhanced community, with long-term positive effects on physical and mental health.
- 5.31 The protection of services and facilities will have positive effects on health as healthcare facilities will be safeguarded and accessible for residents. The vibrancy of the communities will be maintained and enhanced by the vitality of services and facilities. Policies SS9 and SS10 will safeguard transport between islands and the mainland and will promote sustainable transport including walking and cycling through the appropriate location and design of development. Sustainable transport will have positive effects on health through the promotion of healthier lifestyles as communities walk and cycle more. Furthermore, Policy SS9 will have positive effects on equality as it details that access routes must be accessible for all residents, including those with mobility and sensory disabilities.
- 5.32 The health of communities is protected through Policies OE5 and OE6 which will manage waste and pollution. Policies OE1-OE4 will protect the natural and built environment, which can have long-term positive effects on health and well-being. The Policies in Section 4 focus on safeguarding and strengthening the economy and employment opportunities of the Plan area, which can have positive effects on health for all islanders. Fuel poverty is an existing issue for the islands, and there is the potential for positive effects on

equality to address fuel poverty through Policy SS2. An EqIA report accompanies this SA of the Draft Local Plan and assesses the effects of the Plan on protected characteristics (details in Appendix VII of this SA Report).

- 5.33 **Appraisal of Site Allocations:** The site allocations will have long-term positive effects on health and equality through providing housing to meet the needs of local communities, including affordable and accessible houses which will meet the needs of protected characteristics with positive effects on equality. The site allocations were all found to be within walking distance of open spaces, including beaches, and will therefore promote healthy lifestyles among residents with positive effects.
- 5.34 **Synergistic and Cumulative Effects:** The Draft Local Plan supports the delivery of new housing, employment and community infrastructure to meet the needs of all residents in the Plan area. The Council seeks to safeguard existing transport between the island and mainland and seeks to promote the use of sustainable transport modes and healthier lifestyles. The protection and enhancement of the natural and built environment will improve the health and well-being of residents. The Draft Local Plan has the potential for a major long term positive cumulative effect on health and equalities.
- 5.35 **Interrelationships with other Topics:** Health and equalities can be indirectly affected by the nature and significance of effects on the majority of other topics considered through the SA. Positive effects on housing, employment and transport and accessibility can lead to direct and indirect positive effects on health, equalities and communities. Air quality, water resources, water quality, flooding, biodiversity and natural resources, waste, and cultural heritage can also either positively or negatively affect health.

Transport and Air Quality

SEA Directive Topics: Population & Human Health; Material Assets; Air; Climatic Factors

NPPF paragraphs 29-41, 93-108

Relevant SA Objectives:

- SA Objective 6: To maintain air quality & improve sustainable transport

- 5.36 **Appraisal of Draft Isles of Scilly Local Plan Policies:** There are no identified traffic or air quality issues within the archipelago. The small size of the islands and the location of development means that car use is limited. The transport between islands is key for local communities, as is the transport to mainland England. Local residents use boats to transport between islands, also boat services between islands as well as ferry links and air links with the mainland. The safeguarding of existing transport links is key for local communities and the islands' economy.
- 5.37 Policies SS9 and SS10 focus on transport and movement in the archipelago. Policy SS9 addresses the potential increase in vehicle use as a result of new

development. The Policy aims to promote sustainable transport, including walking and cycling, with accessibility to sustainable transport routes for all. The Policy also provides criteria that any development should provide appropriate off-street parking and electric vehicle charging. The Policy is likely to have at least neutral effects and could have minor long-term positive effects on transport within the island, through sustainable transport options and management of parking. The requirement to prepare a Transport Assessment & Travel Plan provides mitigation measures for those developments generating significant movement. Policy SS10 safeguards the vital air and sea transport services for the islands, ensuring that mitigation measures are implemented for any potential negative effects from new development.

- 5.38 There are no designated Air Quality Management Areas in the Isles, and no significant air quality issues. However, the Local Plan aims to protect the air quality in the islands through managing any potential pollution, as detailed in Policy OE5. The promotion of sustainable transport in Policy SS9, and the promotion of renewable energy developments in Policy SS8, will contribute to preventing air pollution with long-term major positive effects.
- 5.39 **Appraisal of Site Allocations:** All site allocations are considered to have the potential for positive effects on sustainable transport. The allocation at Hugh Town was considered to have positive effects on sustainable transport as it is within walking distance to key services and facilities, and this will promote the use of sustainable transport rather than the reliance on private vehicle use. In turn, this will limit increase in emissions from vehicle use. The site allocations at Old Town are further from some key services/facilities which are largely located in Hugh Town, and residents will could rely on private vehicles to access these services/facilities, however there is a pub, shop and sports facilities at Old Town. There are footpaths, and a Council run bus service (the Buzza Bus) for over 60s, which will provide access to Hugh Town with a minor positive effect. However, no significant negative effects were considered for air quality due to the overall small potential increase in vehicle use.
- 5.40 **Synergistic and Cumulative Effects:** The Draft Local Plan will have long-term cumulative positive effects for both transport on the islands and on transport between the islands and the mainland. Sustainable transport will be promoted, and appropriate infrastructure for electric vehicles as well. The positive effects for sustainable transport will be synergistic with positive effects on air quality.
- 5.41 **Interrelationships with other Topics:** Positive effects on transport can lead to indirect positive effects on communities and health, and economy and employment. Conversely, when there are negative effects on transport and accessibility there is the potential for indirect negative effects on the same topics. Positive effects on air quality can result in indirect positive effects on biodiversity, health and climate change.

Climate Change & Coastal Change: flood risk, resilience & adaptation

SEA Directive Topics: Air; Climatic Factors; Water; Material Assets
NPPF paragraphs 93-108

Relevant SA Objectives:

- SA Objective 7: Climate Change, Coastal Change; Greenhouse Gas Emissions

- 5.42 **Appraisal of Draft Isles of Scilly Local Plan Policies:** Climate change is a threat to the Plan area as any increase in sea levels and more extreme weather events would have a significant effect on the islands, with an increased chance of coastal flooding. Policies which increase traffic could have negative effects on climate change through increased emissions, however due to the potential increase being so small, any increase in emissions is considered to be negligible. New development will increase energy demand. However, development will accord with sustainable development criteria in Policies SS1 and SS2 which will mitigate against negative effects on climate change as a result of development.
- 5.43 The islands do not experience fluvial flooding, with the main risk of flooding coming from the surrounding marine waters. Policy SS1 also requires development to be located accordingly to minimise flood risk. Policy SS7 provides criteria which development must meet with regard to flood risk avoidance, ensuring that such mitigation measures are implemented with overall neutral effects. Any new development must have a Flood Risk Assessment - and contain appropriate sustainable drainage systems, with potential minor positive effects on managing flood risk for development. Strong mitigation is provided through the requirement for the application of the Precautionary Principle if there is any doubt regarding risk. The Isles of Scilly Flood Risk Management Strategy and the Shoreline Management Plan will further actively manage coastal erosion to reduce the risk of coastal flooding.
- 5.44 Policy SS1 also requires development to be located and designed to account for adaptation to climate change, with positive effects through locating development in suitable locations to avoid significant effects associated with climate change. Further adaptation to the potential effects of climate change within the Local Plan Policies include SS6 which will manage water resources, Policy SS8 which promotes renewable development and Policy OE2 which seeks to protect and enhance biodiversity, with potential associated positive effects on adapting and mitigating the effects of climate change.
- 5.45 **Appraisal of Site Allocations:** The site allocations were not considered to be at risk of flooding, with mitigation available through the Flood Risk Management Strategy and the Shoreline Management Plan taken into account, and an overall neutral effect.

- 5.46 **Synergistic and Cumulative Effects:** The Local Plan has strong Policies relating to managing flood risk with a neutral effect. The Plan will also promote the incorporation of sustainable urban drainage systems in new development with cumulative short-term positive effects on flood risk. This will have synergistic effects with adaptation and mitigation to climate change. Development at the site allocations will follow Local Plan Policies that promote sustainable development to be resilient to the effects of climate change. Other Local Plan Policies will reduce the islands' contribution to climate change and increase adaptation.
- 5.47 **Interrelationships with other Topics:** The nature and significance of effects on climate change and flooding is closely linked to housing, employment and transport. Flooding is also closely linked to communities and human health as well as water quality. Increased flood risk can have negative effects on human health as well as indirect negative effects on water quality and the economy.

Water Quality & Water Resources

SEA Directive Topics: Water; Material Assets
NPPF paragraphs 109-125

Relevant SA Objectives:

- SA Objective 5: Maintain and improve water quality and use water efficiently and protect water resources. 5A- Water Quality, 5B- Water Resources

- 5.48 **Appraisal of Draft Isles of Scilly Local Plan Policies:** Development proposed in the Draft Isles of Scilly Local Plan has the potential for negative effects on the water environment through increased levels of abstraction. Development also has the potential to decrease water quality through increased surface water run-off. However, Policies within the Draft Plan can mitigate against these potential effects.
- 5.49 There is an identified information gap with regards to the islands' current freshwater resources, however some basic information is known. Water resources are highlighted in the baseline as being stretched to capacity, especially during the peak tourism season when the population of the islands greatly increases. The use of a desalination plant allows groundwater sources to recharge, and water resources are key for the islands' agriculture industry. The sustainable use of water resources is essential, and the Council is the water authority for the island of St Mary's where the proposed new development will be located.
- 5.50 Policy SS6 addresses water management. The Policy provides criteria which new development that is connected to mains or private water supplies will be required to meet. This includes a water consumption standard of no more than 110 litres per person, and an 'excellent' BREEAM107 credit for non-residential development over 500sqm in size. This could have neutral or minor positive effects for water resources on the islands but with some uncertainty at this stage in consideration of the limited water resources and limited information. Policy SS2 focuses on sustainable design and includes criteria that development should reduce pressure on water resources, and increase reuse

of water through green roofs and grey water harvesting measures, which could have positive effects. Policy SS5 will ensure new development has sufficient infrastructure with neutral effects.

