

Isle of Wight Council
Local Plan
Integrated Sustainability Appraisal
(ISA)

Interim Environmental Report

Hampshire County Council
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Non-Technical Summary

Introduction

This Non-Technical Summary provides an overview of the findings of the Integrated Sustainability Appraisal undertaken for the Isle of Wight (IOW) Island Planning Strategy (IPS). The document is referred to herein as the 'Interim Environmental Report ISA.

What is the IPS

The IOW Council is currently in the process of developing the Island Planning Strategy (IPS) to replace the Core Strategy (the IPS includes strategy and development policies). The IPS will form part of the 'IOW Development Plan'. The IOW Development Plan is a collection of plans and policies made up of IPS, The Gypsy, Traveller and Travelling Showpeople Plan (emerging), Minerals and Waste Plan (emerging). All planning applications will be determined in accordance with the Development Plan unless material considerations indicate otherwise. This ISA considers the impacts of the IPS only.

The IPS contains a number of strategic island-wide policies and approaches but also includes policy-based approaches based upon a spatial strategy. In effect the IPS policies have been developed and set out in six groups, along with the allocated sites. The IPS is set out as follows:

- Planning for sustainable development and growth (G1-G5);
- Delivering the housing we need (H1-H11);
- Supporting and growing our economy (E1-E11);
- Better connected island (policies T1-TC6);
- Sustainable strong and healthy communities (C1-C15);
- High quality environment (EV1-19); and
- The Allocated Sites (housing 41, employment 6, health 3).

What is an ISA

The ISA combines several assessment processes, primarily the Strategic Environment Assessment (SEA) and the Sustainability Appraisal (SA) within input from the Habitats Regulations Assessment and the Strategic Flood Risk Assessment. The ISA identifies, describes and evaluates the significant environmental effects of implementing the IPS;

- Identifies actions to prevent, reduce or as fully as possible offset any adverse effects;
- Allows the environmental effects of alternative approaches and mitigation measures to be considered;
- Provides an early and effective opportunity to engage in preparation of the Island Plan through consultation; and

- Monitors the preparation of the IPS to identify any unforeseen environmental effects and take remedial action where necessary.

This Interim Environmental Report describes how the Vision, Objectives, Policies and sites have been identified and appraised and presents the findings of the ISA that will help inform the ongoing plan-making process.

ISA Methodology and Appraisal Process

SA/SEA is a staged process, which ensures that the potential environmental effects of a policy or plan are identified during the development of the plan. It provides a framework through which to consult upon the proposed environmental effects and to update or improve upon the plan, before it is adopted. The stages can be summarised as follows:

- Stage A: Setting the context, establishing the baseline and deciding on the scope of the assessment. A Scoping Report is produced at this stage;
- Stage B: Developing and refining options assessing effects;
- Stage C: Preparing the Environmental Report;
- Stage D: Consulting on the plan; and
- Stage E: Monitoring significant effects of implementing the plan.

The first stage of the ISA (Stage A) involved preparation and circulation of a Scoping Report for consultation. The Scoping Report identified key plans, policies and programmes of relevance to the IPS. It also set out the baseline environment, any existing sustainability issues, and the future baseline scenario without the Plan. The Scoping exercise identified some key themes across the Plan area that need to be assessed in the ISA and scoped out issues where significant effects were not anticipated.

Following the Scoping exercise, a process of developing and refining the options (taking into account Consultee comments) commenced (Stage B). This Interim ISA Report was prepared as part of 'Stage B and C'.

ISA Framework

The ISA framework is made up of a number of ISA Objectives which are used to test the objectives, policies and options of the IPS against. The ISA Objectives have been developed based on the review of plans, programmes and the baseline information, and are as follows:

Topic	Objective	Assessment Criteria
ENVIRONMENTAL		
1. Air Quality	To maintain and improve air quality	Does the Plan seek to reduce the amount of congestion?
		Does the Plan seek to decrease reliance on private vehicles?
		Does the Plan seek to improve air quality particularly in areas with sensitive receptors (i.e. schools, care homes and hospitals)?
2. Coasts	To protect the Island's coastline and minimise the	Does the Plan reduce the risk to infrastructure, property and people from erosion and instability and avoid damage to the coastline of loss of amenity as a result of human activity?

Topic	Objective	Assessment Criteria
	risk to people and property from coastal erosion and flooding.	Does the Plan sustain natural systems and processes for managed retreat of the coastline where applicable? Does the Plan seek to accommodate predicted increases in flooding? Does the Plan seek to ensure it does not contribute to increase flooding?
3. Water Quality and Resources	To maintain and improve the water quality of the Islands, groundwater, rivers and coasts and to achieve sustainable water resources management.	Does the Plan seek to protect water resources including potable reserves and source protection zones (surface and groundwater, quantity and quality)? Does the Plan seek to minimise adverse effects on water hydromorphology, natural processes and aquatic environment? Does the Plan support an environmentally sustainable water supply/ support the reduction in water usage for new development? Does the Plan support the use of infrastructure unlikely to impact nitrate sensitive areas?
4. Landscape (including Noise)	To protect and enhance the Islands diversity and distinctiveness of landscape and townscape character and reduce light and noise pollution	Does the Plan seek to protect and enhance the AONB and coastal designations? Does the Plan protect tranquil areas on the island from unwanted noise? Does the Plan seek to conserve and enhance the fabric and setting of landscape character? Does the plan reduce/ minimise light spill in sensitive areas and protect dark skies?
5. Cultural Heritage	Maintain, protect and enhance buildings, sites and features of archaeological, historical or architectural interest and their settings.	Does the Plan seek to conserve or enhance designated or locally important historic assets (including archaeological deposits)?
6. Biodiversity	Conserve and enhance the biodiversity, flora and fauna of the Plan area including natural habitat and protected species.	Does the Plan seek to protect and enhance international, national, or locally designated sites and species? Does the Plan support net gain? Does the Plan seek to enhance biodiversity, ecological networks and habitat connectivity? Does the Plan protect from tree, hedge and vegetation loss and support an increase in tree cover (12% by 2060)?

Topic	Objective	Assessment Criteria
7. Land use, soils and agriculture	Maintain and protect soil quality, natural resources, and the best agricultural land. Protect greenfield and seek to remediate contaminated land. Achieve the sustainable management of waste.	Does the Plan protect areas which have value for their mineral resource potential and prevent sterilisation?
		Does the Plan encourage the remediation and re-use of contaminated and brownfield land?
		Does the Plan take into consideration soil function, type and classification (safeguarding Best and Most Versatile Grades 1, 2 and 3a)?
		Does the Plan support the waste hierarchy?
		Does the Plan support the protection of RIGGS?
8. Climate Change Emissions	Minimise emissions of greenhouse gases and reduce IOWs contribution to climate change.	Does the Plan seek to reduce carbon emissions in line with meeting the government target of zero emissions by 2050?
		Does the Plan support reduction in private vehicle numbers?
		Does the Plan support electric vehicles, alternative fuels or alternative modes of transport?
		Does the Plan support internet connectivity?
9. Climate Change Resilience	To anticipate and take steps to cope and respond to the consequences related to climate change.	Does the Plan have sufficient adaptability to actively respond to changes in temperature, rainfall and flooding?
		Does the plan provide any mitigation through green infrastructure?
		Does the Plan support the sequential risk-based approach to the location of development, taking into account the current and future impacts of climate change, so as to avoid, where possible, flood risk to people and property?
SOCIAL		
10. Culture	To maintain and protect the local culture, traditions and civic pride of Island towns and villages and increase engagement in cultural activity.	Does the Plan support increase in the local identity of individual settlements?
		Does the Plan support new investment in the public realm and cultural facilities?

Topic	Objective	Assessment Criteria
11. Crime and safety	To reduce crime and the fear of crime and ensure safety in the public realm particularly associated with the evening economy.	Does the Plan seek to reduce incidents of antisocial behaviour and reported incidents?
12. Health and Population: To improve the health and wellbeing of the population and reduce inequalities in health	A range of health inequalities across the Island with those in the more deprived areas facing a shorter life expectancy. To develop and maintain a balanced and sustainable population structure on the Island	Does the Plan provide an adequate distribution of affordable housing across the Island? Does the Plan support an aging population? Does the Plan help to achieve a balanced population structure on the Island?
13. Social Inclusion and Equality To reduce the level and distribution of poverty and social exclusion across the Island	Areas of deprivation on the Island, unfit housing, single pensioner households, and homelessness. Relatively high house price to income ratio. Assess any requirement for Gypsy and Traveller sites.	Provision for a range of flexible accommodation focussed on main areas of deprivation. Does the Plan seek to reduce the disparities in poverty and social deprivation? Level and the distribution of affordable housing across the Island to ensure that sub housing market area needs are being met Meet any identified need of the Gypsy, Traveller and Travelling Showpeople communities by allocating sufficient sites (pitches).
14. Education and training	To raise educational achievement levels across the Island and develop opportunities	Does the Plan support adequate access to education and training facilities and provide opportunities for improvement?

Topic	Objective	Assessment Criteria
	for everyone to acquire the skills they need to find and remain in work.	
15. Accessibility	Improve accessibility to key services and facilities. To protect, enhance and make accessible the Islands green infrastructure.	Does the Plan seek to ensure improved accessibility to sensitive receptors such as residential dwellings, schools and hospitals?
		Does the Plan provide additional opportunity for access to green infrastructure?
		Does the Plan support access to water access-based employment uses?
ECONOMIC		
16. Material Assets	To ensure the provision of adequate infrastructure for transport, utilities, housing and public facilities to meet the needs of residents and visitors.	Will it help to ensure that developments are supported by strong public transport, walking and cycling routes?
		Does it support a Solent crossing network?
		Does it support the continued operation and improvement of the rail network?
17. Employment and Economy	Facilitate high and stable levels of employment so everyone benefits from economic growth.	Does the Plan improve competitiveness, productivity and investment for local businesses?
		Does the Plan support tourism?
		Does the Plan facilitate economic development?
		Does the Plan support and encourage full-time employment opportunities?
		Does the Plan seek to reduce disparities in poverty and social deprivation?

The appraisal involved systematically assessing the following parts of the:

- Alternatives to the IPS;
- Spatial Strategies;
- All the policies;
- All 148 potential housing sites (including those not proposed for allocation); and
- Employment and health sites.

The objective of this ISA Interim Environmental Report is to assess the impacts of the IPS in terms of its environmental, social and economic effects, and to inform and influence the Plan as it

develops. It also considers ‘cumulative effects’ which for the purpose of this assessment is defined as ‘those that result from additive (cumulative) impacts which are reasonably foreseeable actions together with the plan (inter plan effects) and synergistic (in combination effects) which arise from the interaction between impacts of a plan on different aspect of the environment. The appraisal process aims to concentrate on identifying ‘significant effects’ only, as defined by the SEA Directive.

The assessment of environmental effects was qualitative and informed by professional judgement and experience with other ISA, as well as an assessment of national, regional and local trends.

Geographic Information Systems (GIS) mapping has been used to determine the site’s distance from features such as environmental designations. With respect to the assessment of sites, performance categories have been developed which are linked to each objective, in order to provide a robust appraisal of the sites. Colour coding has been used to ensure the impacts are visually apparent at a glance, as shown below:

Symbol	Explanation of the Effect
+	Positive/ Neutral: will result in either a neutral or positive impact on the objective
0	Negligible: Negligible or no effect on the objective
-	Negative: Option will result on a negative impact on the objective
?	Unknown: The relationship is unknown, or there is not enough information to make an assessment

Findings

This interim assessment makes the following general conclusions with respect to ensuring sustainability has been incorporated into the IPS by way of the ISA objectives:

It is noted that several of the ISA Objectives were not represented within the plan, these included noise, crime and safety.

Several of the ISA Objectives were underrepresented these included the water environment, health and the ageing population, education and training, access to sensitive receptors and the economy and employment particularly relating to tourism.

Notably ISA Objective 8 (climate change emissions) and ISA Objective 9 (climate change resilience) were not thoroughly integrated throughout the policies to the extent that they would provide confidence that the plan objectives in this regard could be achieved.

It is recommended that the amendments outlined herein and in Table 1-6, Appendix 1 be made to the draft policies to ensure these outstanding aspects are appropriately incorporated into the plan to facilitate the required change. A summary of the key recommended changes are as follows:

There are some draft policies which have been assessed as conflicting with each other and themselves. This is particularly notable in the Transport policy section with respect to ISA Objectives 1 (air quality) and ISA Objective 8 (climate). Although T 2 is in general favour of sustainable transport, T 6 supports private parking provision encouraging private vehicle use and T 1 supports the airport, both of which could have significant negative effect on ISA Objectives 1

(air quality) and 8 (emissions). Further, T 1 has direct conflict within the policy with respect to supporting air quality reduction, airport use and viability. Conflicts need to be addressed or reasonably justified to ensure negative effects do not occur.

The Transport section policies have direct crossover with the emerging Local Transport Plan (LTP) and T 1 contains specific transport schemes (which have not been assessed herein), which may prejudice the emerging LTP. It is recommended that these specific references be removed.

Issues have been noted between the spatial strategy and several policies. This is particularly relevant with respect to the AONB and areas outside of the settlement boundaries. It is imperative that this lack of clarity is addressed to ensure the AONB is not vulnerable to negative impacts with respect to tranquillity, dark skies, and landscape.

The IPS could be strengthened by 'future proofing'. The IPS has been developed to meet and comply with the existing guidance / standards but many areas such as emissions and biodiversity net gain are fast moving. To ensure the plan is flexible enough to keep pace with developments in these areas, references should be made to the most up-to-date guidance rather than specifying current guidance. This will allow the plan to remain relevant during the plan period without the need for updates.

The IPS uses passive terminology for example the terms, 'it is expected', 'where appropriate', 'should'. It also uses a number of undefined terms such as 'adjacent', 'high quality', 'sustainable'. The use of these terms leaves the requirements as optional rather than required and it leaves the policies open to challenge and potentially negative effects to the ISA Objectives. It is recommended that these terms be replaced with strong language such as 'required' and 'must' used alongside clear definitions.

Although it is acknowledged that for the plan to be flexible, exceptions are required. However, the assessment has identified that 'for public benefit' and 'exceptional circumstances' should be clearly defined to ensure these do not result in negative impacts to the environment.

Most of the policies within the IPS are not clearly measurable and targets are only provided for a small number of policies. This means that there is no assurance that the objectives of the IPS are achievable and importantly there is no way of measuring or monitoring the success of the Plan. It is recommended that where applicable targets be provided within the policies ensuring the IPS is robust.

In general, it is noted that there is room to be more ambitious within the policies to really drive change and capture the opportunities the IPS presents. This is particularly relevant to ISA Objective 1 (air quality), 4 (landscape) and 6 (biodiversity).

It is worth noting that the IPS has a large number of policies (60+) which may be impractical to implement, it increases the risk of conflict within the IPS and poses a risk that the key messages are lost, and the objectives are not met. Streamlining of the policies is recommended.

A total of three health sites, six employment sites, and 41 housing sites have been allocated. These are all within settlement boundaries in accordance with the spatial strategy.

Cumulatively the health sites will have a positive effect on ISA Objectives 12 (health and population), 13 (social) and 16 (material assets). No negative cumulative effects have been identified.

Cumulatively the employment sites may have a negative effect on ISA Objective 7 (land use) as a number of the sites are in Grade 3 ALC and mineral safeguarding areas. Cumulatively the employment sites are expected to have a positive effect on ISA Objective 16 (material assets) and ISA Objective 17 (economy). To ensure negative effects do not occur mitigation should be put in place to ensure mineral areas are not sterilised and that loss of productive soils are minimised.

In accordance with the spatial strategy, a total of 41 sites have been allocated for housing. The majority have been found to have one or more constraint which has resulted in a negative score on the assessment. A negative score does not mean that a negative impact will occur or that the site is unsuitable for housing, rather that the potential for a negative impact to occur exists which requires consideration and/or mitigation during the planning process.

Cumulatively the allocated sites within Cowes have the potential to have a negative effect on ISA Objective 17 (employment) as two of the 6 sites are in an existing employment zone. Several of the sites are in Grade 3 ALC and mineral safeguarding areas. Several the sites have the potential to negative impact ISA Objective 6 (biodiversity) owing to their location either in greenfield areas or in the vicinity of designated sites. Several sites have the potential to impact the ISA Objective 3 (water) owing to their proximity to water bodies.

Within West Wight, the potential exists for cumulative effects to occur with respect to ISA Objective 4 (landscape) owing to the proximity of some of the sites to the AONB and to ISA Objective 6 (biodiversity) due to the proximity to designated sites.

Within Newport the potential exists for negative cumulative effects on ISA Objective 7 (landscape) as many of the sites are located on Grade 3 ALC on the edge of the settlement. There are also potential impacts on ISA Objective 6 (biodiversity) as several of the sites are greenfield and / or have proximity to designated sites. This will require careful consideration on an individual site basis and cumulatively as the sites are brought forward to ensure appropriate mitigation is in place. Further, a number of the sites are located close to noise important areas (ISA Objective 4) and owing to the location of sites, several are not located close to existing transport links.

Next steps

It is important to note that due to the plan making timetable, the IPS has not been updated at this stage to take on board and incorporate the findings of this Interim ISA with respect to the suggested improvements to the policies or to the potential effects of the allocated sites. The Stage B and Regulation 18 engagement processes will allow interested parties to comment on the findings of this Interim ISA and the assessment of the policies and sites as well as the Draft IPS itself. The next stage of the plan preparation process will involve a series of workshops during which the IWC and other key stakeholders will consider comments made on all documents before re-visiting and consider ways to improve and strengthen the plan policies and ensure the most appropriate sites are allocated.

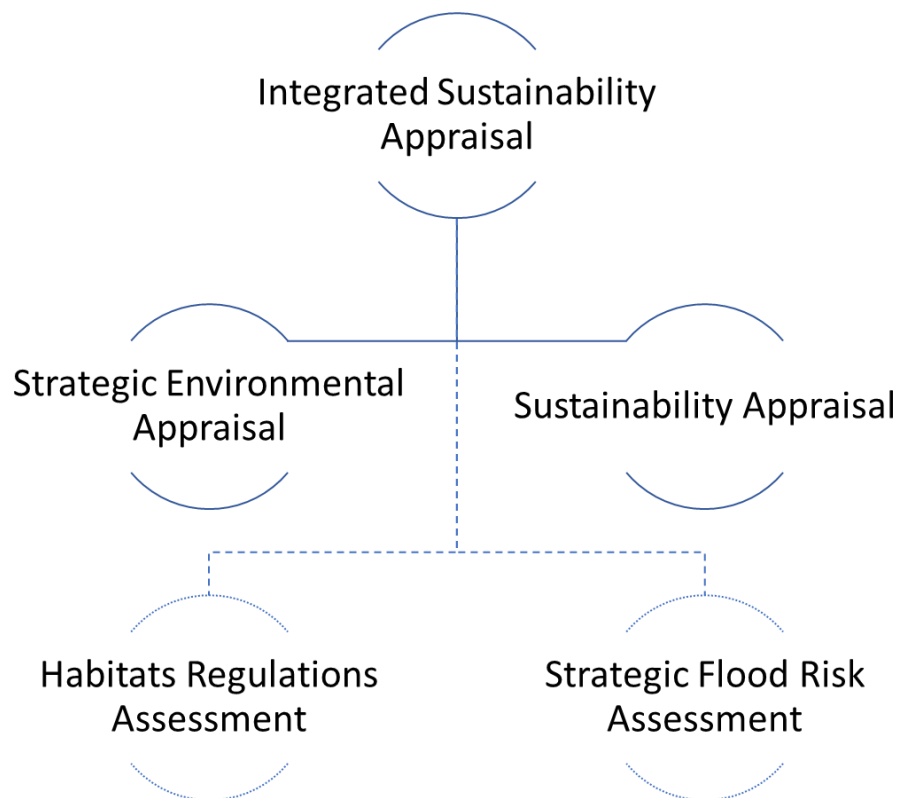
A final Environmental ISA Report will be provided which incorporates the findings of the HRA, SFRA, and details the outcomes of the workshops in effect documenting the evolution of the plan. This final ISA Report will support the Regulation 19 version of the IPS and be subject to public consultation.

1 Introduction and Purpose

1.1 Background

- 1.1.1 Hampshire Services, a trading part of Hampshire County Council (HCC) is preparing the Integrated Sustainability Appraisal (ISA) for the Isle of Wight (IOW) Council to support the preparation of the Island Planning Strategy (IPS) which is the key mechanism for the IOW to realise its vision and strategic priorities.
- 1.1.2 This Integrated Sustainability Appraisal (ISA) is being undertaken to ensure that sustainability aspects are incorporated into the Strategy. The ISA combines several assessment processes (refer Figure 1.1).

Figure 1.1: The ISA Process



1.2 The ISA:

- Identifies, describes and evaluates the significant environmental effects of implementing the IPS;
- Identifies actions to prevent, reduce or as fully as possible offset any adverse effects;
- Allows the environmental effects of alternative approaches and mitigation measures to be considered;
- Provides an early and effective opportunity to engage in preparation of the Island Plan through consultation; and

- Monitors the preparation of the IPS to identify any unforeseen environmental effects and take remedial action where necessary.

1.2.1 This Interim Environmental Report describes how the Vision, Objectives, Policies and sites have been identified and appraised and presents the findings of the ISA.

1.2.2 The ISA meets all the requirements of the Strategic Environmental Assessment Directive. These are signposted throughout the document.

1.3 SEA Explained

1.3.1 When preparing an ISA, it is a statutory requirement to conduct an environmental assessment¹ in accordance with the Strategic Environmental Assessment Directive (Directive 2001/42/EC)² and the Environmental Assessment of Plans and Programmes Regulations 2004. Article 3 (2) of the Directive makes Strategic Environmental Assessment mandatory for plans and programs:

A. which are preferred for agriculture, forestry, energy, industry, transport, waste management, water management, telecommunications, tourism, **town and country planning** or land use and which sets the framework for future development consent for projects listed in Annex I and II of the Environmental Impacts Assessment Direction (85/337/EEC); and

B. which in view of the likely effects on sites, have been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive (92/43/EEC).

1.3.2 The SEA and SA assessments depicted in Figure 1.1. have been combined into a 'Integrated Sustainability Appraisal Report incorporating Strategic Environmental Assessment' (ISA).

1.3.3 SEA is an integrated, systematic appraisal of the potential environmental impacts of policies, plans, strategies, and programmes during the development of the Plan before they are approved. It ensures that the implications for the environment are fully and transparently considered before those final decisions are taken.

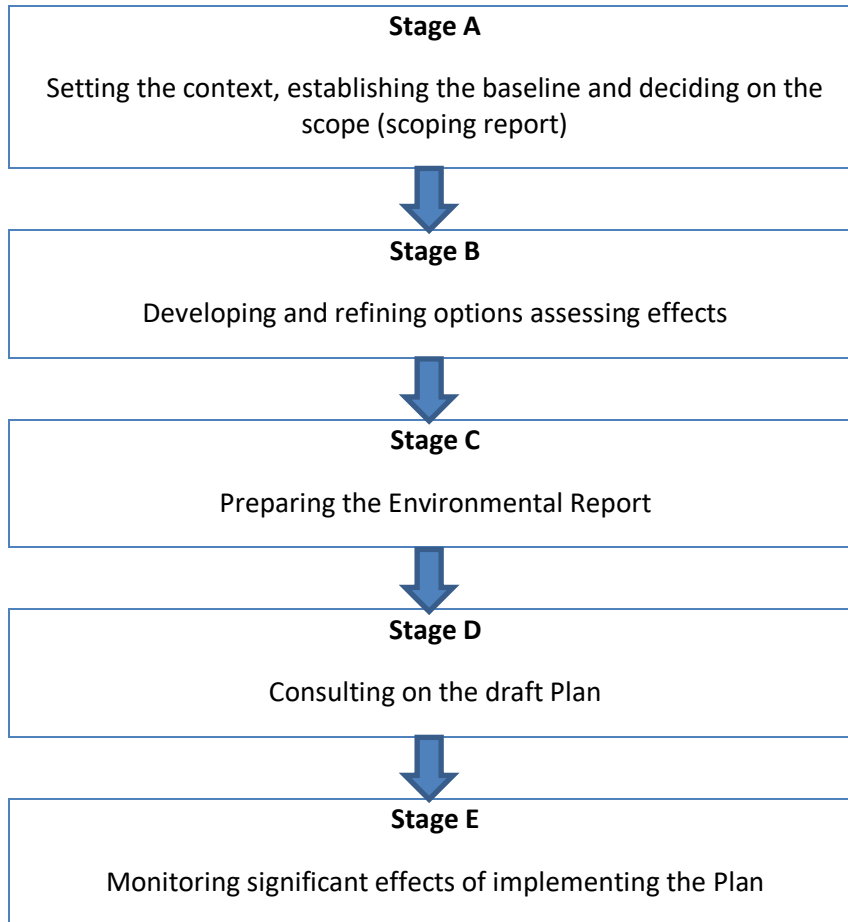
1.3.4 The approach for undertaking this ISA has been based on 'A Practical Guide to the Strategic Environmental Assessment Directive, 2005', 'Practice Advice Note on Strategic Environmental Assessment (2018)' and guidance provided by the National Practice Guidance on Strategic Environmental Assessment and Sustainability Appraisal³.

1.3.5 The stages of the SEA process are set out in Figure 1.2.

¹ Commonly referred to as Strategic Environmental Assessment

² Known as the SEA Directive

³ Planning Practice Guidance: www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal

Figure 1.2: SEA Stages

- 1.3.6 Stage A of the process (scoping) has been undertaken and was submitted for consultation in March 2021 the document was entitled ‘Hampshire County Council IoW Council Local Integrated Sustainability Appraisal, Scoping Report, February 2021’ (scoping report).
- 1.3.7 This Interim Environment Report has been prepared following consultation on the Scoping Report. This Environmental Report will formally meet the requirements of Stages B and C as shown in Figure 1.2.
- 1.3.8 Table 1.1 sets out the tasks involved in each of the stages outlined in Figure 1.2 and how they relate to the preparation of the IPS.

