

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

**Environmental Report**

**November 2025**



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# Non-Technical Summary

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## Introduction

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

## What is the IPS

The Isle of Wight 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 ‘Isle of Wight Development Plan’. The Isle of Wight Development Plan is a collection of plans and policies made up of the 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:

<b>IPS Section</b>	<b>Policies</b>
Section 1: Introduction	
Section 2: The island and the issues we face	
Section 3: How the IPS reflects corporate priorities	CC1, AFF1, INF1
Section 4: Environment	EV1 – 19
Section 5: Community	C1 – 15
Section 6: Growth	G1 – 5
Section 7: Housing	H1 – 11
Section 8: Economy	E1 – 12
Section 9: Transport	T1 – 6
Section 10: Delivery, Monitoring and Review	

## What is an ISA

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

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

This Environmental Report describes how the Vision, Objectives, Policies and sites have been identified and appraised and presents the findings of the ISA. It also documents how the outcomes of the ISA, HRA and SFRA have been taken into account in the preparation of the final version of the plan prior to submission for examination.

### **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 needed 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). The Interim ISA Report was prepared as part of 'Stage B and C'.

Public comments were invited over a 9 week consultation period which ran between Friday 30 July 2021 until 5pm Friday 1 October 2021. The documents consulted on are detailed in the IPS Regulation 18 Consultation Summary Statement but included the draft IPS and draft ISA Environmental Report. Every comment made was logged and reviewed in the formulation of the Regulation 19 submission version of the IPS.

Following the IPS consultation further evidence was commissioned to inform the next stage of the Plan and to explore some of the issues raised (Regulation 19 Pre Submission). The comments submitted during the consultation have been considered along with the further evidence and updates to the policy context and have helped to inform the pre submission Regulation 19 version

of the Plan and this Environmental Report, completing Stage C and in preparation of the consultation associated with Stage D.

### 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
<b>ENVIRONMENTAL</b>		
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 risk to people and property from coastal erosion and flooding.	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?
		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 no 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	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?

Topic	Objective	Assessment Criteria
	and noise pollution	
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. Support and encourage nature restoration proposals that align with measures identified in the Local Nature Recovery Strategy.	Does the Plan seek to protect and enhance international, national, or locally designated sites and species?
		Does the Plan support Biodiversity net gain?
		Does the Plan seek to enhance biodiversity, ecological networks and habitat connectivity?
		Does the Plan protect from tree, hedge and vegetation and Irreplaceable Habitat loss and degradation, 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?
<b>SOCIAL</b>		
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?
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	A range of health inequalities across the Island with those in the more deprived	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?

Topic	Objective	Assessment Criteria
reduce inequalities in health	areas facing a shorter life expectancy. To develop and maintain a balanced and sustainable 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 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?
<b>ECONOMIC</b>		

Topic	Objective	Assessment Criteria
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 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 in a negative impact on the objective
?	Unknown: The relationship is unknown, or there is not enough information to make an assessment

## Findings

The draft interim ISA Environmental Report stated in its findings that the suggested amendments (Tables 1-6, Appendix 1) be made to the draft policies to ensure outstanding aspects were appropriately incorporated into the plan to facilitate required change.

A series of workshops (March 2022) between the council and the ISA lead (Hampshire County Council) were carried out to consider all recommendations made by the ISA on the consultation draft IPS. Where determined appropriate, changes to the IPS were made as a result of the ISA (see Appendix 5 *ISA Island Planning Strategy Workshop March 2022 Outputs* that includes changes made and reasons why).

The Environmental Report has documented the work in relation to ISA that has occurred since the draft Environmental Report was consulted on. It 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.

The final report sets out how;

- the recommendations from the draft ISA Environmental Report have been taken into account in the IPS;
- amendments proposed as a result of the outputs from the Regulation 18 consultation responses have been screened for significance in terms of sustainability appraisal;
- new policy developed as a consequence of the Regulation 18 consultation response has been both screened and where necessary, assessed through the ISA;
- HRA outcomes have been considered in preparing the Regulation 19 version of the plan; and how,
- the SFRA has informed and been informed by the ISA.

## Next steps

A six week Regulation 19 period of representation took place between Monday 8th July 2024 and Monday 19th August 2024 and on 31st October 2024 the Draft IPS was formally submitted to the Secretary of State for Housing, Communities and Local Government. This marked the start of the public examination process.

Over a period of two weeks between Tuesday 25th February 2025 and Thursday 6th March 2025, the examination hearing sessions took place.

On 22nd April 2025, the Inspectors' Post Hearings Letter was sent to the Council (see ED21 in the IPS Examination Documents). This letter asked the council to decide whether it wished to continue with the examination process or alternatively withdraw the draft Island Planning Strategy from the examination process.

In their letter, the Planning Inspectors set out a number of areas of work that they consider it would be necessary for the council to carry out should it wish to continue. This included updating, strengthening and expanding the ISA. The work the council has carried out in updating the ISA is set out below.

**ISA Stage A: Setting the context, objectives, establishing baseline and scope (4 weeks)**

Review March 2021 scoping report in light of any relevant evidence and strategies and Reg 19 consultation responses.

Update June 2024 ISA to reflect any changes coming out of the scoping report review

**ISA Stage B: Developing and refining alternatives and assessing effects (8 weeks)**

All assessment work to be based upon the framework in the June 2024 ISA. Carry out an assessment of the following:

- options (reasonable alternatives) for policies reliant on the 2018 ISA ;
- further detail on alternative housing requirements considered to clearly set out what the consequences of the preferred housing requirement would be against the SA objectives and how any adverse impacts could be mitigated;
- options for proposed changes to policies C11, EV5 and G2, H1 and other related H policies where not covered above (the council is aware of other changes that will be proposed through main modifications that will be considered separately, later in the examination process);
- key policies that give rise to significant environmental effects; and,
- site selection, to include an assessment of all sites identified as viable through the updated SHLAA process with a conclusion why sites should be considered a sustainable option for housing and how consideration against the SA objectives has informed the proposed individual site requirements set out in Appendix 3 of the IPS.

The above assessment work to include (and set out) the assessing of reasonable options. The assessment of all reasonable alternative site options to include an explanation as to why potentially reasonable sites (sites that the SHLAA has objectively concluded were suitable, achievable and available) were not to be preferred in terms of sustainability.

The revised November 2025 ISA will be consulted upon, alongside proposed revision to the IPS and supporting documents for a period of 6 weeks, closing in January 2026. Following this, the council will seek instruction from the planning inspectorate with regards to resumption of the examination period and further consideration of all revised documents, including this ISA.

Once the IPS is adopted the council should refer to the monitoring suggestions set out in section 5 of this report to ensure all viable and relevant metrics have been considered. Although it should be noted that these monitoring suggestions are neither exclusive, nor exhaustive.

# 1 Introduction and Purpose

## 1.1 Background

**1.1.1** This Integrated Sustainability Appraisal (ISA) has been prepared by the Isle of Wight Council over the summer and autumn of 2025 during a pause of the examination into the local plan, known as the Island Planning Strategy. It is an update on previous sustainability appraisal work carried out during the development of the IPS and looks to consolidate and refresh previous assessment work carried out in 2018 and 2024 .