- 5.51 Water quality on the islands is affected by agricultural run-off and wastewater. This can affect groundwater sources and the quality of the marine waters around the islands. Policy SS6 ensures development is connected to appropriate wastewater infrastructure, and that if not possible a waste management system incorporating septic tanks that does not damage environmental or human health is implemented, with long-term neutral effects on water quality. Policy SS5 will ensure development has sufficient infrastructure, including connections to the sewerage network, with at least neutral effects. Policy OE2 protects the natural environment from the effects of development, with at least neutral effects on water quality. Further neutral effects on water quality are provided through Policy OE5 which will control pollution through ensuring development does not have significant adverse effects.
- 5.52 **Appraisal of Site Allocations:** All site allocations were considered to have neutral effects on water resources and water quality. The sites are located away from the main boreholes and groundwater sources for freshwater on St Mary's, which reduces the potential effects on contamination of groundwater. All site allocations are located in areas where connections to the main sewerage network, and to the bio-bubble for Old Town sites, should be achievable. Furthermore, the strong mitigation provided in the Draft Plan Policies will prevent significant negative effects on water quality. Although all site allocations will increase the use of water, no significant negative effects were considered as through efficient design and Plan Policy mitigation the effects on water resources can be mitigated.
- 5.53 **Synergistic and Cumulative Effects:** The sustainable management of water resources in the archipelago is promoted in the Local Plan and will have cumulative long-term positive effects through promoting design incorporating high water efficiency standards. Cumulative positive effects are also considered for water quality, as the Plan will address potential pollution and ensure appropriate infrastructure is in place for new development. The positive effects on water quality are considered to have synergistic positive effects on water resources.
- 5.54 **Interrelationships with other Topics:** Water quality and resources are also closely linked to biodiversity, climate change adaptation, flooding and health, with the potential for both positive and negative effects. The importance of water resources for agriculture on the islands also means the topic is linked with economy.

Landscape & Seascape

SEA Directive Topics: Landscape
NPPF paragraphs 109-125

Relevant SA Objectives:

- SA Objective 9: Protect and enhance the landscape

- 5.55 **Appraisal of Draft Isles of Scilly Local Plan Policies:** The entire archipelago is designated as an AONB, and the highly valued landscape and seascape characterise the Plan area. The landscape is at risk from negative effects associated with tourism, coastal change, and has suffered from decline in traditional farm management. The delivery of new housing development, employment development, and tourism development has the potential to both negatively and positively affect the landscape and the AONB settings, as well as important views and vista from the islands. However, the mitigation available through the Draft Local Plan Policies will mitigate against the potential effects of development on the landscape and seascape character of the islands.
- 5.56 The Local Plan will not allow development on the uninhabited islands, to protect the wild landscape and seascape nature of the archipelago. Policy OE1 will protect the landscape character of the archipelago, including the important features and views and tranquillity. The Isles of Scilly Landscape Character Study will be used to inform the design and location of new development. The Policy provides mitigation measures to ensure that there will be no significant harm to the landscape character with overall likely neutral effects.
- 5.57 Further mitigation is provided through Policy SS2, which ensures that the design of new development is respectful of the landscape character, and does not interrupt key landscape views, with positive effects. The dark night skies are a valued feature of the landscape character and the AONB and will be protected through Policy OE4. The potential negative effects of renewable energy infrastructure, including associated developments such as transmission lines, on landscape – and seascape – is mitigated Policy SS8 and in particular criterion b, and therefore, no significant negative effects and overall effects should be towards neutral.
- 5.58 **Appraisal of Site Allocations:** Development anywhere on the islands will be located within the AONB and has the potential for effects on landscape and seascape character. However, the SA of the site allocations found none would result in significant negative effects on landscape character. The small scale of development at the site allocations, and their location in the existing settlements of Hugh Town and Old Town, avoiding particularly sensitive areas, will limit their potential effects on the landscape. Taking into account the strong mitigation through Draft Local Plan Policies, and project level mitigation, no significant negative effects for the site allocations were identified.

- 5.59 **Synergistic and Cumulative Effects:** Given the policy mitigation provided through the Draft Local Plan and locations within the existing built environment, the development proposed is considered unlikely to lead to any significant negative cumulative effects on the landscape or seascape.
- 5.90 **Interrelationships with other Topics:** The landscape is influenced by and affects a number of the topics considered through the SA. Potential negative effects on the water environment, air quality, biodiversity, heritage and soil can also have indirect negative effects on the landscape. Changes to the landscape can affect communities, health, heritage and biodiversity both positively and negatively. It is considered that policy mitigation is sufficient to ensure that there will no significant negative effects.

Cultural Heritage

SEA Directive Topics: Cultural Heritage, Historic Environment
NPPF paragraphs 126-141

Relevant SA Objectives:

- SA Objective 8: Maintain and enhance cultural and heritage assets; including architectural and archaeological heritage

- 5.91 **Appraisal of Draft Isles of Scilly Local Plan Policies:** The entirety of the archipelago is designated as a Conservation Area, and the coastline is designated as Heritage Coast. There is a diverse mixture of heritage assets on the islands, and substantial levels of undesignated archaeology, including marine and maritime heritage.
- 5.92 All development will inevitably be located within the Conservation Area, and therefore any development has the potential to negatively affect heritage assets through changes to character and/or settings. However, there is also the potential for development to positively contribute to the historic environment through enhancements to features which may be at risk or in a state of deterioration.
- 5.93 Policy SS1, which promotes sustainable development, includes conserving and enhancing the historic environment. Policy SS2 includes conservation of heritage assets and their settings and will ensure the design of new development is sustainable with regards to its effects on landmark buildings and features, providing strong mitigation measures for potential significant negative effects on the historic environment.
- 5.94 Policy OE3²⁸ provides strong protection of heritage, both designated and non-designated, on the islands promoting implementation of mitigation measures that will ensure there are no major significant negative effects on the historic environment. The Policy will promote development that will make a positive difference to sustaining or enhancing heritage assets, including the Conservation Area, Listed Buildings and Scheduled Monuments. This could have the potential for long-term minor positive effects through enhancing

²⁸ Please note this policy is revised & renumbered as OE7 in the Pre-Submission Plan

heritage assets which are at risk or in poor condition. If a development has the potential to have a negative effect on a heritage asset the development will need to describe the significance and provide appropriate mitigation. In exceptional circumstances where the public benefits outweigh the effects on heritage, a programme of recording and analysis will be required.

- 5.94 **Appraisal of Site Allocations:** The site allocations are not considered to result in significant negative effects on cultural heritage. The site allocations will have a small capacity for development, which will limit the effect of development on the historic environment. Although some of the site allocations are close to designated heritage features, the strong mitigation provided through Draft Local Plan Policies is considered comprehensive enough to mitigate against significant negative effects.
- 5.95 **Synergistic and Cumulative Effects:** The highly valued cultural heritage of the archipelago is comprehensively protected through Policy. Development that is positively designed to enhance the historic environment has the potential for minor positive effects that would be cumulative in the longer term.
- 5.96 **Interrelationships with other Topics:** Heritage has links to a number of other topics as it can be affected by housing, employment, communities and the natural environment. The protection and enhancement of heritage can also have indirect positive effects on communities, health, and landscapes, and the economy, especially tourism.

Biodiversity & Geodiversity

SEA Directive Topics: Biodiversity, Flora & Fauna; Heath
NPPF paragraphs 109-125

Relevant SA Objectives:

- SA Objective 1: Prevent loss of and enhance habitats

- 5.97 **Appraisal of Draft Isles of Scilly Local Plan Policies:** The Plan area has a high biodiversity value, with a range of international, national and local designations in the archipelago. There are three European designated sites in the Plan area, with current plans to extend the SPA site. There are numerous SSSI sites in the local landscape, which includes a small number of SSSI sites designated for their geological value.
- 5.98 Development on the islands has the potential for negative effects on biodiversity. In the short-term, disturbance as a result of construction can have negative effects on a range of species, and in the longer-term fragmentation of habitats, increased recreational use and pollution can further affect biodiversity. However, this is considered through the appropriate location of site allocations to avoid sensitive areas, and mitigation is provided through a number of Draft Local Plan Policies.
- 5.99 Policy OE2 will protect and enhance biodiversity and geodiversity. The Policy will permit development where it will conserve and/or enhance biodiversity and geodiversity. The Policy provides specific criteria under which case

development that has a significant effect on biodiversity will be allowed, including satisfying the requirements of the Habitats Regulations and mitigating against effects. Specifically, the Policy focuses on protecting and enhancing the following:

- Sites of Special Scientific Interest (SSSIs);
- legally protected species;
- priority habitats and species listed in the national Biodiversity Action Plans;
- habitats and species of principal importance for the conservation of biodiversity in England
- trees, woodlands, including aged and veteran trees and hedgerows and stone walls; and
- features of the landscape that function or are of importance for

5.100 Further Policies are provided in the Draft Plan that will protect the biodiversity and geodiversity of the islands. This includes Policy SS1 and SS2 which promote sustainable development and design that will mitigate against potential negative effects on biodiversity, and ensure development is sustainable with regards to climate change, with indirect positive effects on biodiversity. Policy SS8 will also benefit biodiversity through moving towards carbon neutral islands and promoting renewable energy, with criteria that renewable energy development does not have an effect on wildlife populations.

5.101 Policies OE5 and OE6 will protect the natural environment and biodiversity through the management and prevention of waste and pollution, including water pollution, noise pollution and air pollution, providing strong mitigation measures and with neutral effects.

Recommendation: Although the draft Policy OE2 has strong wording regarding the protection and enhancement of biodiversity or geodiversity, the SA recommends that the wording is strengthened to include explicit requirement for a 'net gain' for biodiversity, in line with the wording of the NPPF (paragraph 109).

5.102 **Appraisal of Site Allocations:** The sustainability assessment of the site allocations in the Draft Local Plan found that none of the sites would have significant negative effects on biodiversity. Although all the sites are close to European and nationally designated biodiversity sites, the small level of proposed development to be provided for local needs, with no resulting growth, will minimise likely negative effects. The strong mitigation provided through Local Plan Policies is considered sufficient to protect biodiversity and geodiversity from the effects of new development to likely overall neutral effects and the possibilities for some enhancement.

5.103 **Synergistic and Cumulative Effects:** The Isles of Scilly Draft Local Plan will protect the existing biodiversity and geodiversity in the archipelago. Where possible, the Plan will also seek to enhance existing biodiversity, with the potential for positive effects that could be cumulative in the longer-term. The management of waste and pollution, and the mitigation and adaptation to

climate change as detailed in the Plan Policies, will have long-term synergistic positive effects on biodiversity and geodiversity.

