

# **Post-Adoption Environmental Statement**

**For the Island Plan, Isle of Wight Core  
Strategy (including Waste and  
Minerals) and Development  
Management Development Plan  
Document**

**As required by Regulation 16 (Information as to  
adoption of plan or programme) of the Environmental  
Assessment of Plans & Programmes Regulations 2004  
(Statutory Instrument 2004 No. 1633)**

**March 2012**

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## Isle of Wight Core Strategy (including Minerals and Waste) and Development Management Development Plan Document

### Post-Adoption Environmental Statement – 22 March 2012

#### 1. Introduction

- 1.1 The Isle of Wight Council adopted the Isle of Wight Core Strategy (including Waste and Minerals) and Development Management Development Plan Document on 22 March 2012, following examination by an independent Planning Inspector.
- 1.2 During the preparation of the Core Strategy the Council carried out a parallel process of appraising and consulting on Sustainability Appraisal (SA) and the Habitat Regulations Assessment (HRA). The SA identifies the economic, social and environmental impacts of the Core Strategy and its reasonable alternatives. The HRA was undertaken to assess the potential effects of the proposals included in the Core Strategy on the Natura 2000 network of internationally important sites.
- 1.3 In accordance with Regulations 16 (3) and (4) of the Environmental Assessment of Plans and Programmes Regulations 2004 the Isle of Wight Council has produced this statement which sets out:
  - How environmental considerations have been integrated into the Core Strategy;
  - How the environmental report has been taken into account;
  - How consultation responses have been taken into account;
  - The reasons for choosing the Core Strategy as adopted in light of other reasonable alternatives; and
  - The measures that are to be taken to monitor significant environmental effects of the implementation of the Core Strategy.

#### 2. How environmental considerations have been integrated into the Core Strategy

- 2.1 Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), has been an integral part of the preparation of the Core Strategy. Two SA Reports (see below for a further explanation on both these SA Reports as constituent parts of the Environmental Statement) supports the Core Strategy and demonstrates how environmental considerations were integrated into the preparation and adoption of the Core Strategy. The Environmental Report, as required by the (Environmental Assessment of Plans and Programmes) Regulations (2004) consists of two documents, the Sustainability Appraisal of the Island Plan Core Strategy, October 2010, and the Addendum to the SA/SEA of the Isle of Wight Core Strategy, April 2011. The former documents the SA process up to Regulation 25 of the Town and Country Planning (Local Development)(England) Regulations 2004, and the later covering from Regulation 27 through to submission of the Core Strategy (Regulation 30) of the Town and Country Planning (Local Development)(England) Regulations 2004.
- 2.2 An Assessment (Habitats Regulations Assessment for the Isle of Wight Core Strategy Appropriate Assessment Report, April 2011) in accordance with the Habitat Regulations has also been carried out to demonstrate that the policies in the plan do not harm European designated sites for nature conservation.