Table 1.1: SEA and the ISA Process

SEA Stages and Tasks⁴	Deliverable
<i><u>IPS Pre-production</u></i>	
<u>Stage A: Setting the context, establishing the baseline and deciding on the scope</u> A1: identifying other relevant policies, plans and programmes, and sustainability objectives A2: collecting baseline information A3: identifying sustainability issues and problems A4: developing the SA/SEA Framework A5: consulting on the scope of the SA/SEA	Scoping Report, including the baseline (February 2021)
<i><u>IPS Production</u></i>	
<u>Stage B: Developing and refining options assessing effects</u> B1: testing the Plan's objectives of the SA/SEA framework B2: developing and refining the option B3: predicting the effects B4: evaluating the effects B5: considering ways of mitigating adverse effects and maximising beneficial effects B6: proposing measures to monitor the significant effects of implementing the IPS	Draft Interim ISA Environmental Report (this report)
<u>Stage C: Preparing the Environmental Report</u> C1: preparing the Interim ISA Report C2: preparing the Final ISA Environmental Report	Draft Interim ISA Environmental Report (this report) Final ISA Environmental Report
<u>Stage D: Consulting on the Draft Plan</u> D1: consultation on the Draft Plan and accompany Interim SA/SEA Report D2: consultation on Proposed Submission Plan and accompanying Environmental Report	Final ISA Environmental Report
<i><u>IPS Examination</u></i>	
D3: appraising significant changes resulting from representations	Final ISA Environmental Report

⁴ Tasks as Defined in 'A Practical Guide to the Strategic Environmental Assessment Directive, September 2005'.

SEA Stages and Tasks ⁴	Deliverable
<i>IPS Adoption</i>	
<u>Stage E: Monitoring significant effects of implementing the Plan</u> E1: Finalising aims and methods of monitoring E2: responding to adverse effects	ISA Monitoring Reports

1.4 Meeting the requirements of the SEA Directive

1.4.1 The Strategic Environmental Assessment (SEA) Directive sets out certain requirements for the Environmental Report (Stage C) which must be followed. This Environmental Report includes all the information that must be included as per the Directive. A SEA roadmap is provided as Table 1.2, demonstrating how this report complies with the Directive, and the specific requirements of the Directive are also highlighted at the beginning of each chapter.

Table 1.2: SEA Roadmap

Task	Where covered
(a) An outline of the contents; and main objectives of the plan or program; and the relationship with other relevant plans and programmes.	Contents page Section 1 Section 3.1 and the Scoping Report 2021
b) the relevant aspects of the current state of the environment and likely evolution thereafter without implementation of the plan or program.	Section 3.3 and the Scoping Report 2021 Scoping Report
c) the environmental characteristics of areas likely to be significantly affected.	Section 3 and the Scoping Report 2021
d) any existing environmental problems which are relevant to the plan or program including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (The Birds Directive) and 92/43/EEC (the Habitats Directive).	Section 3.3 and the Scoping Report 2021
(e) the environmental protection objectives, established at international community or member state level which are relevant to the plan or program and the way those objectives and any environmental considerations have been taken into account during its preparation.	Scoping Report 2021
(f) the likely significant effects on the environment, including on issues such as:	Section 4 Table 4.3-4.8 and Table 1-6, Appendix 1.

Biodiversity; population; human health; fauna, flora; soil; water; air; climate factors; material assets; cultural heritage including architectural and archaeological heritage; landscape; and the interrelationship between the above factors.	
(g) the measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan or program.	Section 4 Table 4.3-.4.8 and Table 1-6, Appendix 1. 2
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know how) encountered in complying the required information.	Section 4.2
(i) A description of the measures envisaged concerning monitoring in accordance with Article 10.	Section 6
(j) a non-technical summary of the information provided under the above headings.	Non-technical summary at the front of this report

1.5 Sustainability Appraisal (SA)

1.5.1 The Planning and Compulsory Purchase Act 2004⁵ requires Sustainability Assessment (SA) be undertaken for Development Plan Documents (DPD), and Supplementary Planning Documents.

1.5.2 SAs are an effective way to ensure that sustainable development principles are considered during the plan making process. By assessing plan policies against a broad range of SA objectives, the appraisal process exposes strengths and weaknesses of a policy, which can help to develop recommendations for its improvement. As well as helping to enhance the policy, the appraisal process also provides a basis for discussion between stakeholders around a shared set of objectives.

1.6 Habitats Regulations Assessment (HRA)

1.6.1 Under Article 6 (3) of the EU Habitats Directive as transposed into the UK law by the Habitats Regulations⁶, an assessment (referred to as a Habitats Regulations Assessment or HRA) needs to be undertaken in respect of any plan or project which:

- Either alone or in combination with other plans or projects would be likely to have a significant effect on a site designated within the Natura 2000 network – these

⁵ The Planning and Compulsory Purchase Act 2004

⁶ The Conservation of Habitats and Species Regulations 2017. Available from: <http://www.legislation.gov.uk/uksi/2017/1012/contents/made>

are Special Areas of Conservation (SACs), candidate SACs (cSACs), and Special Protection Areas (SPAs). In addition, Ramsar sites (wetlands of international importance), potential SPAs (pSPA) and in England possible SACs (pSACs), are considered in this process as a matter of law or Government policy. [These sites are collectively termed 'European sites' in Habitats Regulations Assessment (HRA)]; and

- Is not directly connected with, or necessary to, the management of the site.

1.6.2 Guidance on the Habitats Directive sets out four distinct stages for assessment under the Directive:

- Stage 1: Screening: the process which initially identifies the likely impacts upon a Natura 2000 site of a plan or project, either alone or in combination with other plans or projects, and considers whether these impacts are likely to be significant;
- Stage 2: Appropriate Assessment: the detailed consideration of the impact on the integrity of the Natura 2000 sites of the plan or project, either alone or in combination with other plans or projects, with respect to the site's conservation objectives and its structure and function. This is to determine whether there will be adverse effects on the integrity of the site;
- Stage 3: Assessment of alternative solutions: the process which examines alternative ways of achieving the objectives of the plans or projects that avoid adverse impacts on the integrity of the Natura 2000 site; and
- Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain: an assessment of whether the development is necessary for imperative reasons of overriding public interest (IROPI) and, if so, of the compensatory measures needed to maintain the overall coherence of the Natura 2000 network.

- 1.6.3 The HRA enables the likely significant effects on European sites to be established as a result of the IPS. To date the policies have been screened, however the allocated sites have not yet been assessed. The outcomes of these assessments will be included in the updated ISA assessment (refer Section 8). The assessment of the sites herein includes consideration of the site's potential impacts on designated sites (refer Appendix 2).

1.7 Strategic Flood Risk Assessment (SFRA)

- 1.7.1 An SFRA will be carried out to assess the risk to IOW from flooding from all sources, now and in the future, considering the impacts of climate change, and to assess the impact that land use changes and development in the areas will have on flood risk.
- 1.7.2 The SFRA will apply the sequential test which aims to steer new development to areas with the lowest probability of flooding. If there are alternative sites in areas of lower flood risk, development should not be allocated or permitted. If it is not possible for the development to be located in flood zones with a lower probability of flooding, it must be demonstrated that the development provides wider sustainability benefits that outweigh flood risk, and a site-specific flood risk assessment must demonstrate that the development will be safe for its lifetime without increasing flood risk.
- 1.7.3 To date the full SFRA is not available however, the assessment of the sites includes full consideration of flood risk (refer Appendix 2). The findings of the SFRA will be incorporated into the Updated ISA (refer section 8).

1.8 Tell us what you think

- 1.8.1 This Interim ISA report forms part of the Regulation 18, which provides notification to the public and stakeholders that the IOW is preparing a Plan and initiates a round of engagement. It is the first stage in the consultation process.
- 1.8.2 IOW Council is seeking the views of Statutory Consultees and other interested parties to express their views and on the findings of the ISA to ensure that the ISA provides a robust assessment of the IPS. Following consultation, the responses will be considered, and a revised ISA will be completed and made available on the IOW website.
- 1.8.3 Comments on any aspect of this report are welcome, although you may prefer to respond to the following questions:
- Do you agree with the assessment of the policies?
 - Are there any impacts that you think have not been adequately addressed?
 - Do you have any suggestions for improvement?
 - Are the mitigation measures appropriate?
 - Is there anything missing from the Plan?
 - Is there any other evidence relevant to the assessment of sites through this process?

- 1.8.4 The consultation runs for a nine week period, the closing date is Friday 1 October 2021.
- 1.8.5 If you require any information about this Interim Report, please contact the Isle of Wight Council, planning.policy@iow.gov.uk
- 1.8.6 Comments received will be reviewed and incorporated into the Final ISA Environmental Report that supports the Regulation 19 version of the IPS.

2 Island Planning Strategy Background and Overview

2.1 Background

- 2.1.1 The Isle of Wight (IOW) Council adopted the Isle of Wight Core Strategy (including Waste and Minerals) and Development Management Development Plan Document in March 2012, following examination by an independent Planning Inspector.
- 2.1.2 The IOW is currently in the process of developing the Island Planning Strategy (IPS) to replace the Core Strategy (the IPS includes strategy and development policies)⁷.
- 2.1.3 A significant amount of assessment work has already been carried out to support the preparation of IOW development plans (some of which have been through examination). This includes:
- Core Strategy: October 2010 – A Sustainability Appraisal (SA) commenced during the pre-production and evidence gathering stage, and a revised SA Scoping Report was published in October 2010.
 - Draft IPS: August 2018 – Scoping Report, outlining the scope and framework for the SA.
 - Draft IPS: November 2018 - Isle of Wight Sustainability Appraisal Report, presents the findings of the Sustainability Appraisal carried out on spatial strategy aspects of the Island Planning Strategy as it was in 2018. Included the assessment of objectives, policies, spatial strategies, and allocations. A decision was taken not to progress with the plan in its current form owing to the issues around housing numbers (refer to section 2.5 for further details).
 - Draft IPS: February 2021 Revised Scoping and Baseline – New scoping and up to date baseline information presenting the baseline and setting out the frameworks of the assessment of the IPS. This was subject to statutory consultation in spring 2021.
- 2.1.4 The IPS will form part of the ‘IOW Development Plan’. The IOW Development Plan is a collection of plans and policies made up of the following documents (refer Table 2.1). All planning applications will be determined in accordance with the Development Plan unless material considerations indicate otherwise.

⁷ strategic policies are provided in Appendix 4 of the IPS

Table 2.1: IOW Development Plan

Plan / Policy	Summary
The Island Planning Strategy (IPS)	Sets the overall strategic direction for the Local Plan and includes strategic policies, allocations for a range of land uses and development management policies.
Gypsy, Traveller and Travelling Showpeople Plan (emerging)	In line with national policy this will allocate specific sites to meet the evidenced requirements of the gypsy, traveller and travelling showpeople communities.
The Island Planning Strategy Waste and Minerals Plan (emerging)	Will deal with waste and minerals issues on the Island. Following the adoption of the Island Planning Strategy, the Island Plan Core Strategy policies relating to Waste and Minerals will be saved until they are replaced by the Island Planning Strategy Waste and Minerals document.

2.1.5 This ISA considers the impacts of the IPS only. The other documents which will make up the Development Plan will be subject to individual ISA and on this basis have not been considered herein.

2.2 Overview of Island Planning Strategy (IPS)

2.2.1 The IPS along with the neighbourhood plans will form the IOW Local Plan. The requirement to produce such a plan is set out in national policy⁸ and is a key tool in determining planning decisions. As such, the IPS is fundamental to delivering sustainable development that reflects the vision and aspirations of the Island community.

2.2.2 The neighbourhood plans have been subject to SA and as such will not be assessed herein⁹.

2.2.3 The development of the IPS provides the key mechanism for expressing how IOW will realise its vision and strategic priorities. This new IPS will provide a framework for IOW future planning for the period 2023-2038.

2.2.4 The IPS contains a number of strategic island-wide policies and approaches but also includes policy-based approaches based upon a spatial strategy. In effect the IPS policies have been developed and set out in six groups, along with the allocated sites. The IPS is set out as follows:

- Growth (G1-G5);
- Housing (H1-H11);
- Economy (E1-E11);
- Transport (policies T1-TC6);
- Community (C1-C15);
- Environment (EV1-19); and
- The Allocated Sites.

⁸ National Planning Policy Framework, Paragraphs 15 to 37, Plan Making

⁹ Please refer to individual neighbourhood Plans for further details.

2.2.5 The IPS also contains Area Statements, for the six regeneration areas (refer Figure 3.1 and section 3.3). The previous three Draft Area Action Plans¹⁰ have been used to inform the IPS but do not form part of the Local Plan¹¹.

2.2.6 In addition, the plan sets out a spatial strategy within which development will be considered (refer section 4.5).

2.3 Plan Area

2.3.1 The study area for the IPS is the area within the administrative boundary of IOW Council (refer Figure 2.1 which depicts the administrative areas of IOW council that are covered by the IPS).

2.3.2 Understanding the needs of these distinct areas is particularly important for deciding on planning policy. When considering the Isle of Wight, its existing population distribution and the specific geography and character six key regeneration areas identify themselves:

- Ryde: and its wider immediate area including villages such as Bembridge, St. Helens, Seaview and Brading
- The Bay: Sandown, Shanklin and Lake but also the smaller settlement of Ventnor and adjacent villages
- West Wight: Mainly rural but with Yarmouth and Freshwater as hub settlements
- West Medina: Cowes, Gurnard and Northwood and settlements in and to the West of Newport
- East Medina: East Cowes and settlements in and to the East of Newport
- Newport: The role of Newport as the Island's commercial, business and civic hub and the range of development opportunities in and around the county town afford it specific attention as a distinct area overlaying the southern ends of both East and West Medina.

2.3.3 These regeneration areas which are referenced throughout the IPS (refer Figure 2.2. which depicts the regeneration areas¹²).

10 Medina Valley Plan Draft, Ryde Plan Draft, The Bay Plan Draft (all 2015)

11 The Area Action Plans have not been adopted but were subject to SA.

12 IOW Regeneration Strategy 2019-2030 (published 2019)

Figure 2.1: Administrative Boundaries of IOW (Plan Area¹³)

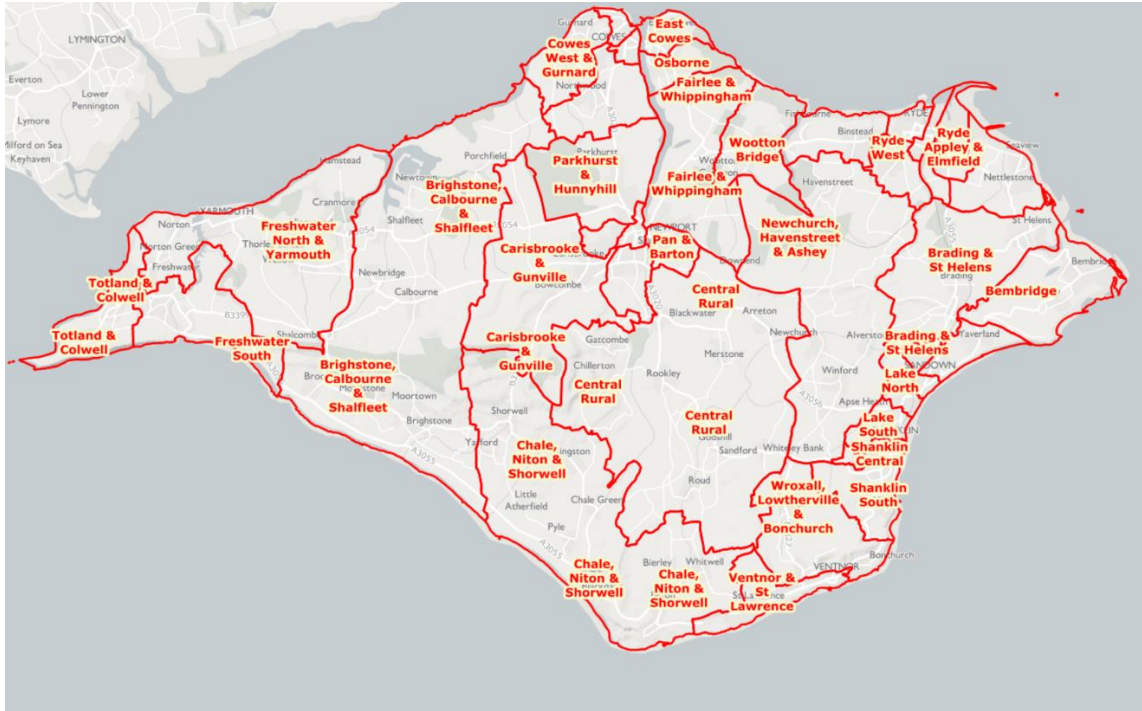
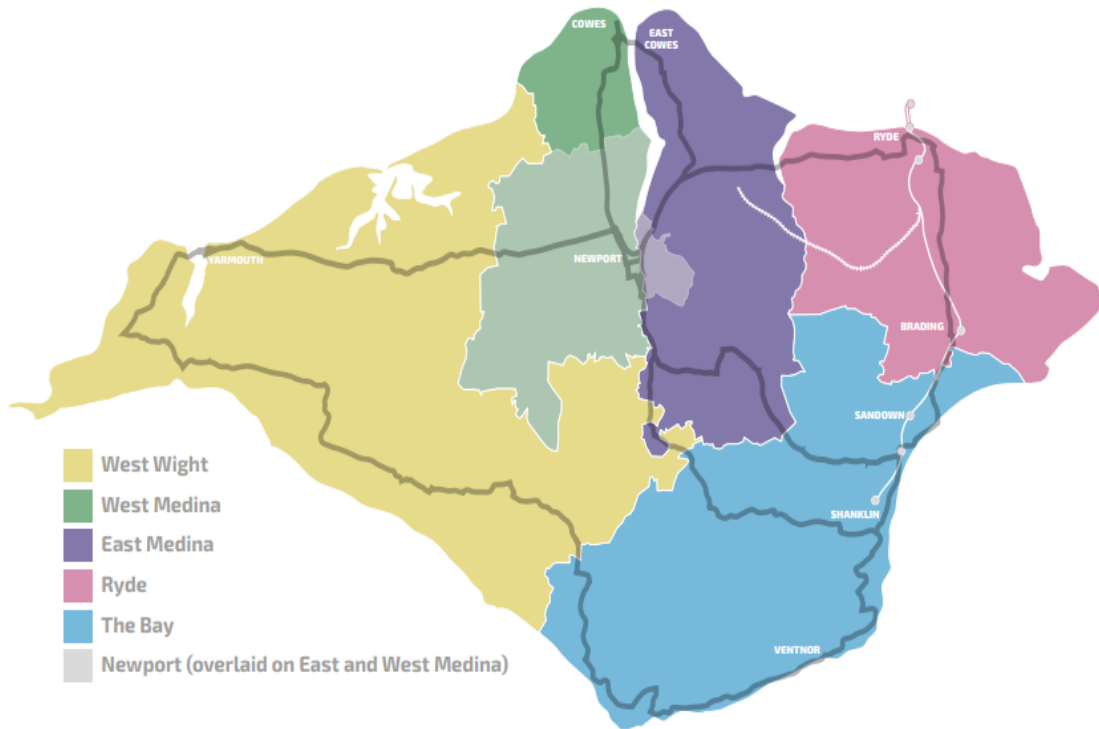


Figure 2.2: Regeneration Areas



13 As of May 2021

2.4 IPS Vision and Objectives

2.4.1 The vision for the IPS is:

'For the Isle of Wight to be an inspiring place in which to grow up, work, live and visit'.

2.4.2 To ensure consistency with the Corporate Plan¹⁴, all the Corporate Plan outcomes have been identified as relevant to land-use planning and therefore form the objectives for the IPS. These comprise the following:

- 1. The environment and unique island characteristics are celebrated.*
- 2. Outstanding digital and transport connectivity.*
- 3. The Isle of Wight is a leading UK visitor destination.*
- 4. Businesses have the confidence to invest.*
- 5. All young people will have the best start in life so that they can fill their potential.*
- 6. A well-educated and skilled community.*
- 7. Community needs are met by the best public services possible.*
- 8. The community feels safe and is the Island is resilient.*
- 9. People take responsibility for their own health and wellbeing.*
- 10. People have a place to call home and can live with independence.*
- 11. Vulnerable people are supported and protected.*
- 12. A financially balanced and sustainable council.*

¹⁴ IOW Corporate Plan 2019-2022 (published in 2019)

- 2.4.3 The vision and these 12 objectives provide the framework within which the planning policies of the IPS have been developed.
- 2.4.4 The vision and the objectives have not been amended since the development of the core policy in 2012 and have been subject to SA as part of the assessment of Draft IPS in 2018, on this basis they have not be re assessed herein. For further details regarding the assessment of these items please refer to the Isle of Wight Council Sustainability Appraisal Report to support the Island Planning Strategy November 2018¹⁵. It is noted that the Corporate Plan is being revised following a change in political administration at the May 2021 local elections. The next version of the IPS will include and update these Corporate objectives accordingly to allow re-assessment in the Final ISA Environmental report, if necessary.

2.5 Spatial Strategy

- 2.5.1 The first draft of the IPS was published for consultation in December 2018 and included the designation of housing allocations to enable the Government's standard methodology housing number for the island to be met. To meet these numbers, the Draft IPS including proposals for two new garden settlements. The response from local stakeholders and the community was overwhelming in opposition and evidence from the Authority Monitoring Reports (AMRs) highlighted some key concerns.
- 2.5.2 Six different spatial strategies were proposed in the draft IPS in 2018. These spatial strategies included the following:
- 1(a) Use existing settlement hierarchy (a) Increase density/site yield;
 - 1(b) Use existing settlement hierarchy (b) extending settlement boundaries;
 - Creating new communities;
 - 3(a) Growth in locations not previously considered (a) New tier(s) in settlement hierarchy with settlement boundaries;
 - 3(b) Growth in locations not previously considered (b) New tier(s) in settlement hierarchy with allocated sites (no settlement boundary); and
 - 3(c) Growth in locations not previously considered (c) New tier(s) in settlement hierarchy with settlement boundaries and allocated sites.

15 Microsoft Word - IPS SA Report FINAL VERSION NOVEMBER 2018 (1) (iow.gov.uk)

- 2.5.3 These options have been assessed in accordance with the framework of the SA undertaken in 2018, and it is worth noting that these 6 spatial options were assessed against a different (higher) level of development. Using the outcomes of the assessment work undertaken in 2018 and the new housing numbers, these spatial strategies were consolidated into four new spatial strategies which were further considered and assessed herein (refer to Table 4.2 for all the options).
- 2.5.4 No option was selected as the preferred option in 2018.

3 Stage A Scoping Appraisal Findings

3.1 Introduction

- 3.1.1 Tasks A1-A4 of the SEA process involve gathering evidence to help set the context and objectives, establish the environmental baseline and decide on the scope of the ISA.
- 3.1.2 The evidence was used to develop a set of suitable objectives against which the sustainability effects of the IPS can be assessed. Full details of the policy context, the relevant aspects of the current state of the environment and any existing environmental problems as required in the Strategic Environmental Assessment (SEA) Directive may be found in the Scoping Report¹⁶.
- 3.1.3 The SEA Directive requirement for Task A1 is as follows:

Under the SEA Directive the Environmental Report should include: An outline of the contents; and main objectives of the plan or program; and the relationship with other relevant plans and programmes (Annex 1a).

‘the environmental protection objectives, established at international, community or member states level, which are relevant to the plan of program and the way those objectives and any environmental considerations have been taken into account during its preparation’ (Annex 1e).

- 3.1.4 A review was undertaken of relevant international, national, regional and local principles, plans, programmes and strategies to identify their implications for the IPS which was produced in February 2021. There is a large volume of regulations, plans, policies, and guidance relevant to the IPS. Full details regarding their relevance and implications to the ISA are provided in Appendix A, Tables A1-A4 of the Scoping Report.
- 3.1.5 The review has identified several key messages which need to be considered whilst developing the IPS and undertaking the ISA. These can broadly be considered in the following categories:
- Environmental Protection – including air quality, noise and vibration, the natural environment and biodiversity, water and coasts. The Island presents a unique environmental setting that requires protection and enhancement to ensure the continued sustainable growth of the Island. Ensuring the integrity of internationally designated sites that surround the Island are a priority. Air quality impacts are dominated by road traffic emissions which require management through effective air quality and transport related measures to ensure mandatory standards are being met and air quality is improving. Waste management is

¹⁶ IOW ISA Scoping Report, February 2021.

crucial to the Island's development; waste volumes and landfill void capacity must be addressed.

- Climate Change – a key issue for all UK plans, with relevance to the IOW due to the threat of coastal and fluvial flooding. Plans need to support the Island in achieving the commitments made with respect to carbon reduction on the Island including greater use of renewable sources. Development and regeneration projects must be designed to ensure resilience to climate change with respect to increased flooding, increases in temperature and extreme weather events. Climate change will directly influence flood risk management and defence measures for the Island and water supply.
- Transport and Infrastructure – including Island regeneration, green infrastructure, connectivity and accessibility, coastal development. Key areas include improving highway condition, walking, and cycling access and road safety to support economic growth whilst protecting the local environment. Transport development should reduce inequalities and barriers and encouraging active travel¹⁷, increasing and maintaining connectivity with the mainland, whilst maintaining a safe and attractive public realm. Infrastructure development to support the Island's economic development goals (particularly renewable energy and advanced marine manufacturing). Transport development must meet any identified regeneration plans to ensure connectivity and accessibility around the Island.
- Housing – provide the housing needs of the current and projected IOW population, offering housing that is suitable to the demographic needs and ensuring a balance between affordable, market and specialist housing. Addressing housing opportunities for young people, families and the issues of rough sleeping and homelessness are identified priorities.
- Healthcare and Education – including mental health service improvements. Effective health care on the IOW is essential when considering the relative isolation to wider healthcare services. Key areas include investing in community services, reducing health inequalities, improving mental health and acute hospital services, and integrating health and social care into the operation of the Island. Improving the Island's overall health and wellbeing is a central aim of the plan.
- Education and Employment Skills – improve school and education delivery on the island to provide a cohesive system. Ensuring the growth of the IOW economy through skill development in strategic sectors (advanced marine manufacturing, renewable energy, and tourism).