1.1.2 This ISA has been undertaken to meet the requirements set out in Appendix 2: *Scope of ISA work* of ED28 Council’s response to Inspectors’ letter concerning additional post Hearing work. This ISA includes changes made as a result of the review of the 2021 scoping report. The scope of the work undertaken in this ISA update is set out below.

**Figure 1.1: Scope of ISA update**

**ISA Stage B: Developing and refining alternatives and assessing effects**

All assessment work to be based upon the framework in the June 2024 ISA. Carry out an assessment of the following:

- Options (reasonable alternatives) for policies reliant on the 2018 ISA;
- Further detail on alternative housing requirements considered to clearly set out what the consequences of the preferred housing requirement would be against the SA objectives and how any adverse impacts could be mitigated;
- options for proposed changes to policies C11, EV5 and G2, H1 and other related H policies where not covered above (the council is aware of other changes that will be proposed through main modifications that will be considered separately, later in the examination process);
- key policies that give rise to significant environmental effects; and,
- site selection, to include an assessment of all sites identified as viable through the updated SHLAA process with a conclusion why sites should be considered a sustainable option for housing and how consideration against the SA objectives has informed the proposed individual site requirements set out in Appendix 3 of the IPS.

The above assessment work to include (and set out) the assessing of reasonable options. The assessment of all reasonable alternative site options to include an explanation as to why potentially reasonable sites (sites that the SHLAA has objectively concluded were suitable, achievable and available) were not to be preferred in terms of sustainability.

- 1.1.3 This Environmental Report sets out how the scope of the ISA update has been carried out, what the outputs are, including why a preferred option has been selected and where alternatives have been rejected, and how these have informed the development of the IPS. Where appropriate, this will include clear signposting to relevant parts of previous ISA.
- 1.1.4 The ISA meets all the requirements of the Strategic Environmental Assessment Directive. These are signposted throughout the document.

## 1.2 SEA Explained

- 1.2.1 When preparing an ISA, it is a statutory requirement to conduct an environmental assessment<sup>1</sup> in accordance with the Strategic Environmental Assessment Directive (Directive 2001/42/EC)<sup>2</sup> 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).
- 1.2.2 The SEA and SA assessments have been combined into a 'Integrated Sustainability Appraisal Report incorporating Strategic Environmental Assessment' (ISA).
- 1.2.3 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.
- 1.2.4 The approach for undertaking this update has been based on the Planning Advisory Service 'Guide to better Sustainability Appraisal' and National Planning Practice Guidance

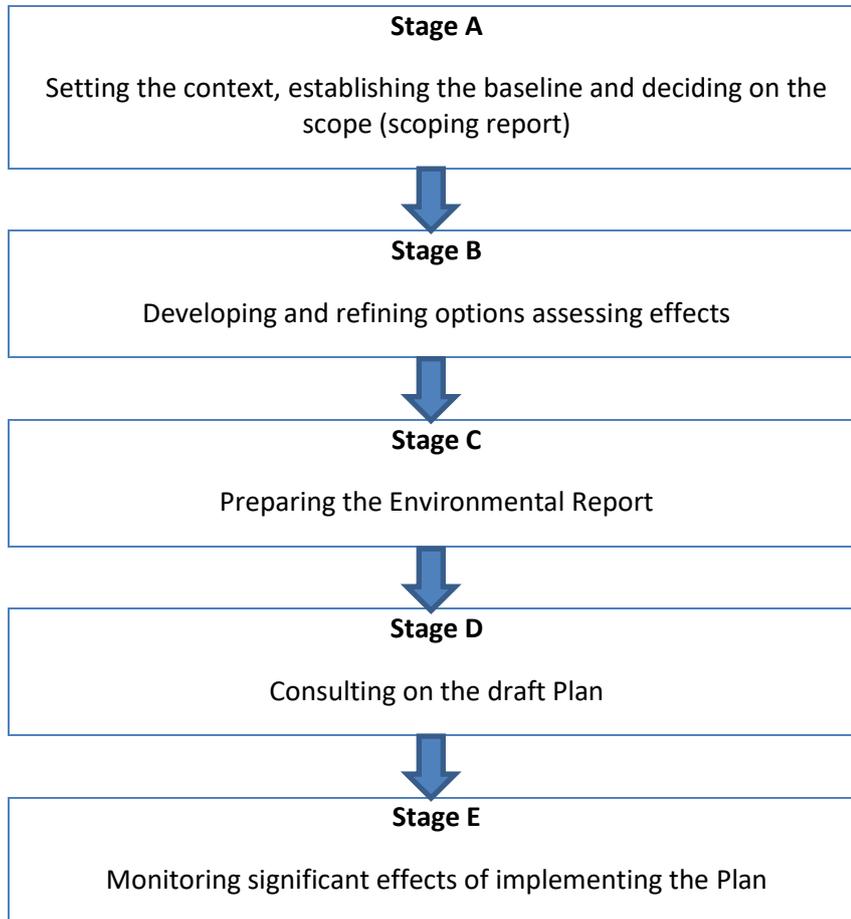
1 Commonly referred to as Strategic Environmental Assessment

2 Known as the SEA Directive

on Strategic Environmental Assessment and Sustainability Appraisal<sup>3</sup>.

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

**Figure 1.2: SEA Stages**



1.2.6 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.

<sup>3</sup> Planning Practice Guidance: [www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal](http://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal)

**Table 1.1: SEA and the ISA Process**

SEA Stages and Tasks <sup>4</sup>	Deliverable
<i>IPS Pre-production</i>	
<p><u>Stage A: Setting the context, establishing the baseline and deciding on the scope</u></p> <p>A1: identifying other relevant policies, plans and programmes, and sustainability objectives</p> <p>A2: collecting baseline information</p> <p>A3: identifying sustainability issues and problems</p> <p>A4: developing the SA/SEA Framework</p> <p>A5: consulting on the scope of the SA/SEA</p>	<p>IPS ISA Scoping Report 2021 – Review August 2025</p>
<i>IPS Production</i>	
<p><u>Stage B: Developing and refining options assessing effects</u></p> <p>B1: testing the Plan’s objectives of the SA/SEA framework</p> <p>B2: developing and refining the option</p> <p>B3: predicting the effects</p> <p>B4: evaluating the effects</p> <p>B5: considering ways of mitigating adverse effects and maximising beneficial effects</p> <p>B6: proposing measures to monitor the significant effects of implementing the IPS</p>	<p>ISA update November 2025</p>
<p><u>Stage C: Preparing the Environmental Report</u></p> <p>C1: preparing the Interim ISA Report</p> <p>C2: preparing the Final ISA Environmental Report</p>	<p>ISA update November 2025</p>
<p><u>Stage D: Consulting on the Draft Plan</u></p> <p>D1: consultation on the Draft Plan and accompany Interim SA/SEA Report</p> <p>D2: consultation on Proposed Submission Plan and accompanying Environmental Report</p>	

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

SEA Stages and Tasks <sup>4</sup>	Deliverable
<i>IPS Examination</i>	
D3: appraising significant changes resulting from representations	Final ISA Environmental Report & ISA update November 2025
<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

### 1.3 Meeting the requirements of the SEA Directive

1.3.1 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 & 2025 Review
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 & 2025 Review
c) the environmental characteristics of areas likely to be significantly affected.	Section 3 and the Scoping Report 2021& 2025 Review
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& 2025 Review
(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	Scoping Report 2021& 2025 Review

and any environmental considerations have been taken into account during its preparation.	
(f) 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.	Section 4 Table 4.3-4.25 and Table 1-6, Appendix 1.
(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 4.3-4.25 and Table 1-6, Appendix 1.
(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

## 1.4 Sustainability Appraisal (SA)

- 1.4.1 The Planning and Compulsory Purchase Act 2004<sup>5</sup> requires Sustainability Assessment (SA) be undertaken for Development Plan Documents (DPD), and Supplementary Planning Documents.
- 1.4.2 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.