- 5.104 **Interrelationships with other Topics:** The natural environment is influenced by and affects a number of the topics considered through the SA. Potential negative effects on biodiversity can also have indirect negative effects on communities, health, climate change, air quality, water quality and flooding. Similarly, improvements to biodiversity can also have benefits for these topics.

Waste & Minerals; Energy; Soil & Agriculture

SEA Directive Topics: Soil

NPPF paragraphs 109-125, 142-149

Relevant SA Objectives:

- SA Objective 10: Support a more sustainable means of production and use of resources. 10A- Waste & Minerals, 10B- Energy, 10C- Soil and Agriculture

- 5.105 **Appraisal of Draft Isles of Scilly Local Plan Policies:** Current waste management and recycling facilities are on St Mary's; however, the Isles of Scilly have one of the lowest household waste recycling rate in England. Development proposed in the Draft Plan has the potential to increase waste, both through construction, and as a result of occupation of new housing and employment development.
- 5.106 Policy OE6 in the Draft Plan seeks to manage waste within the Plan Area. This includes ensuring new development has waste management solutions. The Policy has a strong focus on waste created through construction, promoting the reuse of demolition waste on the islands. Any construction schemes will need to be consistent with sustainable waste management, and the Policy will allow waste facility development that improves sustainable waste management on the islands, with the potential for minor positive effects. Policy SS2 will also have positive effects on waste management through ensuring new development provides appropriate areas for waste and recycling, including kerbside collection sites. This will help promote waste recycling.
- 5.107 There are currently no active mineral operations on the islands, with the last operation ceasing in 1980s. The vernacular style of the islands' buildings means there may always a demand for local stone. Policy OE7 will support the use of recycled and secondary materials to meet local needs, with long-term positive effects on minerals through minimising the need for extraction of new materials.
- 5.108 Energy on the island is almost entirely imported from the mainland, meaning the islands are susceptible to supply vulnerability. The replacement of the sub-sea cable from St Mary's to the mainland has been identified as key to sustaining the current electricity supply. The Smart Islands Programme will promote renewable energy usage and reduce energy use, which will reduce the supply vulnerability for the islands. Development proposed within the

Draft Plan will increase energy consumption, with potential negative effects. Furthermore, the promotion of electric vehicles in Policy SS9 will result in increased electricity consumption. Policy SS8 seeks to promote renewable energy development to increase the self-sufficiency of the islands with regards to energy supply, and move towards a carbon neutral environment, with potential long-term positive effects on energy.

- 5.109 Agriculture is a large part of the islands' economy. There is no information recorded on the grading (1-5) of agricultural land and therefore, no known best and most versatile agricultural land on the islands. Soil resources are key for the agriculture industry, and the prevention of soil loss and soil erosion is vital. Development could result in the loss of soil resources through the loss of greenfield land. Policy SS2 promotes sustainable development which includes the protection of natural capital, which includes soil resources with a residual neutral effect.
- 5.110 **Appraisal of Site Allocations:** None of the site allocations were considered to have significant effects on waste or minerals. None of the allocations will hinder the future extraction of mineral resources, and although development will create waste the mitigation provided through Draft Plan Policies will prevent negative effects. The site options were considered to have positive effects on energy through the promotion of high energy efficiency standards which can reduce energy use. Site allocations at Old Town will result in the loss of greenfield land and therefore associated soil resources, with potential minor negative effects.
- 5.111 **Synergistic and Cumulative Effects:** The management of waste, minerals and energy for the islands will have long-term cumulative positive effects. The proposed development within the Draft Plan could have minor negative effects on waste, however with available Plan Policy mitigation, residual neutral effects were identified. Development also has the potential for the loss of greenfield land in places, with long-term minor negative effects for loss of soil resources.
- 5.112 **Interrelationships with other Topics:** Waste management is closely linked with communities, health and biodiversity, with the potential for both negative and positive indirect effects. Energy is linked with climate change, health, communities, biodiversity and landscape, with the potential for positive and negative effects. Potential effects on soil resources can also have indirect effects on communities and health, climate change, water resources, water quality, economy and flooding.

Equality Impacts Assessment (EqIA)

- 5.113 The Equality Act 2010 applies to the provision of services and public functions and includes the development of the Council's policies and plans. The Act prevents discrimination on the basis of nine protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation. The findings of this EqIA have been integrated into the SA of the Local Plan and are provided separately as Appendix VII to the Draft SA Report.

5.114 The equalities screening assessment found that the Draft Isles of Scilly Local Plan will not have negative effects on protected characteristics or persons identified under the Equality Act 2010 and therefore a full EqIA will not be required. Overall, effects were compatible and positive, or not applicable, with regard to protected persons; no negative effects were identified.

Habitats Regulations Assessment (HRA)

5.115 The Conservation of Habitats and Species Regulations 2010 (as amended) [the Habitats Regulations] require that Habitats Regulations Assessment (HRA) is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of European sites.

5.116 An initial screening assessment of the Isles of Scilly Local Plan was carried out to determine if the emerging policies and allocation sites have the potential for likely significant effects on any European sites. The screening found that the development proposed in the Plan is considered unlikely to have significant effects on any European sites alone, or in-combination with other plans and projects, and therefore an Appropriate Assessment is not required.

6.0 SA of the DRAFT ISLES OF SCILLY LOCAL PLAN (Regulation 19)

Developing the Local Plan from Regulation 18 to Pre-Submission Regulation 19

- 6.1 The Regulation 18 Draft Local Plan was published for consultation 16 March to 11 May 2018 on the Council's website, accompanied by various evidence studies including the Initial SA Report (February 2018). The feedback from this consultation has been analysed and the comments made, together with ongoing technical studies such as the updated Strategic Housing Market Assessment (SHMA June 2018) and the Infrastructure Capacity Assessment (2018)²⁹, have informed the development of the next stage of plan-making – the Pre-Submission Regulation 19 Plan. Comments made, and responses will be available on the Council's website in due course. Comments made on the Initial SA report were also collated and reviewed and taken into account in this next stage of appraisal.
- 6.2 In September 2017, the government published Planning for the right homes in the right places³⁰ - consultation proposals for reforming the planning system to increase the supply of new homes and increase local authority capacity to manage growth. The proposals included a new standard method for calculating local authorities' housing need. A further consultation paper³¹ on changes to planning policy and guidance including the standard method for assessing local housing need has been prepared with the consultation closing on 7 December 2018.
- 6.3 In consideration of these emerging changes for assessing housing need, the Isles of Scilly Council commissioned an updated Strategic Housing Market Assessment (SHMA, June 2018). Using both the current best practice method and the proposed standardised method, the updated SHMA confirmed that the housing need for the Isles of Scilly was 8 dwellings per annum.
- 6.4 The population of the Isles of Scilly is seasonal, reflecting the influence of tourism. The resident population is around 2,200, mostly based on St Mary's; tourist numbers can increase the population to as many as 6,000 people in the peak of summer although visitor numbers have reduced significantly during the last 10 years. The overall trend in population since 1991 is a growth of only about 10 people per year. Therefore, development growth is minimal and housing needs are minimal and reflect the needs primarily for the existing resident population.
- 6.5 In developing the Pre-Submission Draft Local Plan for Regulation 19 consultation, the Council has sought to explain this minimal growth more clearly and in response to certain consultation comments, particularly with

²⁹ <http://www.scilly.gov.uk/planning/local-plan/local-plan-evidence-base-library>

³⁰ <https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

³¹ <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

regard to the plan and the HRA. Policies in the Draft Plan have been amended to address comments received and updated information. Many of the amendments are minor and reflect issues for clarification, providing further guidance, updating or correction of typographical errors. A schedule of the key changes made to the plan is available on the Council's website and key changes may be summarised as follows:

Table 6.1: Summary of Key Changes to Draft Local Plan for Pre-Submission

Policy	Summary of Key Changes
SS1 Principles of Sustainable Development	Amendments for clarification to explain what it means to be sustainable on the Isles of Scilly, promoting biodiversity & further guidance; addition of 2 further criteria (f) promoting cohesive & resilient communities, and (g) generating & sustaining economic activity – recognising the need to increase self-sufficiency.
SS2 Sustainable Quality Design & Place-Making	Redrafting to clarify expectations from all development. Reorganisation into criteria (a) to (k) (I-V); Additional requirements to provide opportunities for measurable net gain in biodiversity; vermin-proof waste collection; & to promote physical activity.
SS3 Re-Use of Buildings	Additional criterion (e) requiring suitable nesting and roosting sites for birds & bats to be incorporated into design.
SS4 Protection of Retailing & Community Facilities	Reflects need to protect existing & support new retail. Minor amendments for clarification – include protection of recreational facilities; and positive support for new integrated health & social care facility.
SS5 Physical Infrastructure	Additional sentence explaining that new infrastructure will be supported where it makes a positive contribution to sustainability of the islands.
SS6 Water & Waste Water Management	Clarification that this applies to conversions as well as new-builds; clarifies differences between water connections & wastewater infrastructure.
SS7; SS8; SS9	No significant changes
SS10 Travel & Transport	Change from support to improve the islands' air and sea services.
OE1 Protecting & Enhancing Landscape & Seascape	Enhancement to afford greater protection to the various types of landscape characters, including specific consideration of the AONB; additional text to reflect the protection of seascape.
OE2 Biodiversity & Geodiversity	Policy has been extensively revised to differentiate between the different levels of designation for nature conservation, including provision of more details on the types of designated habitats and protected species on Scilly.
OE3 (now OE7) Development affecting Heritage	Policy has been significantly expanded & revised to set a clear hierarchy between the most important nationally protected assets and locally important – each type of heritage asset on Scilly is addressed separately.