¹⁷ Active travel simply means making journeys by physically active means - like walking, cycling, or scooting

- 3.1.6 Cultural Heritage and Landscape Character – the development of the Island must be achieved whilst preserving the Island’s heritage, cultural assets, and landscape character. Including the impacts of land-use changes to facilitate development.

3.2 Task A2: Environmental Context (Establishing the Baseline and Future Baseline Environment)

- 3.2.1 The collection of the baseline information on the environment within the Plan area is a key component of the ISA process and a legal requirement under the SEA Directive. The baseline information provides a basis for predicting and monitoring effects and identifying sustainability problems.

- 3.2.2 The SEA Directive’s requirement for Task A2 is outlined below.

In accordance with SEA Directive the Environmental Report should include: the relevant aspects of the current state of the environment and likely evolution thereafter without implementation of the plan or program (Annex 1b); and the environmental characteristics of areas likely to be significantly affected (Annex 1c).

- 3.2.3 Baseline information was compiled for the Scoping Report¹⁸. Information was collected from a number of sources, notably Geographical Information Systems (GIS), Ordnance Survey, Environment Agency and Natural England. Current information was used where possible.

- 3.2.4 Information was collected on the following topics:

- Population and human health;
- Biodiversity, flora and fauna;
- Soil;
- Water;
- Air;
- Climatic factors;
- Material assets;
- Cultural, architectural and archaeological heritage;
- Landscape; and the
- Inter-relationship between the above factors.

¹⁸ IOW ISA Scoping Report, February 2021.

- 3.2.5 Because this is an ISA it also incorporated noise, economy, equality, well-being and other relevant disciplines.
- 3.2.6 The baseline was completed in January 2021 and is provided in the Scoping Report.

3.3 Task A3 Sustainability Issues

- 3.3.1 Task A3 draws evidence gathered in Tasks A1 & 2 to identify environmental issues which will form the basis for a robust ISA. The SEA Directive Requirement for Task A3 is as follows:

The SEA Directive States the Environmental Report should include: any existing environmental problems which are relevant to the plan or program including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (The Birds Directive) and 92/43/EEC (the Habitats Directive) (Annex 1d).

- 3.3.2 A summary of the key sustainability issues of relevance to the IOW is provided in Table 3.1. Further details are provided in the Scoping Report. The outcomes of establishing these keys issues were utilised to develop the ISA objectives. Climate change is integral to many of the baseline topics and its impact is far reaching. To ensure its importance was appropriately highlighted and that the impact of climate change on all aspects of the environment, economy and society are thoroughly incorporated throughout - climate change has been included and considered within all the topics.

Table 3.1: Summary Key Sustainability Issues

Air Quality

Air quality on the IOW is greatly influenced by human activities, notably road traffic emissions. Traffic pollution has been identified as the largest source of air pollution. The large industrial presence on the island (ports and shipping) are also considered to contribute negatively to the local air quality.

Under current environmental legislation, the national air quality objectives are achieved on the IOW and therefore no Air Quality Management Areas (AQMA) have been declared. There are 12 nitrogen dioxide (NO_x) non-automatic (passive) monitoring tubes located around the IOW and 2018 results showed that there were no areas where any exceedances of the hourly or annual mean occurred There are no automatic (continuous) monitoring sites on the IOW. Nitrogen dioxide concentrations are the most likely pollutant to breach the annual mean objective of 40 µg/m³ mean annual concentration or 200 µg/m³ 1-hour mean concentration.

Monitoring of particulate matter (PM₁₀ and PM_{2.5}) is not undertaken on the IOW as no areas have been identified as exceeding national air quality objectives.

It is recognised that opportunities to encourage a modal shift to more sustainable forms of transport on the island may not be recognised due to limited financial mobility (required to purchase electric vehicles). In addition, the IOW is in an area of major

international shipping gateways (Southampton and Portsmouth), within the English Channel Sulphur Emissions Controlled Area. This means that vessels transiting this area are required to either use low-sulphur fuel or be fitted with an exhaust cleaning system. Given the predicted growth at these Ports, shipping is anticipated to make significant contributions to emissions of nitrogen NO_x, SO₂, PM_{2.5} and PM₁₀ including black carbon and carbon dioxide.

The impact of climate change on local air quality is important to consider; the IOW is considered to be most susceptible to hotter and drier conditions in the future which is associated with a decline in air quality.

Noise

Noise pollution on the IOW is dominated by road traffic centred around the urban hubs on the north and northeast of the island. Noise levels along some routes exceed 75 dB. As a result, there are 12 Noise Important Areas (NIA) on the IOW which are closely associated with the urban areas experiencing high road traffic volumes (Newport, East Cowes, Shanklin and Ryde). There are no NIAs for railway noise. Areas of tranquillity are centred in the 'rural' southwest of the IOW.

Despite the relatively large areas of relative tranquillity when compared to neighbouring cities on the mainland, it has been estimated that 60% of the IOW is disturbed by noise and visual intrusion. For comparison, 100% of the cities of Southampton and Portsmouth are considered to be disturbed.

Biodiversity

The IOW hosts a large number of internationally, nationally and locally designated sites - these sites are estimated to cover 70% of the IOW, with a strong relationship with the surrounding coastal and marine environment. 50% of the IOW also falls within the IOW Area of Outstanding Natural Beauty (AONB).

Internationally designated sites include:

- Solent and Dorset SPA
- Solent and Southampton Water SPA and Ramsar
- Isle of Wight Downs SAC
- South Wight Maritime SAC
- Solent Maritime SAC
- Briddlesford Copse SAC
- Solent and Isle of Wight Lagoons SAC

The integrity and health of these sites is currently threatened and pressured as a result of the proximity of human populations, industry and the effects of climate change.

There are 41 nationally designated SSSI covering an area of approximately 4,254 ha; 26 are designated for biological interest, four for geological interest and 11 for both. No new SSSI designations have been made since 2003. In addition, there are three nationally designated Marine Conservation Zones. There are eight Local Nature Reserves and 395 Sites of Importance for Nature Conservation.

The key priorities for the IOW biodiversity are to protect and enhance the sites listed above to avoid net loss and damage and fragmentation and to achieve or maintain a favourable conservation status. Achieving biodiversity net gain is recognised as a key component of this protection. The impact of climate change on local biodiversity is also considered; changes to weather and temperature patterns and water availability will directly impact local wildlife. Protecting and enhancing the local ecosystems can also provide crucial protection from the effects of climate change, for example by increasing resilience to flooding.

Water Quality and Resources

The IOW has four main rivers: Yar, Newtown, Medina and Eastern Yar. A significant proportion of the IOW is susceptible to flooding. The Island is particularly vulnerable to coastal / tidal flooding, this is likely to increase with sea level rises associated with climate change. However, local flooding can also be caused by surface water (pluvial), tidal, groundwater and river (fluvial) sources. The Flood Risk throughout the IOW ranges between Flood Risk 2 and Flood Risk 3.

The IOW is underlain by a number of bedrock aquifers, the majority of which is covered by a Secondary A aquifer. The south of the island is underlain by a primary aquifer¹⁹. Groundwater Source Protection Zones²⁰ are located to the centre and south of the island. The latest WFD assessment identified ten Transitional and Coastal waterbodies on the IOW, eight have been identified as having moderate potential and two as having good potential. Three of the major groundwater units: Central Downs Chalk, Southern Downs Chalk and Lower Greensand supply water for agriculture and industry and are heavily abstracted for public water supply. All three sites are of poor status. There is one Drinking Water Protected Area on the IOW, and there are no Surface Water Safeguard Zones.

Of the 14 sites where bathing water quality is monitored, all sites reached excellent status in 2019. The majority of the IOW is covered by a Nitrate Vulnerability Zone (NVZ, approximately 29,000 ha). 95% of the 70,225 homes and 89% of the 4,060 businesses are connected to the sewerage system.

Coastal erosion is a key issue for the IOW; average rates of coastal erosion for the southern unprotected shores ranges from 0.2-0.5 m per year. Sections of the coastline which comprise chalk cliff lines erode at a rate of between 0.1-0.2 m per year. As a result, 36% of the IOW coast has built coastal defences, mostly in the form of seawalls. By 2100 with the inclusion of climate change, it is projected that between 58-75% of existing saltmarsh around the IOW will be lost.

Saltwater intrusion into freshwater rivers is identified as a likely outcome of climate change over the next 100 years as sea levels and tidal floods extend further upstream.

¹⁹ Principal aquifers are layers of rock or drift deposits that have high intergranular and/or fracture permeability- meaning they usually provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. In most cases, principal aquifers are aquifers previously designated as major aquifer.

²⁰ These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. The maps show three main zones (inner, outer and total catchment).

Climate change has the potential to further affect water quality via the release of nutrients from catchment soils, the transport of nutrients to water courses which indirectly results in oxygen depletion within the water environment, increased storm surges and subsequent sewer flooding and through lower water levels due to prolonged periods of drought during hotter and drier summers. These hotter conditions could also result in the deterioration of semi-natural wetland habitats.

Water for public supply, agriculture and industry is abstracted from the island's rivers and groundwater but demand outstrips supply so at least half the island's water is now imported by pipe from Hampshire. The main climate change consequences related to water resources are increases in temperature, shifts in precipitation patterns and snow cover, and a likely increase in the frequency and severity of flooding and droughts. Climate change may also markedly change the seasonal variation in river-flow. It also has a direct effect on water security.

Population growth, water consumption, climate change, emerging chemicals, plastic pollution and nanoparticles all present potential future threats to water quality in the IOW.

Economy

The IOW accounts for 10% of the Solent Gross Value Added (GVA). IOW job density in 2018 was 0.78, compared to the South East density of 0.88. The proportion of the population of working age is small when compared to the Hampshire region and qualification levels are also low – this has implications for occupational mix and earnings. These factors combine to give the IOW low levels of GVA per head. In 2019 the employment rate on the IOW was 73.6%. The economically active proportion of the population was estimated to be 77.1%, and the proportion of unemployed was estimated to be 3.9%. There is a large seasonal labour force on the IOW, with 30.5% in part-time employment. This is particularly evident in the southwest of the island which has a part-time employment rate of 40%.

The occupational structure on the IOW mirrors the demographics and industrial structure. More than four out of five businesses on the IOW are located in the predominantly Urban East. The largest sector within the Urban East is wholesale and retail, whereas the largest sector within the Rural West is primary and utilities, mostly agriculture and land-based sectors. Newport is the main administrative and shopping centre on the IOW. The marine manufacturing economy is an important sector for the Solent area.

Climate change has the potential to indirectly effect the economy in many ways including damaging property and infrastructure, impacting health and productively and changes to food production. It also offers opportunities with respect to potential employment in the renewables sector.

Material Assets

There is one main hospital on the IOW, St Mary's Hospital. There are 44 primary schools, 12 secondary schools, 11 colleges and three specialist schools on the IOW. Southern Water are responsible for the island's water supply.

The IOW has approximately 820 km of road network, including roads, cycling paths and pavement. The road network on the island is formed mostly by a connection of A-Class roads that form a 'circular around the island loop'.

Public transport around the island is limited. The train service connects Ryde to Shanklin.

Bus services on the IOW are operated by Southern Vectis. There are three ferry services that connect the IOW with mainland England: Wightlink, Red Funnel and Hovertravel. These services carry passengers and vehicles across the Solent.

There are two airports on the island at Bembridge and Sandown however these only cater for light aircraft.

The waste management systems on the IOW include Lynbottom Household Waste Recycling Centre and Afton Marsh, which serve as the main recycling facilities for domestic waste and the new Energy from Waste Plant located at Forest Road. Lynbottom also accepts commercial waste and recycling.

In 2019, there were four active sand and gravel quarries, and soft sand resources are limited to two sites on the island. These quarry locations are associated with the Lower Greensand Group located in the centre of the IOW. Marine sand and gravel sales are now confidential as there are only two operational aggregate wharves on the IOW. The IOW relies on imports of crushed rock.

Mineral Safeguarding Areas have been identified on the IOW, these are predominantly for Sand and Gravel, although there are some chalk areas. A key issue for the IOW is the risk that Mineral Safeguarding Areas will continue to be eroded by development that is neither compatible with mineral development nor realises the potential minerals prior to development.

Predicted increases in population will put pressure on material assets including the road network, mineral resources, educational and health facilities.

Health, Wellbeing and Equality

The IOW had an estimated population (in 2019) of 141,800. The working age population is estimated at 79,600 or 56% of the total population. The proportion of economically active residents on the IOW is lower than the national average and the south east region. Population density on the island is focused on the main towns, particularly in the east

The major towns of the island are Ryde, Newport, Cowes, East Cowes, Sandown, Shanklin and Ventnor (listed in population size order). Life expectancy on the IOW is similar to the England average; male life expectancy is 79.7 years, and for females is 83.5 years. However, there are clear health inequalities across the island. The majority of the IOW population identify themselves as White British (94.8%), and the non-white ethnic population represented only 2.7% of the population in 2011.

The violent crime rate on the island is 113% of the national crime rate. Antisocial behaviour associated with the evening economy has been reported, increasing in both number and seriousness particularly in Newport.

The IOW Community Safety Partnership priorities for 2020-2022 are:

- Violent Crime;
- Reduce Reoffending;
- Anti-social behaviour and community cohesion;
- Domestic Violence & Abuse and Serious Sexual Offences;
- Prevention; and
- Road Safety.

The separation of the IOW from the UK mainland is a key consideration when discussing human health, well-being, and equality. The Isle of Wight NHS Trust is the only integrated acute, community, mental health and ambulance health care provider on the IOW. St Mary's Hospital in Newport is the main acute care hospital and provides the majority of the island's healthcare services, with an A&E department, urgent care services, emergency medicine and surgery, intensive care, maternity, NICU and paediatric services.

Housing on the island will continue to present challenges, a lack of affordable housing has resulted in high levels of over-crowding and extended waiting lists.

Only 6% of the IOW has been classified as publicly accessible and there are 799 km of public rights of way.

Land Use, Soil and Agriculture

The IOW is geologically diverse; in the north of the island, soils are generally slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soil. The majority of the central and southern section is made up of freely draining slightly acid loamy soils.

According to the Agricultural Land Classification (ALC) system, there are no Grade 1 Soils on the IOW, and the majority of soils are Grades 3 and 4. Major developments, including renewable energy developments must avoid AONB and, for photovoltaics, areas of soils of ALC Grades 1-3a.

More agricultural land may be taken out of active farming use in the future to mitigate human activities. Increasingly, a greater land take is required to accommodate development and infrastructure needs and to provide mitigation for potential associated impacts that could arise e.g., to offset increased nutrient and phosphate pollution on protected habitats that would otherwise arise from residential development.

There has been a general decline in the farming of livestock towards more arable farming uses with a greater emphasis on cereal crops since 2000. The number of dairy farms

halved between 2000-2009 and the number of grazing farms also reduced. Crop farms have shown a slight increase in number.

Soil health and climate change are intrinsically linked. Soils are one of the largest stores of terrestrial carbon on Earth. On the IOW, soil biodiversity and the many biological processes and functions that soils supports are thought to be under threat from climate change, population growth, urban development, waste disposal and pollution. Additional impacts to soils from climate change include erosion accelerated by extreme climate events and loss of moisture, loss of land via rising sea level and salt deposition and changes in plant growing times yields and pests and diseases. Compaction, loss of organic carbon and contamination are serious threats to soil health in the UK. They affect agricultural production and our resilience to climate change.

Cultural Heritage

The IOW has a rich historic environment. The island has numerous designated heritage features:

- 1,933 Listed Buildings;
- 128 Scheduled Monuments;
- 8 Registered Parks and Gardens; and
- 33 Conservation Areas.

In addition, there are 188 locally listed cultural heritage assets and there are no registered battlefields on the IOW. There are a wide range of settlements including medieval planned and post-medieval towns. Evidence of historic land use is reflected in Roman settlements such as Brading and medieval settlements such as Newtown. There is a wealth of visually prominent prehistoric burial mounds.

Important buildings include Carisbrooke Castle, Osborne House and an array of medieval churches. Due to the island setting, there is a rich history of boat building, particularly in Cowes. Facilities to support cultural experiences on the island that help to maintain the island identity and to broaden the cultural experiences of residents should be incorporated into development plans.

Growing populations will influence the cultural heritage of the IOW and requires careful management. As a result of climate change, changes in temperature, rainfall, extreme climatic events, soil conditions, groundwater and sea level are all likely to indirectly affect cultural heritage. As climate change increases, so too will flood damage to historic buildings.

Landscape and Townscape

Almost 50% of the IOW falls within the IOW Area of Outstanding Natural Beauty (AONB), divided into five separate parcels. Around half of the coastline is recognised as Tennyson and Hamstead Heritage Coasts. The IOW is also listed as a National Character Area (NCA).

The IOW has a varied landscape as a consequence of its geological history. The Island exhibits, at a small scale, the key characteristics of much of lowland England, from farmed arable coastal plains to pastures and woodland, and from steep chalk downs to diverse estuarine seascapes and dramatic sea cliffs and stacks. The open character and maritime influence give an exposed, wind-blown feel, with the sea and sky dominating the character and many views on this varied Island.

The NCA also includes the statutory nature conservation designations (Ramsar, SPA, SAC, NNR and SSSI) discussed within the Biodiversity section. There is 803 ha of ancient woodland on the IOW, which account for 2% of the NCA.

Increasing recreational pressure on protected landscapes may affect fragile landscape types due to overuse unless suitable alternative and additional greenspaces are available. While the landscapes surrounding urban settlements, unless additional recreational areas are provided, may suffer degradation through uncontrolled and unauthorised use.

Climate change has the potential to impact the landscape as a result of pressure from large scale tree planting, use of the land for renewable energy generation, increase in pathogens and increases in drought, fires and flooding events and sea level rise all have the potentially significantly impact the landscape.

3.4 Limitations to the Baseline

- 3.4.1 The information presented in this report is the result of a desk-based review of publicly available data and no formal requests for records, data or information have been made. Hampshire Services cannot be held liable for third party information. The cut-off date for when relevant baseline information could be included in the baseline assessment was January 2021.
- 3.4.2 It is worth noting that the full impacts of pandemic on the environment are not known at this time, wherever information was available it has been included.

3.5 Task A4: Developing the ISA Framework

- 3.5.1 The Framework is made up of 17 ISA objectives which are used to test the IPS, against. The ISA objectives have been derived from the outcome of the review of plans, programmes and the baseline information and sustainability issues and problems identified.
- 3.5.2 Table 3.2 sets out the ISA Objectives, the assessment criteria used to determine significant effects and possible indicators identified for the Plan Area. These objectives have been subject to consultation as part of the scoping process.

Table 3.2: Environmental Assessment Framework

Topic	Objective	Assessment Criteria
ENVIRONMENTAL		
1. Air Quality	To maintain and improve air quality	<p>Does the IPS seek to reduce the amount of congestion?</p> <p>Does the Plan seek to decrease reliance on private vehicles?</p> <p>Does the Plan seek to improve air quality particular in areas with sensitive receptors (i.e. schools, care homes and hospitals)?</p>
2. Coasts	To protect the Island's coastline and minimise the risk to people and property from coastal erosion and flooding.	<p>Does the Plan reduce the risk to infrastructure, property and people from erosion and instability and avoid damage to the coastline of loss of amenity as a result of human activity?</p> <p>Does the Plan sustain natural systems and processes for managed retreat of the coastline where applicable?</p> <p>Does the Plan seek to accommodate predicted increases in flooding?</p> <p>Does the Plan seek to ensure it does no contribute to increase flooding?</p>
3. Water Quality and Resources	To maintain and improve the water quality of the Islands, groundwater, rivers and coasts and to achieve sustainable water resources management.	<p>Does the Plan seek to protect water resources including potable reserves and source protection zones (surface and groundwater, quantity and quality)?</p> <p>Does the Plan seek to minimise adverse effects on water hydromorphology, natural processes and aquatic environment?</p> <p>Does the Plan support an environmentally sustainable water supply/ support the reduction in water usage for new development?</p> <p>Does the Plan provide support the use of infrastructure unlikely to impact nitrate sensitive areas?</p>
4. Landscape (including Noise)		Does the Plan seek to protect and enhance the AONB and coastal designations?

Topic	Objective	Assessment Criteria
	To protect and enhance the Islands diversity and distinctiveness of landscape and townscape character and reduce light and noise pollution	Does the Plan protect tranquil areas on the island from unwanted noise?
		Does the Plan seek to conserve and enhance the fabric and setting of landscape character?
		Does the plan reduce/ minimise light spill in sensitive areas and protect dark skies?
5. Cultural Heritage	Maintain, protect and enhance buildings, sites and features of archaeological, historical or architectural interest and their settings.	Does the Plan seek to conserve or enhance designated or locally important historic assets (including archaeological deposits)?
6. Biodiversity	Conserve and enhance the biodiversity, flora and fauna of the Plan area including natural habitat and protected species.	Does the Plan seek to protect and enhance international, national, or locally designated sites and species?
		Does the Plan support net gain?
		Does the Plan seek to enhance biodiversity, ecological networks and habitat connectivity?
		Does the Plan protect from tree, hedge and vegetation loss and support an increase in tree cover (12%by 2060)?
7. Land use, soils and agriculture	Maintain and protect soil quality, natural resources, and the best agricultural land. Protect greenfield and seek to remediate contaminated land. Achieve the sustainable management of waste.	Does the Plan protect areas which have value for their mineral resource potential and prevent sterilisation?
		Does the Plan encourage the remediation and re-use of contaminated and brownfield land?
		Does the Plan take into consideration soil function, type and classification (safeguarding Best and Most Versatile Grades 1, 2 and 3a)?
		Does the Plan support the waste hierarchy?
		Does the Plan support the protection of RIGGS?

Topic	Objective	Assessment Criteria
8. Climate Change Emissions	Minimise emissions of greenhouse gases and reduce IOWs contribution to climate change.	Does the Plan seek to reduce carbon emissions in line with meeting the government target of zero emissions by 2050?
		Does the Plan support reduction in private vehicle numbers?
		Does the Plan support electric vehicles, alternative fuels or alternative modes of transport?
		Does the Plan support internet connectivity?
9. Climate Change Resilience	To anticipate and take steps to cope and respond to the consequences related to climate change.	Does the Plan have sufficient adaptability to actively respond to changes in temperature, rainfall and flooding?
		Does the plan provide any mitigation through green infrastructure?
		Does the Plan support the sequential risk-based approach to the location of development, taking into account the current and future impacts of climate change, so as to avoid, where possible, flood risk to people and property?
SOCIAL		
10. Culture	To maintain and protect the local culture, traditions and civic pride of Island towns and villages and increase engagement in cultural activity.	Does the Plan support increase the local identity of individual settlements?
		Does the Plan support new investment in the public realm and cultural facilities?
11. Crime and safety	To reduce crime and the fear of crime and ensure safety in the public realm particularly associated with the evening economy.	Does the Plan seek to reduce incidents of antisocial behaviour and reported incidents?
12. Health and Population:		Does the Plan provide an adequate distribution of affordable housing across the Island?

Topic	Objective	Assessment Criteria
To improve the health and wellbeing of the population and reduce inequalities in health	A range of health inequalities across the Island with those in the more deprived areas facing a shorter life expectancy. To develop and maintain a balanced and sustainable population structure on the Island	Does the Plan support an aging population? Does the Plan help to achieve a balanced population structure on the Island?
13. Social Inclusion and Equality To reduce the level and distribution of poverty and social exclusion across the Island	Areas of deprivation on the Island, unfit housing, single pensioner households, and homelessness.	Provision for a range of flexible accommodation focussed on main areas of deprivation. Does the Plan seek to reduce the disparities in poverty and social deprivation?
	Relatively high house price to income ratio.	Level and the distribution of affordable housing across the Island to ensure that sub housing market area needs are being met
	Assess any requirement for Gypsy and Traveller sites.	Meet the any identified need of the Gypsy, Traveller and Travelling Showpeople communities by allocating sufficient sites (pitches).
14. Education and training	To raise educational achievement levels across the Island and develop opportunities for everyone to acquire the skills they need to find and remain in work.	Does the Plan support adequate access to education and training facilities and provide opportunities for improvement?
15. Accessibility	Improve accessibility to key services and facilities. To protect, enhance and make accessible the Islands green infrastructure.	Does the Plan seek to ensure improved accessibility to sensitive receptors such as residential dwellings, schools and hospitals?
		Does the Plan provide additional opportunity for access to green infrastructure?
		Does the Plan support access to water access based employment uses?
ECONOMIC		
16. Material Assets	To ensure the provision of adequate infrastructure for transport, utilities, housing	Will it help to ensure that developments are supported by strong public transport, walking and cycling routes?

Topic	Objective	Assessment Criteria
	and public facilities to meet the needs of residents and visitors.	Does it support a Solent crossing network?
		Does it support the continued operation and improvement of the rail network?
17. Employment and Economy	Facilitate high and stable levels of employment so everyone benefits from economic growth.	Does the Plan improve competitiveness, productivity and investment for local businesses?
		Does the Plan support tourism?
		Does the Plan facilitate economic development?
		Does the Plan support and encourage full-time employment opportunities?
		Does the Plan seek to reduce disparities in poverty and social deprivation?

- 3.5.3 The objective of this ISA is to assess the impacts of the IPS, to inform and influence the plan and facilitate discussions regarding alternative approaches which will be evaluated in light of their potential impacts including cumulative, synergistic and indirect environmental effects on the different topics.
- 3.5.4 The assessment of these environmental, social and economic effects will be qualitative and informed by professional judgement and experience with other ISA and SEAs, as well as an assessment of national, regional and local trends.
- 3.5.5 The assessment will include how the environment would be affected, positively or negatively, from the implementation of the IPS in relation to the objectives and indicators that comprise the environmental baseline. The IPS vision, principles and policies will be assessed based on their likely impact.
- 3.5.6 Table 3.3 provides a summary of the colour coding criteria.