<sup>5</sup> The Planning and Compulsory Purchase Act 2004

## 1.5 Habitats Regulations Assessment (HRA)

1.5.1 Under Article 6 (3) of the EU Habitats Directive as transposed into the UK law by the Habitats Regulations<sup>6</sup>, 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 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.

1.5.2 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.

1.5.3 The HRA enables the likely significant effects on European sites to be established as a result of the IPS. The HRA (May 2024) assesses the impacts of the Regulation 19 IPS. The outcomes of the HRA have been included in this updated ISA assessment (refer Section

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

8). The assessment of the sites herein includes consideration of the site's potential impacts on designated sites (refer Appendix 3).

- 1.5.4 An update to the HRA is currently being undertaken (Autumn 2025) to assess the potential impacts from all the proposed changes to the IPS. While this has not been completed in time to be reported on within this version of the ISA, it is understood that the proposed changes do not introduce or generate any Likely Significant Effects. Once the HRA update is completed the findings will be incorporated within this report.

## 1.6 Strategic Flood Risk Assessment (SFRA)

- 1.6.1 The National Planning Policy Framework (NPPF) requires local planning authorities (LPAs) to assess the risk of flooding in their areas through undertaking a Strategic Flood Risk Assessment (SFRA)

- 1.6.2 The SFRA has informed the development of policies related to flood risk management and the allocation of land for future development. This has been achieved through a thorough analysis of flood risk on the Island, enabling an informed response to development proposals and planning, and helping to identify strategic solutions to flood risk.

- 1.6.3 Changes and additions to legislation, planning policy and strategy since the SFRA of 2010 are accounted for within the SFRA, such as the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG). The SFRA takes account of newly available data including updates to the Environment Agency's (EA's) Risk of Flooding from Surface Water (RoFSW) and updates to the Environment Agency flood zone mapping. The SFRA provides an updated review of the flood risk on the Island.

- 1.6.4 The SFRA of the IPS has included the following:

- The assimilation of up-to-date flood risk information and the latest national flood risk policy guidance and sustainable drainage recommendations;
- A SFRA Level 1 Assessment of potential development sites, screened against the latest fluvial, tidal and surface water flood zones; and,
- An accompanying Level 2 SFRA which focuses on the 5 sites identified using the information in this SFRA as being potentially suitable for residential development.

The outcomes of the SFRA have been included in this updated ISA assessment (refer to Section 8).

- 1.6.5 A decision was made at the [Extraordinary Meeting of Full Council on Wednesday 1 May 2024](#) to agree to publish the Regulation 19 submission version of the IPS for a period of public representation. A six week Regulation 19 period of representation took place between Monday 8th July 2024 and Monday 19th August 2024 and on 31st October 2024 the Draft IPS was formally submitted to the Secretary of State for Housing, Communities and Local Government. This marked the start of the public examination process.

- 1.6.6 Over a period of two weeks between Tuesday 25th February 2025 and Thursday 6th

March 2025, the examination hearing sessions took place.

1.6.7 On 22nd April 2025, the Inspectors' Post Hearings Letter was sent to the Council. This letter asked the council to decide whether it wished to continue with the examination process or alternatively withdraw the draft Island Planning Strategy from the examination process.

1.6.8 In their letter, the Planning Inspectors set out a number of areas of work that they consider it would be necessary for the council to carry out should it wish to continue. This included updating, strengthening and expanding ISA. The work the council has carried out in updating the ISA is set out below.

**ISA Stage A: Setting the context, objectives, establishing baseline and scope (4 weeks)**

1.6.9 Review March 2021 scoping report in light of any relevant evidence and strategies and Reg 19 consultation responses.

1.6.10 Update June 2024 ISA to reflect any changes coming out of the scoping report review

**ISA Stage B: Developing and refining alternatives and assessing effects (8 weeks)**

1.6.11 All assessment work to be based upon the framework in the June 2024 ISA. Carry out an assessment of the following:

- options (reasonable alternatives) for policies reliant on the 2018 ISA ;
- further detail on alternative housing requirements considered to clearly set out what the consequences of the preferred housing requirement would be against the SA objectives and how any adverse impacts could be mitigated;
- options for proposed changes to policies C11, EV5 and G2, H1 and other related H policies where not covered above (the council is aware of other changes that will be proposed through main modifications that will be considered separately, later in the examination process);
- key policies that give rise to significant environmental effects; and,
- site selection, to include an assessment of all sites identified as viable through the updated SHLAA process with a conclusion why sites should be considered a sustainable option for housing and how consideration against the SA objectives has informed the proposed individual site requirements set out in Appendix 3 of the IPS.

1.6.12 The above assessment work to include (and set out) the assessing of reasonable options. The assessment of all reasonable alternative site options to include an explanation as to why potentially reasonable sites (sites that the SHLAA has objectively concluded were suitable, achievable and available) were not to be preferred in terms of sustainability.

## 2 Island Planning Strategy Background and Overview

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### 2.1 Background

- 2.1.1 The Isle of Wight 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 council has developed the Island Planning Strategy (IPS) to replace the Core Strategy (the IPS includes strategy and development policies)<sup>7</sup>.
- 2.1.3 A significant amount of assessment work has already been carried out to support the preparation of development plans for the Island (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 Regulation 18 Consultation: 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.
  - Draft IPS Regulation 18 Consultation: Public consultation closed 1<sup>st</sup> October 2021 Revised Interim ISA Report presenting the results from developing and refining the options, using a number of ISA Objectives which were used to test the objectives, policies and options of the IPS against.

<sup>7</sup> strategic policies are provided in Appendix 4 of the IPS

- IPS Regulation 19 submission version: June/July 2024 revised in light of Regulation 18 comments and ISA. All amendments have been screened to determine if they are likely to give rise to significant effects (see Appendix 6).
- Revised November 2025 ISA (**this report**) will be consulted upon, alongside proposed revision to the IPS and supporting documents for a period of 6 weeks, closing in January 2026. Following this, the council will seek instruction from the planning inspectorate with regards to resumption of the examination period and further consideration of all revised documents, including this ISA.

2.1.4 The IPS will form part of the ‘IOW Development Plan’. The Isle of Wight 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.