OE4 (now OE3) Managing Pollution	Minor word changes for clarification & enhanced to better minimise light pollution; previously OE5.
OE5 (now OE4) Protecting Scilly's Dark Skies	Addition bullet points to policy to clarify different types of light pollution; previously OE4.
OE6 (now OE5) Managing Waste	Minor word changes for clarification.
OE7 (now OE6) Minerals	Minor word changes for clarification.
LC1 Housing Strategy	Rearrangement of wording and enhancement for clarification – explains where any justified open market homes could come forward. SHMA update confirms 105 affordable homes.
LC2 Qualifying for Affordable Homes	Minor word changes for clarification/updating.
LC3 Balanced Housing Stock	Rearrangement & itemised criteria (1-6) to clarify categories of new homes; revised from only considering accessibility issues to covering accessibility & scale/size of new homes.
LC4 Staff Accommodation	Minor word changes for clarification.
LC5 Removal of Occupancy Conditions	No change
LC6 Housing Allocations	One site allocation (previously H6) removed as some concern over access and risk of flooding; subsequent allocations renumbers H6 & H7. Substantive additions to provide site-specific guidance – each allocation includes i – v site-specific requirements that protect or enhance & provide mitigation for potential negative effects/concerns.
LC7 Windfall Housing	Minor amendments – inclusion of requirement to comply with LC3 as well as LC1&2.
LC8 Replacement Dwellings	Now seeks to control the size of replacement dwellings to ensure that housing stock remains available to local community. Minor word changes for clarification.
LC9 Residential Extensions	Also seeks to control size of extensions. Additional wording to provide further guidance with regard to standards and thresholds.
LC10 Multiple Occupation	Minor word changes for clarification.
WC1; WC2; WC3; WC4; WC5;	No change
WC6 Safeguarding Serviced Accommodation	Revisions to protect for loss of housing stock, regularising guesthouse accommodation, & ensuring that any loss of tourism accommodation is delivering other benefits – economic, community, staff or local need.
S1 Hugh Town & S2 Old Town	Settlement boundary S1 revised to remove elements beyond the garrison wall; settlement boundary S2

	revised to include settlement areas missed and to exclude the airport land as too detached from the main body of the settlement.
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Representations on the Regulation 18 Initial SA Report

- 6.6 A number of comments were made by Natural England (NE) relating to the HRA and hence relevant to the SA. Many of these comments related to plan-making and concern about the extent of growth and proposed new development. Details of comments and responses are provided in Appendix VIII of this SA Report; further clarification was gained through a meeting and telephone discussions with NE, culminating in a substantive rewriting of Policy OE2 Biodiversity & Geodiversity. No comments were received from the other statutory environmental bodies – Environment Agency & Historic England - on the SA or HRA Report at Regulation 18 consultation. Comments from RSPB aligned with those from NE. A further respondent was concerned about options for minerals resources; this was considered to be a matter for plan-making as the SA will assess any identified reasonable alternatives.

SA of Draft Isles of Scilly Local Plan (Pre-Submission Regulation 19)

- 6.7 The SA continued to consider sustainability themes that grouped SA Objectives in the same way as for the SA of the Regulation 18 Draft Local Plan. The assessment built upon the previous SA by investigating the key changes that had been made to the plan and the implications of these changes for any significant effects that had been predicted.

Amended Policies

Communities: Housing & Services/Facilities

SEA Directive Topics: Population & Human Health
NPPF paragraphs 47-68

Relevant SA Objectives:

- SA Objective 2: To support sustainable communities 2A Housing; 2B Services & Facilities

- 6.8 The additional criterion to Policy SS1 Principles of Sustainable Development relating to cohesive and resilient communities will strengthen the positive effects identified by including this explicit principle. The minor additions to Policy SS4 Protection of Retailing & Community Facilities protect recreational facilities and make explicit support for new integrated health and social care facility – strengthening positive effects. Revisions to Policies LC8 & LC9 seek to control the sizes of replacement dwellings and extensions to existing homes – thus ensuring that the housing stock remains available to the local community and strengthening positive effects. Protection of the extant housing stock is further strengthened through revisions to Policy WC6 ensuring that any loss of

tourism accommodation would deliver other benefits – again enhancing mitigation measures to strengthen positive effects.

Economy and Employment

SEA Directive Topics: Population & Human Health
NPPF paragraphs 18-22, 28

Relevant SA Objectives:

- SA Objective 3: To support sustainable economic development & employment

- 6.9 The additional criterion to Policy SS1 Principles of Sustainable Development relating to generation and sustaining economic activity recognises the need to increase self-sufficiency for the islands and will strengthen the positive effects identified by including this explicit principle. The change from “support” to “improve” the islands’ air and sea services in Policy SS10 could enhance the economy by improving transport with positive effects.

Health & Equality

SEA Directive Topics: Population & Human Health
NPPF paragraphs 69-78

Relevant SA Objectives:

- SA Objective 2- To support sustainable communities 2A Housing; 2B Services & Facilities
- SA Objective 3: To support sustainable economic development & employment
- SA Objective 4: To safeguard and enhance human health
- SA Objective 10B: Energy (fuel poverty)

- 6.10 Additional requirements in Policy SS2 Sustainable Quality Design & Place-Making to provide vermin-proof waste collection and to promote physical activity will enhance the likely positive effects of the plan on health. The minor additions to Policy SS4 Protection of Retailing & Community Facilities protect recreational facilities and make explicit support for new integrated health and social care facility could contribute to strengthening positive effects both directly and indirectly. The specific requirements for all new residential development in LC3 to contribute towards sustainable, balanced and inclusive island communities recognises the special character of islands and promotes positive effects for equality objectives.

Transport and Air Quality

SEA Directive Topics: Population & Human Health; Material Assets; Air; Climatic Factors
NPPF paragraphs 29-41, 93-108

Relevant SA Objectives:

- SA Objective 6: To maintain air quality & improve sustainable transport

- 6.11 Policy SS10 Travel & Transport now includes a change from “support” to “improve” the islands’ air and sea services thus with the potential for improving transport with positive effects.

Climate Change & Coastal Change: flood risk, resilience & adaptation

SEA Directive Topics: Air; Climatic Factors; Water; Material Assets
NPPF paragraphs 93-108

Relevant SA Objectives:

- SA Objective 7: Climate Change, Coastal Change; Greenhouse Gas Emissions

- 6.12 None of the changes to the Draft Local Plan were likely to be significant with regard to SA Objectives for climate change – Plan Policies remain likely to promote positive effects through managing flood risk, promoting renewable energy, and requiring high quality sustainable design.

Water Quality & Water Resources

SEA Directive Topics: Water; Material Assets
NPPF paragraphs 109-125

Relevant SA Objectives:

- SA Objective 5: Maintain and improve water quality and use water efficiently and protect water resources. 5A- Water Quality, 5B- Water Resources

- 6.13 Policy SS6 Water and Wastewater Management has been amended to clarify the differences between water connections and wastewater infrastructure; requirements also apply to conversions as well as new builds. These clarifications are not significant with regard to the SA and the positive effects previously indicated remain valid and relevant.

Landscape & Seascape

SEA Directive Topics: Landscape
NPPF paragraphs 109-125

Relevant SA Objectives:

- SA Objective 9: Protect and enhance the landscape

- 6.14 Policy OE1 Protecting & Enhancing the Scilly Landscape & Seascape has been enhanced to afford greater protection to the various types of landscape characters and including specific consideration of the nationally important designation of the Area of Outstanding Natural Beauty (AONB). This enhancement and clarification will strengthen the mitigation measures provided by this Policy in protecting the landscape character and quality, helping to ensure that negative effects are avoided or minimised. Policy OE4 Protecting Scilly's Dark Skies (previously OE5) now includes additional bullet points that explain the different types of light pollution – this clarification will strengthen the mitigation measures provided through policy.

Cultural Heritage

SEA Directive Topics: Cultural Heritage, Historic Environment
NPPF paragraphs 126-141

Relevant SA Objectives:

- SA Objective 8: Maintain and enhance cultural and heritage assets; including architectural and archaeological heritage

- 6.15 Policy OE3 (now OE7) Development affecting Heritage has been expanded and revised to set a clear hierarchy between the most important assets and their setting and those that have local importance: Conservation Area; Listed Buildings; Scheduled Monuments & Archaeology; Registered Parks & Gardens; Non-Designated Local Heritage Assets. Each type of heritage asset is described with its relevance and importance on Scilly providing clearer and stronger guidance including specific requirements for development proposals – such as proportionate historic environment assessments and evaluations. This provides stronger mitigation measures that will ensure that residual effects are at least neutral and with the possibilities for minor positive effects through the encouragement for enhancing heritage assets and their settings.

Biodiversity & Geodiversity

SEA Directive Topics: Biodiversity, Flora & Fauna; Heath
NPPF paragraphs 109-125

Relevant SA Objectives:

- SA Objective 1: Prevent loss of and enhance habitats

- 6.16 Policy OE2 Biodiversity & Geodiversity has been extensively revised to differentiate between different levels of designation: European Sites; National Sites; Protected and Priority Species and Habitats; Irreplaceable Habitats; Local Sites and Habitats and Species of Principal Importance; Avoidance, Mitigation and Compensation for Biodiversity and Geodiversity Impacts. These revisions address the revision to the NPPF (July 2018), comments from Natural England and the RSPB, and incorporate the recommendation from the SA to include the requirement for biodiversity net gain.
- 6.17 The comprehensive clarification provided through the explanations of different levels of protection and importance will support the policy intentions. The additional policy paragraph on avoidance, mitigation and compensation provides additional explanation and sets out clear requirements for development proposals to follow the mitigation hierarchy thus providing stronger mitigation measures to avoid negative effects and promote overall positive effects. The requirement to provide opportunities for enhancement wherever possible indicates the likely possibilities for implementation with positive effects that may be cumulative and synergistic in the longer term as habitat networks are improved.
- 6.18 The Policy also now includes a requirement to minimise the impacts of non-native species throughout the lifetime of the development. This provides mitigation measures against the risks of invasive non-native species that have been identified as vulnerabilities for the European sites. The HRA findings have been taken into account in this updating of the SA; the HRA is discussed later in this Section 6.

Waste & Minerals; Energy; Soil & Agriculture

SEA Directive Topics: Soil
NPPF paragraphs 109-125, 142-149

Relevant SA Objectives:

- SA Objective 10: Support a more sustainable means of production and use of resources. 10A- Waste & Minerals, 10B- Energy, 10C- Soil and Agriculture

- 6.19 Minor amendments for clarification to Policy OE6 (now renumbered OE5) Managing Waste and Policy OE7 (now renumbered as OE6) Minerals do not affect the previous findings of the SA.

