



Council of the
ISLES OF SCILLY

**ISLES OF SCILLY LOCAL PLAN
2015-2030
Main Modifications**

**Sustainability Appraisal (SA)
incorporating
Strategic Environmental Assessment (SEA)
Habitats Regulations Assessment (HRA)**

SA Further Addendum Report

September 2020

by

enfusion



Isles of Scilly Local Plan 2015-2030: Main Modifications

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Equality Impact Assessment &

Habitats Regulations Assessment (HRA)

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1.0 INTRODUCTION

- 1.1 The Isles of Scilly Draft Local Plan 2015-2030 was subject to independent examination by a Planning Inspector, including public hearings held Tuesday 21 to Thursday 23 January 2020. The draft Local Plan was accompanied by the Sustainability Appraisal (SA) Report [SD10-11] (January 2019)¹ that incorporates Equality Impact Assessment (EqIA) [D14] and Strategic Environmental Assessment (SEA), together with the Habitats Regulations Assessment (HRA) Report – undertaken in parallel with a separate report [SD13] (January 2019) and summary findings integrated into the SA Report.
- 1.2 The draft Local Plan was subject to certain modifications, primarily concerned with new technical housing standards and a proposed further housing allocation. These proposed modifications were subject to SA and the SA Addendum Report [SD12] (July 2019) accompanied the draft modified Local Plan for public consultation again through an additional Regulation 19 during August to September 2019 prior to submission to the Secretary of State for independent examination. The HRA Screening & Appropriate Assessment Report was updated [SD15] in December 2019 in order to reflect discussions between the Council and Natural England. These additional SA and HRA Reports have been published within the Examination library.
- 1.3 Matter 3 of the Examination related to Minerals & Waste with consideration of Policies OE5 and OE6. As a result of issues raised and discussions at the hearing, the Inspector requested to Council to do some more work on strategic options for minerals planning and that this should be subject to SA in order to inform further decision-making. The Council identified three reasonable alternatives for minerals extraction and the strategic SA was provided to the Inspector to help inform the proposed modifications to the Local Plan in respect of minerals planning and Policy OE6 Minerals. The approach and findings of this strategic SA are detailed in this SA further Addendum Report.
- 1.4 As a result of the issues raised and discussions held at the public hearings, the Council is proposing modifications to the Local Plan. Many of these are minor or additional modifications that are concerned with corrections, addressing gaps, updating, and providing further clarification. However, certain amendments are major modifications that are significant with regard to the SA process.
- 1.5 It is necessary for the modifications to the Local Plan to be tested through SA and HRA. Therefore, this SA Further Addendum Report sets out the findings of the updated assessments and it comprises a further part of the SA and HRA Reports. It has been prepared in accordance with relevant guidance and legislative requirements and seeks to be a proportionate assessment relevant to the stage of plan-making and in line with national planning (NPPF, 2019) requirements².

¹ <https://www.scilly.gov.uk/planning/local-plan/local-plan-examination-library>

² <https://www.gov.uk/government/publications/national-planning-policy-framework--2> (paragraph 31)

- 1.6 The SA has been undertaken using the same methods of assessment with the same SA framework of objectives, in a similar manner and with a proportionate approach. Any implications for the findings of the HRA are also recorded here in this report. Therefore, the purpose of this SA Further Addendum Report is to explain the additional work done by the Council with regard to minerals planning and to assess and report the implications of the Main Modifications & Additional Modifications with regard to the previous SA and HRA findings.

- 1.7 The IOS Local Plan Main Modifications (MMs) is accompanied by this SA Further Addendum Report and subject to formal consultation. Any representations on the modifications made will be considered by the Inspector before he prepares his final report to the Council. If the plan is found sound by the Inspector, it will be considered by the Council for adoption as the Isles of Scilly Local Plan – and its publication will be accompanied by a SA Adoption Statement.