Table 3.3: ISA Objective Effects Color Coding System

Symbol	Explanation of the Effect
+	Positive/ Neutral: will result in either a neutral or positive impact on the objective
0	Negligible: Negligible or no effect on the objective
-	Negative: Option will result on a negative impact on the objective
?	Unknown: The relationship is unknown, or there is not enough information to make an assessment

- 3.5.7 A proforma will be used for the assessment of policies which will include commentary as to the reasoning for the effect; this will consist of information on the significance, uncertainty, duration, magnitude and reversibility of the effect. The proforma will also provide possible mitigation or negative effects and where applicable enhancement of positive effects (refer Table 3.4). For each policy the strengths, weakness and suggested improvements / mitigations have been provided for all the policies (Table 1-6 Appendix 1). Further, to ensure consistency the assessment of all policies was undertaken by the same individual with experience in policy assessment.

Table 3.4: Proforma for Assessment of Objectives and Policies

	ISA Objectives*					Comments/ Effect and Potential Improvements
IPS Objective/ Policy	1 Air	2 Coasts	3 Water			...
						Strengths: Weakness: Suggestions for Improvement:

*refer Table 3.2 for full objectives

3.5.8 Cumulative impacts will be assessed to ensure the full impact of the IPS is understood. Table 3.5 will be used to document the intra cumulative effects.

Table 3.5: Proforma for Assessment of Compatibility and Total/ Cumulative Effects

IPS Objective/ Policy	1	2	3	4	5	6	7	8	9	10	11	12
1												
2												
...												
Key: Y=compatible	N=potential conflict			?= unknown / not enough information					N/A= Not applicable			

3.5.9 The sites will be assessed using the colour coding presented in Table 3.2, but the proforma presented as Table 3.6 will be used for the assessment. GIS and other available data sources and mapping have been used for the spatial assessment. Where applicable, distances have been measured as the crow flies.

Table 3.6: Proforma for Assessment of Sites

ISA Objective*	Site Specific Assessment Criteria	Effect (colour coding)*	Commentary
1. Air Quality:	+ Site well linked to existing public transport or for public transport (train, solent crossing) (500 m)		
	0 Near to active transport bus, PROW, cycleways (100m)		
	? Site not near existing public transport. Site is located adjacent to school, hospital, care home.		
2. Coasts:	- Site is in Coastal Change Management Area/ or Land at Potential Risk from Future Ground Instability?		
	? All other sites		

3. Water Quality and Resources	+	Site is for or includes water infrastructure		
	0	Is the site adjacent to or within 100m of water body including coast.		
	-	The site is in or partly within flood zone 3 or a groundwater source protection zone		
	?	All other sites		
4. Landscape (including Noise):	+	N/A		
	0	N/A		
	-	The site is in or in vicinity of tranquil area, AONB or other landscape designation, or noise important area, dark skies		
	?	All other sites		
5. Cultural Heritage:	-	A cultural heritage site asset is on site or immediate vicinity/adjacent to site boundary.		
	0	A cultural heritage site is within 250m of the site boundary.		
	?	All other sites		
6. Biodiversity:	+	The site use is specifically for the purpose biodiversity improvement		
	0	National or International designation between 250-1000m. The Site is within a SINC.		
	-	The site is within, partially within or adjacent to a SSSI, SAC, SAC, RAMSAR or is within or partially within woodland or heavily wooded area.		
	?	All other sites		
7. Land use, soils and agriculture:	+	Site in Urban or developed area/ brownfield		
	0	The site is in a rural area		
	-	The site is on grade 1,2 or 3 agri. The site is in a RIGGS, the site is in mineral safeguarding area		
	?	All other sites		
8. Climate Change Emissions:		Cannot be assessed spatially	N/A	
9. Climate Change Resilience:		Cannot be assessed spatially	N/A	

10. Culture:	Cannot be assessed spatially	N/A	
11. Crime and safety:	Cannot be assessed spatially	N/A	
12. Health and Population:	+ Site is specifically for affordable housing or elderly care facilities or health care facilities		
	? All other sites		
13. Social Inclusion and Equality:	+ Site includes traveller allocation or is within the top 3 most deprived areas based on IMD Decile ranking.		
	- Site is for another use and is on an existing affordable housing or traveller site		
	? All other sites		
14. Education and training:	+ Site is for educational purposes		
	- Site is on an existing education site / and change of use to non educational		
	? All other sites		
15. Accessibility:	Cannot be assessed spatially		
16. Material Assets:	+ Site is located within Primary or Secondary settlement boundary. Assumed access to key services and facilities.		
	- All other developments		
17. Employment and Economy:	+ Site is put forward for economic, employment or tourism use		
	- The site is for housing in existing employment opportunity area or an employment allocation.		
	? Other types of development		

*refer Table 3.2 for full objectives

3.6 Task A5 Consulting on the ISA

- 3.6.1 The Scoping Report was provided to Statutory Consultees²¹ and other interested parties including neighbouring councils to allow them to express their views on the scope of ISA for the emerging IPS. The consultation period ran from 19th January 2021 to 1st March 2021.
- 3.6.2 Following the scoping consultation period, responses received were considered and Revised Scoping Report was completed.
- 3.6.3 A summary of the relevant consultee responses along with how these have been considered are provided in Table 3.7.

Table 3.7: How Consultee Responses Have Been Addressed

Statutory Consultee	Comment	How and where addressed in the ISA
Environment Agency	<p>The EA provided a bespoke consultation response on 27/04/21, which included the following comments.</p> <p>The document is clear and well-structured, and the EA agree with the policy context presented. Key comments relate to the Assessment Framework (Table 6.1).</p> <p>The EA raised the interconnected nature of certain environmental topics (coasts, water quality and resources, climate change resilience), however feel that these topics are very muddled at present.</p> <p>The objective stated for ‘coasts’ rightly includes flooding as an issue however there is no assessment criteria in relation to this issue. The assessment criteria for this seems to be under the ‘water quality and resources’ topic but there is no mention of flooding in the objective for this topic. An Assessment criterion for flood risk is also included in the ‘climate change resilience’ topic too. Whilst we do not have an issue with and are in fact are supportive of the objectives and assessment criteria proposed, we think that it should be better organised so that the assessment criteria</p>	<p>These comments have been addressed within the relevant assessment criteria (Table 3.2). Flooding has been removed from the water quality objective. The criteria for flood risk have been amended within the Coasts and Climate Change Resilience sections to better reflect the aims of these topic areas. In addition, the criteria for Water Quality and Resources have been updated to include an assessment against a reduction in water usage for new development. Acknowledge the support for the criteria in relation to biodiversity enhancement and biodiversity net gain and</p>

²¹ Natural England, Environment Agency, Historic England (no response received to date) and Marine Management organisation

Statutory Consultee	Comment	How and where addressed in the ISA
	<p>actually reflect the objective that you are trying to achieve in each topic area.</p> <p>Under the 'water quality and resources' topic area we would also request the addition of an assessment criteria around reduction in water usage for new development. The importance of this has been highlighted through the baseline data in this report. We see this as another way to help meet the objective of sustainable water resources management and would hopefully support/necessitate the inclusion of a policy in the Island Plan requiring the higher optional water efficiency target.</p> <p>In topic area 6 (biodiversity) we support the objective looking at enhancement of biodiversity and a criterion for biodiversity net gain. We also specifically support the criteria in relation to remediation of contaminated land in topic 7 (land use, soils, and agriculture).</p>	remediation of contaminated land.
Marine Management Organisation (MMO)	<p>The MMO did not provide a bespoke consultation response and so the standard response received on 23/04/21 was taken as the formal consultation response. The MMO advised to take note of any relevant policies within the South Marine Plan in regard to areas within the plan that may impact the marine environment. Reference was made to the South Inshore and Offshore marine plans. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach.</p>	Reference to the coastal environment has been made throughout this document, where relevant. A summary of the baseline (marine) environment is provided in Table 3.1 as part of Tasks A2 and A3, supported by the baseline information provided in the Scoping report.
Natural England	No consultation response received.	Biodiversity is addressed throughout the document. A summary of

Statutory Consultee	Comment	How and where addressed in the ISA
		the Baseline environment is provided in Table 3.1 as part of Tasks A2 and A3, supported by the baseline information provided in the Scoping report.

4 Stage B: Developing and Refining Options and Assessing Effects

4.1 Introduction

- 4.1.1 This chapter sets out the findings of the appraisal including: the policies and sites of the draft IPS. The plan's vision, objectives and spatial strategies were assessed in full in 2018, for further details please refer to the 2018 SA²².
- 4.1.2 The appraisal seeks to identify the likely significant effects of the policies and sites as defined in the SEA Directive. Including short, medium, and long-term effects, permanent and temporary effects, and secondary and cumulative effects.

The SEA Directive requires 'the likely significant effects on the environment, including on issues such as: biodiversity; population; human health; fauna, flora; soil; water; air; climate factors; material assets; cultural heritage including architectural and archaeological heritage; landscape; and the interrelationship between the above factors' (Annex 1f).

- 4.1.3 It also sets out mitigation measures as defined in the SEA Directive. Mitigation measures identified are in the form of general recommendations, amendments, or points for consideration, rather than measures designed to counter specific effects.

4.2 B2: Developing Strategic Alternatives

In accordance with the SEA Directive the Environmental Report should include an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know how) encountered in compiling the required information (Annex 1h).

- 4.2.1 This section considers reasonable alternatives with respect to the Plan in its entirety, alternative policies, different spatial strategies, and different sites.
- 4.2.2 With respect to the consideration of alternatives to the IPS in its entirety, potential scenarios are described as 'no plan', 'business as usual' i.e., continuing with the existing Core Strategy, moving forwards with Draft IPS or a new/ revised plan. The decision making behind the selection of what is considered reasonable is provided in Table 4.1.

²² IPS SA Report FINAL VERSION NOVEMBER 2018 (1) (iow.gov.uk)

Table 4.1: Assessment of Reasonable Options

Alternative to Plan	Commentary	Reasonable / Not reasonable
No Plan	Local plans must be positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework on this basis the scenario of 'no plan' was not considered a reasonable option and was eliminated as it would not comply with national policy.	Not reasonable
Business as usual	The government is clear that local authorities are expected to have up-to-date plans in place to guide development within their area. Not having a plan means that the growth will still happen, but there is less control over where it happens on this basis the core strategy (2012) is not up to date and does not allocate any sites therefore on this basis 'business as usual' option is not considered a reasonable alternative.	Not reasonable
Draft IPS Plan (2018)	<p>The first Draft IPS was published for consultation in December 2018 and included the designation of housing allocations to enable the Government's standard methodology housing number for the island to be met, including proposals for two new garden settlements. The response from local stakeholders and the community was overwhelming in opposition to the number of houses to be built, with a primary focus on the lack of capacity of the island to firstly deliver and then support this level of development. The impact on the character of the island and subsequent impact on the tourism industry were also raised as key concerns.</p> <p>The evidence from the Authority Monitoring Reports (AMRs) had also highlighted some major issues, including low levels of housing completions against planning permissions granted and severe shortages in the delivery of affordable housing. This apparent failure in the market to provide affordable housing and indeed sufficient market housing suggested that further evidence was needed to investigate the reasons why this was emerging and what possible solutions might be.</p>	<p>Not reasonable in current format.</p> <p>Although the entire IPS is not considered reasonable in its entirety, the draft IPS contained policies all of which were subject to SA assessment and may be considered a reasonable alternative on an individual policy basis.</p>

New/ revised plan	Preferred option	Reasonable
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4.2.3 With respect to the spatial strategy, six options were assessed in the 2018 SA (refer section 2.5) at which time no specific option was selected as the preferred option and the conclusion was that a hybrid model should be considered (refer section 2.5 for further details). Further, these options were assessed against a different level of development. Using the assessment work undertaken in 2018 and the new housing number four new spatial strategies were considered, and these included a no spatial strategy option. The options are presented in Table 4.2. These spatial options have been assessed herein and may further be considered alternatives to the preferred spatial strategy. Refer to Section 4.5 and Appendix 2 for the full assessment of these spatial options.

Table 4.2: Assessment of Reasonable Options

Spatial Optional Considered
1. Use existing settlement hierarchy and allow for growth outside but immediately adjacent to existing settlement boundaries (existing adopted plan approach)
2. Use existing settlement hierarchy (a) Increase density/site yield, focus on infill and brownfield, do not allow development beyond settlement boundaries (preferred option)
3. Growth in existing settlements, outside of settlement boundaries and in locations not previously considered (effectively no spatial strategy)
4. Creating new communities (new garden settlements)

4.2.4 With respect to considering alternative sites, a long list was developed from the SHLAA²³, this list comprised all sites that may be suitable for housing. Sites were removed from the list on the basis of the basic criteria of size²⁴. The remaining sites form a shortlist (total 148 sites). Consideration was given to further removing sites that fell outside of the preferred spatial strategy, however there was some concern that if the most suitable sites (from a SA perspective) were not within the preferred strategy area they would not be captured, on this basis a decision was made not to remove the sites from SA assessment based on spatial distribution. All shortlisted sites were therefore subject to full assessment. Not all of the sites assessed have been selected for allocation, those assessed but not allocated may be considered alternative sites to those

23 Strategic Housing Land Availability Assessment (SHLAA)

24 All sites less than 10 units excluded from assessment, but to fall in windfall numbers.

selected for allocation (refer to section 4.6 and Appendix 3 for the assessment of shortlisted sites).

- 4.2.5 There are 6 employment sites. The selection of the employment sites has been informed by the Employment Land Study²⁵. This work identified the most suitable sites to meet demand for employment space. Section 6 of the Employment Land Study 'Site Assessments' sets out both the methodology and a series of recommendations which have been used to select the allocated employment sites.
- 4.2.6 There are three health sites (locality hubs) have come from the IOW Local Care Plan (2017-2021) and are based upon NHS demand information. No alternatives are provided.

4.3 B1-B5: Testing the Plans Policies against the ISA Objectives

- 4.3.1 In this section of the Report, the policies themselves are explored to ensure the principles of sustainability are fully integrated into the IPS.
- 4.3.2 The policies are the key instrument in how development will be guided on the IOW during the plan period. As discussed in section 2.2, there are more than 60 policies that are grouped by theme. These groups are as follows:
- Growth (G1-G5);
 - Housing (H1-H11);
 - Economy (E1-E11);
 - Transport (policies T1-TC6);
 - Community (C1-C15); and
 - Environment (EV1-19).
- 4.3.3 To ensure each policy is assessed both on its individual merits and as part of the group, each policy has been assessed individually using the methodology and framework outlined in the Scoping Report and section 3.5 (including Tables 3.2 and 3.3) of this document. However, to ensure the group is assessed as a whole, the commentary has been provided for the 'group' of policies in their entirety (please refer to Appendix 1, Tables 1-6, and Section 4.4).

4.4 Findings of the Assessment of the Policies

- 4.4.1 The full assessment of the policies is provided as Tables 1-6, Appendix 1 with summaries provided as Tables 4.3-4.8 within this section. Given the number of policies (over 60) and length of the policies contained within the Island Plan it has not been deemed

²⁵ Employment Land Study Isle of Wight Council Final Report March 2015 Prepared by GL Hearn Limited

practical to include the full details of all the policies. However, it is recommended that the assessment provided herein is considered alongside a full copy of the policies in order to fully understand the comments made. The following section provides a summary of these findings²⁶.

Growth (G1- G5):

4.4.2 Table 4.3 provides a snapshot visual summary of the sustainable development and growth group of five policies relating to sustainable development.

Table 4.3: Summary of sustainable development and growth assessment

IPS	ISA Objectives*																
	1 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy
G1	0/-	0	0	0	0	0/-	+	0	0	0	0	?	?	?	?	?	?
G2	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
G3	0/-	0	?	?	0	0/+	0	0	0	?	0	?	?	?	?	?	0
G4	?	?	?	?	?	?	?	?	?	?	?	?	0	?	?	?	?
G5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

4.4.3 This group of policies are designed to ensure development meets the needs of the present without comprising the ability for future generations to meet their own needs. It is an important set of policies encouraging growth, whilst ensuring the environment is protected and where possible enhanced. Full details of the assessment are provided in Appendix 1, Table 1.

²⁶ It is noted that the order in which the policies are presented herein reflected the order of the presentation of the policies within the IPS as of the middle of June 2021. It is noted that the order of the policies within the IPS was amended at the end of June 2021 however there was not sufficient change for these changes in the order of policies to be reflected in the ISA. This in no way affects the assessment.

4.4.4 The principle of these policies is that the impacts should be negligible or positive and that no negative effects should occur. However, the assessment results indicate that three of the policies do have the potential to cause negative impact to the ISA objective 1 (air quality), 6 (biodiversity) and 13 (equality). It is also noted that reference is made in these policies to specific schemes which have not been assessed herein.

4.4.5 To ensure these negative effects do not occur and the potential positive impacts are captured improvements and mitigation measures are required to be made to the policies. Suggestions for improvements / mitigation are as follows:

- **G1 Our Approach Towards Sustainable Development and Growth:**
 - Revisit and clarify the overall objective of this policy as there are a lot of overarching ideas including transport, health, open space, and the high street, but there are no robust methods of how these ideas will be delivered or applied and no targets.
 - Consider removing reference to specific sites and schemes as this may prejudice the Local Transport Plan.
 - Revisit the aim regarding transport and determine whether the aim could be more ambitious for example 'to reduce the requirement for travel, with a focus of local active travel'.
 - This policy needs to provide details of how all the aspects will be supported and be delivered and how these things will be achieved. For example, where in the plan is health and well-being supported and how does it support people to live long healthy active lifestyles? There is no evidence within these group of policies to support this. Provide detail on preferred locations i.e., large settlements over rural, focusing on deprived areas for example, providing general areas where education and healthcare etc will be located. Where is public open space and public realm encouraged? With respect to the natural environment, there could be a much more ambitious target to enhance and improve and one way this can be realised is via net gain. References to the high street only focus on retail and do not capture the huge opportunities for evolution of the high street and the potential benefits it could have too many of the ISA objectives over the plan period.
- **G2 Priority Locations for Development and Growth:** Consider including that non allocated (windfall) sites must be shown not have a detrimental effect on the environment. The policy should also contain more detail for non-housing related developments such as commercial areas.
- **G3 Developer Contributions:** Consider using stronger wording than 'seeks'. It could be stated that development that does not provide sufficient developer contributions will not be supported, this prevents contributions being optional/ challenged and ensure the policy is robust. Consider removing the term 'infrastructure' when referring to stakeholders and replace with terminology that encompasses other bodies such as Natural England, Historic England, Environment Agency and Sports England to ensure the full range of environmental benefits can be considered. Consider how evidence of the dialogue with stakeholder should be provided i.e., include full list of consultations with dates and names, along with specific outcomes and mitigations in the form of a consultation statement to ensure transparency and consistency.

- G3 Developer Contributions:** With respect to ecology aspects, net gain should be separated out from developer contributions. Net gain should be required or expected for all developments. This is critical to ensure ISA objective 6 (biodiversity) obtains a positive score and the opportunities during the plan period are captured and delivered. Net gain is also included in policy G2 consider simply referring to this policy rather than repetition. The ecology line item should be written to ensure it captures non designated sites, connectivity, species and tree planting etc.
- G4 Managing Viability:** Consider including a specific statement that these unviable sites will only be considered only in exceptional circumstances and explain when these circumstances will be considered otherwise. If this change is not made this policy provides an avenue for developers to bring unviable sites to the authority as the norm. Consider including a statement that requires that mitigation must be included in the viability assessment.

Housing (H1-H11)

4.4.6 Table 4.4 provides a snapshot visual summary of this group of policies relating to housing delivery.

Table 4.4: Summary of Delivering the housing we need assessment

Delivering the housing we need	ISA Objectives*																
	1 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy
H1	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	+	?
H2	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	+	?
H3	?	?	?	?	?	+	?	?	?	?	?	?	?	?	+	+	?
H4	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
H5	0	0	0	-	0	0	0	0	0	0	0	+	+	0	0	0	0
H6	0	0	0	+	+	?	+	0	0	0	0	0	0	0	0	0	0
H7	0	0	0	-	0	?	-	0	0	0	0	0	+	0	0	+	0
H8	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0
H9	0	0	0	?	0	?	+	0	0	0	0	?	0	0	0	0	0
H10	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

H11	0	0	0	0	0	0	0	0	0	0	0	0	0	?	0	0	0	0
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4.4.7 This is a key group of policies that are designed to support the delivery of housing required to provide certainty to residents and the development sector. Full details of the assessment are provided in Appendix 1, Table 2.

4.4.8 It is noted that this group of policies has the potential to generate significant positive effects on ISA objectives 13 (equality), 15 (accessibility), and 16 (material assets). The assessment results indicate that a number of the policies have the potential to cause negative impact.

4.4.9 These policies are directly linked to the site assessments (refer section 4.6 and Appendix 2) and they work alongside the spatial strategy providing the flexibility for exception sites. It is imperative that there is no conflict and that they are clear and robust to ensure they are not subject to interpretation or challenge. The assessment indicated that there were a number of direct conflicts particularly relating to the Areas Outstanding Natural Beauty (AONB) which require clarification.

4.4.10 Improvements and mitigation measures are required to ensure the positive impacts are captured and the negative impacts do not occur. Suggestions for improvements / mitigation are as follows:

- **H3 General Requirements:** It is important that the principles of net gain are clear and concise and not combined with other items such as buffers and open space. Future proofing of the plan period is particularly important in this area, which is quickly evolving, and although the Environment Bill currently requires 10% net gain flexibility is required to ensure the policy can evolve with government guidance. It is recommended that a statement be included regarding government guidance or similar.
- **H3 General Requirements:** The policy would benefit from directly referring to appropriate standards for items like vehicle and pedestrian safety to ensure its robust. It should also define and explain what improved access to public transport might look like.
- **H3 General Requirements:** Requires more specific detail around tree loss and what developers need to show in this regard. Consider the requirement for arboriculture statement where the applicant must demonstrate how trees and hedgerows have been protected, retained, or mitigated for.
- **H3 General Requirements:** Clearly define what ‘sustainable’, ‘high quality’, ‘appropriate’, ‘taking account of setting’, ‘appropriate buffers’, ‘improved access to public transport’ would look like, how it will be achieved and remove ambiguity.
- **H3 General Requirements:** With respect to the Suitable Alternative Natural Greenspace (SANG), it states that developments will be ‘expected to provide’ which leaves it open to interpretation, consider replacing ‘expected’ with ‘required’.
- **H3 General Requirements:** Consider whether this policy be the main location to capture environmental aspects consider the inclusion of climate change resilience, health, education etc. Currently it focuses on biodiversity and trees rather than the full range of topics.

- **H4 Infilling outside settlements:** Consider stating that infilling outside settlements will only be considered as an exception. Consider including details of exactly what is required to be demonstrated to ensure the policy is robust and defensible and provide a definition for what is an 'important open space' as this is open to challenge.
- **H5 Affordable Housing:** There is need to clarify the size of development allowed in the AONB. Policy H6 states very specific development will be allowed in the AONB, however this seems to contradict the policy by talking about sites of 9 dwellings. Clarification over what is allowed in the AONB is imperative. This policy could also consider whether there could be any potential opportunities to encourage development and regeneration in deprived areas.
- **H6 Housing in the Countryside:** Please refer to comment above re AONB clarification and consider including specific reference to minimising light, noise to protect dark skies and tranquillity to ensure these are adequately considered.
- **H7 Rural and First Homes:** Clarify if rural exception sites are allowed in AONB, recommend stating 'rural exception sites and first homes sites will not be allowed in any designated areas including the AONB'. Consider defining 'adjacent' to minimise challenges and the potential for sprawl. Consider including details that applications will need to include the assessment of environmental impacts and will need to assess and show there are no significant impacts that cannot be mitigated.
- **H8 Ensuring the Right Mix:** Recommend changing the word 'should' to 'must' to ensure the policy is robust.
- **H9 New Housing on Developed Land:** Consider tangible ways to support brownfield development, for example allowing exception to other policies (i.e., affordable housing). Consider other ways these sites can be brought forward for example not requiring gardens but other amenity value. Consider other uses from housing which may be more suitable for Part 1 sites for example commercial or SANGs. Reference should be made to the need for applications to be supported by a conceptual model and where applicable remedial action plans. If practical, consider other benefits such as pre application consultations with the Contaminated Land Officer regarding conceptual models and /and remedial action plans.
- **H11 Gypsy and Traveller:** Provide further details on what and where the council will be providing gypsy, traveller sites to ensure needs can be met as there are no allocated sites for this purpose. However, it is noted that a Gypsy, Traveller and Travelling Showpeople Plan proposed (emerging) which would include additional details in this regard.

Economy (E1-11);

4.4.11 Table 4.5 provides a snapshot visual summary of this group of policies relating to the economy.

Table 4.5: Summary of Supporting and growing our economy assessment

IPS	ISA Objectives*																
	1 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy
E1	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
E2	0	0	0	0	0	?	?	0	0	0	0	0	0	0	0	0	+
E3	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0
E4	0	0	0	-	0	-	-	0	0	0	0	+	+	0	0	0	+
E5	0	?	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0
E6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0
E7	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+	+
E8	0	0	0	-/?	0	0	0	0	0	0	+	0	0	0	0	+	+
E9	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
E10	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+
E11	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+

4.4.12 This is a key group of policies that are designed to support economic growth. Full details of the assessment are provided in Appendix 1, Table 3.

4.4.13 It is expected that all of these policies would generate a positive effect on ISA objective 17 (economy), however the assessment recorded only seven policies scored positively for ISA objective 17. The policies also scored positively once across the group of policies for ISA objective 12 (health), 13 (equality) and 16 (material assets).

4.4.14 Given the nature of the policies economic growth is often seen to be in conflict with protecting and enhancing the environment so has the potential to have a negative effect on for the natural environmental ISAs and this is reflected in the E group of policies scoring three negative effects for ISA objective 4, 6 and 7 respectively. It is important that all policies within this group include consideration of the impacts to the natural environment.

4.4.15 These policies are directly linked and have the potential to conflict with the spatial strategy and the H group of policies.

