



Council of the  
ISLES OF SCILLY

**ISLES OF SCILLY LOCAL PLAN  
2015-2030  
Pre-Submission**

**Sustainability Appraisal (SA) Report  
incorporating  
Strategic Environmental Assessment  
(SEA)  
NON-TECHNICAL SUMMARY (NTS)**

**January 2019**

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## Non-Technical Summary (NTS)

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### **This is the NTS of the Sustainability Report**

1. This is the Non-Technical Summary (NTS) of the Sustainability Appraisal Report documenting the processes of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) within an integrated appraisal for the Isles of Scilly Local Plan (IOSLP). This summary is an integral part of the Sustainability Appraisal Report that accompanies the Regulation 19 Pre-Submission Draft Local Plan for public consultation commencing 1 February 2019. It provides an outline of the SA process and findings, including how the SA has influenced the development of the draft Plan, and in accordance with the requirements of the National Planning Policy Framework (NPPF), the European SEA Directive, and UK guidance on SA/SEA.

### **The Isles of Scilly Local Plan (IOSLP)**

2. The Local Plan sets out the long-term Vision, Objectives and Spatial Strategy for how the Isles of Scilly area could develop in the period up to 2030, identifying the needs for housing, employment, supporting infrastructure and community facilities. It has been prepared in accordance with national planning requirements and informed by various technical studies, including the Sustainability Appraisal and consultation with the public, stakeholders and regulators.
3. The draft Isles of Scilly Local Plan for Regulation 19 consultation comprises the following elements:
  - Vision, Strategic Aims & Objectives
  - Section 1: Promoting a Sustainable Scilly- Policies SS1-SS10
  - Section 2: Our Outstanding Environment- Policies OE1-OE7

- Section 3: Building a Strong Living Community- Policies LC1-LC10
  - Section 4: Building a Strong Working Community- Policies WC1-WC6
  - Section 5: Monitoring and Implementation
4. The Local Plan will provide up to 105 new homes over the Plan period, and the draft Plan allocates seven sites to deliver this housing. The Local Plan will concentrate housing development in the two main settlements of Hugh Town and Old Town, on the island of St Mary's. The Plan will deliver affordable housing which will meet the needs of local communities without resulting in unsustainable or significant growth to the islands' population. Open market housing on the Isles of Scilly is unsustainable and will exacerbate existing housing and social issues. However, the Plan acknowledges that some open market housing may be required to ensure the viability of affordable housing, although any open market housing will be subject to a detailed viability assessment.

### **Sustainability Appraisal: SA, SEA, EqIA & HRA**

5. The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Plans. This requirement for SA is in accordance with planning legislation. Local Plans must also be subject to Regulations for Strategic Environmental Assessment (SEA) and Government advises that an integrated approach is taken so that the SA process incorporates the requirements for SEA – and to the same level of detail.
6. The Council of the Isles of Scilly commissioned independent specialist consultants, Enfusion, to progress the sustainability appraisal work. 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 duty 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.
7. The Council is also required to undertake a Habitats Regulations Assessment (HRA) of the Local Plan. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any site designated for its nature conservation importance. The findings of the health, equality and habitats assessments have been integrated into the SA as relevant and at each stage of plan-making and assessment.
8. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK Guidance suggests a staged approach to SEA. Initially the scope of the SA is determined by establishing the baseline conditions and context of the area, by considering other relevant plans and objectives, and by identifying issues, problems and

opportunities. From this scope, a SA Framework of objectives for sustainable development in the Plan area were developed and form the basis against which the emerging elements of the IOSLP are assessed.