Housing Sites Allocations (H1-H6)

6.20 Policy LC6 now confirms the preferred housing site allocations as follows:

- H1 Former Secondary Schools, Carn Thomas, Hugh Town: around 26 homes
- H2 Former Primary School, Carn Thomas, Hugh Town: around 7 homes
- H3 Land at the west side of Old Town Road on the north of Ennor Castle, Old Town: around 15 homes
- H4 Land to the north east of Ennor Close, Old Town: around 13 homes
- H5 Land to the south of Launceston Close, Old Town: around 12 homes
- H6 (previously H7) Land to the south east of Ennor Close, Old Town: around 11 homes
- H7 (previously H8) Land to the east of Ennor Close, Old Town: around 20 homes

6.21 An earlier site (H6 Land to the south of Ennor Close, Old Town) was removed from the allocations because there is concern about the scope for access improvements, the land too low lying and thus at risk of flooding, and concern that it was not strategic in terms of size for the Local Plan. The Policy has also been revised significantly to include site-specific requirements for each allocation. These provide clear mitigation measure requirements that are focused for each site and ensure that avoidance/mitigation for potential negative effects will be implemented. This confirms the earlier findings for the SA and strengthens the mitigation measures ensuring neutral or positive residual effects.

6.22 The concern identified with regard to water and wastewater systems has been addressed through site-specific requirements for appropriate connections and upgrades to water and sewerage for all Sites H1 - H7. Provision of appropriate vehicular and/or pedestrian access is required for Sites H3, H4, H5, H6 and H7. Specific requirements for heritage assets and their settings are set out in Sites H1, H3, H5, H6 and H7. Specific requirements to reduce tidal flood risk are provided in Sites H3 and H6. Specific design requirements are set out for Sites H1 & H2 in recognition of the original buildings, and for Site H3 to protect or enhance the setting of Ennor Castle. Site H7 further includes a requirement to reduce future amenity issues for occupants of new housing and to minimise any conflict with the operational and safety requirements of the nearby St Mary's Airport. The changes to S1 Hugh Town & S2 Old Town Settlement Boundaries have reflected comments made and do not affect the previous findings of the SA.

SA of Implementation of the Isles of Scilly Local Plan as a whole

6.23 The SA found that the Local Plan will have major positive effects for SA Objectives on housing to meet identified need, essentially for affordable

housing and for the existing residents of the Scillies. Policies will also support the future sustainable development for the islands, encouraging the economy and more self-sufficient communities to be more resilient to climate change and predicted trends in economic development. Strong development management policies are included to provide mitigation measures that will ensure that the any potential negative effects are avoided/minimised to at least neutral effects; encouragement or requirement for enhancements will have positive effects. Positive effects for housing, the economy, communities and environmental assets will be cumulative in the longer-term. Overall, the SA found that the Local Plan will have positive effects and that mitigation measures are in place to ensure that there are no significant negative effects.

Equality Impacts Assessment (EqIA)

- 6.24 The findings of this EqIA have been integrated into the SA of the Local Plan and are provided separately as Appendix VII to the SA Report. No comments were received on the initial EqIA during Regulation 18 consultation. Appendix VII has been updated with the relevant changes made to the Local Plan. Policy SS4 Protection of Retailing and Community Facilities now includes positive support for a new integrated health and social care facility that would enhance positive effects for health and equality. Policy LC3 includes specific requirements for new residential development to contribute to inclusive island communities with enhancement of positive effects for equality.
- 6.25 The updated equalities screening assessment found that the Draft Isles of Scilly Local Plan will not have negative effects on protected characteristics or persons identified under the Equality Act 2010 and therefore a full EqIA will not be required. Overall, effects were compatible and positive, or not applicable, with regard to protected persons; no negative effects were identified.

Habitats Regulations Assessment (HRA)

- 6.26 The Conservation of Habitats and Species Regulations 2010 (as amended 2017) [the Habitats Regulations] require that Habitats Regulations Assessment (HRA) is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of European sites.
- 6.27 An initial screening assessment (February 2018) of the Isles of Scilly Local Plan was carried out to determine if the emerging policies and allocation sites have the potential for likely significant effects on any European sites. Since this initial screening, important European rulings have had implications for the way in which HRA is undertaken in the UK – embedded mitigation such as provided through plan policies can no longer be taken into account at the screening stage and mitigation measures can only be considered during the appropriate assessment stage. Accordingly, the HRA screening was revised and appropriate assessment undertaken for consideration of potential likely

significant effects for water quality/levels, recreational disturbance, and habitat loss or fragmentation.

- 6.28 The revised screening and appropriate assessment found that the development proposed in the Isles of Scilly Local Plan is considered unlikely to have significant effects on any European sites alone, or in-combination with other plans and projects.

7.0 PROPOSED MONITORING

- 7.1 The SEA Directive and Regulations require that the significant effects (positive and negative) of implementing the plan should be monitored in order to identify at an early stage any unforeseen effects and to be able to take appropriate remedial action. Government guidance³² on SA/SEA advises that existing monitoring arrangements should be used where possible in order to avoid duplication.
- 7.2 Government requires local planning authorities to produce Monitoring Reports (MRs), and the Isles of Scilly Council Monitoring Report³³ (produced annually) is considered sufficient to ensure appropriate monitoring takes place.

³² http://planningguidance.planningportal.gov.uk/?post_type=&s=sustainability+appraisal

³³ <http://www.scilly.gov.uk/planning-development/planning-policies-and-guidance>

8.0 CONSULTATION & NEXT STEPS

- 8.1 The Isles of Scilly Local Plan and its accompanying SA documents are provided for consultation through the Council's website. Comments made, and responses prepared will be recorded and inform the next stages of plan-making and assessment. Thus, consultation is a vital ongoing and iterative element of the plan-making and the SA processes. The Isles of Scilly Local Plan reflect the findings of various technical studies and the responses received so far during consultation.
- 8.2 The Draft Local Plan will be available for Pre-Submission Regulation 19 consultation between 1 February and 15 March 2019. The Plan will be available to the general public and the statutory consultees, including Historic England, Natural England, and the Environment Agency. The plan will then be submitted to the Secretary of State for Housing, Communities & Local Government who will appoint a Planning Inspector to carry out an independent examination of the draft Local Plan. The submitted Local Plan will include supporting evidence, including the SA and HRA Reports.
- 8.3 Any comments on the SA should be made to the Isles of Scilly Council:
- <http://www.scilly.gov.uk/planning-development/local-plan-review>
planning@scilly.gov.uk

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 (January 2019) accompanying the Draft Isles of Scilly Plan on Regulation 19 Pre-Submission consultation – and in accordance with paragraph 35 of the National Planning Policy Framework (2018)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 plans	Section 1 Introduction	Sets out the vision and main objectives of the Draft Isles of Scilly Local Plan.
	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 plan including,	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 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
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 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 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.
	Section 5 & 6 Appendices IV to VIII	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 adverse effects on the environment of implementing the plan	Section 5 & 6 Appendices IV to VIII	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 appraisal matrices (appendices).
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in	Sections 4, 5 & 6 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.

SEA Directive & Regulation Requirements	SA Report Section	Summary of Contents
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 7	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.

SA Appendix II

<http://www.scilly.gov.uk/planning-development/local-plan-review/sustainability-appraisal>

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 Enhance Habitats	Prevent loss of habitat	
		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 Communities	Ensure the provision of affordable housing	2A
		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 Facilities	Improve access to services for all islanders	2B
		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 & Employment	Support the diversification and long term viability of commercial activities, including agriculture, fishing, the marine industry and tourism	
		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 Enhance Human Health	Deliver adequate provision of infrastructure (physical, social and green) including compliant drinking water, sewage disposal and waste management	Water Infrastructure is addressed in SA5, moved to avoid duplication
		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 population	Moved to SA2 Communities to avoid 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 water quality and use water efficiently and protect water resources	Prevent pollution	5A
		Protect and improve drinking water to ensure compliance with Drinking Water Inspectorate	
		Protect existing groundwater abstractions from derogation by new abstractions	5B
		Protect Controlled Waters from adverse abstraction impacts	5B
		Increase use of sustainable drainage systems	
		Improve efficiency and conservation in use of water	5B
		Ensure sufficient water supply for agriculture	5B
		Protect woodland and promote timber production	
	5A- Water Quality		
	5B- Water Resources		

		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 & Improve Sustainable Transport	Meet national air quality standards	
		Deliver a more sustainable pattern of 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 and consequences of climate change with particular focus on improving resilience and adaptation Climate Change; Coastal Change; Greenhouse Gas Emissions	Reduce greenhouse gas emissions	
		Ensure tourism is compatible with the climate change agenda	
		Improve energy efficiency	Moved to SA10 Resources to avoid duplication
		Improve public transport (includes taxis)	Moved to SA6 AQ & Transport to avoid duplication
		Increase the use of sustainable design and construction techniques	
		Ensure access to services during and after severe weather events	
		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 architectural and archaeological heritage	Protect and enhance architectural heritage	
		Protect and enhance archaeological heritage (including unknown)	
		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 10A- Waste & Minerals	Increase recycling and composting	10A
		Promote sustainable timber production	10A
		Increase the renewable energy capacity	10B
		Improve efficiency and effectiveness of sewerage system	Sewerage is addressed in SA5 Water - moved to SA5 to avoid duplication
		Ensure the efficient use of developed land	10C

	10B- Energy	Ensure the sustainable use of mineral resources including the use of recycled and secondary aggregates	10A
	10C- Soil and Agriculture	Increase local food production	10C
		Maintain agricultural activities whilst avoiding and reducing adverse impacts	Added from SA1 Biodiversity to SA10C as 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	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
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: Maintain a World Class Environment													
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
Aim: Provision of Infrastructure														
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
Aim: Housing														
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	+
Aim: Strong, Vibrant and Healthy Community														
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: 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: Carbon Neutrality														
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 Hough 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
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 Hough 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 in 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	0	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	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	0	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	0	0	0	0	0	0	0	0	0
Summary SA Findings:																			
<p>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.</p> <p>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.</p>																			

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

Key: Categories of Significance		
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 Facilities	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.
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 SPD ¹ 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 <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	1A Town Centre Boundary	1B Do Nothing
	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		
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	0
5B: Water Resources	Not applicable and neutral effects predicted.	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 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	+?
7: Climate Change	Not applicable and neutral effects predicted.	0	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	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	0
10A: Waste & Minerals	Not applicable and neutral effects predicted.	0	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%20IoS.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
<p>Summary SA Findings:</p> <p>Most SA Objectives are not relevant to these options 1A & B on retail protection and neutral effects are indicated.</p> <p>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”.</p> <p>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.</p>			

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	2A Settlement Boundaries	2B Do Nothing
	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		
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

⁸ <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 ⁹ . 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	+?
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?