- 2.2 SA commenced during the pre-production and evidence gathering stage, and a revised SA Scoping Report was published in October 2010. The SA/SEA (Sustainability Appraisal of the Island Plan Core Strategy, October 2010) carried out on the first draft of the Core Strategy policies accompanied the revised Scoping Report (the revised Scoping Report informing the SA assessment framework) and was also published in October 2010, as part of the Core Strategy Regulation 25 stage consultation.
- 2.3 The final SA Report, incorporating SEA, was published alongside the Pre-Submission (Regulation 27) Draft Core Strategy in April 2011. While the SA Report published at this stage is the same as that at the previous (Regulation 25) stage, an addendum (Addendum to the SA/SEA of the Isle of Wight Core Strategy, April 2011) was also published. This addendum to the Core Strategy SA had been prepared in recognition that since the Regulation 25 stage consultation, further work had been carried out on the Core Strategy, resulting in a number of changes. The guidance<sup>1</sup> is clear that further consideration will need to be given to such changes in the context of environmental assessment (SA/SEA).
- 2.4 A final SA screening (Environmental Screening Assessment (incorporating the requirements of SA/SEA and HRA) of the Suggested Changes to the Island Plan Core Strategy following the Examination Hearing Sessions, November 2011) was carried out. This reviewed the suggested changes to the Core Strategy, following examination, to determine if any of them would, if recommended for inclusion by the Inspector, be likely to alter the results of the Sustainability Appraisal as published. It concluded that no further environmental assessment work (SA/SEA or HRA) is required if the suggested changes put forward by the Council are adopted as part of the Core Strategy.
- 2.5 The final screening (as detailed above in paragraph 2.4) considered all the changes set out in Appendix A 'Council's Changes that go to Soundness' of the Inspectors Report. 10 suggested changes were identified as having potential negative impacts on European sites. All the remaining suggested changes were either screened out (having been identified as not applicable due to policy or wording deletion) or identified as not requiring any further SA/SEA assessment.
- 2.6 For the 10 identified as having potential negative impacts on European sites, all of these resulted from the revisions made to housing provision, made in turn as a result of updating the housing trajectory. Therefore further assessment work was carried out (as part of the final screening) to better understand the likelihood of the impacts occurring and whether policy safeguards and mitigation as proposed in the Core Strategy was sufficient to address any additional impact resulting from the changes. This involved a comparison of the submitted and revised housing figures and an assessment of the resulting revisions in over provision (as it is the excess capacity of SHLAA sites in each AAP area that has provided the evidence to justify sufficient flexibility in the choice of sites to avoid impacts on European sites, bearing in mind those SHLAA sites assessed as likely to have direct impacts have already been screened out through the previous HRA work).
- 2.7 Following this further assessment it was possible to conclude that both the capacity in terms of available SHLAA sites and therefore the flexibility to deliver housing, despite the revised figures through the updated trajectory, remain and therefore the conclusions of the HRA remain valid. Specifically "The HRA has concluded there are no likely significant effects as a result of the strategic-level Core Strategy policies. It also demonstrates, through the higher level Appropriate Assessment in relation to European and Ramsar sites, the identified level of

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<sup>1</sup> A Practical Guide to the Strategic Environmental Assessment Directive, DCLG (formerly ODPM) 2006

Isle of Wight Council, Island Plan Core Strategy Post Adoption Environmental Statement, March 2012 development can be accommodated within the broad locations set out in the Core Strategy” (Habitats Regulations Assessment for the Isle of Wight Core Strategy Appropriate Assessment Report, April 2011).

- 2.8 Given the over-capacity within the SHLAA sites, the Council is reassured that it will be able to accommodate the relatively modest additional requirement for housing. Particularly as the Council has made the following commitment, which is proposed to be amended to also refer to SP4 (see change SC014 of the Schedule of Suggested Changes) in its spatial strategy (SP1 Spatial Strategy); “Proposals that contribute to delivering the identified level of development set out in SP2 and SP3 will need to demonstrate how, in line with the Habitats Regulations, there will be no significant impact on the integrity of European designated sites. Where this cannot be demonstrated planning permission will not be granted.”
- 2.9 At each stage in the preparation of the Core Strategy reasonable options have been evaluated against the SA framework to predict and evaluate the effects of the Core Strategy and to inform the choice of options and development of policies as the Core Strategy evolved.

### **3. How the environmental report has been taken into account**

#### **Core Strategy Sustainability Appraisals, 2006 & 2008**

- 3.1 The Council has previously prepared and submitted two Core Strategies, but has withdrawn each Core Strategy due to concerns that they would be found unsound at independent examination. Both previous Core Strategies were subject to a Sustainability Appraisal, published in February 2006 and December 2008 respectively.
- 3.2 The process of preparing what is now the adopted the Core Strategy is seen as an evolution, rather than the preparation of three different or distinct documents. This has also resulted in a similar evolution of the Sustainability Appraisal process, which has been iterative and continually updated throughout the preparation of the Core Strategy, including during the preparation of the previously withdrawn Core Strategies.
- 3.3 Early versions of Core Strategy options were assessed utilising the initial sustainability framework which had been developed for the SA. Through this approach, an early sustainability input to the plan took place, which predated the commencement of the formal SA process of the adopted Core Strategy. All versions of both the Core Strategy and relevant accompanying environmental assessment documents have been through extensive consultation.