### **Sustainability Characteristics of the Isles of Scilly Council area and likely evolution without the Local Plan**

9. The Plan area has a small residential population of approximately 2200 people, and the population is considered to be stable but ageing. There is a trend of younger people leaving the islands for employment, and there are limited employment opportunities on the islands. Access to services and facilities is limited on the smaller islands and there are no secondary education facilities in the Plan area, and the islands are among the most deprived in the country with regards to access to housing. The key sectors of the islands' economy include tourism and farming. Transport links to the mainland are vital for the support of the economy and the transport of goods. Coastal change and coastal flooding is an issue for the islands, and the potential effects of climate change are likely to exacerbate these issues. The islands are not self-sufficient with regards to energy, which is currently sourced from the mainland.
  
10. The Isles of Scilly has a highly valued natural environment, with three European designations and numerous national and local designated biodiversity and geodiversity sites in the Plan area. The entire archipelago is designated as an AONB and as a Conservation Area, due to the distinct landscape, seascape and historic environment. There are current threats to these assets through recreational pressures and climate change. Water resources are limited on the island and during the peak summer months when the islands' population grows due to visitor numbers, are placed under stress. There are also existing capacity issues with waste water infrastructure, and water quality on the islands is affected by run-off from agricultural land. Air quality is considered to be good in the Plan area.

### **Key Sustainability Issues, Problems and Opportunities**

11. The key sustainability issues and opportunities are summarised in the table below:

<b>Key Sustainability Issues and Opportunities</b>
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.
Need to 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.

### How has the Isles of Scilly Local Plan been assessed?

12. An SA Framework was compiled, including SA Objectives and decision-aiding questions that aim to resolve the issues and problems identified for development planning in the IOSLP area. This SA Framework, together with the baseline information, comprises the basis for assessment. The SA Objectives are as follows:

SA No	SA Objective
1	Prevent Loss of and Enhance Habitats
2a	Housing
2b	Services and Facilities
3	Support Sustainable Economic Development & Employment
4	Safeguard and Enhance Human Health
5a	Water Quality
5b	Water Resources
6	Maintain Air Quality & Improve Sustainable Transport
7	Climate Change: Coastal Change; Greenhouse Gas Emissions
8	Maintain and enhance cultural and heritage assets; including architectural and archaeological heritage
9	Protect and Enhance the Landscape
10a	Waste & Minerals
10b	Energy
10c	Soil and Agriculture

13. Each developing element of the Draft IOSLP was subject to sustainability appraisal. Using the SA Framework, the baseline information available, and

professional opinion, the likely effects of the emerging Draft IOSLP were assessed. The SA considered the nature of the likely sustainability effects (including positive/negative, duration (short, medium or long term), permanent/ temporary, secondary, cumulative and synergistic) and according to categories of significance as set out in the following table:

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

14. The Draft Local Plan Policies were tested using the SA Objectives grouped within sustainability themes to better consider inter-relationships between topics and to address implementation of the plan as a whole, as follows:
- Communities - Housing & Services/ Facilities
  - Employment & Economy
  - Health & Equality
  - Transport & 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
15. The SA made suggestions to the plan-making team for mitigating significant negative effects, where possible, and possibilities for enhancement, where relevant. Sustainability Appraisal is informed by the best available information and data. However, data gaps and uncertainties exist, and it is not always possible to accurately predict effects at the plan level. For example, specific significance of effects on biodiversity and heritage assets may depend on more detailed studies and assessments that are more appropriately undertaken at the next stage of planning - at the project or site level. Climate change impacts are difficult to predict as the effects are most likely to be the result of changes at a cumulative and regional or national level, and therefore a precautionary approach that seeks to deliver best practice mitigation and adaptation is the most appropriate approach.

### **What reasonable alternatives have been considered and addressed?**

16. The IOSLP is limited with regards to reasonable alternatives, due to the overall small area of the archipelago and the special characteristics of the islands. However, strategic options were identified for five Policies including protection of retail, housing strategy, affordable homes, windfall housing, and new employment development.
17. Twenty-six potential housing sites were identified, including through a call for sites process across the islands, and these were then subject to a Strategic Housing Land Availability Assessment (SHLAA, 2016). The SHLAA identified 10 proposed sites which were considered to be reasonable – deliverable within the Plan period, and these site options were subject to SA using the full SA Framework of Objectives.