**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 Isle of Wight Local Plan. The

requirement to produce such a plan is set out in national policy<sup>8</sup> 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 development of the IPS provides the key mechanism for expressing how the Isle of Wight will realise its vision and strategic priorities. Following examination hearing sessions in early 2025 and subsequent receipt of the Inspectors Post Hearings letter, the IPS is focusing on the first 5 years of the plan period from 2025/26 to 2029/30. Years 6 onwards, as identified by the Inspectors, will either be picked up in future Site Allocations DPDs with respect to housing supply, or more likely an entire new local plan under the new-plan making system as the IWC are covered by the transitional arrangements set out in paragraph 236 of the NPPF (Dec 2024).

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

- Environment (policies EV1 – EV19);
- Community (C1-C15);
- Growth (G1 – G5);
- Housing (H1 – H11);
- Economy (E1 – E12);
- Transport (T1 – T6); and
- The Allocated Sites (H2 and Appendices 1 & 2).

2.2.4 The previous three Draft Area Action Plans<sup>9</sup> have been used to inform the IPS but do not form part of the Local Plan<sup>10</sup>.

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

<sup>8</sup> National Planning Policy Framework, Paragraphs 15 to 37, Plan Making

<sup>9</sup> Medina Valley Plan Draft, Ryde Plan Draft, The Bay Plan Draft (all 2015)

<sup>10</sup> The Area Action Plans have not been adopted but were subject to SA.

## 2.3 Plan Area

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

2.3.2 Understanding the needs of different parts of the island 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 (five identified in our Regeneration Strategy and a sixth identified in the IPS at paragraph 3.47):

- 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 are referenced in paragraph 3.47 of the IPS and are set out in Figure 2.2. They reflect different locational areas of the island and paragraph 3.48 of the IPS uses them to help demonstrate the scale of planned growth within each.

Figure 2.1: Administrative Boundaries of IOW (Plan Area11)

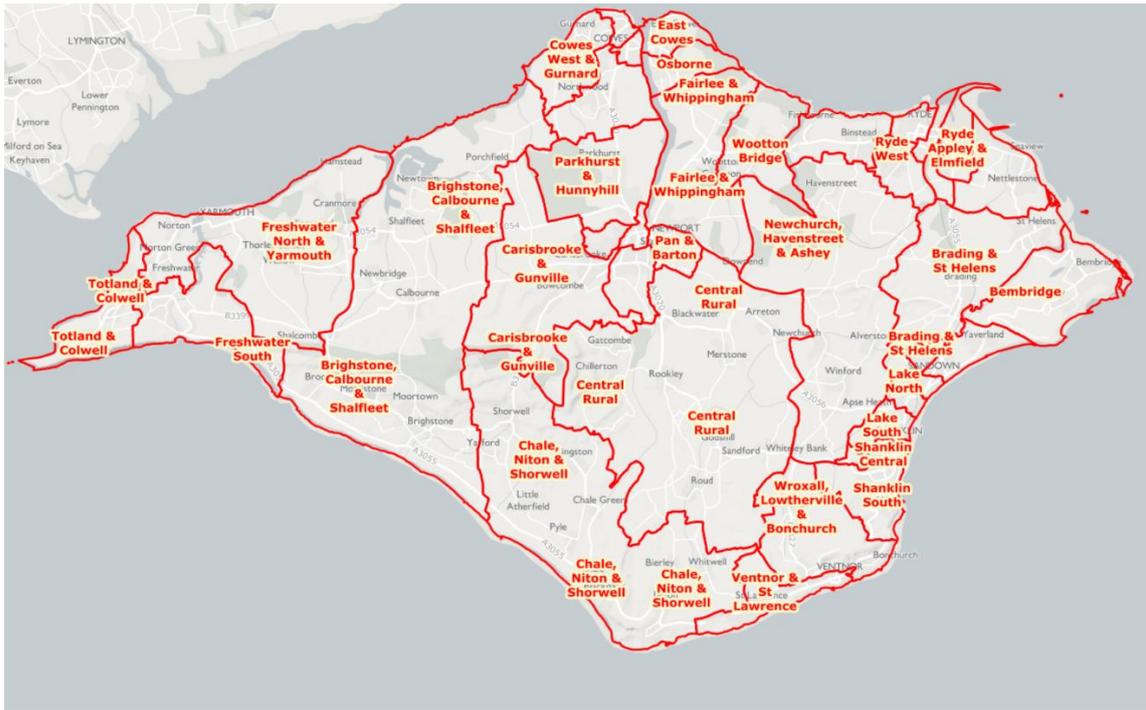
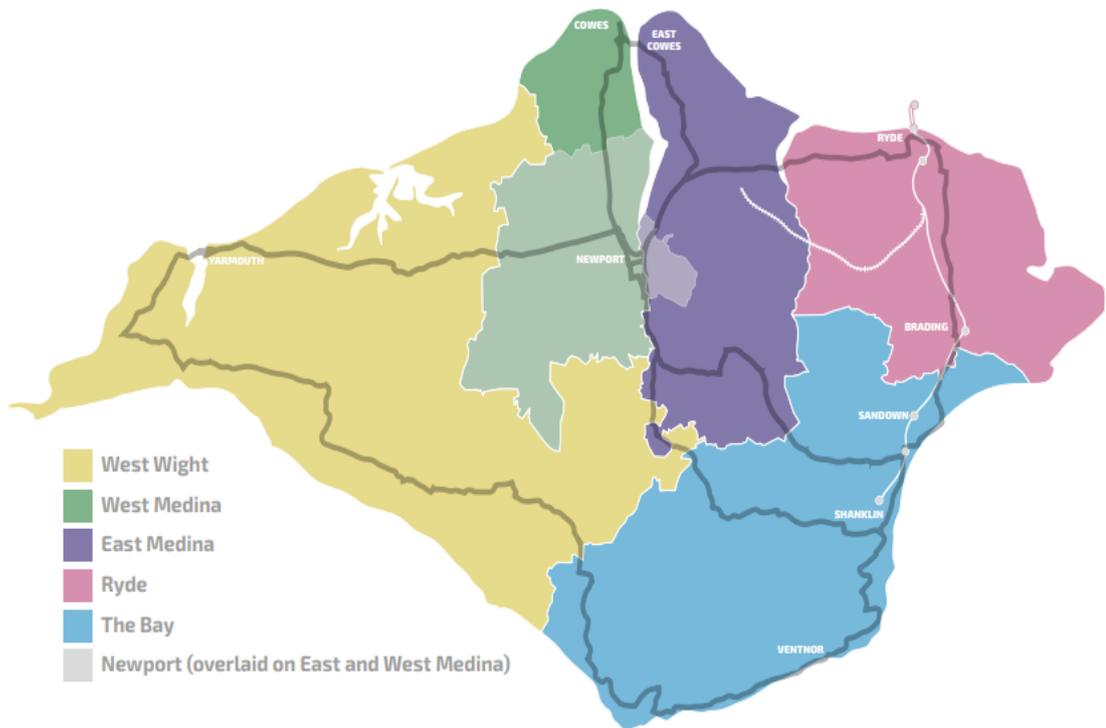


Figure 2.2: Regeneration Areas



11 As of May 2021

## 2.4 IPS Vision and Objectives

2.4.1 The Isle of Wight Council published a Corporate Plan [Viewing Document: Corporate Plan 2021-2025 \(iow.gov.uk\)](https://www.iow.gov.uk) in late 2021 that sets out strategic priorities and direction for the Isle of Wight Council as a whole. These strategic priorities are set against the clear aim of working together openly and with communities to support and sustain the island economy, environment and people.