2.0 SA OF STRATEGIC POLICY OPTIONS FOR MINERALS

- 2.1 At the early stages of plan-making and sustainability assessment, the Council considered that it was inappropriate to advocate mineral extraction on the islands due to the exceptional environmental quality of the Isles of Scilly. Thus, it was thought that there were no reasonable alternatives appropriate that required investigation through the SA process. Representations from Mulciber Ltd made at both the Regulation 18 and 19 consultation stages disagreed and the consultee proposed evaluation of small scale working of minerals on the islands. These comments were recorded in the Submission SA Report (January 2019 [SD10]) in Appendix VIII.
- 2.2 At the examination hearings in January 2020, Mulciber Ltd reiterated that the SA has not considered reasonable alternatives to no primary extraction on the islands, and that the draft Local Plan has not had proper regard to national policy in respect of minerals and waste. The Council reiterated that on the basis of scale, exceptional environmental quality, the need to reduce wastes exported from the islands, the promotion of recycled materials was the most appropriate approach. As a result of the issues raised and discussed, the Inspector requested a SA of strategic options for minerals extraction on the islands – restrict, minimise and promote. This comparative SA sought to investigate these options in a comparable way using the same SA Framework and to the same level of detail as appropriate for strategic assessment; it focuses on quarrying for rock and stone.
- 2.3 Construction minerals include aggregates, brick clay and cement raw materials. The supply of aggregates includes crushed rock, sand and gravel (land-won and marine-dredged) with significant contributions from recycled and secondary materials. Brick clay is an essential raw material for the manufacture of bricks; limestone and chalk are the primary materials for the production of cement.³
- 2.4 The unique situation for construction materials and the Isles of Scilly is set out in the IoS Council's document Minerals Resources Assessment (August 2019) [EB043]⁴. Sand and gravel aggregates are not available from local sources and rely on import supplies only. There is a small supply of reclaimed slates and these are also imported. There are some local supplies of granite, crushed rock and aggregate, and crushed construction/demolition waste available on the islands. There are no active quarries on the islands. The Memorandum of Understanding (MoU) with Cornwall Council confirms that the development on the islands could use the established minerals supplies of Cornwall.
- 2.5 The SA/SEA process requires that reasonable alternatives should be considered and compared as the plan evolves, including the preferred approach, and be assessed against the sustainability characteristics of the

³ <https://www.gov.uk/government/publications/extractive-industries-transparency-initiative-payments-report-2018/mining-and-quarrying-in-the-uk>

⁴ <https://www.scilly.gov.uk/planning/local-plan/local-plan-examination-library>

area. Government guidance⁵ advises that reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. It was agreed that the SA process should investigate three strategic options for minerals policy, as follows:

- Option A Restrict: Absolutely no minerals extraction on the islands
- Option B Minimise: Maybe some minerals extraction on the islands
- Option C Promote: Absolutely progress minerals extraction on the islands

2.6 The SA findings are detailed within Appendix I of this report and the summary comparative findings are shown in Table 2.1, as follows:

Table 2.1: Summary SA of Strategic Options for Minerals Policy

SA Objectives	A: Restrict	B: Minimise	C: Promote
1: Prevent loss of and enhance habitats	0	0?	-?
2A: Housing	0	0	0
2B: Services and Facilities	0	0	0
3: Sustainable economic development	0	+?	+ - +?
4: Human Health	0	0?	0?
5a: Water Quality	0	0	0?
5B: Water Resources	0	0	0?
6: Air Quality & Sustainable Transport	0	0?	-?
7: Climate Change	0	0	0?

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

8: Cultural & Heritage Assets	0	0?	+	-?
9: Landscape	0	-?	-	
10A: Waste & Minerals	+	-?	-	
10B: Energy	0	0	0	
10C: Soil & Agriculture	0	0?	-?	

- 2.7 The SA found that neutral effects are indicated for many of the SA Objectives since there are other Local Plan Policies that will provide mitigation measures – for example, in particular Policy OE2 Biodiversity & Geodiversity and Policy OE3 Managing Pollution.
- 2.8 The Minimise Option B will have mostly neutral effects but with some uncertainties as the significance of effects and effectiveness of mitigation measures is dependent upon the precise size and location of any mineral extraction sites – particularly for SA Objectives on heritage, and landscape & seascape.
- 2.9 There may be some minor positive effects on employment for the Minimise B and Promote C options but uncertainty as the number of jobs is not known. Conversely, there could be negative effects on the tourism and recreation/leisure sectors through the introduction of quarrying with associated noise, dust and disturbance.
- 2.10 There is uncertainty associated with the likely effects for SA No 3 Economy, 6 Air Quality/Transport and 7 Climate Change - producing on-island would reduce transport costs and this could have positive effects although the comparative costs of modular off-island construction and use of on-island stone materials is not known. The relative emissions and contribution to climate change effects from traffic movements by road on the islands compared to traffic/ship movements from the mainland is not known and effects on air quality/emissions from road transport will depend upon precise scale and locations of any mineral extraction sites.
- 2.11 It is assumed that there will be some minor negative effects from the Promote Option C as the scale of activities will be higher – particularly on SA Objectives for biodiversity, air quality/sustainable transport, climate change, and landscape – and that mitigation measures may be more difficult to implement. However, this depends upon precise scale and locations of any mineral extraction sites.
- 2.12 The Inspector considered that overall, at this stage and having regard to the commentary set out, that the SA provides an adequate assessment of the

alternatives on which decisions about the need for Main Modifications to the plan can be made. The Inspector considered that, taking into account everything that had been read, heard and seen on the issue, the relevant policy and supporting text should seek to minimise minerals extraction – and that this is in line with the discussion at the hearings.