4.4.16 This group of policies includes specific employments allocations which have been assessed in section 4.6.

4.4.17 Improvements and mitigation measures are required to ensure the positive impacts are captured and the negative impacts do not occur. Suggestions for improvements / mitigation are as follows:

- **E1 Supporting a growing economy:** Consider including a statement regarding general principles of employment, explaining if employment will be allowed outside of these allocations.
- **E2 Sustainable economic development:** Include a statement regarding the need for applicants to show the application has no detrimental effects to the natural environment.
- **E3 Upskilling the island:** Consider including an additional line stating applications must be in line with other policies that protect the environment or similar.
- **E4 Supporting the rural economy:** It is essential the policy goes further to explicitly state both what is allowed and what is not allowed with regards to development in rural areas. Further details are required to ensure that such development does not have negative impacts on other aspects of the environment.
- **E5 Maintaining employment sites with water access:** Consider including a statement regarding support of all employment sites with water access.
- **E6 Digital Infrastructure:** Change wording from ‘expect’ to ‘require’. Clarify what type of development is allowed, i.e., is this just commercial, if so what size/ type, does it apply to housing.
- **E7 Supporting and Improving our Town Centres:** Town centres are evolving, and the policy does not reflect this as it does not include other uses for town centres and open spaces, social spaces. Consider amending the policy to provide a clear vision for the town centre which can evolve during the plan period.
- **E9, 10 and 11 Tourism, the Bay and Ryde:** Consider combining the policies relating tourism.

Transport (policies T1-T 6)

4.4.18 Table 4.6 provides a snapshot, visual summary of this group of policies relating to transportation.

Table 4.6: Summary of Better Connected Island ISA Assessment

	ISA Objectives*																
IPS Policy Better connected Island	1 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy
T 1	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

T 2	+	0	0	0	0	0	0	?	0	0	0	0	0	0	+	0	0
T 3	?	0	0	0	0	0	0	?	0	0	0	0	0	0	0	+	0
T 4	?	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0
T 5	+	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0
T 6	- /?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

4.4.19 This group of policies looks at connectivity and transportation within the IOW and with the mainland, encompassing the Solent Crossing, the airport, the rail network, buses, active transport, and private vehicle use. Full details of the assessment are provided in Appendix 1, Table 4).

4.4.20 It is noted that this group of policies has the potential to generate significant positive and negative effects on ISA objective 1 (air quality), 8 (climate change emission) and 15 (accessibility). Although as a group they did achieve two positive scores for ISA objective 1 (air quality) and for 15 (accessibility) and one for 8 (climate change) there is the potential for this group to score much more positively and create significant positive change which is not currently captured. The assessment results indicate that individually and as a group these policies may not be, robust, or ambitious enough to facilitate the required changes.

4.4.21 These policies have direct crossover with the emerging Local Transport Plan (LTP) and T 1 contains specific transport schemes, which may prejudice the emerging LTP and potentially may result in the IOW having conflicting plans. Further, it is noted that the schemes that are outlined would require full assessment to consider their impacts (which has not been undertaken herein).

4.4.22 This group of policies has the potential to have negative impacts on the ISA objectives 4 (landscape and noise) and 5 (biodiversity). Transport schemes including sustainable and active transport schemes can result in the widening of existing road networks which can result in loss of habitats and species. They can also have significant visual and noise implications if the emphasis is towards reducing emissions and not enough consideration is given to wide environmental impacts. These impacts are often of minor significance at a local level but cumulatively across the island could be significant.

4.4.23 It is noted that there is conflict between the policies with respect to ISA objectives 1 and 8, although T 2 is in general favour of sustainable transport, T 6 supports private parking provision encouraging private vehicle use and T 1 supports the airport both of which could have significant negative effect on ISA objectives 1 (air quality) and 8 (emissions). Furthermore, T 1 has direct conflict within the policy with respect to supporting air quality reduction and airport use and viability.

4.4.24 Improvements and mitigation measures are required to ensure the positive impacts are captured and the negative impacts do not occur. Suggestions for improvements / mitigation are as follows:

- **T1 Better Connected Island:** Overall this policy requires clear robust direction for the overall group of policies, for example supporting existing transport links, supporting sustainable active transport schemes, and reducing air emissions to a set target. Conflict regarding air quality should be addressed.
- **T2 Sustainable transport:** Consider widening the statement regarding ‘safer routes to school and other significant destination’ to include ‘sensitive locations’. To ensure that the policy does not result in potential negative environmental impacts consider including statement ensuring schemes will only be supported where negative impacts to the environment does not occur.
- **T4 Supporting Rail network:** Consider removing reference to specific schemes to avoid conflict with the emerging LTP. Consider inserting a statement which ensures further rail related schemes would be supported where it can be proven not have negative impact on the environment or where positive out way the negatives.
- **T5 Electric charging vehicles:** Could be strengthened by defining words like ‘major’ which leaves it open to challenge, consider making it a requirement for all developments to provide certainty around future provision. Consider including specifics regarding types / speed and consider other forms of electric transport including scooters, buses etc.
- **T6 Parking Provision:** May indirectly encourage private car ownership and usage within existing settlements and potentially already congested areas. This policy should encourage developers to consider parking provision for all development and provide evidence as to why parking is required as opposed to alternatives. This directly links to the spatial strategy and needs to be strong to prevent negative impact in this key area (refer section 4.5). Other options such as park and ride or car share schemes could be considered as these would positively impact ISA objectives and support the other policies within this group. It is important to note that this policy has strong linkages with the emerging LTP and must not to conflict with emerging LTP re private vehicle use. Reconsider the use of ambiguous words such as ‘well designed’ and ‘adequate’ which can be challenged.

Community (C1-15);

4.4.25 This group of policies relates to creating sustainable, strong and healthy communities. It also includes public realm and health and well-being. In order to enable people to stay as independent as possible for as long as possible, there are policies covering 'Facilitating Independent Living' and 'Providing Annexe Accommodation'. And policies supporting provision of public services: 'Delivering Locality Hubs' and 'Facilitating a Blue Light Hub'. These policies also set out the council's commitment to renewable energy and lowering carbon emissions in new development (refer Table 4.7).

Table 4.7: Summary of Sustainable strong and healthy communities assessment

IPS Policy Sustainable Strong and Healthy Communities	ISA Objectives*																
	1 Air	2 Coasts	3 Water	4 Landscape and Noise	5 Cultural Heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy
C1	0	0	0	+	0/+	?	0	0	0	0	+	+	0	0	+	0	0
C 2	0	0	0	0	0	?	0	0/+	?	0	0	0	0	0	?	+	0
C3	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	+	0
C4	0	0	0	0	0	0	0	0	0	0	0	+	+	0	0	0	0
C5	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0	0
C6	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0
C7	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
C8	0	0	0	0	0	0	0	0	0	0	0	?	0	0	0	0	0
C9	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0
C 10	+	-	0	-	?	?	?	+	+	0	0	0	0	0	0	0	0
C 11	?	0	0	0	0	0	0	?	0	0	0	0	0	0	0	0	0
C 12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C 13	?	?	+	?	0	?	?	0	0	0	0	0	0	0	0	+	0
C 14	0	0	0	0	0	0	0	0	0	+	0	0	0	+	+	+	0
C 15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

4.4.26 It is noted that this group of policies has the potential to generate significant positive effects on ISA objectives 1 (air quality), 4 (landscape), 8 (emissions), 12 (health), 14 (education) and 15 (accessibility). As a group, these objectives all received one or more positive scores with ISA objectives 12, 14 and 15 allocated more than one positive score.

4.4.27 Policies C 10 (supporting renewable energy) scored positively for ISA objectives 1 (air), 8 (emissions) and 9 (resilience). It also scored negatively for ISA objectives 2 (coasts) and 4 (landscape).

4.4.28 These policies contain specific schemes (health related), the effects of which are considered in the site allocation (section 5.6).

4.4.29 Key suggestions for improvements / mitigation are as follows:

- **C1 High Quality Design for New Development:** This policy has the potential to support biodiversity through enhancing the ecological value of new development, through wildlife corridors and hedgerows/trees. Remove wording of 'where possible' with regards to protecting and improving land, water quality to ensure its not optional.
- **C2 Improving our Public Realm:** The overarching aim of the policy is unclear. The policy would benefit from a definition of high-quality public spaces, with an inclusion of other aspects of these quality spaces i.e., preserve tranquillity/minimise light spill. Consider impacts to Local Character Areas and/or light spill should be mentioned (through the implementation of a lighting strategy). The policy could be strengthened by adding in commentary on conserving and enhancing the local landscape setting and local identity of settlements to support ISA5. The relationship between soft landscaping and biodiversity net gain could be emphasised to allow a positive score for ISA6, provided that adverse effects to designated sites are not caused through the development.
- **C10 Supporting Renewable Energy and Low Carbon Technologies:** Consider stating that development supporting green infrastructure will be supported rather than listing the types, as this does not future proof the plan or allow for innovative technology moving forwards in the plan period. It is recommended that changes be made that prevent development in the AONB and other sensitive areas as this may have significant negative effect. Consider the need for applications to be supported by full assessment of risks and details of mitigation measures.
- **C11 Lowering Carbon and Energy Consumption in New Development:** Remove the term 'wherever possible' as this suggests its optional and allows challenge. 'Major development' should be defined. The policy should set clear and ambitious targets for carbon emission targets, renewable energy, and recycling to assist with achieving zero emission by 2050. It should encourage innovation and other options. In summary, the policy should be more ambitious and include clear measurable targets.
- **C13 Maintaining Key Utility Infrastructure:** Consider the addition of a statement ensuring such applications would generally be supported in these areas but only where it can be demonstrated that there are no negative effects. For example, landscape or biodiversity impacts should be adequately considered and any potential impacts assessed and mitigated.
- **C14 Providing Social and Community Infrastructure:** Consider whether economic reasons are an appropriate justification for loss of community infrastructure. Consider requiring that alternatives will always be required within the same community rather than 'where appropriate'. To strengthen protection of existing facilities and ensure on going provision for the Plan period.

Environment (EV1-EV19).

4.4.30 The group of policies are designed to ensure the historic and natural environment are addressed within the Plan. Full details of the assessment are provided in Appendix 1, Table 6).

4.4.31 This group of policies has the potential to have significant positive impacts on many of the ISA objectives 1-7. However, there is also the potential for these policies to overlap and conflict with other policies within the Plan and in this regard to ensure all potential conflicts were captured these policies were assessed last. Refer to Table 4.8 for the summary of the assessment of the EV policies.

Table 4.8: Summary of High quality environment assessment

IPS	ISA Objectives*																
	1 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy
EV1	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0
EV2	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0
EV3	0	0	0	0	0	+	0	0	0	0	0	0	0	0	+	0	0
EV4	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EV5	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0
EV6	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0
EV7	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0
EV8	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0
EV9	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
EV10	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0
EV11	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0
EV12	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0
EV13	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EV14	0	0	+	0	0	0	0	0	+	0	0	0	0	0	0	0	0
EV15	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
EV16	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	?

EV17	0	+/ ?	+/ ?	0	0	0	0	0	+	-	0	0	?	0	0	0	0
EV18	0	+	?	?	0	0	0	0	+	0	0	0	0	0	0	0	0
EV19	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

4.4.32 All policies scored positively for one at least one ISA objective and policies EV3, EV14, EV17 and EV18 scored positively for two ISA objectives. Four policies were allocated two positive scores. ISA objectives 2 (coast), 3 (water), 6 (biodiversity), 9 (climate change) and 15 (accessibility) were the best represented.

4.4.33 It is noted that three of the policies (EV11, 12 and 17) were assessed as potentially having a negative effect on ISA objectives 4 (landscape) and 10 (culture). These negative impacts related to potential determinantal effects to the AONB, dark skies (policies 12 and 11) and significantly to cultural identified associated policy EV17 which relates to relocation from coastal risk areas which is accepted that on occasion may be required to protect lives.

4.4.34 Key suggestions for improvements / mitigation are as follows:

- **EV1 Conserving and Enhancing the Historic Environment:** Demonstrate where they have been informed by sufficient evidence. Add a statement to ‘including where necessary through field work’. Amend statement ‘Loss of scheduled monuments’ to refer to ‘archaeological sites of demonstrable equivalence’.
- **EV2 Ecological Assets and Opportunities of Enhancement:** Amend term ‘located away from’, to ‘development must be shown not have an impact on designated site via HRA or similar’. Consider tightening the exceptions and whether permanent damage would be acceptable under any circumstances. On the three numbered points: 1) Consider adding that not providing ecological assessment must be fully justified i.e., the expectation is that all applications should include at least a Preliminary Ecological Assessment. Applicants should be pointed towards tool such as Biodiversity Checklists as a means of conducting due diligence prior to submission. May also wish to highlight the role of pre-application engagement. 2) Highlight that BNG is in addition to any required mitigation/enhancement measures already needed. The policy should include reference to the mitigation hierarchy – i.e., that the expectation is that development first avoids impacts and then only compensates as a last resort.
- **EV3 Recreation Impact on the Solent European Sites:** Consider amending the term ‘net gain’ which can be confused for ‘biodiversity net gain’. Consider whether this policy should relate to housing developments (above a certain size or dwelling number) or all development types. Consider mentioning that this is in addition to HRA.
- **EV4 Water Quality Impact on Solent European Sites (nitrates):** Recommend that the statement regarding the position statement be amended to say all applications should be made in strict accordance with the current position statement therefore ensuring future proofing of the plan.
- **EV5 Trees Woodland and Hedgerows:** To ensure the policy achieves its objective it is important that there is a requirement that applications must include details of trees and

hedgerows on site arboriculture and hedgerow assessments in order to allow the council to make the assessment (either surveys or statements). The policy should provide measurable targets to ensure these items are protected but also increased to show how the IOW will meet the 2060 target. Consider including reference to biodiversity net gain.

- **EV6 Protecting and Providing Open Spaces:** Consider changing the term 'expected' to 'are required' or 'must'. Consider combining EV6 and EV7 to avoid repetition.
- **EV7 Local Green Spaces:** Define special circumstances. Change wording consider to 'support' or 'encourage'. Consider combining EV6 and EV7 to avoid repetition.
- **EV8 Protecting High Grade Agricultural Soil:** Remove reference to large sites to avoid conflict and ensure it is in line with spatial strategy and exception policies. Include all developments not just agricultural and forestry.
- **EV9 Protecting our Landscapes and Seascapes:** Recommend clearly defining the aim of the policy to include the protection and enhancement of the landscape (including seascape), focusing on landscape, townscape, character, and visual aspects of the IOW. Consider removing references to biodiversity and climate change which are included in other policies. Consider moving RIGGS to policy EV8 which relates to soils and geology. Change the word 'expected' to 'required'. Include clear wording regarding how views and character areas will be protected. Are there any exceptions? and when and how exceptions will be made. Consider a statement which says any developments which have a negative impact on these aspects after mitigation has been applied will not be supported. Consider requirement for certain size of development to require landscape visual impact assessment. Consider how these aspects are addressed within the AONB in particular.
- **EV10 Preserving Settlement Identity:** Consider whether the policy is needed with the existing spatial strategy.
- **EV11 IOW AONB:** It is imperative that all references to the AONB within all policies are in full agreement with regards to what is allowed and what is not allowed, and the exceptions explicitly stated so no ambiguity remains. They should also be in line with the spatial strategy as the AONB is outside of the settlement boundaries. Provide clarity regarding whether this refers only to exception sites, or green infrastructure. Amendments are required across all groups of policies to ensure the AONB is sufficiently protected.
- **EV12 Dark Skies:** Clarify what development would be allowed in the dark skies and how this fits in with the spatial strategy. For example, does this only apply to exception sites or sites of certain size or type? Consider no outside lighting and / or mitigation measures.
- **EV13 Water Resources:** A number of policies manage water resources consider combining.
- **EV14 Managing Flood Risk:** Consider change of terminology regarding 'be safe from flooding'. Clarify whether this is applied to all sites regardless of size or just those over 1 hectare.
- **EV15: Monkmead:** A number of policies manage water resources consider combining.
- **EV16 Managing our Coasts:** Clarify what is meant by a sustainable and practical approach, is this in addition to a vulnerability assessment?
- **EV17 Facilitating Relocation from Coastal Change Management Areas:** Consider a requirement that applications must include consideration of exceptions to any aspect contrary to policy and include full assessment of impacts and mitigation measures.
- **EV18 Improving Resilience from Coastal Flood Risk:** Recommend removal of first paragraph as it is not a policy. Clarify when these requirements be applied and what

definition will be applied (is this for all developments on the island, in 'hold the line' areas or on the coast)? Clarify whether development in 'hold the line' will need to 'provide' new coastal defences or just contribute to existing defences? Clarify when developer contributions will be required as opposed to the defence works themselves, what would be the scale? With respect to new coastal defences, it is noted that there will always be material environmental impact and, in this regard, has the council considered occasions where positive impacts may out-weigh negatives and mitigation can be provided as this is not currently allowed in this policy. Pre apps are voluntary, consider re wording to state pre app are highly recommended to ensure applicants are fully aware of the requirements at the earliest stages.

- **EV19: Managing Ground Instability:** The policy could be combined with EV18 and EV16.

4.5 B1-B5: Testing the Spatial Strategies against the ISA Objectives

- 4.5.1 Four spatial strategies were assessed against the ISA framework (refer Table 4.2). Of these, Strategies 3 and 4 (no spatial strategy and new communities respectively) were both found to have a larger number of negative effects against the ISA objectives (refer to Appendix 2 for full assessment details).
- 4.5.2 Strategies 1 and 2 are similar in nature so scored almost identically across the ISA objectives. However, there was an exception relating to ISA Objective 10 (culture) with Strategy 1 scoring a question mark (?) and Strategy 2 achieving a positive score. Strategy 2 achieved a positive score as it was considered to support the local identity of individual settlements by reducing encroachment and settlement coalescence by restricting development to within fixed boundaries leaving no room for challenges or interpretation.
- 4.5.3 Specific strengths of Strategy 2 are that it scores positively for ISA Objective 4 (landscape) because it seeks to protect the IOWs tranquillity, dark skies and the AONB. It also scores positively for ISA Objective 6 (Biodiversity) as it seeks to protect designated sites. It scores positively for ISA Objective 7 (land use) as it encourages brownfield regeneration and safeguards RIGGS and agricultural land.
- 4.5.4 Strategy 2 was not found to have a direct negative effect on any of the ISA objectives. However, it could potentially have an indirect negative impact on ISA Objective 1 (air quality) in so far as contributing to congestion. Although development would be focused within existing settlements with public transport infrastructure it does not preclude an increase in private vehicle ownership and use. On this basis ISA Objective 1 scored a ? as the impacts are uncertain.
- 4.5.5 Strategy 2 'Use existing settlement hierarchy (a) Increase density/site yield, focus on infill and brownfield, and not allow development beyond settlement boundaries' is the preferred option and this is supported by the ISA assessment.

4.5.6 For Strategy 2 to fulfil its purpose by facilitating the housing numbers required it is necessary to adjust existing settlement boundaries (the housing numbers required cannot be accommodated within existing settlement boundaries). These should be agreed, assessed and fixed for the period of the plan to ensure the impacts assessed herein are achieved. It is imperative that the spatial strategy be robustly supported by clear policies relating to sustainable transport, affordable housing and investment in deprived areas, education, and healthcare provision. This would support and encourage any additional opportunities and indirect positive impacts, and to prevent any potential negative impacts with respect to congestion and air quality that this strategy could cause.

4.6 B1-B5: Testing the Sites against the ISA Objectives

Housing

- 4.6.1 All sites in the SHLAA have been assessed in accordance with the methodology outlined in section 3 and Table 3.6. This included the assessment of a total of 148 sites. Full details of the individual assessments of these sites may be found in Appendix 3.
- 4.6.2 IOW Council selected the allocated sites that it plans to take forward based primarily on the spatial strategy (refer section 4.5), but also on other criteria as outlined in the Draft Island Planning Strategy (IPS): Revisiting the site allocations approach, briefing paper. Out of the sites located within the settlement areas, a total of 41 housing sites have been selected to be taken forward for allocation (refer to section 6.5 for further details on the limitations associated with the housing allocation selection process).
- 4.6.3 For ease of discussion, the 41 allocated sites have been grouped into settlements. Sites not located within settlements have been assessed and full details are provided in Appendix 3. Site IDs have been used as references and full site details in relation to the IDs are provided in the front of Appendix 3.
- 4.6.4 A summary of the sites within each settlement area is provided in Table 4.9.

Table 4.9: Site Allocations Summary

Settlement Area	ID* of allocated sites	ID sites assessed
Bembridge Secondary settlement	IPS183, IPS184	N/A
Brading Rural Service centre	N/A	IPS102, IPS145, IPS213, IPS319
Brightstone Rural Service Centre	N/A	IPS306

Cowes Primary Settlements	IPS35, IPS42, IPS199, IPS317, IPS323, IPS394	IPS204, IPS205, IPS367, IPS122, IPS122, IPS219, IPS304
East Cowes Primary Settlement	IPS414, IPS290	N/A
Godshill Rural Service Centre	IPS237	IPS43, IPS340
Newport Primary Settlement	IPS413, IPS200, IPS231, IPS233, IPS234, IPS342, IPS358, IPS371, IPS382, IPS386, IPS383, IPS406, IPS411	IPS78, IPS126, IPS161, IPS307, IPS346, IPS357, IPS376,
Niton Rural Service Centre	N/A	IPS196, IPS197, IPS198
Rookley Rural Service Centre	N/A	IPS30, IPS41, IPS286, IPS349
Ryde Primary settlement	IPS415, IPS34, IPS150, IPS271, IPS412	IPS21, IPS55, IPS80, IPS86, IPS105,
St Helens Rural Service Centre	N/A	IPS331, IPS347
The Bay Primary Settlement	IPS25, IPS65, IPS74, IPS77, IPS81, IPS68	IPS114, IPS117, IPS135, IPS160, IPS177, IPS217, IPS263, IPS373, IPS393,
Ventnor Secondary Settlement		IPS67, IPS69, IPS368
West Wight Secondary Settlement	IPS7, IPS71, IPS82a, IPS189, IPS403, IPS410	IPS90
Wootton Secondary Settlement	IPS98, , IPS3	IPS157, IPS312
Wroxall Rural Service Centre		IPS19, IPS51, IPS73, IPS297

*for site ID details refer to reference sheets at the front of Appendix 3.

4.6.5 With respect to the 41 allocated housing sites, the majority have been found to have one or more constraint which has resulted in a negative score in the assessment (refer Appendix 3 for full details of each site). A negative score does not mean that a negative impact will occur or that the site is unsuitable for housing, rather that the potential for a negative impact to occur exists. For example, if a site is in the proximity of a designated site, it has been found to have a negative score for ISA Objective 6 (biodiversity) as the development has the potential to negatively affect a designated site. This does not mean the site should not be allocated, but rather highlights that the site has a potential constraint which requires further consideration to ensure that impacts are identified and where applicable mitigated.

4.6.6 It is important to note that due to the plan making timetable, the IPS has not been updated at this stage to take on board and incorporate the findings of this Interim ISA with respect to the suggested improvements to the policies or to the potential effects of the allocated sites.

Health

4.6.7 The three health sites have been assessed against the framework outlined in section 3.5 and 3.6. The full assessments are provided in Appendix 4. A summary of the site findings are as follows:

- The Bay Locality Health Hub was not found to have any potential negative impacts and scored positively for five of the ISA objectives.
- The Central Locality Newport Health Hub scored negatively for ISA Objective 3 (water) because the site lies within Flood Zone 3 and is adjacent to the River Medina. In this regard it is essential that plan policies relating to water resources and flood risk are adequately considered and any required mitigation be implemented to prevent negative impacts. The site scored positively for four ISA objectives.
- The St. Marys Hospital site scored negatively for ISA Objective 6 (biodiversity) and 7 (land use) because of the site's proximity to the Medina Estuary SSSI, Solent & Southampton Water Ramsar & SPA and Solent Maritime SAC which are located 170 m east. The site is also Grade 3 ALC. It is noted that policy EV8 seeks to protect agricultural soils from forestry or agricultural development but makes no reference to other development types. On this basis there is no policy to ensure mitigation is put in place to minimise the negative impact. Development on this site should be to subject to Habitat Regulations Assessment.

Employment

4.6.8 The six allocated commercial sites have been assessed against the framework outlined in 3.5 and 3.6. The full assessments are provided in Appendix 4. A summary of the site findings are as follows:

- The Somerton Farm site was not found to have any negative impacts.

- The Lowtherville Road site was found to have three negative impacts on ISA objectives. ISA objective 1 (air) because there are no bus stops on Lowtherville Road, the nearest bus routes are along Newport Road, 140 m south. The site is not located in proximity to a rail route, a public footpath or cycle route network. ISA Objective 3 (water) could be impacted as the site lies within a Zone II (Outer) Source Protection Zone and is within an area of high groundwater vulnerability.
- The Kingston Marine Park site was found to have three negative impacts on ISA objectives. ISA Objective 3 (water) because the western side of the site lies within Flood Zone 3 and is adjacent to the River Medina, however it is noted that the site is a marine employment site required to be located adjacent to an estuary, so in this case its location adjacent to the river would not be considered a negative. ISA Objective 6 (biodiversity) as the western boundary of the site is immediately adjacent to several internationally and nationally designated sites: Medina Estuary SSSI, Solent Maritime SAC, Solent & Southampton Ramsar and SPA. ISA Objective 7 (land use) as the southern half of the site is Grade 3 ALC. Development on this site should be subject to Habitat Regulations Assessment.
- The Land East of Pan Lane site was found to have one negative impact on ISA Objective (7) (land use) because it is located on Grade 3 ALC (greenfield land) and is within a mineral safeguarding area.
- The Nicholson Road site was found to have one negative impact on ISA Objective (7) (land use) because it is located on Grade 3 ALC (greenfield land) and is within a mineral safeguarding area.
- The Sandown Airport site was found to have one negative impact on ISA Objective (7) (land use) because it is located on Grade 3 ALC (greenfield land) and is within a mineral safeguarding area.

5 Monitoring

5.1.1 It is essential that monitoring suggestions are simple, effective, and measurable. For monitoring to generate useful data a baseline would be required on which to compare the data on an annual basis. It is noted that the majority of the policies within the IPS do not contain specific measurable and targets are only provided for a small number of policies, this means that there is no way of directly measuring or monitoring the success of the Plan against the ISA objectives. Where possible available metrics have been included on which to monitor (refer Table 5.1). In order for the monitoring to be meaningful targets will need to set.