### **What are the likely significant effects of the Pre-Submission Draft IOSLP?**

18. Overall, the Draft Local Plan was found to have significant positive sustainability effects against a number of SA Objectives. The Vision, Strategic Aims and Objectives, and Spatial Strategy were found to either have positive effects or neutral effects on the SA Objectives, with no negative effects identified. The Strategic Options were also found to have either positive or neutral effects, with negative effects identified only for services/facilities and landscape for Option 4b where settlement boundaries would not be defined.
19. The Policies within the Draft Local Plan were all assessed against the topics for sustainable development, and generally, Policies were found to have positive or neutral effects. Major positive effects were identified for housing through the provision of sites for development, services and facilities, economy and employment, and health and equality. Policies within the Plan will protect the special characteristics of the Plan area, including biodiversity and geodiversity, historic and cultural heritage, air quality, water quality and water resources, providing strong mitigation measures with overall likely neutral effects.
20. The site options were mostly found to have positive or neutral effects on the SA Objectives. The sites will have major positive effects on housing, and minor positive effects on energy, sustainable transport and human health. There is the potential for the loss of greenfield land and soil resources at a number of the site options, with potential negative effects. The site options were found to have neutral effects on the remaining SA Objectives.

### **How could negative effects be mitigated?**

21. A key function of the Sustainability Appraisal process is to provide advice and recommendations to the development of the plan to help mitigate identified negative effects and enhance positive effects. At each stage, these recommendations are taken forward into the next stage of the plan making process. Potential negative effects have been mitigated through the development of strong policies that protect the natural environment and

promote sustainable and connected communities through requirements for appropriate provision of supporting infrastructure. Major significant effects have been avoided by selecting site allocations that avoid negative effects on nationally and locally designated environmental assets.

### **HRA & EqIA**

22. The HRA considered the likely effects on air quality, disturbance, changes in water levels or quality, and habitat loss or fragmentation – from the Draft Plan individually, or in combination with effects from other plans and projects. The HRA screening and appropriate assessment found that the mitigation provided through Draft Local Plan Policies was sufficient such that there were no likely significant effects alone, or in-combination, as a result of the implementation of the Plan.
23. The equalities screening assessment has 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 thus 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.

### **Were there any difficulties encountered?**

24. There were no significant technical difficulties encountered during the preparation of this SA. There are inherent difficulties in predicting the likely future baseline and assumptions were made using professional judgment. Information gaps were identified with regard to water resources and some of the protected characteristics under the Equality Act.

### **How has the SA influenced the draft Isles of Scilly Local Plan?**

25. The SA found that the Plan will have positive effects, with major effects for housing and employment. Potential negative effects on environmental and heritage assets will be mitigated through strong Policies and the proposed location of new development within the existing built environment. The SA made one suggestion for Policy OE2 – that it could be strengthened to include the explicit requirement for 'net gain' of biodiversity.

### **Consultation**

26. The SA Scoping Report was subject to wide consultation during autumn 2016 and comments received have been considered. Consultation is a vital ongoing and iterative element of the plan-making and SA processes. The Second Stage Regulation 18 consultation for the Draft Local Plan and supporting documents was made available through the Council's website in early 2018. Comments made, and responses, were recorded and have informed this next stage of plan-making and assessment. Any comments received on the Pre-Submission Local Plan will be provided together with the Local Plan for submission to the Secretary of State.



## Monitoring Proposals

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

## Next Steps

28. The documents will be available online for consultation at the below address:

<http://www.scilly.gov.uk/planning/local-plan/draft-local-plan-2015-2030/public-consultation-march-may-2018>

The updated Local Plan and supporting evidence including the SA Report will be submitted to the Secretary of State for Housing, Communities and Local Government for independent examination.