- 2.13 Therefore, the Council decided to progress Option B Minimise. The outline reasoning for progressing Option B Minimise is that this option minimises potential adverse effects on sustainability topics such as landscape beauty and heritage assets; it allows for some minerals extraction if needed should the use of recycled and secondary materials not be able to supply the construction demands. Option A Restrict is not progressed as it would not allow for any mineral extraction should this become necessary if construction demands cannot be met through recycling and use of secondary materials. Option C Promote is not progressed as such a need is not anticipated, taking into account the limited number of new houses identified, and there is concern for potential negative effects on environmental quality that may be difficult to mitigate.
- 2.14 These findings of the SA of strategic options for mineral policy helped inform the modification of the Policy OE6 Minerals and this is discussed further in the next section of this SA Report. Thus, the development and appraisal of proposals in the plan has continued to be an iterative process, with the proposals being revised to take account of the appraisal findings – and in accordance with Government guidance on SA/SEA.

3.0 MAIN MODIFICATIONS TO THE LOCAL PLAN

3.1 The draft Local Plan amended as a result of the independent examination proposes Main Modifications (MMs) as advised by the Inspector and Additional Modifications (AMs) as proposed by the Council. The AMs are minor changes for updating, correction, and to provide further clarification – these are not considered significant with regard to the SA or HRA processes. The MMs are more substantive changes, and these were screened for their significance with regard to the previous SA and HRA findings. Professional judgment was used to determine likely significance of the MMs and taking into account the characterisation of the plan area and the SA framework of objectives. These screening is set out in the Table 3.1, as follows:

Table 3.1: Key Changes to the Local Plan Relevant to the SA & HRA

Key Change Ref	Policy No	Outline of Change	Significant for SA or HRA?
Inspector's Main Modifications			
MM1	SS3	Amendments to wording to ensure that requirements are achievable; additional criterion requiring that re-use of buildings should not result to harm to any protected species.	Yes
MM2	SS8	Amendments to clarify that onshore wind developments are not included within this particular policy; clarification to include "conserve" scenic beauty (wildlife deleted).	No
MM3	SS9	Rewording for clarification to ensure appropriate support for improvements to transport links.	No
MM4	OE1	Deletion of "where appropriate" and "...unless the benefits of the proposals are demonstrated to clearly outweigh any harm".	Yes
MM5	OE2	Substantive revised wording to ensure that it is not conflicting or contradictory.	Yes
MM6 & MM7	WC5 & WC6	Amalgamation of elements of Policy WC6 & deletion of WC6 as salient points merged with WC5.	No
MM8	SS1	Updating to reflect NPPF para 149 regarding plans taking a proactive approach to mitigating and adapting to climate change.	Yes
MM9	LC6	Site H3 Old Town – wording strengthened to require that impacts of surface water runoff are avoided. Delete requirement to limit to the eastern side of the site, and the requirement to reintroduce the north-south boundary.	Yes
MM10	OE6	Revised with support for the use of secondary & recycled construction materials to minimise the need for direct minerals extraction – but some scale-scale minerals extraction could be justified.	Yes

MM11	OE5	Existing waste sites now identified on Policies Maps; addition of risk to "human health" and support for colocation of facilities for waste & heat/energy.	Yes
MM12	LC1	Revisions to wording for clarity and consistency.	No
MM13	LC2	Removal of footnote & opening text as not appropriate for the policy.	No
MM14	LC3	Revision of wording to ensure that minimum house size aligns with the Nationally Described Space Standards but as a maximum should be within 30% of the minimum.	No
MM15	LC8 & LC9	Amend Policy LC8 & delete Policy LC9 - merging two policies into single extensions and replacement dwellings policy. Revise wording to enable a house to be enlarged to meet the min NDSS and to set a maximum that would ensure a home become no larger than 30% above the NDSS for the size of the household, without justification.	No
MM16	LC7	Amendments for clarification regarding windfall housing on St Mary's and off-islands.	No
MM17	M1-LC1	Amendments to Monitoring Indicators for the Housing Strategy with clarity for housing numbers, baseline impacts on NE designations, and review of renewable energy sites.	Yes
MM18	LC5	Change from meeting needs of community to local housing need.	No
MM19	SS5	Revised wording for clarification regarding supporting infrastructure.	No
MM20	OE4	Additional supporting text explaining appropriate and essential lighting; remove from policy "are essentially required for" and replace with "are essential for".	No
MM21	LC4	Additional wording to explain requirements for staff accommodation on St Mary's and on an off-island.	No
MM22	WC2	Amendments to wording for clarification regarding home-based businesses.	No
MM23	WC4	Revisions to wording to change emphasis to protection of industrial and business land and premises (as opposed to general employment land) – for clarification.	No
MM24	N/A	Clarification that all policies are strategic.	No
MM25	Para 217 (222)	Policy OE6 (MM10): Additional supporting text explaining that opportunities for land to be utilised for waste management will be considered.	No