Table 5.1 Suggested Monitoring

SA/SEA Objective	Monitoring Suggestions
1. Air Quality	<ul style="list-style-type: none"> • Assessment of local air quality monitoring data. • Number of new parking spaces approved/ total number of parking spaces.
2. Coasts	<ul style="list-style-type: none"> • Applications approved in Coastal Change Management Areas. • Granted Relocations. • Number of properties defended from flood. • Amount of Development Contributions.
3. Water Quality and Resources	<ul style="list-style-type: none"> • Applications not linked to sewer network. • Application including water recycling.
4. Landscape (including Noise)	<ul style="list-style-type: none"> • Status of Noise Important Areas • Applications granted in AONB • Applications granted in dark skies area • Applications granted in in tranquillity area
5. Cultural Heritage	<ul style="list-style-type: none"> • Number of development applications granted for existing heritage assets.
6. Biodiversity	<ul style="list-style-type: none"> • Number of applications granted without 10% biodiversity net gain (i.e., as exceptions). • Total net gain achieved. • Number of applications granted which include net tree and hedgerow loss. • Number of site applications permitted within a designated site (international and local)
7. Land use, soils and agriculture	<ul style="list-style-type: none"> • Amount of Grade 3 ALC land lost to development. • Amount of mineral sterilised. • Applications granted in RIGGS.

	<ul style="list-style-type: none"> • Applications granted which included a remedial action a plan.
8. Climate Change Emissions	<ul style="list-style-type: none"> • Number of new electric vehicle points. • Amount of renewable energy generated.
9. Climate Change Resilience	<ul style="list-style-type: none"> • Amount of land granted for green infrastructure. • Amount of land developed in flood zone 3
10. Culture	<ul style="list-style-type: none"> • Number of dwelling approved outside of primary and secondary settlements. • Number of dwellings granted in priority locations.
11. Crime and safety	N/A
12. Health and Population: To improve the health and wellbeing of the population and reduce inequalities in health	<ul style="list-style-type: none"> • Number applications granted for or including health care provision.
13. Social Inclusion and Equality To reduce the level and distribution of poverty and social exclusion across the Island	<ul style="list-style-type: none"> • % affordable housing granted • Number gypsy traveller sites granted • Number of applications granted in area with deprivation index 1-3.
14. Education and training	<ul style="list-style-type: none"> • Number of applications for or including education facilities approved.
15. Accessibility	<ul style="list-style-type: none"> • Number of applicants granted water-based access. • Number of new SANGs. • Total developer contributions. • New Rights of Way
16. Material Assets	<ul style="list-style-type: none"> • Number of housing units granted per annum.
17. Employment and Economy	<ul style="list-style-type: none"> • Floor space granted for retail/ employment granted per annum

6 Cumulative, Indirect, Synergistic, Long Term Effects

6.1 Cumulative Effects

6.1.1 The SEA Directive requires information to be provided on the likely cumulative and synergistic (i.e., in combination effects) on the environment. For this assessment cumulative effects are defined as ‘those that result from additive (cumulative) impacts which are reasonably foreseeable actions together with the plan’ (inter plan effects) and synergistic (intra plan effects) are defined as ‘those that arise from the interaction between effects within the same plan on different aspects of the environment’. The appraisal process aims to concentrate on identifying ‘significant effects’ only, as defined by the SEA Directive.

6.2 Summary of Intra Plan Effects (synergistic within the IPS)

6.2.1 The intra²⁷ plan (synergistic) effects of the Objectives of the IPS have been considered within the ‘at a glance summary’ Tables 4.3-4.8 section 4 and where applicable discussions around synergistic effects within each of group of policies are discussed in section 4.5.

6.2.2 Cumulatively the hospital sites will have a positive effect on ISA Objectives 12 (health and population), 13 (social) and 16 (material assets). No negative cumulative effects have been identified.

6.2.3 Cumulatively the employment sites may have a negative effect on ISA Objective 7 (land use) as several of the sites are Grade 3 ALC or mineral safeguarding areas. Cumulatively the employment sites are expected to have a positive effect on ISA Objective 16 (material assets) and ISA Objective 17 (economy). To ensure negative effects do not occur mitigation should be put in place to ensure area remain viable for mineral production and that loss of productive soils are minimised. Currently the proposed policies may not ensure adequate protection in these areas.

6.2.4 To assess the cumulative effects of the housing allocations, the sites have been grouped into settlements and assessed collectively. This has been done for those settlements with five or more housing allocations higher levels of growth. Those settlements with less than five allocations were not considered likely to have significant cumulative effects. Areas with five or more allocations include:

- Cowes (6 sites);
- West Wight (6 sites);
- Newport (13 sites); and
- Ryde (5 sites).

²⁷ Within the LTP

6.2.5 Tables 6.1-6.3 provide an ‘at a glance’ summary of the potential cumulative effects of the housing allocations within the settlement areas.

Table 6.1: Cumulative Effects of Allocated Sites (Coves Primary Settlement)

IPS	ISA Objectives*																
	1 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy
IPS035	+	?	-	+	0	-	+					?	?	?		+	?
IPS042	-	?	0	+	0	0	+					?	?	?		+	-
IPS119	-	?	?	+	0	0	-					?	?	?		+	?
IPS317	0	?	?	+	0	?	-					?	?	?		+	?
IPS323	0	?	0	-	0	-	-					?	?	?		+	-
IPS394	+	?	-	+	0	-	+					?	?	?		+	?

Grey = cannot be assessed spatially

6.2.6 Cumulatively the allocated sites within Coves have the potential to have a negative effect on ISA Objective 17 (employment) as two of the 6 sites are in an existing employment zone. To mitigate the effects, the applications should be required to show they will not result in loss of employment opportunities. Several of the sites are in Grade 3 ALC and mineral safeguarding areas which should be addressed during the planning application process to ensure mineral resources are not sterilised. Several of the sites have the potential to negatively impact ISA Objective 6 (biodiversity) owing to their location either in greenfield areas or in the vicinity of designated sites. Several have the potential to impact the ISA Objective 3 (water) owing to the site proximity to water bodies. An HRA will be required to ensure the sites can be brought forward without negatively impacting the designated sites. During the planning process further consideration should be given to those sites in proximity to waterbodies to ensure no negative impacts occur.

Table 6.2: Cumulative Effects of Allocated Sites (West Wight Primary Settlement)

IPS	ISA Objectives*																
	1 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy
IPS007	0	?	?	-	-	-	+					?	?	?		+	?
IPS071	0	?	?	+	0	0	-					?	+	?		+	?
IPS082a	0	?	?	+	0	-	+					?	?	-		+	?
IPS189	0	?	?	-	0	0	+					?	?	?		+	-
IPS403	0	-	?	-	?	-	+					?	?	?		+	?
IPS410	0	?	?	+	0	0	0					?	+	?		+	?

6.2.7 Within West Wight, the potential exists for cumulative effects to occur with respect to ISA Objective 4 (landscape) owing to the proximity of some of the sites to the AONB and to ISA Objective 6 (biodiversity) due to the proximity to designated sites. During the development process it is imperative that mitigation measures be put in place to ensure impacts do not occur.

Table 6.3: Cumulative Effects of Allocated Sites (Newport Primary Settlement)

IPS	ISA Objectives*																
	1 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy
IPS200	0	?	0	-	-	0	-					?	?	?		+	?
IPS231	0	?	0	+	?	?	-					?	?	?		+	?
IPS233	-	?	0	+	?	?	-					?	?	?		+	?
IPS234	-	?	?	+	?	?	-					?	?	?		+	?

IPS342	0	?	-	?	?	?	-					?	+	?		+	?
IPS358	0	?	0	-	0	0	-					?	?	?		+	?
IPS371	0	?	?	+	-	-	+					?	? / 0	?		+	?
IPS382	-	?	?	+	?	?	-					?	?	?		+	?
IPS383	-	?	?	-	-	-	+					?	?	?		+	?
IPS386	0	?	0	+	0	?	-					?	+	?		+	?
IPS406	-	?	0	-	0	-	-					?	?	?		+	?
IPS413	0	?	?	+	0	0	+					?	?	?		+	?
IPS411	0	?	?	+	0	0	+					?	+	?		+	?

6.2.8 Within Newport the potential exists for negative cumulative effects on ISA Objective 7 (landscape) as many of the sites are located on Grade 3 ALC on the edge of the settlement. There are also potential impacts on ISA Objective 6 (biodiversity) as several of the sites are greenfield and / or have proximity to designated sites which require careful consideration on an individual site basis and cumulatively as the sites are brought forward to ensure appropriate mitigation is in place. Further, a number of the sites are located close to noise important areas (ISA Objective 4) and are not located close to existing transport links.

Table 6.4: Cumulative Effects of Allocated Sites (Ryde)

IPS	ISA Objectives*																
	1 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy
IPS034	0	?	-	-	?	0	+					?	?	?		+	?
IPS150	0	?	-	0	0	0	-					?	?	?		+	?
IPS271	+	?	0	+	?	?	+					?	?	?		+	?
IPS412	+	?	0	+	-	0	+					?	+	?		+	?
IPS415	0	?	0	+	-	-	-					?	?	?		+	?

- 6.2.9 Within Ryde the potential exists for potential cumulative effects on ISA Objectives 3 (water) as two sites lie within flood zones 2-3, and 7 (landuse) two of the sites are located on mineral safeguarding areas. Although two sites scored negative for ISA Objective 5 (cultural heritage) the effects relate to different cultural items so would not necessarily be considered cumulative. During the development process measures should be put in place to ensure negative effects to do occur.

6.3 Summary of Inter Plan Effects (additive and synergistic outside of the Plan)

- 6.3.1 To assess the cumulative effects of the IPS it is usual to assess the potential significant effects of the IPS with other reasonably foreseeable Plans or developments. However, given the Isle of Wight is geographically separate from the mainland it is considered unlikely that many plans would have significant effect on the IOW. All emerging IOW plans will need to consider how they support the plan in particular the emerging IOW LTP which is closely linked to the better-connected island policies and the gypsy and travelling show people emerging plan. Relevantly the South Marine Management Plan, aim is to *'ensure that by 2037 the South Marine Plan area will have maintained its distinctive natural beauty and diversity while sustainable economic growth, protection of the natural and historic environment as well as the wellbeing of those who live, work and visit the south coast will have been enhanced through balanced and sustainable use of its resources'*. This has a direct relevance to the Local Plan and in particular those policies which cover coastal areas and flood defence. In general, the aims of the emerging IPS and the South Marine Management Plan are in line and no negative cumulative effects have been identified.

6.4 Mitigation

- 6.4.1 Tables 1-6, Appendix 1 provides details of how mitigation measures could be incorporated into the revised Plan.

6.5 Limitations and Difficulties Encountered

- 6.5.1 Given that this is a revised plan, some of the assessment of alternatives has been undertaken in previous assessment works in accordance with a slightly different ISA/SA framework. A decision was taken that these alternatives have gone through the entire SA process including assessment and consultation and in that regard, there was very limited benefit to re assessing the alternatives in accordance with the amended framework.
- 6.5.2 The cut-off date for when relevant information, with respect to new and emerging baseline information could be included was Spring 2021. Where possible emerging Plans have been considered.

- 6.5.3 The SFRA and HRA were not available at the time this report was issued and on this basis the findings have not be incorporated herein. The ISA will be updated to reflect the findings and mitigation in the SFRA and HRA (refer Section 8).
- 6.5.4 IOW Council identified the draft housing allocations using an approach which is documented in the Draft Island Planning Strategy (IPS): Revisiting the site allocations approach. The briefing paper outlined five reasons for removal of sites from the previous version of the Draft IPS which includes size of site, whether the site was located within the settlement boundaries (both of which are criteria used in this ISA) but other criteria were also used (which has not been used herein) which included:
- In or adjacent to a Rural Service Centre or at a Sustainable Rural Settlement so can be a Rural or First Homes exception site;
 - Operational commercial site, no certainty of delivery;
 - Adjacent greenfield site not forming a logical extension to the settlement boundary / less certainty of delivery / site specific issues; and
 - Professional judgement.
- 6.5.5 It is noted that all allocated sites, that meet the size threshold, and the spatial strategy (refer Table 4.9) will be re assessed considering the findings of this ISA (refer section 8 for further details) and comments received during the Regulation 18 consultation.
- 6.5.6 It was not possible to assess the sites spatially against all the ISA Objectives as the process was limited to those data sets which were available. This is particularly relevant for ISA Objective 8 (climate change emissions) and ISA Objective 9 (climate change resilience). This does affect the outcome of the findings of the site as some environmental topics are not considered thereby giving greater weight to those that can be assessed spatially.
- 6.5.7 It is also worth noting some data sets used for the assessment are very limited which impacted the output. This is particularly relevant for tranquillity mapping where only very high scale mapping is available.
- 6.5.8 With respect to the site allocations assessment, some aspects such as the impacts on crime cannot be assessed at all and some data sets are unavailable.
- 6.5.9 The selection of the employment sites has been informed by the Employment Land Study²⁸. This work identified the most suitable sites to meet demand for employment space. Section 6 of the Employment Land Study 'Site Assessments' sets out both the methodology and a series of recommendations which have been used to select the allocated employment sites. However, the alternative employment sites have not been assessed against the current ISA framework.
- 6.5.10 Because many of the policies are not specific and measurable, developing ways of monitoring the success of the Plan is extremely difficult. If some of the recommended

²⁸ Employment Land Study Isle of Wight Council Final Report March 2015 Prepared by GL Hearn Limited

changes outlined in section 4 are implemented, then more meaningful monitoring suggestions may be developed.

- 6.5.11 It is noted that the ISA objectives are all given equal weighting and importance. However, it is noted that in plan making the IOW Council may give some items a higher priority than others. For example, the delivery of affordable housing and protecting the local environment is a key priority based on the findings of previous public consultation.
- 6.5.12 Difficulties were encountered when assessing the potential cumulative effects of the allocated housing sites. When all the allocated sites were assessed together the findings were not meaningful and the information became unmanageable. To overcome this, the potential effects were assessed separately for employment and health. Housing sites were assessed within groups. Initially regeneration areas were selected for the grouping. However, during discussions with the IOW, it became apparent that the most meaningful assessments would be based on settlement areas. For those areas with less than five allocations over the plan period, it was determined that the potential for cumulative effects to exist would be low. However, it is noted that the cumulative assessment does not take in to account the size / number of dwelling within each allocation. The revised Environmental report will include details of the number to ensure the cumulative effects are considered proportionally.
- 6.5.13 With respect to the cumulative effects of the allocated sites it was not deemed possible to assess the potential effects for the operational phases because the phasing of when the sites may be brought forward within the plan period is unknown. However, it is noted that potential impacts would need to be managed via the planning process. For example, a Construction Environmental Management Plan may to be required where potential impacts exist within a settlement area.
- 6.5.14 With respect to the potential impacts of allocated sites, it is important to recognise that the data presented is not a full impact assessment but merely an indication of potential constraints which may affect the sites. It is imperative that these are addressed during the planning process and an Environmental Impact Assessment, where applicable.

7 Conclusions and Recommendations

- 7.1.1 This IPS shows many aspects of good planning and has been developed and informed by a sound evidence base and up to date baseline data. In general, the IPS is in line with other relevant international and local plans as outlined in the Scoping Report. However, consideration needs to be given to the outcome of the Habitats Regulations Assessment and Strategic Flood Risk Assessment.
- 7.1.2 This interim assessment makes the following general conclusions with respect to ensuring sustainability has been incorporated into the IPS by way of the ISA objectives:
- It is noted that several of the ISA Objectives were not represented within the plan, these included noise, crime and safety.
 - Several of the ISA Objectives were underrepresented these included the water environment, health and the aging population, education and training, access to sensitive receptors and the economy and employment particularly relating to tourism.
 - Notably ISA Objective 8 (climate change emissions) and ISA Objective 9 (climate change resilience) were not thoroughly integrated throughout the policies to the extent that they would provide confidence that the plan objectives in this regard could be achieved.
- 7.1.3 It is recommended that the amendments outlined herein and in Table 1-6, Appendix 1 be made to the existing policies to ensure these outstanding aspects are appropriately incorporated into the plan to facilitate the required change. A summary of the key recommended changes are as follows:
- 7.1.4 There are some policies which have been assessed as conflicting with each other and themselves. This is particularly notable in the Transport section policies with respect to ISA Objectives 1 (air quality) and ISA Objective 8 (climate). Although T 2 is in general favour of sustainable transport, T 6 supports private parking provision encouraging private vehicle use and T 1 supports the airport, both of which could have significant negative effect on ISA Objectives 1 (air quality) and 8 (emissions). Further, T 1 has direct conflict within the policy with respect to supporting air quality reduction, airport use and viability. Conflicts need to be addressed to ensure negative effects do not occur.
- 7.1.5 The Transport section policies have direct crossover with the emerging Local Transport Plan (LTP) and T 1 contains specific transport schemes (which have not been assessed herein), which may prejudice the emerging LTP. It is recommended that these specific references be removed.
- 7.1.6 Issues have been noted between the spatial strategy and several policies. This is particularly relevant with respect to the AONB and areas outside of the settlement boundaries. It is imperative that this lack of clarity is addressed to ensure the AONB is not vulnerable to negative impacts with respect to tranquillity, dark skies, and landscape.

- 7.1.7 The IPS could be strengthened by ‘future proofing’. The IPS has been developed to meet and comply with the existing guidance / standards but many areas such as emissions and biodiversity net gain are fast moving. To ensure the plan is flexible enough to keep pace with developments in these areas, references should be made to the most up-to-date guidance rather than specifying current guidance. This will allow the plan to remain relevant during the plan period without the need for updates.
- 7.1.8 The IPS uses passive terminology for example the terms, ‘it is expected’, ‘where appropriate’, ‘should’. It also uses a number of undefined terms such as ‘adjacent’, ‘high quality’, ‘sustainable’. The use of these terms leaves the requirements as optional rather than required and it leaves the policies open to challenge and potentially negative effects to the ISA Objectives. It is recommended that these terms be replaced with strong language such as ‘required’ and ‘must’ used alongside clear definitions.
- 7.1.9 Although it is acknowledged that for the plan to be flexible, exceptions are required. However, the assessment has identified that ‘for public benefit’, ‘exceptional circumstances’ should be clearly defined to ensure these do not result in negative impacts to the environment.
- 7.1.10 Most of the policies within the IPS are not measurable and targets are only provided for a small number of policies. This means that there is no assurance that the objectives of the IPS are achievable and importantly there is no way of measuring or monitoring the success of the Plan. It is recommended that where applicable targets be provided within the policies ensuring the IPS is robust.
- 7.1.11 In general, it is noted that there is room to be more ambitious within the policies to really drive change and capture the opportunities the IPS presents. This is particularly relevant to ISA Objective 1 (air quality), 4 (landscape) and 6 (biodiversity).
- 7.1.12 It is worth noting that the IPS has a large number of policies (60+) which will be impractical to implement, it increases the risk of conflict within the IPS and poses a risk that the key messages are lost, and the objectives are not met. Streamlining of the policies is recommended.
- 7.1.13 A total of three health sites, six employment sites, and 41 housing sites have been allocated. These are all within settlement boundaries in accordance with the spatial strategy.
- 7.1.14 Cumulatively the health sites will have a positive effect on ISA Objectives 12 (health and population), 13 (social) and 16 (material assets). No negative cumulative effects have been identified.
- 7.1.15 Cumulatively the employment sites may have a negative effect on ISA Objective 7 (land use) as a number of the sites are in Grade 3 ALC and mineral safeguarding areas. Cumulatively the employment sites are expected to have a positive effect on ISA Objective 16 (material assets) and ISA Objective 17 (economy). To ensure negative effects do not occur mitigation should be put in place to ensure mineral areas are not sterilised and that loss of productive soils are minimised.

- 7.1.16 In accordance with the spatial strategy, a total of 41 sites have been allocated for housing. The majority have been found to have one or more constraint which has resulted in a negative score on the assessment. A negative score does not mean that a negative impact will occur or that the site is unsuitable for housing, rather that the potential for a negative impact to occur exists which requires consideration during the planning process.
- 7.1.17 Cumulatively the allocated sites within Cowes have the potential to have a negative effect on ISA Objective 17 (employment) as two of the 6 sites are in an existing employment zone. Several of the sites are in Grade 3 ALC and mineral safeguarding areas. Several the sites have the potential to negative impact ISA Objective 6 (biodiversity) owing to their location either in greenfield areas or in the vicinity of designated sites. Several sites have the potential to impact the ISA Objective 3 (water) owing to their proximity to water bodies.
- 7.1.18 Within West Wight, the potential exists for cumulative effects to occur with respect to ISA Objective 4 (landscape) owing to the proximity of some of the sites to the AONB and to ISA Objective 6 (biodiversity) due to the proximity to designated sites.
- 7.1.19 Within Newport the potential exists for negative cumulative effects on ISA Objective 7 (landscape) as many of the sites are located on Grade 3 ALC on the edge of the settlement. There are also potential impacts on ISA Objective 6 (biodiversity) as several of the sites are greenfield and / or have proximity to designated sites. This will require careful consideration on an individual site basis and cumulatively as the sites are brought forward to ensure appropriate mitigation is in place. Further, a number of the sites are located close to noise important areas (ISA Objective 4) and owing to the location of sites, several are not located close to existing transport links.

8 Next Steps

- 8.1.1 It is important to note that due to the plan making timetable, the IPS has not been updated at this stage to take on board and incorporate the findings of this Interim ISA with respect to the suggested improvements to the policies or to the potential effects of the allocated sites. The Stage B and Regulation 18 engagement processes will allow interested parties to comment on the findings of the Interim ISA and the assessment of the sites.
- 8.1.2 After receipt of the consultee responses (Autumn 2021) the IOW will enter a stage of revision during which time they will look to addressing the outcomes of:
- This Interim ISA;
 - The Consultee responses;
 - The HRA; and
 - The SFRA.
- 8.1.3 The process will involve a series of workshops during which the IWC and key stakeholders will re-visit and consider ways to improve and strengthen the plan policies.
- 8.1.4 The workshops will also ensure the most appropriate sites are allocated.
- 8.1.5 The outcome of these workshops will help inform a revised IPS which will take account of the consultee responses, the ISA and the findings of the other supporting studies.
- 8.1.6 A final Environmental ISA Report will be provided which incorporates the findings of the HRA, SFRA, and details the outcomes of the workshops in effect documenting the evolution of the plan. This final ISA Report will support the Regulation 19 version of the IPS and be subject to public consultation.