#### **Revised Scoping Report October 2010 Isle of Wight Council Sustainability Appraisal of Core Strategy Development Plan Document**

- 3.4 The Revised Scoping Report for the SA of the Island Plan (Revised Scoping Report, October 2010, Isle of Wight Council Sustainability Appraisal of Core Strategy Development Plan Document) was published in October 2010. It set out the scope of the SA for the Core Strategy, and contained updated data and objectives for the SA of the Core Strategy.
- 3.5 The Scoping Report set out the context of the sustainability appraisal, established the baseline situation, identified key sustainability issues and developed relevant objectives against which to assess the emerging Core Strategy policies.

- 3.6 The Preferred Options document included sections under each topic on the options considered and the key spatial and sustainability issues to ensure that the SA was integrated into the development of the policies and proposals.

#### **Sustainability Appraisal of the Island Plan Core Strategy, October 2010**

- 3.7 The SA Report is a key part of the Island Plan Core Strategy's preparation and development. Where appropriate, recommendations have been made (which are summarised in both the full report and Non-Technical Summary) and included in the final policies. Section 5 and Table 5.2 of the Addendum to the SA/SEA (April 2011) details how the findings of the SA have been taken into account in the proposed Submission Core Strategy prior to examination. Recommendations were also made when options were being developed for the overall spatial development pattern, strategic policies, development management policies and strategic sites being considered for allocation.
- 3.8 The SA report describes the full process of SA, incorporating Strategic Environmental Assessment. It includes a summary and review of the assessments carried out in the early stages of plan preparation prior to and including the evolution of the Core Strategy policies, including the evaluation of alternative options.
- 3.9 Consultation on the SA allowed stakeholders to analyse the Core Strategy with regards to sustainability objectives. This helped to highlight any issues with regards to the performance of the Plan against these objectives and associated indicators. By addressing these issues it enabled the Core Strategy to help minimise and wherever possible enhance its sustainability effects.

#### **Addendum to the SA/SEA of the Isle of Wight Core Strategy, April 2011**

- 3.10 The Addendum carried out five stages of work to ensure both compliance and proper iteration between (environmental) assessment and Core Strategy policy development. The results of these stages are set out in the addendum, but can be summarised as;
- An assessment of all consultation responses made in relation to the Sustainability Appraisal to identify any need for alterations either to the assessment itself (in terms of methodology) or the results;
  - A screening assessment of all changes made to every policy and supporting text;
  - A detailed assessment of those policies identified as a 'significant change' from the previous plan version consulted on;
  - A consideration of the cumulative, synergistic and in-combination effects; and
  - Details of how the findings of the SA have been taken into account in the Submission Core Strategy prior to examination.

#### **Environmental Screening Assessment (incorporating the requirements of SA/SEA and HRA) of the Suggested Changes to the Island Plan Core Strategy following the Examination Hearing Sessions, November 2011**

- 3.11 The final SA screening (carried out to review the suggested changes to the Core Strategy, following examination) sets out details of how the findings of the SA have been taken into account in the Submission Core Strategy prior to examination. This has been done for both Core Strategy policies and strategic allocations.