2.4.2 The Corporate Plan outlines that as a result of the actions of the Council:

‘We want the Isle of Wight to be a place where everyone:

1. can develop their skills and fulfil their potential;
2. is part of the community and enjoys good health;
3. enjoys the benefits of a green and thriving economy;
4. understands the work of the council and the challenges it faces.’

2.4.3 To ensure consistency throughout the council's key plans and strategies, this corporate vision will underpin all Council documents, including the Island Planning Strategy. The Corporate Plan also sets out three key areas of action, together with fifty-one specific aspirations spread across all eight portfolio areas. The three key areas of action are:

- Provision of affordable housing for Island residents;
- Responding to climate change and enhancing the biosphere;
- Economic recovery

2.4.4 Some of the relevant aspirations are reproduced below and in combination with the key areas of action these will help inform a set of strategic policy priorities for the Island Planning Strategy.

- Embed both the biosphere and the climate change strategy into policy, including the Island plan;
- Support and enhance our biosphere and AONB areas. Support the active management and development of biosphere status and secure dark sky status;
- Commit to develop sustainable transport options with a focus on infrastructure to encourage active travel;
- Promote the building of affordable supported social retirement housing to ensure residents maintain their independence for as long as possible;
- Housing that is created must be housing fit for purpose. We will prioritise truly affordable housing for Island residents, meaning housing that is not just affordable to rent or buy but affordable to live in and maintain;
- Wherever possible bring appropriate empty and derelict buildings back into use for affordable housing;

- Use the recent brownfield site data to identify housing opportunities;
- Only develop greenfield sites when absolutely necessary (in respect of greenfield sites not already allocated in the IPS);
- Complete key regeneration projects to drive employment, skills and inward investment;
- Use available powers to deal with long term empty or derelict buildings that mar our seafront and town centre areas;
- Focus on regenerating our High Street and visitor economy to assist post COVID-19 recovery and growth;
- Promote people-oriented place planning for town centres

2.4.5 As a result, three overarching strategic policies have been included in the Island Planning Strategy that reflect the corporate aspirations and also many of the comments received during the two public consultation exercises carried out on draft versions of the IPS in 2018 and 2021. These policies cover **Climate Change (CC1)**, **Affordable Housing (AFF1)** and **Infrastructure (INF1)** and all development coming forward during the plan period will be expected to align with these overarching strategic policies.

2.4.6 These overarching strategic policies have been screened as part of the (ISA) assessment process to determine if any of the amendments made to the plan following the last Regulation 18 consultation require further appraisal (see section 8).

## 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 included 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.

2.5.3 As part of the pause in examination hearings update work a reassessment of the spatial strategy options has been carried out, using the updated 2025 ISA assessment framework. Full details are set out in section 4 of this report.

## 3 Stage A Scoping Appraisal Findings

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### 3.1 Introduction

3.1.1 Tasks A1-A4 of the SEA process involved 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 can be found in the Scoping Report<sup>12</sup>.

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 or 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 and this baseline scoping has been updated as part of the review of the ISA in 2025. Full details regarding their relevance and implications to the ISA are provided in Appendix A, Tables A1-A4 of the Scoping Report, with the IPS ISA Scoping Report 2021 – Review 2025 identifying those areas updated.

3.1.5 Several key messages have been identified 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 the natural environment and biodiversity and nature recovery, water and coasts. The Island presents a unique environmental setting that requires protection and enhancement to ensure the

<sup>12</sup> IOW ISA Scoping Report, February 2021.

continued sustainable growth of the Island. Ensuring the integrity of internationally designated sites that surround the Island are a priority.

- Climate Change – a key issue for all UK plans, with relevance to the IOW due to the threat of flooding, coastal squeeze, sea level rise, erosion and landslide reactivation. 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, coastal change, 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 travel<sup>13</sup>, 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 Island 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.

<sup>13</sup> Active travel simply means making journeys by physically active means - like walking, cycling, or scooting

- 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).
- 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 both the positive and negative impacts on heritage assets 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 Report<sup>14</sup>. 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;

<sup>14</sup> IOW ISA Scoping Report, February 2021.

- Climatic factors;
- Material assets;
- Cultural, architectural and archaeological heritage;
- Landscape; and the
- Inter-relationship between the above factors.

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, reviewed in 2025 and is provided in the Scoping Report and Scoping Report Review 2025.

### 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 Island is provided in Table 3.1. Further details are provided in the Scoping Report. The outcomes of establishing these key 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.

3.3.3 In addition to reviewing the baseline, the 2025 review of the (2021) Scoping Report also reviewed the key messages (as set out in section 4.3 Key Messages from Review of Legislation, Plans and Policies of the 2021 Scoping Report). The updates identified were the inclusion of '*sea level rise*', '*erosion and landslide reactivation*' and '*coastal change*' under Climate Change, and the addition of '*nature recovery*' to biodiversity (as in '*biodiversity and nature recovery*') under Environmental Protection. The summary of key sustainability issues below have themselves been reviewed to ensure they cover these updates to the baseline.

**Table 3.1: Summary Key Sustainability Issues**

<p><b>Air Quality</b></p> <p>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.</p> <p>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<sub>x</sub>) 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/m<sup>3</sup> mean annual concentration or 200 µg/m<sup>3</sup> 1-hour mean concentration.</p> <p>Monitoring of particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) is not undertaken on the IOW as no areas have been identified as exceeding national air quality objectives.</p> <p>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<sub>x</sub>, SO<sub>2</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> including black carbon and carbon dioxide.</p> <p>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.</p>
<p><b>Noise</b></p> <p>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.</p> <p>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.</p>
<p><b>Biodiversity</b></p>

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, as is supporting nature restoration proposals that align with measures identified in the Local Nature Recovery Strategy.

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 aquifer<sup>15</sup>. Groundwater Source Protection Zones<sup>16</sup> 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. 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 a likely increase in the frequency and severity of flooding and droughts. Climate change may also

15 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.

16 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).

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 productivity 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 Island, 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 island has approximately 820 km of road network, including roads, cycle 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. The cut-off date for when relevant baseline information could be included in the baseline assessment for the 2021 Scoping Report was January 2021. However, **the Scoping Report has been reviewed and updated all baseline information, correct as at July 2025.**
- 3.4.2 It is also worth noting the ongoing and emerging changes to both the local plan making process and the supporting environmental assessment framework currently being progressed through the Planning & Infrastructure Bill. This ISA is supporting the IPS, which is focusing on the first five years of the plan period from 2025/26 to 2029/30. Subsequent plan-making (which the IWC is required to start on immediately after adopting the IPS) may be subject to different environmental assessment regulation or procedure.