Appendix 1: Assessment of the Policies (Tables 1-6)

Table 1: Assessment of 'Growth

IPS	ISA Objectives*																	Commentary
	1 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy	
G1 Our Approach Towards Sustainable Development and Growth	?/-	0	0	0	0	?/-	+	0	0	0	0	?	?	?	?	?	?	<p>Strengths: This policy has the potential to positively impact several ISA objectives including 12-17 but does not provide the level of detail sufficient to score the any of the ISA objectives positively hence ? are provided.</p> <p>Negatives: There are numerous statements in the policy which are more like visions or objectives rather than policies and do not state how they will be achieved or provide sufficient information to generate an outcome that can be assessed against the ISA objectives. Examples include but are not limited to ‘health needs recognised through the planning system’, ‘the environment will be protected and celebrated’, ‘managed growth will support sustainability’. The policy states it will facilitate travel on the island via road networks and sustainable travel options but doesn’t say how this will be achieved and this would have an indirect negative effect on ISA objective 1 (air quality) if largely road related. It is unclear how managed growth with support sustainably? Although the policy refers to employment and education uses it does not say how and where these are supported within settlements. This policy has strong links to the emerging LTP, the inclusion of specific schemes potentially creates conflict with the LTP. Use of terms such as ‘highest quality design’ is ambiguous. There is no consideration of net gain simply protecting the existing environment which is not ambitious and forward looking within the plan period.</p> <p>Improvements: Consider removing reference to specific sites and schemes and determine whether the aim could be to reduce the requirement for travel, with a focus of local active travel. Consider providing details of how all the aspects will be supported and be delivered and how these will be achieved, for example where in the plan is support for health and wellbeing and how does it support people to live long healthy active lifestyles as there is no evidence within these group of policies to support this. Consider providing more detail on preferred locations e.g. large settlements over rural, focusing on deprived areas for example, providing general areas of education and healthcare etc. Where is public open space and public realm encouraged? With respect to the natural environment there could be a much more ambitious target to enhance and improve the natural environment and one way this can be realised is via net gain. With respect to reference to the high street, focusing on retail only does not capture the huge opportunities for evolution of the high street and the potential benefits it could have to many of the ISA objectives over the plan period.</p>

<p>G2 Priority locations for development and growth</p>	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	<p>Strengths: This policy effectively supports and provides more detail to the spatial strategy for development which has been assessed in Appendix 2 and discussed in section 4.5.</p> <p>Negatives: There is an opportunity to ensure that ISA objective 13 is positively impacted by ensuring deprived areas are specifically supported within the policy. The policy focuses primarily on housing and there is the potential to achieve positive impacts on ISA objective 12, 14 and 17 by specifying preferred areas for commercial, educational, and healthcare provision. There is currently no preference/ weighting for the type of settlements i.e., is primary settlement development preferred over rural?</p> <p>Suggested Improvements: Consider including that non allocated sites must be shown not have a detrimental effect on the environment. Providing more detail for non-housing related developments to ensure more consideration of commercial areas.</p>
<p>G3 Developer contributions</p>	/-	0	?	?	0	?/+	0	0	0	?	0	?	?	?	?	?	?	<p>Strengths: Specifically, the policy includes a good range of items that developer contributions can be used for which includes transport related infrastructure (including sustainable), open space, affordable housing, education, it also includes flood and water management. The policy is not specific enough to allow for any ISA objective to score positively.</p> <p>Negatives: The policy uses the terms ‘seeks’, which suggests that contributions are optional. Regarding consultations it states these must be ‘infrastructure providers’ which excludes other bodies. There is no detail regarding the quality and format that this dialogue should include. The ecology line (3) is vague and covers too many items and is currently directed towards existing designations, and critically net gain should be not considered part of developer contributions, neither should it optional. There are currently no items relating to coastal protection and culture is underrepresented. Flood and water management is listed but not specific with regards to nitrate sensitive infrastructure and sustainable water supply. There is no mention of tree planting.</p> <p>Suggested Improvements: Consider using stronger wording than ‘seeks’, to ensure the policy is robust. It could be stated that development that does not provide sufficient developer contributions will not be supported, this prevents contributions being optional/ challenged. Consider removing ‘infrastructure’ when referring to stakeholders and replace with terminology that encompasses other bodies such as NE, HE, EA and Sports England to ensure the full range of environmental benefits can be considered. Evidence of the how the dialogue with stakeholders should be provided i.e., comprise include full list of consultations with dates and names, along with specific outcomes and mitigations in the form of a consultation statement. With respect to ecology aspects, net gain should be separated out from developer contributions. Net gain should be required or expected for all developments (consider a sperate policy). This is critical to ensure ISA objective 6 (biodiversity) obtains a positive score and the opportunities during the plan period are captured and delivered. The ecology line item could be written to ensure it captures non designated sites, connectivity, species and tree planting etc.</p>
<p>G4 Managing viability</p>	?	?	?	?	?	?	?	?	?	?	?	?	-	?	?	?	?	<p>Strengths: The requirement for a viability assessment provides a robust mechanism to assess potential impacts of deferment of the delivery of the plan requirements which potentially could have negative effects on many of the ISA objectives. The inclusion of a review mechanism (with payment) provides assurance that impacts will be adequately assessed.</p> <p>Negatives: The policy suggests that where compromises are required this will be considered with respect to affordable housing allocation. Which has a negative effect on ISA objective 13. Further this policy may encourage developers to bring forward unviable sites with the expectation that significant compromises? can be made from the outset. The impacts of this policy are unknown as such ? has been provided for most ISA objectives as there is not enough information provided upon which to make an assessment.</p> <p>Suggested Improvements: Consider including specific statement that these viabilities will only be considered only in exceptional circumstances and explain when these circumstances will be considered otherwise this policy provides an avenue for developers to bring viable sites to the authority as the norm. Consider that as part of viability assessment mitigation must be provided.</p>

<p>G5 Ensuring planning permissions are delivered</p>	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	<p>Strengths: The policy does not have an impact on the ISA objectives. Negatives: The policy does not have an impact on the ISA objectives. Suggested Improvements: N/A</p>
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*Refer Appendix 2 for details on spatial strategy

Table 2: Assessment of 'Housing'

IPS	ISA Objectives*																	Commentary
	1 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy	
H1 Planning for housing delivery	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	+	?	<p>Strengths: This policy sets the scene for the H group of policies and refers to other policies. The policy scores positively for ISA objective 16 as it secures the housing numbers to be brought forward over the plan period. It also provides a breakdown of where these numbers are expected to come from providing reassurance that it is achievable.</p> <p>Negatives: There is not enough information contained within the policy to assess the impacts against most of the ISA objectives. The potential impacts of the individual sites can be found in Appendix 2 and the cumulative assessment in Section 6. Although the policy mentions an average number of dwellings per year it does not provide a mechanism for ensuring throughput, however this is touched upon in H1.</p> <p>Improvements: Refer to comments provided for those policies referenced.</p>
H2 Sites Allocated for Housing	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	+	?	<p>Strengths: The policy mentions phasing of developments which potentially ensures delivery throughout the plan period.</p> <p>Negatives: Does not have a negative impact on any of the other ISA objectives.</p> <p>Suggested Improvements: Refer to specific site assessments in Appendix 2.</p>

<p>H3 General Requirements</p>						+										+	+		<p>Strengths: Achieves a positive score for ISA objective 6 (biodiversity) because it directly supports net gain. It indirectly may have some positive benefits with respect to ISA objective 1 (air quality) as it introduces the concept of developments being connected with public transport however not enough information is provided to allocate a positive score. The introduction of the requirement for SANG is positive with respect to ISA objective 15 (accessibility) as it provides green space opportunities.</p> <p>Negatives: The policy includes many concepts which are vague and not defined these include: ‘sustainable’, ‘high quality’, ‘appropriate’, ‘taking account of setting’, ‘appropriate buffers’, ‘improved access to public transport’. Some aspects are combined for example mixing safe vehicle access and hedgerow loss. Unclear why specifically only hedgerows are listed, consideration should be given to verges and trees which are often impacted. There are no details regarding relevant guidance for example for items like pedestrian safety. There is not enough information to allocate scores for the other ISA objectives.</p> <p>Suggested Improvements: Consider net gain being standalone and mixed with and open space and buffers which are not net gain. Important to ensure policy is future proof for the plan period and this area is always evolving so although the white paper current recommends 10% important to ensure there is flexibility for the policy to evolve by considering including a statement regarding or as per reflected in in government guidance or similar.</p> <p>Refer to standards or policies for items like vehicle and pedestrian safety to ensure its robust and define and explain what improved access to public transport might look like. Provide more specific detail around tree loss and what developers need to show in this regard. To ensure this issue is adequately address consider the requirement for arboriculture statement where the applicant must demonstrate how trees and hedgerows have been protected, retained, or mitigated for.</p> <p>Consider either removing or providing more detail regarding how the council will work with the developer on phasing. Clearly define what ‘sustainable’, ‘high quality’, ‘appropriate’, ‘taking account of setting’, ‘appropriate buffers’, ‘improved access to public transport’ would look like and how it will be achieved.</p> <p>With respect to the SANG, it states that developments will be ‘expected to provide’ which leaves it open to interpretation, consider expected with required.</p> <p>Should this policy be the main location to capture environmental aspects consider the inclusion of climate change resilience, health, education etc as at the moment it focused on , biodiversity and trees rather than the full range of topics.</p>
<p>H4 Infilling outside settlements</p>	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: The policy aims to protect the character and setting of areas outside the settlement boundary by saying if it does not respect the character, it will be refused resulting the policy to be allocated a positive ISA score for ISA objective 4 (landscape). Given this policy is only for exceptions the scale is considered to low and therefore only have no or negligible effect on the other ISA policies.</p> <p>Negatives: The policy does not include details of the will be required to ensure the applicants demonstrate this as one person’s interpretation of amenity value and respect for character is different and leaves decisions open to challenge.</p> <p>Suggested Improvements: Consider stating only considered as exception when infilling. Consider including details of exactly what is required to be demonstrated to ensure the policy is robust and defensible and what is an important open space?</p>

<p>H5 Affordable Housing</p>	-	-	-	+	-	-	-	-	-	-	-	+	+	-	-	-	-	<p>Strengths: positive ISA objective 13 because ensure distribution of affordable housing across the island. Provides a range of first time, starter, rented and affordable homes and therefore scores positively for ISA objective 13 (social inclusion) adequate distribution of affordable housing scoring positively for ISA objective 12. Detailing the size of development required to comply with this policy makes is robust and transparent. Good references to planning documents to ensure the plan is flexible over the long term and can evolve with government policy. Negatives: The spatial strategy (refer section 2.5) and the policy H6 does not facilitate large development in the AONB (H states isolated properties only) so there is a conflict here which suggests that developments of 9 would be allowed in the AONB which resulted in a negative score for ISA objective 4. There is no specific focus on existing deprived area and regeneration in these areas. Suggested Improvements: There is need to clarify the AONB. Consider whether they could be any potential opportunities to encourage development and regeneration in deprived areas.</p>
<p>H6 Housing in the countryside</p>	-	-	-	+	+	~	+	-	-	-	-	-	-	-	-	-	-	<p>Strengths: The policy is clear that development in the AONB is by exception and the criteria are clear resulting in a positive scored for ISA objective 4 (landscape). It also includes reference to cultural heritage assets in so far as requiring optimal use so scores positively for ISA objective 5 (cultural heritage). It also scores positive for ISA objective 7 (land use) by protecting greenfield areas. Negatives: The policy does not make specific reference to dark skies or tranquillity which are important aspects to the AONB. Suggested Improvements: Clarify size of developments (isolated or over 9 dwellings) with the policy H5 as there is currently conflict. Consider including reference to minimising light, noise to protect dark skies and tranquillity.</p>
<p>H7 Rural and First Homes</p>	-	-	-	+	-	~	+	-	-	-	-	-	+	-	-	-	+	<p>Strengths: The policy scores positively for ISA objective 13 as it allows for affordable housing across the island and provides flexibility for the council to exercise discretion re rural exception sites. It also scores positively for ISA objective 16 as it supports the provision of adequate housing. Negatives: Policy is in potential effect in conflict with the spatial strategy which states it will not support development outside of settlement boundaries (as these have already been amended). There is clear definition of 'adjacent' and this leaves the council open to challenge and potentially urban sprawl. The policy states that first home exception sites are not permitted in AONB but it appears the rural exceptions sites are which could have negative impact on ISA objective 4 (landscape and 7 (land use). Unclear what is meant by 'where they can demonstrate they will facilitate delivery of the whole scheme'? This policy does not current include and consideration of environmental impacts and or mitigation which could potentially result in significant negative impacts. Suggested Improvements: Clarify if rural exception sites are allowed in AONB, recommend stating 'rural exception sites and first homes sites will not be allowed in any designated areas including the AONB. Consider defining adjacent to minimise challenges and the potential for sprawl. Consider including details that application will need to be include the assessment of environmental impacts and will need to assess and show no significant impacts that cannot be mitigated.</p>
<p>H8 Ensuring Right Mix</p>	-	-	-	-	-	-	-	-	-	-	-	-	+	-	-	-	-	<p>Strengths: provides clear advise on the expected housing mix but leaves flexibility for different approaches resulting in a positive score for ISA objective 13 (social inclusion). Negatives: The wording 'should' suggests its optional. The policy does not impact the other ISA objectives. As with policy H2 there is an opportunity for the policy to consider benefits or exceptions for developments brought forward in derived areas to encourage regeneration. Suggested Improvements: Consider changing the word 'should' to 'must' to ensure the policy is robust.</p>

<p>H9 New housing on developed land</p>	-	-	-	?	-	?	+	-	-	-	-	?	-	-	-	-	-	<p>Strengths: The policy supports development of brownfield for housing which potentially could have effects on ISA objective 7 (landuse). This policy has the potent to indirect have a positive effect on other IA objectives like landscape and biodiversity however not enough information is provided and as such the objective shave been allocated a ?.</p> <p>Negatives: The policy does not go far enough to say how these sites will be supported. They are often costly to bring forward as require investigations and potentially remediation and, on this basis, to make it viable support is required. The policy does not consider these sites being brought forward for other purposes i.e., commercial, or other purposes SANGs. Further it does not consider suitability for use, and this could have potential negative effects on the ISA objective 12 (health) if potential contamination is not adequately addressed in the planning process.</p> <p>Suggested Improvements: Consider tangible ways to support brownfield development, for example allowing exception to other policies (i.e., affordable housing). Consider other ways these sites can be brought forward for example not requiring gardens with accessible soil but other amenity value. Consider other uses from housing which may be more suitable for Part 1 sites for example commercial or SANGs. Reference should be made to the need for applications to be supported by a conceptual model and where applicable remedial action plans. If practical, consider other benefits such as consultations with the CLO regarding the conceptual model and remedial action plans.</p>
<p>H10 Self and custom build</p>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<p>Strengths: No impacts of ISA objectives</p> <p>Negatives: No impacts of ISA objectives</p> <p>Suggested Improvements: Could this be included in policy H8 instead of a standalone policy.</p>	
<p>H11 Gypsy traveller and show people</p>	-	-	-	-	-	-	-	-	-	-	-	-	?	-	-	-	<p>Strengths: The policy shows that the council understands the need and will allocate sites. It also provides a list of requirements and states size that requires a management plan. However, there is not enough information to score the policy positively for ISA objective 13 because it doesn't show how it will meet the need.</p> <p>Negatives: The policy does not state what the need / numbers that will be provided are within the plan period and there are no details regarding the location of these sites or how they will be allocated. With respect to applications there is not definition for sustainably located.</p> <p>Suggested Improvements: Provide further details on what and where the councils will be providing to ensure needs can be meet as there are no allocated sites for this purpose therefore no guarantee that needs of gypsy, travellers and travelling show people can be meet. Allocated sites would need to be subject to ISA assessment.</p>	

Table 3: Assessment of 'Economy'

IPS	ISA Objectives*																	Commentary
	1 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy	
E1 Supporting a growing economy	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	<p>Strengths: This policy allocates specific sites for economic use, which are assessed in the allocated sites.</p> <p>Negatives: It does not make clear the council’s policies for employment sites coming forward outside of these allocations.</p> <p>Improvements: Consider including a statement regarding general principles of employment, explaining if employment will be allowed outside of these allocations.</p>
E2 Sustainable economic development	0	0	0	0	0	?	?	0	0	0	0	0	0	0	0	0	+	<p>Strengths: The policy has a positive impact on ISA objective 17 as it facilitates economic development. It also has a positive impact on ISA 7 as it encourages better use of existing sites and brownfield land.</p> <p>Negatives: The policy does not have any information about not causing negative environmental impacts which potentially allows them to occur. Water access is already covered in policy in E5 and is simply repeated here.</p> <p>Suggested Improvements: Remove repetition regarding water access. Include a statement regarding the need to show no negative aspects to the natural environment.</p>
E3 Upskilling the island	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	<p>Strengths: The policy has a positive impact of ISA objective 14 (education) as it supports upskilling and is clear and prescriptive as to when an employment and skills plan is required.</p> <p>Negatives: The policy does not specifically state that it must be in line with other policies that protect the environment.</p> <p>Suggested Improvements: Consider including an additional line stating must be in line with other policies that protect the environment or similar.</p>
E4 Supporting the rural economy	0	0	0	-	0	-	-	0	0	0	0	+	+	0	0	0	+	<p>Strengths: The policy has positive impacts to ISA objective 12 (health) and 13 (equality) by specifically requiring housing built for work workers to be affordable. It positively impacts ISA objective 17 by supporting economic development and employment opportunities.</p> <p>Negatives: This policy potentially conflicts with both the spatial strategy and H policies with respect to development outside of development boundaries and specifically in rural and agricultural areas particularly with respect to dwellings. It has the potential to cause negative effects on three of the ISA objectives including: 4 (landscape), 6 (biodiversity) and 7 (land use) and has the potential to be misused. By allowing development for tourism purposes (i.e holiday lets) this potentially takes away the potential positive impacts of rural dwellings for local people. Although the policy refers to the local road network it has the potential to impact negatively the local road network and landscape it does not go far enough to ensure protection and does not consider other aspects of the environment such as tranquillity, dark skies, and biodiversity.</p> <p>Suggested Improvements: It is essential the policy goes further to explicitly state both what is allowed and what is not allowed with regards to development in rural areas. Further details are required to ensure that such development does not have negative impacts on other aspects of the environment.</p>

E5 Maintaining employment sites with water access	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	<p>Strengths: Provides a framework for maintaining water access at employment sites scoring a positive for ISA objective 15 (accessibility).</p> <p>Negatives: The policy does not specifically state it supports the development of employment site with water-based access.</p> <p>Suggested Improvements: Consider including a statement regarding support of water based activities.</p>
E6 Digital Infrastructure	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	<p>Strengths: The policy scores positively for ISA objective 16 (material assets) as is provide framework mechanism to support digital infrastructure.</p> <p>Negatives: The wording ‘expects’ suggests it may be optional. There is a lack of clarity around who and when this policy would apply to. Is this all development regardless of size and location, does it include housing developments? is this</p> <p>Suggested Improvements: Change wording from ‘expect’ to ‘require’ ensuring its robust. Clarify what type of development is this just commercial, if so what size/ type, does it apply to housing?</p>
E7 Supporting and Improving our Town Centers	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+	+	<p>Strengths: The policy scored positively for ISA objectives 10 (culture), because it seeks to encourage development in the public realm. It also scores positively for ISA objectives 16 and 17 (material assets and economy respectively) because it facilitates economic development in town centres and contributes to provision of public facilities.</p> <p>Negatives: The policy only considers economic, and retail uses within the town centres and fails to identify other benefits a town center can bring such as open spaces and cultural improvements. It also does not address anti-social behaviour.</p> <p>Suggested Improvements: Town centres are evolving, and the policy does not reflect this as it does not include other uses for town centres and open spaces, social spaces. Consider amending the policy to provide a clear vision for the town center which can evolve during the plan period.</p>	
E8 Supporting the Evening Economy	0	0	0	-/?	0	0	0	0	0	0	-/+	0	0	0	0	+	+	<p>Strengths: The implications for ISA objective are complex, on the one hand the policy scores positively as it includes consideration of anti-social behaviour, however any increase in foot fall may have negative effects on ISA objective (11 crime) particularly around night time and alcohol.</p> <p>Negatives: Increase in evening footfall potentially has a negative effect on the local noise environment.</p> <p>Suggested Improvements: N/A</p>	
E9 Supporting High Quality Tourism	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	<p>Strengths: The policy scores positively for ISA Objective 17 (economy) as it supports tourism. It includes considering of unique features and protected site and species.</p> <p>Weaknesses: N/A</p> <p>Suggested Improvements: N/A</p>	
E10 The Bay Tourism Opportunity Area	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	<p>Strengths: The policy scores positively for ISA Objective 17 (economy) as it supports tourism. It also scores positively for ISA objective (coasts) as it seeks to reduce flood risk and refers to coastal defences.</p> <p>Weaknesses: N/A</p> <p>Suggested Improvements: Consider combining policies regarding tourism.</p>	
E11 Ryde Tourism Opportunity Zones	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	<p>Strengths: The policy scores positively for ISA Objective 17 (economy) as it supports tourism.</p> <p>Weakness:</p> <p>Suggested Improvements: Consider combining policies regarding tourism.</p>	

Table 4: Assessment of 'Transport'

IPS Policy	ISA Objectives*																	Commentary
	1 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy	
T1 Better connected Island	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: The concepts of sustainable transport options, accessibility, and reduction in the impacts on air quality are introduced.</p> <p>Negatives: As a policy it has almost no impacts on the SA objectives. The objective of the T1 policy is unclear and within the policy there are direct conflicts. The policy states it will ‘reduce the impact on air quality and climate change’, (but does not provide any details of how this will be achieved), whilst also saying ‘it will support the island airports’. How will support the airport what sort of developments and is this in conflict with air quality improvements on this basis it scored a negative for ISA objective 1 (air quality).</p> <p>It makes reference to ‘opportunities to avoid or mitigate any environmental impacts’ but does not go far enough and doesn’t include the need to seek improvement and opportunities and potentially introduce biodiversity net gain.</p> <p>The policy states it supports ‘high quality places’ but doesn’t define what a ‘high quality place’ is or how it they will be supported and it unclear how this is linked to a connected island.</p> <p>It states that proposals that prejudice the implementation of these schemes will not be permitted, which excludes opportunities for alternative schemes that may potentially score better on the SA objectives overall than those included.</p> <p>It states it will work with partners, agencies and developers to ensure that the transport network on the Island supports the level of growth planned but doesn’t say how. This is more of an overarching principle or objective rather than a policy? Stating which transport schemes it will support it is potentially prejudicing the emerging Local Transport Plan (LTP) and creating direct conflict particularly if the LTP does not support these schemes?</p> <p>Is the River Medina Bridge a policy? how will it be implemented? would it be better to be located in the LTP? The SA impacts of these individual schemes require assessment.</p> <p>There is nothing in this group of policies about alternatives such as bus network, car shares, park and rides which potentially offers opportunities for positive impacts on SA objectives.</p> <p>Improvements: Consider re visiting the overriding purpose of this objective to support connectivity whilst avoiding negative impacts and seeking environmental opportunities. Consider changing the policy to say it is supporting certain types of schemes, to avoid conflicts with the emerging LTP and potentially exclude other schemes which could have positive impacts on the SA objectives. It is critical to strengthen the requirement of environmental opportunities and with respect to all SA objectives and in particular biodiversity and net gain.</p> <p>Consider if this is the best place for the reference to airports and consider other places elsewhere in the plan (as it isn’t considered sustainable transport), also provide additional details in regards to how airports will be supported as this potentially has an impact on the SA objectives.</p> <p>The statement ‘The creation of new sustainable transport routes will be supported’ is repetitive and there is no definition.</p> <p>With regards to the statement ‘should not cause a significantly adverse impact to local or strategic road network that cannot be managed or mitigated’. This seems like an important point which needs defining as could lead to negative impacts of a number of the SA objectives.</p>

<p>T 2 Sustainable transport</p>	+	0	0	0	0	0	0	?	0	0	0	0	0	0	0	+	0	0	<p>Strengths: Has the potential to have indirect positive effect on air quality by providing alternative means of travel. It also has the potential to impact the climate change emissions however indirectly positively it wasn't felt that there was enough information to generate a positive score. It has a positive effect on accessibility as it seeks to improve access to schools.</p> <p>Negatives: The types of scheme this policy aims to support have the potential for negative environmental impacts particularly where existing road and infrastructure are expanded or widened to facilitate sustainable transport options. This can result in tree and vegetation clearance and impact to protected species and wildlife corridors. It can also have negative visual impacts.</p> <p>Suggested Improvements: Consider widening the breath statement regarding 'safer routes to school and other significant destination' to include 'sensitive locations'. To ensure that the policy doesn't have the potential negative environmental impacts consider including statement in this regard.</p>
<p>T3 Cross Solent Transport</p>	?	0	0	0	0	0	0	?	0	0	0	0	0	0	0	0	+	0	<p>Strengths: This policy scores positively in accessibility as it specifically supports the Solent Crossing Network.</p> <p>Negatives: It is not thought to have an impact on the other objectives.</p> <p>Suggested Improvements: The statement regarding the need to demonstrate environmental and economic benefits is unnecessary as new terminals would be subject to the EIA. Consider simplifying.</p>
<p>T 4 Supporting Rail network</p>	?	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	<p>Strengths: Scores positively for accessibility as it supports the rail network.</p> <p>Negatives: Schemes put forward still have the potential to negatively impact the environment with respect to noise, biodiversity which are not considered.</p> <p>Suggested Improvements: Consider including a statement which protects these aspects of the environment.</p>	
<p>T 5 Electric charging vehicles</p>	+	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	<p>Strengths: Indirect positively impact air quality and emissions.</p> <p>Negatives: No negative impacts were identified associated with SA objectives.</p> <p>Suggested Improvements: Consider change in wording from should include provision to must to ensure statement is robust. Currently states major, why cannot this be for all developments. Use of the term major developments leaves flexibility and uncertainty and it not capturing the opportunity for positive effects on air quality and emissions. Consider specifying the speed of charging points.</p>	
<p>T 6 Parking provision</p>	-R	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: The policy did not score any positives with respect to the ISA objectives.</p> <p>Negatives: The policy scored negatively for ISA objectives 1 as indirectly it could negatively impact air quality by encouraging private car usage. It is worth noting that in some locations parking should not be encouraged and indeed these spaces may use land which might otherwise be utilised.</p> <p>Suggested Improvements: Use of the term 'well designed' is ambiguous. Consider changing wording. Use of the word 'adequate' weakens the policy. Consider amending the wording to state that applications must be supported by statement justifying the number of private parking provided. With respect to bicycle parking, consider including set number that is required per unit as again the 'adequate' can be interpreted.</p>	

Table 5: Assessment of 'Community'

IPS Policy Sustainable Strong and Healthy Communities	ISA Objectives*																	Commentary
	1 Air	2 Coasts	3 Water	4 Landscape and Noise	5 Cultural Heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy	
C1 High Quality Design for New Development	0	0	0	+	0/ +	?	0	0	0	0	+	+	0	0	+	0	0	Strengths: The policy respects the character of the area, particularly AONB and Conservation Areas. The provision of safe, accessible, and inclusive development encourages safe communities. High quality design will also encourage human health and wellbeing. Preserving the integrity of traditional shop fronts and building detailing protects the cultural heritage. Negatives: Suggested Improvements: This policy has the potential to support biodiversity through enhancing the ecological value of new development, through wildlife corridors and hedgerows/trees. Remove wording of 'where possible' with regards to protecting and improving land, water quality to ensure not optional.
C2 Improving our Public Realm	0	0	0	0	0	?	0	0/ +	?	0	0	0	0	0	?	+	0	Strengths: The policy encourages indirect benefits for ISA 15 (accessibility) through a focus on improving and encouraging public open space and pedestrian and cycle connections. The provision of soft landscaping can indirectly support ISA6 through biodiversity net gain benefits to the IOW. Encouraging sustainable and active travel by improving the public realm may potentially have an indirect positive effect on ISA 8 (emissions). Negative: No negative impacts identified according to the ISA objectives. Suggested Improvements: The overarching aim of the policy is unclear; there are benefits for ISA15 and ISA4 which could be more clearly demonstrated. The policy would benefit from a definition of <i>high quality public spaces</i> , with an inclusion of other aspects of these quality spaces i.e., preserve tranquillity/minimise light spill. Consideration of impacts to Local Character Areas and/or light spill should be mentioned (through the implementation of a lighting strategy). The policy could be strengthened by adding in commentary on conserving and enhancing the local landscape setting and local identity of settlements to support ISA5. The relationship between soft landscaping and biodiversity net gain could be emphasised to allow a positive score for ISA6, provided that adverse effects to designated sites are not caused through the development.
C3 Improving our Health and Wellbeing	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	+	0	Strengths: This policy directly supports ISA 12 (health), ISA 15 (accessibility) and ISA 16 (material assets by demonstrating that new development will be required to support access to open space and encourage physical activity. Negatives: No negative impacts identified according to the ISA objectives. Suggested Improvements: Consider include wording to ensure the HIA include assessment outcomes must demonstrate clear benefits to the overall health and wellbeing impact of the development.
C4 Health Hub at St Mary's Hospital	0	0	0	0	0	0	0	0	0	0	0	+	+	0	0	0	0	Strengths: This policy directly supports ISA 12 (health) and ISA 13 (social inclusion) by improving access to healthcare and supporting the aging population and providing affordable housing. Negatives: No negative impacts identified according to the ISA objectives. Suggested Improvements: Access to NHS and other healthcare services on the island might also require consideration of transport routes and public transport services to achieve this.