- 3.12 All of the Council's suggested changes, as listed in Appendix A 'Council's Changes that go to Soundness' of the Inspector's Report have been assessed by the Council through the environmental screening assessment carried out in November 2011 and submitted to the Inspector. The changes that have been identified by the Inspector as required in order to make the Core Strategy sound are detailed in Appendix C 'Changes that the Inspector considers are needed to make the plan sound' of the Inspector's Report. Two changes are identified by the Inspector (Inspector Change No. IC1 & IC2). Both of these changes have already been assessed through the environmental screening assessment (Change Ref. SC126 & SC129) with the difference between the Council's suggested changes (as assessed) and the Inspector's (not assessed) being the specified quantum in the Inspectors changes of locally affordable housing to be delivered. The percent provision (of 35%) remain the same for both versions of suggested changes, therefore the SA screening assessment remains valid. Furthermore, the Inspector states as part of the introduction to his report that "My report deals with the changes that are needed to make the DPD sound. Most have been suggested by the Council during the examination process. ... The two changes that I recommend are set out in Appendix C. None of these changes materially alter the substance of the plan and its policies, or undermine the sustainability appraisal..."

#### 4. How consultation responses have been taken into account

- 4.1 Sustainability Appraisal Reports have been available for comment alongside the Core Strategy during key stages of its preparation. The reports have been available to a range of national, regional and local organisations and local people.

##### Scoping Report Consultation May – June 2010

- 4.2 The Scoping Report has been subject to consultation during the previous withdrawn Core Strategy process. Consultation was undertaken on the revised Scoping Report during May – June 2010 with members of the Island Plan Environment Steering Group. This group comprises the statutory consultees under the SEA Regulations (Environment Agency, Natural England and English Heritage) as well as key environmental stakeholders the RSPB, the Isle of Wight Area of Outstanding Natural Beauty Unit, Southern Water Services and the Council's Coastal Management Group. The key roles of this group are;
- To approve environmental assessments accompanying Development Plan Documents of the Island Plan at key stages (including baseline information and methodology);
  - To help steer and manage the processes associated with environmental assessments, ensuring key milestones and legal requirements are met;
  - To provide early reviewing of draft documents and round table discussion leading to an overall agreed and policy standpoint;
  - Sign off plans and accompanying assessments prior to submission;
  - Provide the Council with a single key contact within each organisation.
- 4.3 Comments received led to revisions to the baseline data and SA framework and helped to inform the methodology and scope of the SA. Following the receipt of consultation responses on the Scoping Report, the options were appraised utilising the SA Framework of objectives and indicators developed, consulted on and updated through the scoping stage for the SA. This was done so that the options assessment was revisited to ensure that consultation responses on the scoping stage of the SA process had been fully considered.

- 4.4 The Sustainability Appraisal Report was formally consulted on for a six week period closing on Friday 10<sup>th</sup> December 2010 alongside the draft Core Strategy as part of the Core Strategy Regulation 25 stage consultation. Since this time further work has been carried out on the Core Strategy, resulting in primarily minor changes, with a small number of major changes. Guidance<sup>2</sup> is clear that further consideration needs to be given to such changes in the context of environmental assessment (SA/SEA).
- 4.5 In response to this requirement and given the changes made following the Regulation 25 consultation period, the Council undertook (amongst other steps, see the five stages detailed in paragraph 3.10) an assessment of all consultation responses made in relation to the Sustainability Appraisal to identify any need for alterations either to the assessment itself, or the results. This assessment is set out in the Addendum to the SA/SEA (April 2011), Table 2.1 All Comments Received on the SA/SEA of the Regulation 25 Core Strategy. A large number of comments primarily related to the Habitats Regulation Assessment (HRA) and European sites, even though they were either made against the SA/SEA or referenced the SA/SEA.
- 4.6 The consultation responses helped shape the Core Strategy and the main changes as a result have been to:
- Include a number of further references to the HRA within the Core Strategy.
  - Highlight the Council's commitment to undertaking SA/SEA's of subsequent DPDs.
- 4.7 The Addendum to the SA/SEA was consulted on as part of the wider formal Core Strategy consultation required by Regulation 27. As such this was a public consultation, over a six week period, commencing in April 2011. The results of this consultation were published in the Council's Core Strategy Regulation 30 Statement, in June 2011. However there were no representations received specifically against either the SA or HRA documents.