### 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
<b>ENVIRONMENTAL</b>		
1. Air Quality	To maintain and improve air quality	Does the IPS 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 particular in areas with sensitive receptors (i.e. schools, care homes and hospitals)?
2. Coasts	To protect the Island’s coastline and minimise the risk to people and property from coastal erosion and flooding.	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? 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 no 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 provide support the use of infrastructure unlikely to impact nitrate sensitive areas?
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. Support and encourage nature restoration proposals that align with measures identified in the Local Nature Recovery Strategy.	Does the Plan seek to protect and enhance international, national, or locally designated sites and species? Does the Plan support Biodiversity net gain? Does the Plan seek to enhance biodiversity, ecological networks and habitat connectivity? Does the Plan protect from tree, hedge and vegetation and Irreplaceable Habitat loss and degradation, 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?
<b>SOCIAL</b>		
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 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?

<b>Topic</b>	<b>Objective</b>	<b>Assessment Criteria</b>
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?
<b>ECONOMIC</b>		
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 were 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 was 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 included 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 were 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 Colour 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 was used for the assessment of policies which includes commentary as to the reasoning for the effect; this consists of information on the significance, uncertainty, duration, magnitude and reversibility of the effect. The proforma also provides 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 (Tables 1-6 Appendix 1). Re-assessed policies where there are potential changes and potential allocations to address the shortfall identified in the housing shortfall methodology.

**Table 3.4: Proforma for Assessment of Objectives and Policies**

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

\*refer Table 3.2 for full objectives

- 3.5.8 Cumulative impacts were assessed to ensure the full impact of the IPS is understood.

Table 3.5 was 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 were assessed using the colour coding presented in Table 3.3, but the proforma presented as Table 3.6 was 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
<b>1. Air Quality:</b>	+ 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.		
<b>2. Coasts:</b>	- Site is in Coastal Change Management Area/ or Land at Potential Risk from Future Ground Instability?		
	? All other sites		
<b>3. Water Quality and Resources</b>	+ 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		
<b>4. Landscape (including Noise):</b>	+ N/A		
	0 N/A		
	- The site is in or in vicinity of tranquil area, AONB or other landscape		

	<p>designated, or noise important area, dark skies</p> <p>? All other sites</p>		
<b>5. Cultural Heritage:</b>	<p>- A cultural heritage site asset is on site or immediate vicinity/adjacent to site boundary.</p> <p>0 A cultural heritage site is within 250m of the site boundary.</p> <p>? All other sites</p>		
<b>6. Biodiversity:</b>	<p>+ The site use is specifically for the purpose biodiversity improvement</p> <p>0 National or International designation between 250-1000m. The Site is within a SINC.</p> <p>- 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.</p> <p>? All other sites</p>		
<b>7. Land use, soils and agriculture:</b>	<p>+ Site in Urban or developed area/ brownfield</p> <p>0 The site is in a rural area</p> <p>- The site is on grade 1,2 or 3 agri. The site is in a RIGGS, the site is in mineral safeguarding area</p> <p>? All other sites</p>		
<b>8. Climate Change Emissions:</b>	Cannot be assessed spatially	N/A	
<b>9. Climate Change Resilience:</b>	Cannot be assessed spatially	N/A	
<b>10. Culture:</b>	Cannot be assessed spatially	N/A	
<b>11. Crime and safety:</b>	Cannot be assessed spatially	N/A	
<b>12. Health and Population:</b>	<p>+ Site is specifically for affordable housing or elderly care facilities or health care facilities</p> <p>? All other sites</p>		
<b>13. Social Inclusion and Equality:</b>	+ 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		
<b>14. Education and training:</b>	+	Site is for educational purposes		
	-	Site is on an existing education site / and change of use to non educational		
	?	All other sites		
<b>15. Accessibility:</b>		Cannot be assessed spatially		
<b>16. Material Assets:</b>	+	Site is located within Primary or Secondary settlement boundary. Assumed access to key services and facilities.		
	-	All other developments		
<b>17. Employment and Economy:</b>	+	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 Consultees<sup>17</sup> 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 19<sup>th</sup> January 2021 to 1<sup>st</sup> March 2021.
- 3.6.2 Following the scoping consultation period, responses received were considered and a Revised Scoping Report was completed. A summary of the relevant consultee responses along with how these have been considered are provided in Table 3.7.
- 3.6.3 The ISA Stage A Scoping Report 2021 – Review 2025 will be consulted upon, alongside the

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

Revised November 2025 ISA and proposed revision to the IPS for a period of 6 weeks, closing in January 2026. ISA.

**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 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>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 remediation of contaminated land.</p>

Statutory Consultee	Comment	How and where addressed in the ISA
	<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>	
<p>Marine Management Organisation (MMO)</p>	<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>	<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.</p>
<p>Natural England</p>	<p>No consultation response received.</p>	<p>Biodiversity is addressed throughout the document. A summary of 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.</p>

## 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: plan options, the spatial strategy, the policies and sites of the draft IPS. When first assessed in 2018 it included the then standard method housing number, similarly the standard method for the generation of a housing number and growth option has been considered in the 2025 revision of this ISA following receipt of the Post Hearings Letter from PINS in April 2025. The IPS is now focusing on planning for deliverable growth in the first five years of the plan period (2025/26 to 2029/30) using the standard method housing number (703dpa) at the time of submission (October 2024). Future plan making, as required by the transitional arrangements of paragraph 136 of the NPPF, will also use the standard method housing number as a starting point when that work commences post-adoption of the IPS.

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 Options Assessment Methodology

4.2.1 The identification and assessment of options as part of the ISA 2025 has been based upon guidance ([NPPG Strategic environmental assessment and sustainability appraisal](#)) and best practice ([Planning Advisory Service Guide to better Sustainability Appraisal](#)). Table 4.1 below sets out the framework used to both identify and then screen options. Each of the sections 1 to 5 has been drawn directly from national guidance (see para. 018 *How can the sustainability appraisal assess alternatives and identify likely significant effects?* of the NPPG above). The approach, assessment and reasoning for each section is detailed below.

Table 4.1: Options identification and assessment framework

1. Option	2. Reasons for identification	3. Likely significant effects	4. Mitigation	5. Conclusions

A					
B					
C					
etc.					

4.2.2 **1. Option** - Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The council used a set of initial option screening criteria to determine which options were viable to be taken forward to assessment (columns 3 to 5). Any option discarded at this stage is detailed in a summary table, with the 2<sup>nd</sup> column being ‘Reasons for exclusion’.

4.2.3 The original screening criteria used for option identification in the 2018 SA was checked for relevance against guidance. It was found that the 3 screening criteria of *NPPF conformity*, *Deliverable*, and *IPS Objectives* are closely aligned with both the (NPP) Guidance and PAS best practice (where it states, “*Consider alternatives which would secure the objectives of the plan proposed within the geographical area of the plan and don’t include options that cannot be delivered...*” reflective of both the Deliverable and IPS Objectives screening criteria). In doing so the 2018 screening criteria remains relevant and has been used in this assessment to help filter options. However, to reflect the update to the council’s corporate plan (2021) the 12 IPS Objectives of the (previous) corporate plan used to screen options have been replaced with 3 key areas for action. The amended options screening criteria are set out below.