⁹ <https://www.cornwall.gov.uk/media/25838697/clean-air-for-cornwall-strategy-2017.pdf>

¹⁰ <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
Summary SA Findings:			
<p>Many SA Objectives are not relevant to these options 2A & B on the Housing Strategy and neutral effects are indicated.</p> <p>For Option 2A, provision of allocation sites for housing will have direct major positive effects for SA Objectives on housing and health; directing such sites to existing settlements of Hugh Town & Old Town will have minor 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 allocated housing sites are guided to within the existing two towns.</p> <p>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.</p>			

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	3B Do Nothing
		1: Prevent loss of and enhance habitats	Not applicable and neutral effects predicted.
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
Summary SA Findings:			
<p>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.</p> <p>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.</p>			

Policy Option 4 – Policy Number 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.			
SA Objectives	Assessment of Effects	4A Settlement Boundaries	4B Do Nothing
	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		
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 - some uncertainty at this stage of assessment.	+	0?
2A: Housing	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	+?
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
Summary SA Findings:			
<p>Many SA Objectives are not relevant to these options 2A & B on retail protection and neutral effects are indicated.</p> <p>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.</p> <p>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.</p> <p>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.</p>			

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	5B 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
Summary SA Findings:			
<p>Many SA Objectives are not relevant to these options 5A & B on employment land and neutral effects are indicated.</p> <p>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.</p>			

Isles of Scilly Local Plan 2030: Regulation 18 Consultation

Appendix VI: SA of Site Options

Key:

Categories of Significance		
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)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
No 1: Prevent loss of and enhance habitats	<p>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 distance¹. The Ramsar site is designated for the presence of the European storm-petrel, the European shag and the lesser black-backed gull². The SPA 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.</p> <p>The proposed site is located approximately 130m to the south⁴ 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 & sandflats, and reef habitats; Grey Seal & Shore Dock⁵. The SAC is sensitive to water pollution, habitat loss and recreational activities⁶. 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.</p> <p>The site is also the same distance from the proposed extension to the SPA site⁷ 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.</p>	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))

	<p>The site is located approximately 230m from Lower Moors SSSI⁸, which is to the east and contains Lowland Fens Priority Habitat and Deciduous Woodland Priority Habitat⁹. The SSSI is designated for its range of wetland habitats and importance as a feeding site for a small number of wintering bird species¹⁰. 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 condition¹¹.</p> <p>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.</p> <p>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.</p>	
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=S1001273&ReportTitle=Lower%20Moors%20\(St.%20Mary%27s\)%20SSSI](https://designatedsites.naturalengland.org.uk/ReportUnitCondition.aspx?SiteCode=S1001273&ReportTitle=Lower%20Moors%20(St.%20Mary%27s)%20SSSI))

<p>No 4: Safeguard and enhance human health</p>	<p>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.</p> <p>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 identified¹² 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.</p>	<p>0 +</p>
<p>No 5a: Maintain and improve water quality</p>	<p>Hugh Town has a formal¹³ piped foul drainage system and the untreated effluent is discharged into the surrounding sea. It is understood that the sewerage system is at capacity¹⁴ 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.</p> <p>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.</p> <p>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 practises¹⁵, 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.</p>	<p>0?</p>

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

<p>No 5B: Use water efficiently and protect water resources</p>	<p>The island of St Mary's relies on a number of boreholes and a desalination plant with three reservoirs for storage¹⁶. 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 reported¹⁷.</p> <p>Mitigation measures are available through the provision & use of water efficient devices with likely residual neutral effect against SA Objective 5B Water Resources.</p>	<p>0</p>	
<p>No 6: Maintain air quality and improve sustainable transport</p>	<p>Air quality is good in the Isles of Scilly & there are no major air quality issues with no Air Quality Management Areas (AQMAs) declared¹⁸. 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.</p> <p>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.</p>	<p>0</p>	<p>+</p>
<p>No 7: Climate Change; Coastal Change; Greenhouse Gas Emissions</p>	<p>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 SMP2¹⁹ 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.</p> <p>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.</p>	<p>0</p>	<p>+</p>

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

<p>No 8: Maintain and enhance cultural & heritage assets, including architectural and archaeological heritage</p>	<p>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 it²⁰. 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 Guide²¹, to ensure development integrates well with the existing architectural style and the Character Area of Hugh Town – with neutral effects.</p> <p>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.</p> <p>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 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.</p>	<p>0</p>
<p>No 9: Protect and enhance the landscape</p>	<p>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 island²², 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.</p>	<p>+</p>
<p>No 10A: Waste & Minerals</p>	<p>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.</p>	<p>0</p>

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: Energy	New development on any site has the potential to be sustainably designed to reduce the need for heating, 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- Hugh Town Site: Sandy Banks, Telegraph Road; Ref A11 (12 dwellings)	
Assessment of Effects	
SA Objectives	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
No 1: Prevent loss of and enhance habitats	<p>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's²⁴, 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 gull²⁵. The SPA is also designated for its populations of storm-petrel and lesser black-backed gull and the assemblage of seabirds of international importance²⁶. 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.</p> <p>The site option is located approximately 250m to the south-east from the Isles of Scilly marine SAC complex²⁷ 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 activities²⁸. 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.</p> <p>The site is also the same distance from the proposed extension to the SPA site²⁹ 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.</p> <p>Lower Moors SSSI is located 50m to the south of the site³⁰, and contains Lowland Fens Priority Habitat and Deciduous Woodland Priority Habitat. The SSSI is designated for its range of wetland habitats and importance</p>
	0

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

	<p>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 condition³¹. In addition, there is a band of Lowland Heathland Priority Habitat 90m to the north-west of the site.</p> <p>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</p> <p>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.</p> <p>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.</p>	
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

<p>No 3: Support sustainable economic development & employment development</p>	<p>No employment land is proposed at the site option; therefore, not applicable and neutral effects indicated.</p>	<p>0</p>	
<p>No 4: Safeguard and enhance human health</p>	<p>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.</p> <p>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 identified³² 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.</p>	<p>0</p>	<p>+</p>
<p>No 5a: Maintain and improve water quality</p>	<p>Hugh Town has a formal³³ 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 west³⁴. Potential pollution during the construction phase can be avoided through careful pollution controls & implementation of an Environmental Management Plan.</p> <p>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 practises³⁵, however development on the site is not likely to have an impact on groundwater quality.</p> <p>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.</p>	<p>0</p>	

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

<p>No 5B: Use water efficiently and protect water resources</p>	<p>The island of St Mary's relies on a number of boreholes and a desalination plant with three reservoirs for storage³⁶. 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 effect³⁷.</p>	<p>0</p>	
<p>No 6: Maintain air quality & improve sustainable transport</p>	<p>Air quality is good in the Isles of Scilly & they are not considered to have any major air quality issues with no AQMAs declared³⁸. 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.</p> <p>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.</p>	<p>0</p>	<p>+</p>
<p>No 7: Climate Change; Coastal Change; Greenhouse Gas Emissions</p>	<p>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. SMP2³⁹ 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.</p> <p>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</p>	<p>0</p>	<p>+</p>

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	<p>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 it⁴⁰. 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 Guide⁴¹, to ensure development integrates well with the existing architectural style and the Character Area of Hugh Town.</p> <p>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.</p> <p>The nearest Listed Buildings to the site are around 300m to the west, with existing development existing between 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.</p>	0
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

St Mary's Island- Hugh Town Site: Bayview Terrace, 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 (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
No 1: Prevent loss of and enhance habitats	<p>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 distance⁴⁴. The Ramsar site is designated for the presence of the European storm-petrel, the European shag and the lesser black-backed gull⁴⁵. The SPA is also designated for its populations of storm-petrel and lesser black-backed gull and the assemblage of seabirds of international importance⁴⁶. 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.</p> <p>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</p>	0

⁴⁴ Defra (2017) Magic Map

⁴⁵ JNCC (2008) Isles of Scilly Ramsar Information Sheet

⁴⁶ JNCC Defra (2016) Isles of Scilly SPA Natura 2000 Standard Data Form

	<p>& 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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	
<p>No 2A: Housing</p>	<p>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.</p>	<p>++</p>

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

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

<p>No 2B: Services and Facilities</p>	<p>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.</p>	<p>0?</p>
<p>No 3: Support sustainable economic development & employment development</p>	<p>No employment land is proposed at the site option; therefore, not applicable and neutral effects indicated.</p>	<p>0</p>
<p>No 4: Safeguard and enhance human health</p>	<p>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.</p> <p>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.</p>	<p>0 +</p>
<p>No 5a: Maintain and improve water quality</p>	<p>Hugh Town has a formal⁵³ 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 sewerage⁵⁴. 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.</p> <p>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 practises⁵⁵, however development on the site is not likely to have an impact on groundwater quality.</p>	<p>0</p>

⁵³ Three Dragons (for the Isles of Scilly Council) (2014) Infrastructure Plan

⁵⁴ SHLAA Infrastructure Assessment (2016)

⁵⁵ Natural England (2015) Isles of Scilly National Character Area Profile

<p>No 5B: Use water efficiently and protect water resources</p>	<p>The island of St Mary's relies on a number of boreholes and a desalination plant with three reservoirs for storage⁵⁶. 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 reported⁵⁷.</p>	<p>0</p>	
<p>No 6: Maintain air quality and improve sustainable transport</p>	<p>Air quality is good in the Isles of Scilly & they are not considered to have any major air quality issues with no AQMAs declared⁵⁸. 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.</p>	<p>0</p>	<p>+</p>
<p>No 7: Climate Change: Coastal Change; Greenhouse Gas Emissions</p>	<p>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. SMP2⁵⁹ 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.</p>	<p>0</p>	<p>+</p>