MM26	New Para 204 (209)	Additional supporting text clarifying the intention to produce guidance on appropriate lighting.	No
MM27	SS7	Additional criterion to support natural dune restoration and flood defence and coastal management works – providing adequate account is taken of Policy OE2.	Yes?
MM28	Paras 265-268	New paragraphs to explain the derivation of the data supporting and the justification for the 105 new affordable homes figure. This is required to make absolutely explicit that there is not a formal housing requirement figure for the Scillies against which a five-year supply of deliverable housing land can be calculated.	Yes?
MM29	Para 156 (160)	Amended to clarify that the list of sea defence projects is not proposed in the plan but are already identified and being actively progressed by the Council.	No
MM30	SS4	Changes to SS4(5) to list favoured uses to reflect changes to the Use Classes Order that came into effect on 1 September 2020.	
Council's Policy Map Modifications			
PMM1	Policies Map	Safeguarded Waste Sites added - Porthmellon Waste Management Site, Pendrathen C&D recycling site, and the Off-Island Waste Transfer Sites	Yes
PMM2-PMM4	Policies Map	Refs to Policies LC7 & SS4 inserted; transport link corrected with ref to Policy SS9.	No

3.2 The Council's Additional Modifications (AM1-AM70) are all concerned with minor amendments to the supporting text for policies – for purposes of updating, correction, and clarification. As such, they are not considered to be significant with regard to the SA and the HRA. However, some of the proposed clarifications do strengthen the previous findings of the SAs of draft policies. For example, AM21 proposes changing supporting text from *'initiatives such as the Smart Island programme, as well as future sustainability projects'* to *'sustainable design, improved site waste management and improved biodiversity'*, thus clarifying and making explicit what constitutes a future sustainability project. AM35 relates to an additional paragraph to reflect the Council of the Isles of Scilly's commitment to the declaration of a climate emergency – strengthening SA objectives for climate change. AM40 proposes a new paragraph which clarifies that support will be given to waste related proposals that are co-located on existing waste sites. AM51 proposes additional text to provide specific information on the species of bats (as protected species) present on the Isles of Scilly – strengthening the likely positive effects for biodiversity objectives.

4.0 IMPLICATIONS FOR THE FINDINGS OF THE SA & HRA

- 4.1 At this stage of plan-making, the amendments to the draft Local Plan reflect refinements to address concerns raised during consultation and discussed at the examination hearings. The Main Modifications were screened using professional judgment for their likely significance with regard to the findings of the previous SA and HRA. Any implications arising for the SA and HRA are discussed in the following paragraphs.
- 4.2 **Policy SS3 Reuse of Buildings:** The amendments to ensure that requirements are achievable will help ensure that mitigation measures are implemented confirming that there will be no significant adverse effects on the historic environment. The addition of a requirement that any demolition or re-roofing of a building should not result in harm to any protected species further confirms that mitigation measures are in place to ensure that there are no significant negative effects on protected biodiversity.
- 4.3 **Policy OE1 Protecting and enhancing the Landscape and Seascape:** The removal of “where appropriate” and “benefits outweighing harm” makes clear that development will only be permitted where it aligns with the statutory purpose of AONB. An additional criterion makes it clear that development will not be supported on the uninhabited islands. This further strengthening of Policy OE1 helps to confirm that potential negative effects on landscape and seascape character and quality are avoided or minimised with no likely significant residual effects predicted for designated landscapes or seascapes.
- 4.4 **Policy OE2 Biodiversity & Geodiversity:** The policy wording has been rearranged to make explicit the requirements for avoiding adverse impacts and delivering biodiversity net gain based on ecological networks. This clarification reinforces the strengthening of the policy to ensure that potential negative effects are avoided and that positive effects are likely that may be cumulative in the longer term – confirming the previous findings of the SA. It may be noted that the updating to the HRA, and as reported in [SD15] (December 2019) has also been taken into account in preparing this SA Further Addendum Report.
- 4.5 **Policy LC6 Site H3 Old Town:** The strengthening of the wording to avoid impacts of surfacewater run-off on the adjacent SSSI will ensure that such mitigation is implemented and that there will be no residual negative effects on SA objectives.
- 4.6 **Policy OE6 Minerals:** Policy revised to reflect discussions at the examination hearings and the findings of the strategic SA of options for minerals policy (and as reported in this document in section 2 and Appendix I). The revised policy supports the use of secondary and recycled construction materials in order to minimise the need for direct minerals extractions but recognises that some justified small-scale mineral extraction could be considered. The

previous SA found mostly neutral effects for SA objectives as potential negative effects on environmental and community/human health objectives were avoided through the policy approach to restrict any direct minerals extraction on the islands. The revised policy acknowledges that some minerals extraction may be needed but that this should be minimised – thus reducing the potential negative effects on landscape, visual amenity and noise disturbance through quarrying. Any such likely effects will be mitigated through other Local Plan Policies, including OE1 Landscape & Seascape, OE2 Biodiversity & Geodiversity, and OE3 managing Pollution.