#### **Environmental Screening Assessment (incorporating the requirements of SA/SEA and HRA) of the Suggested Changes to the Island Plan Core Strategy following the Examination Hearing Sessions, November 2011**

- 4.8 The council suggested a number of possible changes to the wording of the Core Strategy. There are a number of sources from which the suggested changes have come, most of which can be identified as a form of consultative process, including:
- to reflect representations received
  - to address issues set out in the Statements of Common Ground
  - to reflect discussion at the relevant examination hearing session

These changes were formally documented and submitted by the Council to the Inspector in the Schedule of Suggested Changes (6<sup>th</sup> November 2011).

- 4.9 Whilst all policies prior to the examination had been subject to Sustainability Appraisal, the Council took the opportunity to review the suggested changes to determine if any of them would, if recommended for inclusion by the Inspector, be likely to alter the results of the Sustainability Appraisal as published. Based on the results of the screening exercise (as set out

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<sup>2</sup> A Practical Guide to the Strategic Environmental Assessment Directive, DCLG (formerly ODPM) 2006

Isle of Wight Council, Island Plan Core Strategy Post Adoption Environmental Statement, March 2012 in the screening assessment) it was possible to conclude that no further environmental assessment work (SA/SEA or HRA) is required if the suggested changes put forward by the Council are adopted as part of the Core Strategy.

- 4.10 At no stage in the SA process was it considered that the Core Strategy would be likely to have any significant effects on the environment of another Member State, and nor was this suggested in any of the consultation responses received. Accordingly, no transboundary consultation was undertaken.

## 5. The reasons for choosing the Core Strategy as adopted, in light of other reasonable alternatives

- 5.1 As detailed in section 3.2 above, development of both the Core Strategy and its Sustainability Appraisal has been an evolution, with a lot of work having been carried out prior to the formal plan stages of this Core Strategy. The SA Report (December 2008) prepared for the previous (withdrawn) Core Strategy carried out extensive options testing.
- 5.2 The options appraisal of the Core Strategy is set out in the SA Report (October 2010) of the Core Strategy (Section 4. Options Appraisal). Three different levels of options which were relevant to the Core Strategy, were identified, as follows;
- **Strategic options** which cover the overall level and distribution of development on the Island. These are covered in strategic policies of the Core Strategy and include the overall development strategy for the Island, locational strategies for the main development types e.g. housing and area based strategies.
  - **Policy options** for particular topics (e.g. flood risk, affordable housing). Many policies in the Core Strategy are mainly concerned with individual topics and therefore policy options relate to different approaches to particular topics.
  - **Strategic sites/areas** for development in particular locations on the Island. Strategic sites set out in the strategic policies and therefore options should be concerned with potential alternatives to sites/location put forward.
- 5.3 Options for the Island Plan Core Strategy were identified gradually through the various stages of plan preparation. This was also informed by work carried out for the previous versions of the Core Strategy, prior to the formal plan stages of this Core Strategy.

### Summary of Options Appraisal

#### Overall levels of housing development

- 5.4 The Core Strategy sets out the overall housing provision levels for the Island together with a spatial distribution pattern. The overall levels of growth were originally based on the targets set out in the South East Plan. The targets were developed through the regional planning process and a number of alternatives were tested through SA (South East Sustainability Appraisal Report – Annex E Detailed Sustainability Appraisal of the Sub-Regional Policy Framework). The Council's view is that given the previous testing of options through the South East Plan SA and the Council's continued commitment to previously proposed levels that further options appraisal was not required at this level.