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

<p>SA Objective 8- Maintain and enhance cultural & heritage assets; including architectural and archaeological heritage</p>	<p>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 it⁶⁰. 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 Guide⁶¹, to ensure development integrates well with the existing architectural style and the Character Area of Hugh Town.</p> <p>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.</p> <p>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.</p>	<p>0?</p>
<p>SA Objective 9- Protect and enhance the landscape</p>	<p>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 guide⁶² and through Plan Policy mitigation; likely neutral effect.</p>	<p>0</p>
<p>No 10A: Waste & Minerals</p>	<p>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.</p> <p>There are no Mineral Safeguarded Areas on the IOS⁶³.</p>	<p>0</p>

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

<p>No 10B: Energy</p>	<p>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.</p>	<p>+?</p>
<p>No 10C: Soil and Agriculture</p>	<p>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.</p>	<p>-?</p>

St Mary's Island- Old Town Sites: Old Town 1, North of Ennor Farm, Ref A13 (15 dwellings), Ennor Close, Ref A14 (13 dwellings); Old Town 3, Launceston Close, Ref A15 (12 dwellings); Old Town, Ennor Close, Ref A16 (3 dwellings); Old Town, Ennor Close, Ref A17 (11 dwellings); Old Town, Ennor Close, Ref 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)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	
No 1: Prevent loss of and enhance habitats	<p>The Old Town site options are located approximately 3km from the Isles of Scilly Ramsar and SPA sites⁶⁴. The Ramsar site is designated for the presence of the European storm-petrel, the European shag and the lesser black-backed gull⁶⁵. The SPA site is also designated for its populations of storm-petrel and lesser black-backed gull and the assemblage of seabirds of international importance⁶⁶. 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.</p> <p>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 Dock⁶⁷. The SAC is sensitive to water pollution and recreational activities⁶⁸. 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.</p> <p>The site options are also the same distance from the proposed extension to the SPA site⁶⁹ 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.</p>	0

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))

	<p>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 species⁷⁰, and is classified as an Important Bird Area but is not a component of the SAC complex; and is in an unfavourable but recovering condition⁷¹. 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.</p> <p>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.</p> <p>The Old Town site options are unlikely to have any negative effects on internationally or nationally designated sites with overall likely neutral effects.</p>	
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

⁷⁰ Natural England (1986) Lower Moors SSSI Citation

⁷¹ Natural England (2012) Online

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

<p>No 4: Safeguard and enhance human health</p>	<p>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.</p> <p>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 identified⁷² 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.</p>	<p>0 +</p>	
<p>No 5a: Maintain and improve water quality</p>	<p>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 treated⁷³. Sites A13,14,16,17,18 will be able to connect to the main sewerage network, however the bio-bubble is at capacity⁷⁴ 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 issues⁷⁵, with uncertainty at this stage around the effect this may have.</p> <p>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 practises⁷⁶, however development on the sites is not likely to have an impact on groundwater quality as groundwater sources are located away from the sites.</p> <p>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.</p>	<p>0?</p>	
<p>No 5B:</p>	<p>The island of St Mary's relies on a number of boreholes and a desalination plant with three reservoirs for storage⁷⁷. 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</p>	<p>0</p>	

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

<p>Use water efficiently and protect water resources</p>	<p>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.</p>					
<p>No 6: Maintain air quality and improve sustainable transport</p>	<p>Air quality is good in the Isles of Scilly & there are no major air quality issues with no Air Quality Management Areas (AQMAs) declared⁷⁸. 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.</p> <p>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 October⁷⁹, and the Buzza Bus (charity) service is only available to the over 60s⁸⁰. 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.</p>	<table border="1"> <tr> <td data-bbox="1935 360 1989 459">0</td> <td data-bbox="1989 360 2040 459">+</td> </tr> <tr> <td colspan="2" data-bbox="1935 459 2040 687"></td> </tr> </table>	0	+		
0	+					
<p>No 7: Climate Change: Coastal Change; Greenhouse Gas Emissions</p>	<p>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 flooding⁸¹. Overall likely neutral effect.</p> <p>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.</p>	<table border="1"> <tr> <td data-bbox="1935 687 1989 823">0</td> <td data-bbox="1989 687 2040 823">+</td> </tr> <tr> <td colspan="2" data-bbox="1935 823 2040 1023"></td> </tr> </table>	0	+		
0	+					
<p>No 8: Maintain and enhance cultural &</p>	<p>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</p>	<table border="1"> <tr> <td colspan="2" data-bbox="1935 1023 2040 1201">+</td> </tr> </table>	+			
+						

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

⁷⁹ <https://www.thisisscilly.com/isles-of-scilly-community-bus-timetabel>

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

<p>heritage assets, including architectural and archaeological heritage</p>	<p>could address an existing issue with the local character. Any development should follow the Isles of Scilly Design Guide⁸³, to ensure development integrates well with the existing architectural style and the Character Area of Old Town. Potential for a minor positive effect.</p> <p>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.</p> <p>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 heritage assets in the immediate area it is recommended that a Heritage Impact Assessment is conducted to ensure there are no negative effects.</p>	
<p>No 9: Protect and enhance the landscape</p>	<p>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 guide⁸⁴, which will help ensure any future development is well integrated with the existing landscape and overall neutral effects.</p>	<p>0</p>
<p>No 10A: Waste & Minerals</p>	<p>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.</p> <p>There are no Mineral Safeguarded Areas on the IOS⁸⁵.</p>	<p>0</p>

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

⁸⁴ Ibid.

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

<p>No 10B: Energy</p>	<p>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.</p>	<p>+</p>
<p>No 10C: Soil and Agriculture</p>	<p>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.</p>	<p>-</p>

Appendix VII is the Equality and Diversity Impact Assessment (EqIA) which is uploaded separately [here](#)

Appendix VIII: Consultation Representations & Responses/Action Taken

Consultation Representations to Initial SA Report & HRA Screening Report (16 March – 11 May 2018) accompanying draft Local Plan on Regulation 18 Consultation

Initial SA Report/ HRA Screening Report	Consultee & Comments	Enfusion Responses & Action Taken
Natural England		
HRA	The HRA should be considered in the light of our comments on the Local Plan. If the Council is proposing allocations for provision of housing, employment uses, waste & minerals, these will need to be addressed as part of the HRA.	Understood with thanks. The HRA has considered housing allocations (Policy H1-H7). The Plan does not make allocation provision for employment, waste or minerals development.
HRA method	<p>The Council should consider the need to address mitigation measures within the framework of an Appropriate Assessment rather than as part of the screening assessment – based on the recent EU Court of Justice Judgment (People over Wind & Sweetman v Coillte Teoranta Case C-323/17). It is not permissible to take account of measures intended to avoid or reduce the harmful effects of the plan or project on a European Site at the screening stage.</p> <p>This is particularly relevant to the mitigation measures discussed briefly in paras 3.11 to 3.27 of the HRA Report.</p>	<p>Agreed. It is proposed to take the following steps:</p> <ol style="list-style-type: none"> 1. Revisit the screening and revise the screening eliminating the mitigation relied upon – this is Appendix IV in the HRA. 2. Identify whether likely significant effects – answer yes - as before. 3. Undertake an Appropriate Assessment (AA) 4. Take into account mitigation at that stage - using the LP Policies to

Initial SA Report/ HRA Screening Report	Consultee & Comments	Enfusion Responses & Action Taken
		<p>mitigate</p> <p>5. Conclusions ought to be exactly the same as before – with mitigation, there are no likely significant effects.</p> <p>6. Prepare HRA Supplementary Report: AA</p> <p>Meeting 2 July with NE confirmed acceptability of approach.</p>
HRA Report paras 2.22-2.12 Level & Distribution of Growth in the Plan	Please see our comments in relation to Local Plan provision for housing (letter 9 May). We consider that the Plan makes a realistic assessment of sites required to deliver housing to meet identified needs and that options for delivery are tested through the SA and HRA process.	Noted. This is a matter for plan-making. The SA is required to test "reasonable alternatives"; we are not aware of any similar requirement for the HRA process.
HRA Para 2.13	If employment sites are to be allocated to meet employment needs these will need to be assessed within the HRA.	Agreed. This is a matter for plan-making.
HRA Para 3.3 Isles of Scilly SPA	It should also be noted in this para that since all areas within the new marine boundary for the proposed site could already be described as being are 'functionally linked' to the existing terrestrial SPA any future planning application or plan proposals will be subject to the HRA process regardless of whether the proposed SPA is formally designated. Natural England already advises authorities to consider the impact of activities on areas outside the current SPA boundary that support the existing features of the SPA. Management is therefore already required in the marine area as necessary to protect the breeding seabird features of the terrestrial SPA.	Noted with thanks. Additional information and clarification regarding the pSPA and management in the marine area will be included in the HRA report.