- 4.7 **Policy OE5 Managing Waste:** The additional criterion that makes explicit the location of existing waste sites and that their use should not be prejudiced helps confirm that SA objectives for waste management will be progressed positively. The addition of support for co-location of waste management and heat/energy generation promotes SA objectives for waste positively. The inclusion of specific risk to human health also further confirms that mitigation is in place to protect health.
- 4.8 **Monitoring Framework M1-LC1 Housing Strategy:** Monitoring commitments have been redrafted to make explicit that the number of houses will be no more than 105 before review; that there will be consideration of baseline impacts of development on natural environment designations in terms of recreational pressures, and that the LPA will renew renewable energy sites to maximise renewable energy. These commitments in the Monitoring Framework further confirm that there is a limit of 105 new homes and thus assuage the concerns raised by NE and the RSPB regarding potential impacts on protected biodiversity. This further supports the previous SA and HRA findings that there will be no significant negative effects on biodiversity, including designated sites.
- 4.9 New paragraphs supporting Policy LC1 explain the derivation of the data supporting and the justification for the 105 new affordable homes figure – providing clarity that supports the positive findings from the SA for housing objectives.
- 4.10 **Policy SS7 Flood Avoidance & Coastal Erosion:** The additional criterion 3 provides guidance and clarification regarding support for natural dune restoration and works connected with flood resilience and coastal defence – where they have been adequately addressed in accordance with Policies OE2 and OE7. This additional guidance makes clear the interconnectedness between SA objectives for biodiversity, the historic environment, water management and climate change – thus strengthening the mitigation measures within policies and ensuring that there are no significant negative effects.

- 4.11 **Habitats Regulations Assessment (HRA):** The previous HRA and appropriate assessment (AA) concluded that there was adequate embedded policy through careful selection (size, location and site-specific requirements) of site allocations and other Policies to provide mitigation measures to ensure that there will be no loss of integrity for the designated sites – alone or in-combination with other plans or projects. The amendments and refinements to the draft Local Plan strengthen these policy mitigation measures, including commitments to monitoring before review.
- 4.12 **Equality Impact Assessment (EqIA):** The amendments to the draft Plan confirm the previous findings of the EqIA which remains valid and relevant.

5.0 SUMMARY & CONCLUSION

- 5.1 The proposed Main Modifications to the draft Isles of Scilly Local Plan 2015-2030 have been analysed for their significance with regard to the findings of the SA, EqlA and the HRA. The changes and refinements to Policies were found to confirm the previous findings through providing further clarification and guidance and strengthening mitigation measures to ensure that effects are reduced towards negligible/neutral and with further certainty for the positive effects that had been indicated. The previous findings of the SA, EqlA and HRA are valid and relevant; mitigation measures have been strengthened through the amendments to the draft Plan.

- 5.2 This SA Further Addendum Report (September 2020) will accompany the draft Local Plan Main Modifications on formal public consultation. Any comments on the SA will be taken into account by the Inspector in his conclusions – and prior to the adoption of the Local Plan in due course.

Isles of Scilly Local Plan 2015-2030 Main Modifications Sustainability Appraisal (SA) Further Addendum Report

Appendix I: SA of Strategic Policy Options for Minerals

Strategic Options	
A	Restrict: Absolutely no minerals extraction on the islands
B	Minimise: Maybe some minerals extraction on the islands
C	Promote: Absolutely progress minerals extraction on the islands

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

Please note SA No 3 has 2 effects – on jobs/economy & tourism/economy

Options for Minerals Extraction				
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	A: Restrict	B: Minimise	C: Promote
		1: Prevent loss of and enhance habitats	The Isles of Scilly have an exceptional environmental quality a range of internationally and nationally protected biodiversity sites, including a SAC complex, a SPA complex and a Ramsar complex. 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. 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 practices, recreational pressure and climate change (SA Report) [SD10—SD12].	0