<p>C 5 Facilitating Independent Living</p>	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0	0	<p>Strengths: This policy support ISA 12 (social inclusion) through the provision if independent living and supporting a balanced population structure. ISA objective 15 (accessibility) is supported by the provision of at least 20% dwelling as accessible for the elderly or those with mobility problems. Negative: No negative impacts identified according to the ISA objectives. Suggested Improvements: For the provision of 20% accessible dwellings to be beneficial, the last statement within this policy needs to be supported by detail on how this will be enforced through the planning system.</p>
<p>C 6 Providing Annexe Accommodation</p>	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: N/A Negative: May potentially have an impact on indirect impact on landscape. Suggested Improvements: N/A</p>
<p>C 7 Delivering Locality Hubs</p>	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	<p>Strengths: The locality hubs require assessment under site allocations. Negative: N/A Suggested Improvements: N/A</p>
<p>C 8 Facilitating a Blue Light Hub</p>	0	0	0	0	0	0	0	0	0	0	0	?	0	0	0	0	0	0	<p>Strengths: The policy may have a positive effect on ISA if a blue light hub went ahead, but not enough information is provided to give the policy a positive score. Negative: The policy does have any effect on the ISA objectives because it simply states it will be considered as to whether its needed. Suggested Improvements: N/A</p>
<p>C 9 Education Provision</p>	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	<p>Strengths: The policy scored positively for ISA objective 14 (education) as it supports opportunities for improvements to educational facilities. Negative: N/A Suggested Improvements: N/A</p>
<p>C 10 Supporting Renewable Energy and Low Carbon Technologies</p>	+	-	0	-	?	?	?	+	+	0	0	0	0	0	0	0	0	0	<p>Strengths: The policy scores positively for ISA objective 8 (emissions) and 9 (climate resilience) as it supports green infrastructure. Negative: The policy has the potential to have a negative impact on ISA objective 2 (coasts) as it may encourage development in these areas, and ISA objective 4 (landscape) as it may significantly impact the AONB and landscape character of the Island. The policy suggests that potential negative impacts to other aspects of the environment may be overlooked. There is no mention of required mitigation. Suggested Improvements: Consider stating that development supporting green infrastructure will be supported rather than listing the types as this does not future proof the plan or allow for innovative idea technology moving forwards in the plan period. It is recommended that changes be made not to support development in the AONB and other sensitive areas as this may have significant negative effect. Consider the need for applications to be supported full assessment of risks and details of mitigation measures.</p>
<p>C 11 Lowering Carbon and Energy Consumption in New Development</p>	?	0	0	0	0	0	0	?	0	0	0	0	0	0	0	0	0	0	<p>Strengths: The policy introduces the concept of carbons emission reduction, renewable energy and recycling. However, the policy does not go far enough or provide enough information to allow for positive scores to be allocated to ISA objective 1 (air quality) or ISA objective 8 (emissions) as it does not provide the detail required to ensure it supports zero 2050 emissions. Negative: The terminology used appears to suggest these items are optional rather than required. It does not go far enough to support the target of carbon neutrality. Climate change is more than just energy emissions, what about flooding etc. Suggested Improvements: Remove the term ‘wherever possible’ as this suggests its optional and allows challenge. ‘Major development’ should be defined. The policy should set clear and ambitious targets for carbon emission targets, renewable energy, and recycling to assist with achieving zero emission by 2050. It should encourage innovation and other options. In summary, the policy should be more ambitious and include clear measurable targets.</p>

<p>C 12 Utility Infrastructure Requirements for New Development</p>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: N/A Negative: N/A Suggested Improvements: N/A</p>
<p>C 13 Maintaining Key Utility Infrastructure</p>	?	?	+	?	0	?	?	0	0	0	0	0	0	0	0	+	0	<p>Strengths: The policy scores positively for ISA objective 16 (material assets) as it supports infrastructure and it scores positively for ISA objective 3 as it supports sustainable water supply. Negative: It is worth noting that the specific locations specified in the policy have not been individually assessed and in order to determine potential environmental impacts these would need to be assessed based on the nature and type of application. There is no mention of solid waste sites. Suggested Improvements: Consider the addition of a statement ensuring such applications would generally be supported in these areas but only where it can be demonstrated that there are no negative effects to for example landscape, biodiversity to ensure these are adequately considered and any potential impacts assessed and mitigated.</p>
<p>C 14 Providing Social and Community Infrastructure</p>	0	0	0	0	0	0	0	0	0	+	0	0	0	+	+	+	0	<p>Strengths: The policy seeks to support cultural, educational, leisure and community facilities which scores positively for ISA objective 10 (culture), 14 (education), 15 (accessibility) and 16 (material assets). It also includes the need to be located near to existing transport links which indirectly may have the potential to have positive effects on air quality locally however not enough information was available to give it a positive score Negative: The statement regarding the approval of the loss of community infrastructure for the benefit of the economy effectively provides a loophole putting at risk community facilities. The policy also includes a statement regarding providing alternatives but only says ‘where appropriate’ but does not define when and where or who determine what is appropriate. Suggested Improvements: Consider whether economic reasons are an appropriate justification for loss of community infrastructure. Consider re wording that alternative will always be required within the same community rather than ‘where appropriate’. To strengthen protection of existing facilities and ensure on going provision for the Plan period.</p>
<p>C 15 Community-led Planning</p>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: N/A Negative: N/A Suggested Improvements: The policy does not explain how conflict between said plans may be resolved.</p>

Table 6: Assessment of 'Environment'

IPS	ISA Objectives*																	Commentary	
	1 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy		
EV1 Conserving and enhancing historic environment	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: It is allocated a positive score for ISA objective 5 (cultural herotgae) because it addresses both designated and undesignated heritage assets. It requires ‘sufficient evidence’ to be submitted and acknowledges the needs for a balanced judgment. Provision is made for proportionate mitigation of harm through recording and substantial harm to designated heritage assets would be wholly exceptional.</p> <p>Negatives: Reference to sufficient evidence does not overtly mention the potential need for the results of a field evaluation to be submitted with the application (ie prior fieldwork), although this may be inferred where the absence of a field evaluation represents ‘insufficient evidence’. In recognising that the treatment of designed and non designated heritage assets is different it does not acknowledge that undesignated archaeological heritage assets demonstrably of the same weight as designated Scheduled Monuments should be treat the same. The test – “the nature of the site prevents reasonable use of the site” “viable use to enable conservation” “grant funding and public ownership is not possible” “harm is outweighed by the benefits of using the site” – can all be applied to the built heritage. But the archaeological heritage is less likely to pass the test of ‘reasonable use of the site’ ‘viable use’ and ‘bringing the site back into use’ A Scheduled Monument is not generally regarded as an economically viable asset.</p> <p>Suggested Improvements: “Demonstrate where they have been informed by sufficient evidence, including where necessary through field work, ...”“Loss of scheduled monuments and archaeological sites of demonstrable equivalence,”</p>

<p>EV2 Ecological Assets and opportunities for enhancements</p>	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: The policy has the potential to have a positive effect on ISA objective 6 (biodiversity) as it seeks to afford some protection to designated sites. It is also prescriptive on the type of information expected to be provided in support of an application. It also refers to the importance of non-designated sites and connectivity networks.</p> <p>Negatives: There are a number of ambiguous terms used in the policy including ‘development opportunities should be located away from ‘ and the ‘national site network’ does this refer to ecological network? . Further it does not state how applicants could show how they have ‘maintained and enhanced’ said network and is it not measurable. The exceptions create a risk of potential negative effects occurring for an overriding public interest (which is not defined). The policy does not make reference to the legal requirement for HRAs or the requirement for biodiversity net gain. Policy focus is protection but not enhancement.</p> <p>Suggested Improvements: Amend term ‘located away from’, to development must be shown not have an impact of designated site via HRA or similar. Include references net gain policy. Consider tightening the exceptions and whether permanent damage would be acceptable under any circumstances. On the three numbered points: 1) Consider adding that not providing ecological assessment must be fully justified i.e. the expectation is that all applications should include at least a Preliminary Ecological Assessment. Applicants should be pointed towards tool such as Biodiversity Checklists as a means of conduction due diligence prior to submission. May also wish to highlight the role of pre-application engagement to flush. 2) Highlight that BNG is in addition to any required mitigation/enhancement measures already needed. The policy should include reference to the mitigation hierarchy – i.e. that the expectation is that development first avoids impacts and then only compensates as a last resort.</p>
<p>EV3 Recreation Impact on the Solent European Sites</p>	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	+	0	0	<p>Strengths: This policy has a positive effect on ISA objective 6 (biodiversity) and ISA objective (15) as it relates to the provision of recreation spaces and SANGs. It is clear what is required and when. It is also stated that if not provided applications will be refused which makes the policy robust and enforceable.</p> <p>Negatives: Only considers housing, does not include other types of development that can have an effect on designated site.</p> <p>Suggested Improvements: Consider amending the term net gain which can be confused for biodiversity net gain. Consider whether this policy should relate to housing developments (above a certain size or dwelling number) or all development types. Consider mentioning that this is in addition to HRA.</p>
<p>EV4 Water Quality Impact on Solent European Sites (nitrates)</p>	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: The policy has a positive effect on ISA objective 3 (water) as it ensures use of infrastructure unlikely to impact nitrate sensitive areas.</p> <p>Negatives: Mentioning the council has a position statement does not ensure compliance.</p> <p>Suggested Improvements: Recommend that the statement regarding the position statement be amended to say all applications should be made in strict accordance with the current position statement therefore ensuing future proofing of the plan as these changes.</p>
<p>EV5 Trees Woodland and hedgerows</p>	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: The policy scores positively for ISA objective 6 (biodiversity) as it seeks to protect trees, hedgerow. It makes reference to ensuring the right type of tree in the right place.</p> <p>Negatives: The policy is not measurable and considers retention but enhancement to meet the required 12% increase by 2060.</p> <p>Suggested Improvements: To ensure the policy achieves its objective it is important that there is a requirement that applications must include details of trees and hedgerows on site arb and hedgerow assessments in order to allow the council to make the assessment (either surveys or statements). The policy should provide measurable targets to ensure these items are protected but also increased the show how the IOW will meet the 2060 target. Consider including reference to net gain.</p>

<p>EV6 Protecting and providing green open spaces</p>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	<p>Strengths: The policy is allocated a positive score for ISA objective 15 (accessibility) as it provides protection and contributes to public open spaces. Negatives: Use of the term ‘are expected’ suggests it is optional. The policy is closely linked to EV3 with respect to SANGs and EV7. Improvements: Consider changing the term ‘expected’ to ‘are required’ or ‘must’. Consider combining EV6 and EV7 to avoid repetition.</p>
<p>EV7 Local green spaces</p>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	<p>Strengths: The policy recognises the importance of local green spaces. Negatives: The inclusion of the term ‘very special circumstances’ potentially allows for the loss of such sites representing a negative impact to ISA 15 (accessibility). Suggested Improvements: Define special circumstances. Change wording consider to ‘support’ or ‘encourage’. Consider combining EV6 and EV7 to avoid repetition.</p>
<p>EV8 Protecting high grade agricultural land</p>	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: The policy takes into consideration soil classification and supports safeguarding best grade of agricultural soils and is allocated a positive score for ISA objective 7 (soils). Negatives: The phrase ‘can demonstrate is necessary’ is vague and open to interpretation potentially resulting in inappropriate development on the best agricultural soils. The policy appears to suggest that development over 5 hectares would be considered. However, this is potentially in conflict with other policies such as spatial strategy and exception rules. Improvements: Remove reference to large sites to avoid conflict and ensure it is in line with spatial strategy and exception policies.</p>
<p>EV9 Protecting our landscapes and seascapes</p>	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: The policy introduces an intention to preserve and enhance landscapes, which provides a positive score to ISA objective 4 (landscape). Negatives: The policy does not define landscape and seascapes and does not include townscapes. It has general themes but does not include details of how these will be achieved through the development process. The focus of the policy is unclear aim part biodiversity, part soils, part climate change. Unlike other policies this does not include exceptions. Improvements: Recommend clearly defining the aim of the policy to include the protection and enhancement of the landscape (including seascape), focusing on landscape, townscape, character, and visual aspects of the IOW. Consider removing references to biodiversity, climate change which are included in other policies. Consider moving RIGGS to policy EV8 which relates to soils and geology. Change the word ‘expected’ to ‘required’. Include clear wording regarding how views and character areas will be protected. Are there any exceptions? and when and how exceptions will be made. the exceptions to this. Consider a statement which says any developments which have a negative impact on these aspect after mitigation will not be supported. Consider requirement for certain size of development to require landscape visual impact assessment and potentially ZVTs? Consider how these aspects are addressed in AONB in particular.</p>
<p>EV10 Preserving settlement identity</p>	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	<p>Strengths: The policy aims to support the local identity of individual settlements by preventing coalescence. Negatives: Potential conflict with spatial strategy. Improvements: Consider whether the policy is needed with the existing spatial strategy.</p>

<p>EV11 IOW AONB</p>	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: The policy seeks to protect and enhance the AONB so scores positively for ISA objective 4 (landscape). Negatives: There is potential conflict here with several other policies including CSSCH10 and the spatial strategy. The policy refers to exceptions relating to ‘wider planning issues’ which are not defined and leaves the policy open to interpretation and challenge and potentially significant detrimental development within the AONB. The policy states applications will be ‘carefully assessed’ but doesn’t specifically state would do this assessment and doesn’t specifically put the onus on the applicant to provide sufficient information in this regard. Improvements: It is imperative that all references to the AONB within all policies are in full agreement with regards to what is allowed and what is not allowed and the exceptions explicitly stated so no ambiguity remains. They should also be in line with the spatial strategy as the AONB is outside of the settlement boundaries. Provide clarity regarding whether this refers only to exception sites, or green infrastructure. Amendments are required across all groups of policies to ensure the AONB is sufficiently protected.</p>
<p>EV12 Dark Skies</p>	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: There is an acknowledgement of support of the principles of dark skies. Negatives: This policy seeks to reduce/ minimise light spill relating to new developments in sensitive areas and protect dark skies, however the fact that it allows new development and makes no attempt to protecting existing light levels potentially represents a negative impact to ISA objective 4 (landscape). In addition it allows outside lighting in dark sky areas. Improvements: Clarify what development would be allowed in the dark skies and how this fits in with the spatial strategy. For example, does this only apply to exception sites or sites of certain size or type? Consider no outside lighting and / or mitigation measures.</p>	
<p>EV13: managemen t water reoursces</p>	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: The policy scores positively for ISA objective 3 (water) as it seeks to protect water resources. Negatives: N/A Improvements: Consider combing with EV15.</p>	
<p>EV14 Managing Flood risk</p>	0	0	+	0	0	0	0	0	+	0	0	0	0	0	0	0	<p>Strengths: The policy scores positively for ISA objective 3 (water) and 9 (climate resilience). It contains clear and explicit requirements for applicants. Negatives: No negative impacts have been identified. Improvements: Consider change of terminology regarding ‘be safe from flooding’. Clarify whether this is applied to all sites regardless of size.</p>	
<p>EV15: Monkmead Catchment</p>	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: The policy scores positively for ISA objective 3 (water) as it seeks minimise adverse effects on the water environment. Negatives: The policy only focuses on one area of the Island and has some cross over with EV15. Improvements: Consider removing the refer to a particular location and including a policy reading the water environment of the Island (see EV15).</p>	
<p>EV16 Managing our coasts</p>	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: The policy clearly states residential developments will not supported in CCMA and supports protection of risk via the requirement for vulnerability risk assessments providing a positive score to ISA objective 2. Negatives: The policy states that a ‘practical’ and sustainable approach should be taken, however this is not defined, and it open to interpretation. Improvements: Clarify what is meant by sustainable and practical approach, is this in addition to a vulnerability assessment.</p>	

<p>EV17 Facilitating relocation from coastal change management areas</p>	0	+/?	+/?	0	0	0	0	0	+	-	0	0	?	0	0	0	0	<p>Strengths: The policy states that applications for relocations must not be contrary to other policies effectively preventing significant harm. It has the potential to have a positive impact on ISA objective (9) climate resilience and ISA objective 2 (coasts) as it reduces reduced risk to infrastructure.</p> <p>Negatives: Moving of communities could potentially have a negative effect on ISA objective 10 (culture) as it impacts the settlements and local culture. It is also worth noting that any such a relocation would likely be in contrary to policies not least the spatial strategy thereby potentially making the policy unworkable (which is reflected in the ISA objectives 2 and 3 being allocated a ? score).</p> <p>Improvements: Consider a requirement that applications must include consideration of exceptions to any aspect contrary to policy and include full assessment of impacts and mitigation measures.</p>
<p>EV18 Improving resilience from coastal flood and risk</p>	0	+	?	?	0	0	0	0	+	0	0	0	0	0	0	0	0	<p>Strengths: The policy seeks to accommodate predicted rises in sea level and manage if not reduce the risk of infrastructure resulting in a positive score of ISA objective 2 (coasts) and (climate resilience). It confirms development coast risk areas will not be allowed to happen without mitigation being in place.</p> <p>Negatives: The policy is unclear as it states that development in ‘hold the line’ area should ‘provide’ or ‘contribute to maintenance of coastal defences’ but subsequently the policy states proposals for coastal defences will only be permitted where no adverse impact to environment and future reduction schemes. Confusion arises whether over which areas parts of this policy applies. Does provide certainty around how a proposal would be dealt with and what will be required but puts the onus on the pre app.</p> <p>Improvements: Recommend removal of first paragraph as it not a policy. Clarify when these requirements be applied and what definition will be applied (is this for all developments on the island, in hold the line areas or on the coast)? Clarify whether development in hold the line will need to ‘provide’ new coastal defences or just contribute to existing defences? Clarify when developer contributions will be required as opposed to the defence works themselves, what would be the scale? With respect to new coastal defences, it is noted that there will always be material environmental impact and, in this regard, has the council considered occasions where positive impacts may out way negatives and mitigation can be provided as this is not currently allowed in this policy. Pre apps are voluntary, consider re wording to state pre app are highly recommended to ensure applicants are fully aware of the requirements at the earliest stages.</p>
<p>EV19 Managing Ground Instability in new development</p>	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>Strengths: The policy scores positively for ISA objective 2 (coasts).</p> <p>Negatives: Potentially conflicts with policy EV18 and EV16.</p> <p>Improvements: The policy could be combined with EV18 and EV16.</p>

Appendix 2: Assessment of the Spatial Strategies

IPS Policy Sustainable Strong and Healthy Communities	ISA Objectives*																	Commentary
	1 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy	
1. Use existing settlement hierarchy and allow for growth outside but immediately adjacent to existing settlement boundaries	?	0	0	+	0	+	+	0	0	?	0	0	?	0	0	?	0	<p>Strengths: This strategy scored positively for ISA 4 (landscape) because it seeks to protect the IOWs tranquillity and the AONB. It also scores positively for ISA objective 6 (Biodiversity) as it seeks to protect designated sites. It scores positively for ISA objective 7 (land use) as it encourages brownfield regeneration and safeguards RIGGS and agricultural land.</p> <p>The strategy was given a ? for ISA objective 10 (culture) as it has the potential to protect the local identity of individual settlement areas however, because there is no definition of ‘immediately adjacent’ this is open to challenge which potentially puts the settlements at risk of settlement creep and on this basis, there was not enough information to enable a this to be scored positively. ISA objective 13 (equality) was also given a ? as developing within existing settlements offers the indirect opportunity to focus accommodation in areas of deprivation but it was not thought enough information was provided to confirm outcome. With respect to ISA 16 (materials) there is the potential for positive indirect effects to occur as a result of indirectly support existing transport networks including the railway and Solent crossing, but it is not considered enough to score a positive.</p> <p>Negative: The strategy was not found to have a direct negative effect on any of the ISA objectives however it could potentially have an indirect negative impact on ISA objective 1 (air quality) in so far as contributing to congestion, although development would be focused within existing settlements with public transport infrastructure it does not preclude an increase in private vehicles on this basis ISA objective 1 scored a ? as the impacts are uncertain.</p>

<p>2. Use existing settlement hierarchy (a) Increase density/site yield, focus on infill and brownfield, do not allow development beyond settlement boundaries</p>	?	0	0	+	0	+	+	0	0	?	0	0	?	0	0	?	0	<p>Strengths: This strategy is very similar to strategy 1 and on this basis the strengths of this strategy are the same strategy 1. Except for ISA 10 (culture) which allocated a positive in strategy 2 as it was felt that clearly defining settlement boundaries and not allowing adjacent development prevented the risk of creep and settlement coalescence, thereby supporting the identity of individual settlements and ensuring definition between settlements and rural areas.</p> <p>Negative: The negatives are the same as for strategy 1 with respect to uncertainties regarding ISA objective 1.</p>
<p>3. Growth in existing settlements, outside of settlement boundaries and in locations not previously considered</p>	?	-	-	-	-	-	-	?	0	-	-	?	-	0	-	?	0	<p>Strengths: This strategy has the potential to score positively for some IPS Objectives, however given the large scale of this strategy, a strategy-wide approach is recommended to ensure that all strengths and weaknesses are considered. IPS1 could be supported through a reduction in congestion away from the existing towns and settlements. IPS5 could be supported through development elsewhere in the island could potentially remove pressures to develop adjacent to existing buildings and architecture within existing settlement. However, this does not take into consideration any archaeological impacts which are discussed below. IPS12 and IPS13 could be supported through new development across the island, which has the potential to improve the distribution of affordable housing, however it is not possible to determine any impacts on population structure in relation to this strategy at this stage without additional information. IPS15 could be supported by increasing the demand for and encouraging the development of rail infrastructure and other public transport networks throughout the island which are currently limited to the 'urban hubs'. However, there are considerable landscape, land-use and biodiversity impacts associated with the development of the public transport network which must be considered.</p> <p>Negatives: The large-spatial scale of this strategy ultimately results in a high number of negative scores against the majority of the IPS Objectives. This strategy was given a ? for IPS1 as more information is required to determine whether congestions and reliance on private vehicles will be reduced as a result. Air quality around sensitive areas is also unknown. Air quality on the IOW does not currently exceed national objectives – island-wide development may increase the reliance on private vehicles resulting in greater pollutant emissions.</p>

															<p>IPS2 was scored negatively, as at this stage it is assumed that island-wide development could result in new development adjacent to the coastline and within areas of coastal amenity. The managed retreat of coastlines would not be possible in these areas. Other areas of this IPS are not able to be determined at this stage and require more information.</p> <p>IPS3 scored negatively as development in greenfield areas will require water supply diversion and new water utility infrastructure to areas that do not current have access to potable water. This would put additional pressure on the water supply, which is already known to require imports. This does not support sustainable water resource management. Development throughout the IOW may impact SPZ and other potable reserves.</p> <p>IPS4 scored negatively as development throughout the IOW would result in a loss of AONB land, a loss of tranquil areas and would significantly disrupt the fabric and setting of the existing landscape character area. This strategy would introduce additional sources of noise and light pollution throughout the island, including in areas currently designated as dark sky reserve. IPS5 scored negatively largely due to the potential for impacts, damage and destruction of archaeological deposits and locally historic assets within previously undeveloped land. IPS6 scored negatively as development throughout the IOW would reduce habitat connectivity and ecological networks. This strategy does not support the protection of trees, hedges and vegetation or designated site protection. IPS7 scored negatively as this strategy does not encourage the re-use of brownfield land and sustainable use of land. RIGGS and agricultural land would not be protected. IPS8 requires more information to determine the effects, it is not possible to determine if private vehicle numbers will change, however it can be assumed that development outside of existing settlements and transport networks would encouraging commuting and associated emissions, if transport is not adequately addressed through new development (i.e. inclusion of public transport networks/encourage sustainable active travel).</p> <p>IPS9 scored neutrally as this strategy is not considered to affect the climate change resilience of new development.</p> <p>IPS10 scored negatively as this strategy does not encourage a local identity. Unstructured development throughout the island would result in indistinct communities and societies around the IOW. not able to determine if investment in the public realm and cultural facilities will be undertaken. IPS11 scored negatively as new settlements could put strain on existing police services and could result in increases in anti-social behaviour in existing settlements.</p> <p>IPS12 was scored ? as the impact of this strategy on population structure and aging population health is not currently known. IPS13 scored negatively, however more information is required. development throughout the island</p>
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																			could overlook the existing settlements and areas of known deprivation and not encourage the regeneration of these areas. IPS14 was scored neutrally as the impact of this strategy on education is not currently known. IPS15 was scored negatively as development throughout the IOW may not be targeted around the existing infrastructure and could therefore isolate some residents, with limited access to essential services such as schools or hospitals, especially given the limited infrastructure in place currently. IPS16 was scored with ? as the strategy does not provide information on transport provision between developments or on the Solent Crossing Network. Given that the current crossing network is focussed on a few key settlements, it is assumed that any development not in these areas would not directly support the Solent Crossing Network. IPS17 was scored neutrally as employment and the economy are not considered to be affected by this strategy at this stage.
4. Creating new communities	?	0	?	-	0	-	-	?	0	-	0	0	-	0	-	-	0	<p>Strength: The strategy did not score positively for any ISA objective. It scored a ? for ISA objective 1 (air quality) as it may potentially remove direct congestion away from existing settlement, however it may potentially increase private vehicle usage and encourage more vehicles visiting the settlements to access services on this basis the impacts are considered uncertain. It scored a ? for ISA objective 3 (water resources) as on the positive side new development can be designed to support water usage however there is no infrastructure in these areas which is a negative. ISA objective 8 (climate emission) scored a ? as potential new developments could be designed in line with zero emissions, however in conflict would be likely increase in private vehicle numbers and absence of public transport networks in these areas.</p> <p>Negative: Strategy 4 might introduce light and noise in an otherwise undisturbed areas having a negative effect on ISA objective 4 (landscape) Building a new community in otherwise undeveloped land is likely to have a negative impact on ISA objective 6 (biodiversity). It also fails to protect greenfield and agricultural land uses resulting a negative effect on ISA objective 7 (land use). With respect to ISA objective 10 it doesn't increase the identify of existing settlements so scores a negative for this ISA objective. This strategy does not address inclusion or equality and doesn't focus on existing areas of deprivation so scored negatively for ISA objective 13. The new communities are unlikely to be large enough to support their won key services, public transport infrastructure or educational facilities and on this basis, they score neutrally for ISA objectives 14 and 15.</p>	

Appendix 3: Assessment of the Housing Sites

Appendix 4: Assessment of Health and Employment Sites