Initial SA Report/ HRA Screening Report	Consultee & Comments	Enfusion Responses & Action Taken
HRA Report Para 3.7	<p>It would be useful if the conservation objectives and vulnerabilities for each of the designated sites could be set out within the main body of the text.</p> <p>Similarly, it would be useful if the impact types/pathways could be identified for each designated site. We recognise that there may be overlaps between designations, but it would make the HRA report easier to follow.</p>	<p>Detailed information on conservation objectives & vulnerabilities provided in Appendix I and characterisation summarised in Table 3.1.</p> <p>Impact types associated with new developments summarised in Table 3.2; discussed in section 4.</p>
HRA Appendix III Allocation/Policy Screening Policy LC1	<p>Appendix III identifies policy LC1 as having the potential for likely significant effects. However, there is no reference to policy LC1 in this section. Policy LC1 which makes provision for market homes to enable the delivery of affordable homes should be assessed as part of the Appropriate Assessment. It would appear that between 40 – 50% more homes than allocated will be required to deliver the affordable housing sought over the Plan period and meet the full objectively assessed needs over the Plan period (as required by NPPF para 47). In particular we ask whether the need for accommodation to meet tourism needs has been taken into consideration given the Plan's aspiration to "support the Islands' ambition to be an internationally competitive visitor destination, capitalising on the Island's exceptional environment" (Plan para 262). Clarification is therefore sought regarding the level of provision for housing which will inform the need for revision to the HRA/need for appropriate assessment.</p>	<p>Matter for plan-making.</p> <p>Meeting 2 July 2018 explained the situation with objectively identified need and population trends – a growth of only about 10 people per year since 1991; housing need confirmed as only 8 dwellings per year (updated SHMA June 2018).</p>
HRA Report Para 3.17	<p>We do not consider recreational pressure to be an issue for the SPA extension in particular. As mentioned above, all the waters within the proposed extension boundary could be defined as being functionally linked to the existing terrestrial SPA and therefore require protection in that they are linked to the existing designation.</p>	<p>Noted with thanks and understood. Paragraph will be amended.</p>
HRA Para 3.18	<p>Please see comments regarding housing provision above</p>	
HRA Report	<p>Para 3.18 concludes that no significant increase in recreational activities is considered</p>	<p>Noted.</p>

Initial SA Report/ HRA Screening Report	Consultee & Comments	Enfusion Responses & Action Taken
Para 3.18-3.19	likely. We question this conclusion on the basis that the Plan is unclear about the overall level of housing provision required to meet needs. There is no mention here of disturbance as a result of noise and light pollution although such disturbance factors are referred to in table 3.2.	Additional text to explain.
HRA Report Para 3.22	Refers to pollution of groundwater arising from site allocations. More information is sought on the nature of potential pollution and any site specific mitigation measures proposed. These measures should then be reflected in the SA and Plan policy. Also, and as referred to against para 3.17 above, all the waters within the proposed extension boundary could be defined as functionally linked to the existing terrestrial SPA and therefore would require protection for the existing designation.	No site specific mitigation needed as the scale of development small and Policies provide sufficient mitigation measures (see para 3.23).
HRA Report Para 3.24	We do not consider that the Site Improvement Plan for the Special Area of Conservation (SAC) provides any mitigation. It is merely a statement of key threats/recommendations of how an impact could be managed. This issue will need to be addressed at the appropriate assessment stage.	Noted with thanks
HRA Report Para 3.25	The Local Plan is unclear about the need for new waste or employment facilities. If sites are to be allocated for such uses, impacts on air quality will need to be considered. Also, is the assumption that there will be a reduction in private vehicle use in St Mary's supported by evidence?	Noted; no new waste or employment land allocated. Based on proximity of new development to services – see SA
HRA Report Para 3.26	Table 3.2 refers to the potential impact arising from introduction of invasive species. However this issue is not referred to in this section of the report.	Agreed and additional text to be provided
HRA Report Para 3.27	As referred to above, following the Sweetman Judgement, Appropriate Assessment will be required to assess potential impacts flagged up at the screening stage and to address potential mitigation measures. Where mitigation measures are proposed these should also be reflected in the Sustainability Appraisal and Plan policy (including in relevant site allocation policy)	Noted and action as set out previously.

Initial SA Report/ HRA Screening Report	Consultee & Comments	Enfusion Responses & Action Taken
SA	Although the Sustainability Appraisal (SA) report states that a screening exercise has been undertaken, no supporting evidence to support the conclusions regarding the need for Appropriate Assessment could be found. We will be able to comment formally on Plan policies and proposals when supported by an evidenced HRA.	HRA Screening Report (Feb 2018) was made available for consultation comments May-June 2018; NE provided formal comments on the HRA in June 2018 and as presented above in this SA appendix. Although good practice for early consultation, there is no formal requirement to consult on the HRA until the final draft Plan.
Plan Policies OE1 & OE2	Policies for protection of the Environment (OE1-Landscape Character and OE2 – Biodiversity and Geodiversity) need revision to ensure they comply with the National Planning Policy Framework (NPPF).	This is a matter for plan-making although it is acknowledged that these Policies provide mitigation measures for potential negative effects on SA objectives.
	It would appear that between 40 – 50% more homes than allocated will be required to deliver the affordable housing sought and meet the full objectively assessed needs over the Plan period (as required by NPPF para 47) unless affordable homes are to be delivered through grant funding. Given the environmental constraints across the Isles we feel it is important that the Plan makes a realistic assessment of sites required to deliver the total amount of homes and that options for delivery are tested through the SA and HRA process.	For plan-making & see earlier comment re population and identified housing need.
Policy LC1 Housing Provision	It would appear that between 40 – 50% more homes than allocated will be required to deliver the affordable housing sought and meet the full objectively assessed needs over the Plan period (as required by NPPF para 47) unless affordable homes are to be delivered through grant funding. Given the environmental constraints across the Isles we feel it is important that the Plan makes a realistic assessment of sites required to deliver	The SA/SEA is required to consider “reasonable alternatives”. There is no definition in the SEA Regulations but for SA/SEA in the UK this assumed to be realistic and

Initial SA Report/ HRA Screening Report	Consultee & Comments	Enfusion Responses & Action Taken
	the total amount of homes and that options for delivery are tested through the SA and HRA process.	deliverable within the timescale and scope of the Plan.
Non-Housing Allocations	Provision for employment use, minerals and waste. Clarification is sought regarding the need for additional provision for these uses over the Plan period. Where sites are to be allocated these, and potential alternatives, will need to be assessed through the HRA and SA process.	For plan-making; the SA will assess any identified reasonable alternatives. The SA and the HRA will assess any proposed sites for allocation.
Environment Agency		
SA	No comments received at this Regulation 18 consultation stage	Noted
Historic England		
SA	No comments received at this Regulation 18 consultation stage	Noted
RSPB		
SA/HRA	<p>The assessment of likely impacts of the plan on key nature conservation sites (in the Sustainability Assessment) is inadequate because; it is unclear what the overall predicted scale of the development will be as a result of the plan due to lack of information on the scale and location of open marketing housing, new staff accommodation and new holiday developments, and the associated infrastructure needs, and we are not comfortable with the analysis of the potential impacts (there is no HRA provided and some impacts are missing e.g. disturbance), and disagree with the conclusions.</p> <p>We believe that there is potentially likely significant effects that could result from the planned growth particularly from in-combination indirect effects such as disturbance, and increases in the threat of non-native species, which need to be assessed through the Habitats Regulations Assessment process.</p>	<p>HRA Report (Feb 2018) made available in May after these initial comments on the SA Report (Feb 2018). The SA Report had been informed by the HRA.</p> <p>Disturbance, Habitat Loss & Fragmentation were considered through the initial HRA (Table 3.2; paras 3.17-3.20; and 3.26) and considered in the HRA revised screening and appropriate</p>

Initial SA Report/ HRA Screening Report	Consultee & Comments	Enfusion Responses & Action Taken
		assessment, including disturbance and threats from non-native species – both alone and in-combination.
SA Mitigation through LP Policies	<p>It is very unclear how the core policies will address all the wildlife issues as stated in the SA and grow biodiversity so additional information is required in the Policies (OE2, SS1 & SS2).</p> <p>The current biodiversity policy (OE2) is confusing and lacks detail; it needs to clearly set out the levels of protection for wildlife in a hierarchy, with detailed information against each, and provide clearer information on what is required by the planning process.</p> <p>We recommend that a biodiversity supplementary planning document is produced to explain in more detail what is required for biodiversity to support planners and developers in the development process to provide net gains in biodiversity.</p>	<p>For plan-making.</p> <p>Policies such as OE2 can provide mitigation measures for certain predicted negative effects.</p> <p>The SA recommended (para 5.101) that Policy OE5 is strengthened to include a requirement for net gain – to be incorporated at the next stage of plan-making.</p>
SA Report Table 2.1 SA Framework	Add line: Prevent unacceptable levels of disturbance by managing or controlling activities	Table 2.1 comprises the SA Framework of Objectives & Sub-Objectives/Decision-Aiding Questions – consulted upon & agreed through the SA Scoping process (final report July 2016). Disturbance has been considered within the HRA.
SA/HRA	The plan highlights significant (unquantified) growth for the islands, especially when considered in-combination with other plans. We are uncomfortable with the findings because there is a lack of information/evidence relating to the scale of the potential impacts being assessed, the lack of a Habitats Regulation Assessment (HRA) and the	HRA Report (Feb 2018) made available May 2018. Scope of HRA now needs revision in the light of the recent EU CJ

Initial SA Report/ HRA Screening Report	Consultee & Comments	Enfusion Responses & Action Taken
	lack of inclusion some important potential impacts such as disturbance. We believe that the draft plan potentially has likely significant affects and that an Appropriate Assessment under the Habitats Regulation Assessment (HRA) maybe required.	Sweetman – as explained previously.
	The open market, new workers accommodations and new tourism accommodation and associated infrastructure needs have to be quantified.	This is for plan-making.
	Disturbance study should be undertaken to clarify the potential growth of recreational and transport activity and identify any infra-structure or management needs required to ensure growth is sustainable, especially as a result of the in-combination effects with other plans.	In-combination effects considered by the HRA Report (Feb 2018).
	With the increase in planned development, the associated transportation of materials to and between islands, and increasing waste management requirements there is an increase in the potential threat to the islands from non-native species. A risk assessment needs to be carried out which highlights key invasive non-native species threats (including pathogens, plants, invertebrates and vertebrates), potential pathways and suitable measures that could be put in place within the plan to address this impact.	Not identified as a key issue in the SA, HRA or plan-making due to the very limited proposals for new development.
Mulciber Ltd		
SA Table 2.1 SA Framework	Unrealistic to expect all materials required for the islands' development can be met through recycled and secondary materials. This is confirmed by para 5.107 of the SA which refers to "minimising the need for extraction of new materials".	Agreed. SA Objective No 10A Waste & Minerals aims for sustainable use of minerals.
SA Report paras 5.101-116	The SA is deficient in that it does not properly assess reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme. In particular, the SA should consider:	For plan-making; the SA will assess any identified reasonable alternatives.

Initial SA Report/ HRA Screening Report	Consultee & Comments	Enfusion Responses & Action Taken
	<ul style="list-style-type: none"> the effect of not safeguarding mineral resources of local importance in contravention of the NPPF and NPPG; the effect of not allocating a site for the extraction of minerals in contravention of the NPPF and NPPG. the effect of not allocating areas for new or enhanced waste management facilities in appropriate locations in contravention of the NPPW 	