	<p>The potential primary effects on biodiversity of quarrying relate to the removal of surface features with loss or fragmentation of habitats and disturbance of species, including through noise and dust. Indirect effects can also be negative since the conversion of raw materials requires energy that can be polluting and generate wastes; further potential indirect effects relate to transportation. Quarrying involves 3 stages – scoping/preparation; operations; rehabilitation & closure. The significance of such negative effects on biodiversity will depend upon the scale and location of the quarrying activities, and there may be mitigation measures available – such as avoidance of highly sensitive areas, controlling noise & dust activities – all of which can be more certain of delivery through the requirement for an Environmental Management Plan (EMP) with a site Biodiversity Plan and restoration could deliver biodiversity net gain, although this would only be in the longer term and depends on location.</p> <p>The Restrict option will clearly have neutral effects on biodiversity through avoidance – the highest level in the mitigation hierarchy. The Minimise option indicates some mitigation by minimising activities thus reducing negative effects. Specific minerals policy could indicate locations where negative effects would be minimised and other Plan Policies such as OE2 Biodiversity & Geodiversity should protect important biodiversity – neutral effects but some uncertainty at this stage as depends on location. Promotion of minerals extraction is likely to have negative effects due to the limited land & likelihood of negative effects on habitats and species – uncertainty as depends on extent and locations.</p>			
<p>2A: Housing</p>	<p>Not applicable – the location of construction materials does not directly affect provision of housing - and neutral effects predicted. It is assumed that the need for construction materials to build the new dwellings can be met through the use of recycled & secondary materials available on the islands and through continued importation of both materials as well as through the use of off-site construction methods. The draft Local Plan seeks to promote more sustainable building, for example, through Policy SS2 sustainable Quality Design that requires using natural resources more prudently, including the use of locally sourced, recycled or low-carbon materials in construction where they are available and represent a viable option.</p> <p>Please see SA Objective No 6 for transport effects and No 10 for sustainable resources.</p>	<p>0</p>	<p>0</p>	<p>0</p>
<p>2B: Services and Facilities</p>	<p>Not applicable – the location of construction materials does not directly affect provision of services & facilities - and neutral effects predicted.</p> <p>Please see SA Objective No 6 for transport effects and No 10 for sustainable resources.</p>	<p>0</p>	<p>0</p>	<p>0</p>

3: Sustainable economic development		0	+?	+	-	+?	-
	<p>The economy of the Isles of Scilly is unusual – self-contained and dominated by tourism with high levels of very small businesses – and with low levels of unemployment. There were no specific employment development needs identified for the new Local Plan and its policies seek to strengthen and diversify the local economy.</p> <p>There are no active quarries currently so there are no islanders employed in the business of quarrying or direct mineral extraction such the Restrict option would not result in loss of jobs – neutral effects.</p> <p>The options to Minimise & Promote minerals extraction would have positive effects for jobs & business as it could result in some employment/job creation on the islands – uncertainty at this stage as precise numbers are not known and these numbers are likely to be negligible compared to the numbers employed within the tourism & recreation/leisure sectors.</p> <p>It is likely that direct minerals extraction through quarrying activities would have negative effects on tourism through noise, dust & disturbance – Minimise would reduce the significance of such effects but uncertainty as depends upon precise location.</p> <p>However, producing on-island would reduce transport costs and this could have positive effects although the comparative costs of modular off-island construction and use of on-island stone materials is not known – so uncertainty of significance on economic objectives (please see SA Nos 6 Air Quality/Transport & 7 Climate Change).</p>						
4: Human Health	<p>Quarrying activities have the potential for noise, vibration and dust impacts that can adversely affect people's health and well-being. The significance of such effects depends upon the extent and location of such activities; mitigation measures can be available through other Plan Policies and the use of water to suppress dust and enclosing noisy plant & equipment. This can be ensured through the implementation of an Environmental Management Plan (EMP) to control and manage activities.</p> <p>The Restrict option will avoid such negative effects. The Minimise & Promote options could have such negative effects, but the significance is uncertain at this stage since extent/scale and location are not known. Site specific requirements could limit such effects and other Plan Policies such as OE3 Managing Pollution protects human health from polluting effects of noise, vibration, light or air. Please see SA No 6 for effects from traffic.</p>	0	0?		0?		

<p>5a: Water Quality</p>	<p>There is the potential for pollution with direct negative effects on water quality, but this depends upon scale and location.</p> <p>The Restrict option will avoid such negative effects. The Minimise & Promote options could have such negative effects, but the significance is uncertain at this stage since extent/scale and location are not known. Site specific requirements could limit such effects – particularly effectiveness likely for the Minimise option - and other Plan Policies such as OE3 Managing Pollution and SS6 Water and Waste Water Management. Some uncertainty indicated for the Promote option as depends upon the scale & location.</p>	0	0	0?
<p>5B: Water Resources</p>	<p>Whilst mineral extraction can usually, at least in part, be carried out in relatively dry conditions above the water table, mineral reserves can extend beneath the water table - dewatering may be required. Such operations have potential to impact upon the quality, levels and flow regime of groundwater and surface water resources. It is not known if dewatering would be a requirement on the islands but there are existing issues for sustainable water management and the water supply for St Mary's is supplemented by the desalination plant that is used to improve water quality and help the groundwater levels recharge to reduce the risk of saline intrusion.</p> <p>The Restrict option will avoid such negative effects. The Minimise & Promote options could have such negative effects, but the significance is uncertain at this stage since extent/scale and location are not known. Site specific requirements could limit such effects – particular effectiveness likely for the Minimise option - and other Plan Policies such as OE3 Managing Pollution and SS6 Water and Waste Water Management. Some uncertainty indicated for the Promote option as depends upon the scale & location.</p>	0	0	0?
<p>6: Air Quality & Sustainable Transport</p>	<p>Air quality is very good in the Isles of Scilly & there are no issues or Air Quality Management Areas (AQMAs) declared⁶.</p> <p>It is assumed that none of the options will include transport of construction materials to the mainland & the overriding objectives for the Local Plan are to re-use existing materials & encourage modern construction methods including modular design.</p>	0	0?	-?