**Initial option screening criteria – updated 2025**

**1. NPPF conformity**  
 Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

- a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- b) Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
  - i. The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>12</sup>; or
  - ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

**2. Deliverable**  
 How deliverable is the option?  
 Is there time within the plan period to implement the option?  
 Is it likely that the option will not be fully implemented for one reason or another? Ask ‘what might go wrong with this option?’  
 Is the option flexible enough to accommodate changing circumstances such as revisions to housing needs and site viability?

Does the option give rise to any cross-boundary issues that will need to be considered early on?

**3. IPS Objectives**

Does the option(s) support and/or help to deliver these objectives?

1. Provision of affordable housing for Island residents;
2. Responding to climate change and enhancing the biosphere;
3. Economic recovery.

- 4.2.4 **2. Reasons for identification** - Outline the reasons the alternatives were selected.
- 4.2.5 **3. Likely significant effects** - Identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in [schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004](#)
- 4.2.6 For each option impacts have been identified under the established appraisal categories of Environment, Social and Economic. A fourth category of Sustainable Development has been used to assess the overall sustainability of the option with regards to location and likely effects in terms of movement, access and transport.
- 4.2.7 The principle of improving the delivery of new homes in the most sustainable locations by reducing the reliance on private transport and maximising opportunities to prevent or minimise potential negative impacts with respect to traffic generation and air quality has been identified through the work on sustainability carried out in the in the development of the IPS, the ISA and HO17 IPS Housing Evidence Paper B. This has been updated and is set out in the 2025 allocations site options paper E.
- 4.2.8 **4. Mitigation** - Identify measures envisaged to prevent, reduce and, as fully as possible, offset any likely significant adverse effects.
- 4.2.9 **5. Conclusions** - Provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.

**4.3 Assumptions**

- 4.3.1 A number of assumptions have been made through the assessment of options process, being;
- The plan will address a housing shortfall, 300 additional units across the first 5 years of the plan period, 2025/26 – 2029/30. Total units provision per annum is equivalent to 703, although the distribution of the provision is likely to vary over the plan period (generally recognised that plan delivery increases to a peak over plan lifetime).

- The plan will allocate sufficient sites to deliver housing requirement (standard method) without expecting neighbouring authorities to aid this provision.
- Given the interim provision and short-term nature of the plan, there will be sufficient infrastructure provision over the lifetime of the plan (as evidenced in the IPS Infrastructure Delivery Plan Documents GS6 – GS9), through a combination of main utility investment and (plan) contributions.
- Potential for any settlement to grow will be limited by the nature of it’s location on the Island where it is located in proximity to either or both coast and estuary.
- Impacts on environmental designations includes supporting habitat (e.g. Brent Goose overwintering habitat etc).
- Impacts, both positive and negative, from traffic will have related impacts such as noise, air quality and health.

#### 4.4 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).

- 4.4.1 This section considers reasonable alternatives with respect to the Plan in its entirety, and different spatial strategies.
- 4.4.2 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, including requirements of a 5 year plan delivering a revised housing number of 703.

**Table 4.2: 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
Submitted IPS (October 2024)	Submitted plan with no changes following examination hearings.	Not reasonable, inspectors stated as submitted would be unsound.
Submitted IPS with changes to address the soundness concerns raised by the Inspectors	The council decided on 28 May 2025 to continue with the examination of the IPS and instructed officers to work on a series of proposed changes to address the soundness concerns raised by the Inspectors covering the housing number (increase to 703dpa and concentrate on first five years of the plan period), update the ISA work, update the local plan viability report and consider whether to retain the net zero policy (C11).	Reasonable and the preferred option, subject to Full Council approval
New plan	Withdraw the IPS from examination and develop a new plan under the new national planning framework, once this has been published.	Reasonable, but further away from plan-led development because there would likely be a 30 month plan preparation period prior to further period of examination and Full Council decided on 28 May 2025 to continue with the examination of the IPS

4.4.3 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. As part of the post examination hearings update work a reassessment of the spatial strategy options has been carried out, using the updated 2025 ISA assessment framework. The first step was identifying viable options for the spatial strategy.

4.4.4 Initially all potential spatial options were identified, regardless of how realistic they were. This was done to ensure all potential opportunities for the development of spatial options were considered. This was also done knowing that the ‘*Option*’ criteria (detailed in para.s 4.2.2 – 4.2.3 above) would filter out those options not likely to be realistic (deliverable). The work has also been carried out with a view to addressing the housing shortfall in the plan identified following the examination hearings. The council prepared a housing shortfall methodology that sets out how the level of shortfall has been calculated. The policy and site options have then been taken through this ISA assessment process, before a separate policy and site allocation judgement is taken that takes into consideration the outputs of the ISA work. A core principle underpinning all of the update work is the necessity for any plan revisions (additional sites / policy changes) to deliver housing within the next 5 years, as this is the plan period that the IPS is now focusing on. The key stages and iterations between them are set out below:

Stage 1: Housing shortfall methodology – IWC calculates the level of housing shortfall that the IPS needs to address and details how policy options and site allocation options will be identified.

Stage 2: ISA update – a range of policy and site allocation options that could address this identified shortfall are assessed through the updated ISA work (This document is effectively ‘Stage 2’).

Stage 3: IPS policy and site allocation decisions – outside of, and separate to this ISA work, planning decisions on which policy revisions and which additional site allocations will be chosen to meet the shortfall identified in Stage 1. These planning decisions to take account of the ISA outputs generated through Stage 2 (Stage 3 is set out in the update to HO17 Housing Evidence Paper B).

Stage 4: IPS policy and site allocation consultation – the policy revisions and additional site allocations chosen will then be subject to a period of public consultation, before being returned to the Planning Inspectors for consideration.

Stage 5: The Planning Inspectors will decide whether the proposed changes are sufficient to address soundness concerns, and if so, the proposed changes would form part of the Main Modifications examination stage.

### **G2: Priority locations for housing development and growth**

4.4.5 As set out in paragraphs 20 and 21 of the council’s ‘**Housing Shortfall Methodology**’, one way of delivering additional housing is to review the underlying spatial strategy options for the island and consider whether any alternative approaches could help to meet some or all of the shortfall. This point was also referenced during the examination hearings, particularly related to the more rural areas of the island and whether there was sufficient policy flexibility for smaller scale developments to come forward to support the smaller settlements on the island (and help the SME sector that is key to the island housebuilding economy). The matter was also specifically raised in paragraph 32 of ED21 Post Hearings Letter where the Inspectors highlighted that a more flexible policy approach may generate additional housing via a higher windfall allowance. The council concur with this

point and set out below the relevant options considered.