### Overall spatial development strategy

- 5.5 The overall principle of where development will be focused on the Island is reflected in the broad spatial development strategy. This represents the highest level of decision making at the local level regarding the strategy for the Island Plan. A key part of the Core Strategy SA is to appraise the overall spatial strategy options for development. During the previous withdrawn Core Strategies this was considered in detail. Six different spatial options were presented within the original Issues and Options (Isle of Wight Council, September 2008). The options were presented to stimulate discussion and gain opinion regarding peoples' preferred option/s. The options were appraised as part of the original SA on the first withdrawn Core Strategy in 2006 and again during the SA of the second withdrawn Core Strategy in 2008.
- 5.6 This was reviewed again for the SA of the Proposed Submission Core Strategy 2010. Each of the six options considered was required to support economic regeneration of the Island, however, the type and main locations of regeneration would differ between the options. A summary of the options was provided in the main SA Report (October 2010), with the appraisal detail available in Appendix C: Spatial Strategy Development Options Appraisal, of the SA.
- 5.7 For all the options assessed there were potential negative effects arising from additional growth and development. However, in terms of overall performance (when assessed against the SA Objectives) of the spatial options, Option 5 performed the best as it links regeneration across all the main settlements on the Island therefore offering the greatest community and economic benefits. By concentrating development it also helps limit emissions and score more positively in relation to the economic objectives. The SA review of the spatial options came to the view that Option 5 (Linked Regeneration Options) is the best performing option (see Appendix C 'Sustainability Appraisal of Spatial Development Option' of the Sustainability Appraisal, October 2010 for further details).

### Spatial strategy and strategic policy options

- 5.8 The choice of overall development strategy for the Core Strategy sets the framework for the spatial strategy policy. The strategic policies of the plan are a more detailed expression of the overall spatial strategy. In terms of policy options these are either based around potential alternative locations or approaches to delivering the overall spatial strategy. The main SA Report (October 2010) summarises the policy options considered (see Table 4.3 Summary of Policy Options, of the SA Report, October 2010) and the appraisal results of the policy options (section 4.5 Options Appraisal Summary, of the SA Report October 2010). This then informed the preferred options for the Core Strategy, which in turn were developed in policy wording for the Proposed Submission Core Strategy.
- 5.9 The examination in public of the Core Strategy provided the opportunity for the Inspector to assess whether the plan satisfies the relevant legal requirements and whether it is 'sound', including whether it is 'justified'. To be 'justified' the plan has to be founded on a robust and credible evidence base and be the most appropriate strategy when considered against reasonable alternatives. The Inspector found the Core Strategy, with a limited number of changes, to be sound. In relation to the legal requirements, the Inspector stated that Sustainability Appraisal had been carried out and is adequate. In his report the Inspector states, "None of these changes materially alter the substance of the plan and its policies, or undermine the sustainability appraisal and participatory processes undertaken." The Council has reached the same conclusion. Therefore none of the changes will make further assessment necessary.

## **6. The measures that are to be taken to monitor significant environmental effects of the implementation of the Core Strategy**

- 6.1 A description of the measures envisaged concerning monitoring in accordance with Article 10 is required by the (SEA) Directive.
- 6.2 The Core Strategy will need to be monitored to identify any sustainability effects of the implementation of the Core Strategy's policies. Appendix A of the SA Report (October 2010) outlines possible indicators and where appropriate, targets used to measure the sustainability effects. The policies will be monitored using information from a number of national, regional and local documents and sources including:
- Isle of Wight Local Transport Plan
  - Isle of Wight Annual Monitoring Report
  - Catchments Abstraction Management Plan
  - AONB Management Plan
  - Solent Forum
  - Environment Agency data on water
- 6.3 The monitoring of performance is not an end in itself. Instead its role is to identify areas of under and over-performance and where appropriate activate remedial action.
- 6.4 Chapter 9 of the Core Strategy sets out information on the implementation and monitoring of the Core Strategy policies. It includes a series of monitoring indicators and targets to assess the effectiveness of the policies and whether they are achieving the objectives of the Core Strategy. Many of the indicators and targets relate to the potential environmental effects of implementation of the Core Strategy. The main mechanism for monitoring the policies and their environmental effects is through the Annual Monitoring Report, produced by the Council each year. That report will also indicate where a policy is not working or targets are not being met, and will identify what remedial action may be needed.