⁶ <https://www.cornwall.gov.uk/media/25838697/clean-air-for-cornwall-strategy-2017.pdf>

	<p>Option A Restrict & Option B Minimise is likely to continue with some importing of minerals from the mainland that might increase with the small quantum of development proposed, although some uncertainty at this stage.</p> <p>Quarrying involves transport with truck movements that can cause traffic congestion – significance depends upon scale and location. The islands already suffer from a high proportion of cars, particularly on St Mary’s and the draft Local Plan seeks to manage movement more sustainably, for example, through Policy SS10 Managing Movement.</p> <p>The Restrict option will avoid such negative effects – or at least retain the existing movements of minerals including those imported from the mainland. The Minimise & Promote options could have such negative effects, but the significance is uncertain at this stage since extent/scale and location are not known. Site specific requirements could limit such effects – particular effectiveness likely for the Minimise option.</p> <p>It is assumed that the Promote option would include more transport movements on the islands themselves with the likelihood of more negative effects - but uncertainty at this stage with potential for some negative effects on air quality and transport depending upon location & extent of sites.</p>			
<p>7: Climate Change</p>	<p>The UK construction industry is working to reduce its carbon footprint. It is understood that the manufacture of cement and lime are the most energy intensive processes in the industry⁷ and that key issues for carbon reduction relate to road transport.</p> <p>The Restrict option will retain the current situation of some importing of materials from the mainland – neutral effects. The Minimise option would limit the traffic movements on the mainland providing some mitigation measures perhaps towards neutral. It is assumed that the Promote option would include more transport movements on the islands & therefore some uncertainty but effects likely to be less than the Restrict or Minimise options. However, this depends upon the relative emissions & contribution to climate change effects from traffic movements by road on the islands compared to traffic/ship movements from the mainland – and this is not known. It is assumed that importing materials is more likely to contribute negatively overall to climate change effects.</p>	<p>0</p>	<p>0</p>	<p>0?</p>

⁷ For example, please see C Mitchell (BGS, 2015) Sustainability in the UK Construction Industry

	<p>Producing on-island would reduce transport costs and this could have positive effects- although, the comparative costs of modular off-island construction and use of on-island stone materials is not known – so uncertainty of significance (please see SA Nos 6 Air Quality/Transport). Overall, uncertainty of significance of likely effects as the precise extent of legacy material available is not known, nor its quality, nor whether it would make a difference to the costs of constructing the planned homes.</p>			
<p>8: Cultural & Heritage Assets</p>	<p>The whole of the Isles of Scilly is designated as a Conservation Area⁸, and includes defined Heritage Coasts⁹. Any development should follow the Isles of Scilly Design Guide¹⁰, to ensure development integrates well with the existing character and style.</p> <p>The scale and technical proficiency of the modern quarrying means that it can have a major, potentially destructive, impact on archaeological remains and can result in significant harm to the significance of nearby heritage assets. But quarrying also offers rare potential to deliver new knowledge about our historic environment¹¹. The most common irreversible impact on the historic environment within an area potential development area is on archaeological remains. The most common off-site impacts are on the significance of the asset in terms of its setting.</p> <p>The Restrict option will avoid such negative effects. The Minimise & Promote options could have such negative effects, but the significance is uncertain at this stage since extent/scale and location are not known. It is assumed that the Minimise option would locate activities to avoid/minimise any negative effects on archaeology & heritage assets; other Plan Policies will help protect the historic environment Policy OE7 Development affecting Heritage.</p> <p>The Promote option is assumed to be of sufficient sized activities such that there would be negative effects, particularly on the archaeological resource that is strong on the islands – but also, of sufficient size such that there could be investigative work undertaken that could enhance the knowledge of the islands' archaeological heritage; uncertainty at this stage as depends on location.</p>	<p>0</p>	<p>0?</p>	<p>+</p> <p>-</p>

⁸ <http://www.scilly.gov.uk/sites/default/files/document/planning/Conservation%20Area%20Character%20Statement%20CONSULTATION%20DRAFT.pdf>

⁹ <http://www.scilly.gov.uk/sites/default/files/document/planning/A%20Heritage%20and%20Cultural%20Strategy%20for%20the%20IoS.pdf>

¹⁰ Isles of Scilly Council (2006) Isles of Scilly Design Guide

¹¹ <https://historicengland.org.uk/advice/planning/mineral-extraction/impacts/>

<p>9: Landscape</p>	<p>The Isles of Scilly are one of England's finest landscapes as evidenced by their national designation as an AONB¹². Mitigation measures for potential negative effects from new development are possible through compliance with the Isles of Scilly design guide¹³, to help ensure any future development is well integrated with the existing landscape. Nonetheless, the visual impacts of quarrying on landscape have been debated since the early 1900s.</p> <p>Visual effects may be reduced through screening & planting – but the effectiveness of this depends on scale and location – and land is limited on the islands. It is assumed that there is sufficient stone currently available on the islands to ensure that new buildings can match the local vernacular and meet with the Design Guide. It may be noted that off-site construction that is sustainable and is sensitively designed is likely to be acceptable.</p> <p>The Restrict option will avoid such negative effects. The Minimise & Promote options could have such negative effects, but the significance is uncertain at this stage since extent/scale and location are not known. It is assumed that the Minimise option would locate activities to minimise any negative effects on landscape and visual impacts; other Plan Policies will help protect the landscapes through Policy OE1 Protecting & Enhancing the Landscape & Seascape – uncertainty of residual effects as depends on size and location.</p> <p>The Promote option is assumed to be of sufficient sized activities such that there would be negative effects on the landscape & seascapes – uncertainty of effectiveness of any possible mitigation measures at this stage.</p>	0	-?	-
<p>10A: Waste & Minerals</p>	<p>The draft Local Plan seeks to support the use of construction materials & minerals already on the islands through the use of recycled and secondary materials to avoid the requirement for any further direct extraction – and the Restrict option would support positive effects for the SA Objective.</p> <p>Negative effects are indicated for the Minimise & Promote options, although some uncertainty of significance still at this stage for the Minimise option as mitigation measures through limitation of activities is not precisely known.</p>	+	-?	-

¹² <https://landscapesforlife.org.uk/index.php/about-aonbs/aonbs/isles-scilly>

¹³ <https://www.scilly.gov.uk/planning/local-plan-local-planning-policies/current-local-plan-2005/supplementary-planning-guidance>

	There is sufficient capacity for waste management over the Plan period through redevelopment of the waste site at Porthmellon. The Plan also promotes more recycling and reuse, and this should further minimise wastes arising. It is appreciated that there may be positive effects from co-locating wastes and minerals activities but there is no requirement for additional wastes facilities for this Plan.			
10B: Energy	Not applicable – the location of construction materials does not directly affect SA sub-objectives to increase renewable energy and improve energy efficiency.	0	0	0
10C: Soil & Agriculture	The Isles of Scilly are limited in land and farming is limited to small-scale although it remains important and contributes to the character and sustainability of the islands. Loss of agricultural land through minerals extraction could have negative effects for loss of soils and agricultural practices.	0	0?	-?
	The Restrict option will avoid such negative effects. The Minimise & Promote options could have such negative effects, but the significance is uncertain at this stage since extent/scale and location are not known. It is assumed that the Minimise option would locate activities to minimise any negative effects on soils/agriculture but some uncertainty at this stage as depends on precise size & location.			
Summary SA Findings:				
Neutral effects are indicated for many of the SA Objectives since there are other Local Plan Policies that will provide mitigation measures – for example, in particular Policy OE2 Biodiversity & Geodiversity and Policy OE3 Managing Pollution.				
The Minimise option will have mostly neutral effects but with some uncertainties as the significance of effects and effectiveness of mitigation measures is dependent upon the precise size and location of any mineral extraction sites – particularly for SA Objectives on heritage, and landscape & seascape.				
There may be some minor positive effects on employment for the Minimise and Promote options but uncertainty as the number of jobs is not known; conversely, there could be negative effects on the tourism & recreation/leisure sectors through the introduction of quarrying with associated, noise, dust & disturbance.				
There is uncertainty associated with the likely effects for SA No 3 Economy, 6 Air Quality/Transport & 7 Climate Change - producing on-island would reduce transport costs and this could have positive effects although the comparative costs of modular off-island construction and use of on-island stone materials is not known. The relative emissions & contribution to climate change effects from traffic movements by road on				

the islands compared to traffic/ship movements from the mainland is not known & effects on air quality/emissions from road transport will depend upon precise scale & locations of any mineral extraction sites.

It is assumed that there will be some minor negative effects from the Promote option as the scale of activities will be higher – particularly on SA Objectives for biodiversity, air quality/sustainable transport, climate change, and landscape – and that mitigation measures may be more difficult to implement; depends upon precise scale & locations of any mineral extraction sites.