- 4.4.6 As submitted, Policy G2 supported development within the settlement boundaries across the settlement hierarchy (Primary, Secondary and Rural Service Centres) and outside of settlement boundaries development would have to meet a specific local need that has been identified and accord with one of policy H4, H6, H7, H9 or H10. It will also be appropriate to carry out a conformity check for these policies (H4, H6, H7, H9 & H10) subject to the outcome of the policy option chosen for G2.
- 4.4.7 A stepped approach was used to identify and test options for the spatial strategy through to full assessment against the ISA framework, recommendations/mitigation and an identified preferred (in ISA terms) spatial strategy policy option. This covered the following steps;
1. **Initial options generation and screening** - This applied an options generation and testing framework (detailed below) to all potential options, regardless of viability, and then discounting those not considered feasible when applying the options criteria (this includes reasons for exclusion);
  2. **Testing spatial performance of options** - This tested the spatial strategy options identified from options generation as being viable, using indicative growth maps to assess how each option would perform spatially.
  3. **Assessment of spatial strategy options against ISA objectives** - Builds on the spatial assessment of the viable options by taking the growth descriptions generated from the spatial assessment and applying the ISA framework, considering the ISA objectives and assessment criteria.
  4. **Conclusions on ISA performance, recommendations (including mitigation) and identification of a preferred (in SA terms) option**
- 4.4.8 7 options were initially identified as potential spatial strategies, being;
- A. Use existing settlement hierarchy to distribute increased quantum of growth proportionately through increased density and higher windfall allowance within settlement boundaries
  - B. Creating new communities
  - C. Growth in locations not previously considered
  - D. Core Strategy 20212/presumption in favour of development only, no new local policy guiding spatial distribution (current status quo).
  - E. Focus significant majority of development to within OR immediately adjacent to the primary settlement boundaries.
  - F. Focus additional development to within or immediately adjacent secondary settlement boundaries.
  - G. Focus additional development to within or immediately adjacent settlement boundaries of rural service centres.

4.4.9 Of these, 3 (options A, B and D) were excluded having applied the initial options criteria under column 1. Option of the initial options generation and screening, and therefore did not proceed further for consideration. The reasons for their exclusion are set out in Table 4.3 below. Table 4.4 details the full options generation and screening for the spatial strategy considered reasonable alternatives.

**Table 4.3: Spatial strategy options considered but discounted**

1. Option		5. Reason for exclusion	Test failure 1. NPPF conformity 2. Deliverable 3. IPS Objectives
<b>A</b>	Use existing settlement hierarchy to distribute increased quantum of growth proportionately through increased density and higher windfall allowance within settlement boundaries	Not considered viable as current windfall delivery from existing settlements equates to 103 dpa over the last 8 years. Therefore, it does not seem realistic (there is no evidence) to suggest that this could be increased as over time windfall opportunities reduce within a settlement boundary.	Will not meet objectively assessed needs and take away any flexibility threatening deliverability (1&2).
<b>B</b>	Creating new communities	Not considered viable due to the limitations of the 5-year plan and the uncertainty this would introduce with no identified party, land or proposal.	Not deliverable as there is not sufficient time (2).
<b>D</b>	Core Strategy 20212/presumption in favour of development only, no new local policy guiding spatial distribution (current status quo).	Not considered viable as the approach has not delivered sufficient housing to date over it's lifetime since adoption in 2012 average housing completions is 376dpa, with no allocations and any historic allocations having an increasing unlikelihood of delivery with age.	Will not provide any certainty to communities over where growth might take place and will not make sufficient provision of affordable housing (1&3).

**Table 4.4: Spatial strategy options considered reasonable alternatives**

1. Option	
<b>C</b>	<p><b>Growth in locations not previously considered</b></p> <p>Figure X identifies areas not previously considered for growth (blue shading). Areas excluded from this are the National Landscape and the 3 tiers of settlements considered for growth in the other options. There is a wide geographic spread of this potential growth area, with no identified centres of growth. This includes areas between primary settlements that have been identified as strategic gaps (as set out in IPS policy EV10: Preserving settlement identity).</p>

2. Reasons for identification	3. Likely significant effects	4. Mitigation	5. Conclusion
<p>Potential to match Island development sector needs with supply in areas that have been a consistent source of small (less than 10 units) sites.</p>	<p><b>Environment</b> Potential for significant impacts on both nature conservation and landscape designations from. Potentially expanding urban footprint in wider rural area outside of the established settlement hierarchy.</p> <p><b>Social</b> Housing not delivered in areas of most need. Not responding to the demographic need of the Island as provision is likely to be in rural areas, potentially increasing value and limiting market due to mobility (reliance upon private transport) to access services and facilities. Unlikely to contribute to the social cohesion of existing Island communities. Potential to provide more aspiration sector housing to attract higher grade professions.</p> <p><b>Economic</b> Housing provided is likely to be of a higher value and therefore positively contribute to the SME sector by providing great profit margins.</p> <p><b>Sustainable Development</b> Negative impact by locating people further away from existing services and likely to lead to increased journeys through private transport. New infrastructure provision likely to be needed.</p>	<p>Screening and boundary treatment of sites. Require landscape impact visual assessments. Determine critical mass beyond which new development would outweigh existing and negatively impact character and setting.</p> <p>Explore potential to link housing provision to the nearest assessed local need.</p> <p>Use cycle and footpath network as a factor in location.</p>	<p>Difficult to anticipate what the socio-economic consequences of this option would be. There are positives in terms of matching land supply to the Island’s SME development sector and potentially providing for unmet housing need in hard-to-reach wider rural areas. However, these benefits are likely to be outweighed by the negative impacts associated with locating development in areas not previously considered, including landscape/visual and character, and nature conservation. Most significant in terms of both impact and the inability to mitigate this will be the sustainable development implications of locating new development</p>

			outside of the established settlement hierarchy, subsequent reduced provision of sustainable transport provision combined with an increased need to travel, likely resulting in increasing car use.
<b>1. Option</b>			
<b>E</b>	<p><b>Focus significant majority of development to within OR immediately adjacent to the primary settlement boundaries.</b> Figure X identifies the areas for potential growth associated with the primary settlements by a red line boundary around each of the primary settlements, being Cowes, East Cowes, Newport, Ryde, and the Bay (Sandown, Lake and Shanklin). All 5 primary settlements are located either within the central Medina Valley (Cowes, East Cowes and Newport) or on the eastern side of the Island. There are no indicated areas of growth to the west or south of the Island. Newport is located at the centre of the Island, while Cowes, East Cowes and Ryde are all located on the north coast of the Island and have various different forms of cross-Solent transport provision.</p>		
<b>2. Reasons for identification</b>	<b>3. Likely significant effects</b>	<b>4. Mitigation</b>	<b>5. Conclusion</b>
Matches additional growth to the primary settlements, where the majority of development takes place.	<p><b>Environment</b> Reduced potential for impacts on environmental designations due to the location of the designations (including landscape) in relation to primary settlements. Increased potential to locate development on brownfield land (or reuse existing buildings). May be restricted opportunity to take a sequential approach to flood risk that locates all development in areas of lowest risk.</p> <p><b>Social</b> Potential to impact capacity on existing services. Maintain or increase local population helping with potential viability such as high streets, services. Increased potential to deliver</p>	Prioritise use of brownfield sites. Prioritise extensions to settlements that have the least potential for impacts on environmental designations. Sequential approach to sites to minimise negative impacts and maximise positive impacts, i.e. brownfield within a settlement boundary, within a settlement boundary, brownfield immediately	Multiple benefits of this approach, with the potential to contribute to the regeneration of established settlements where investment is needed to unlock redundant buildings and vacant sites. A highly sustainable option providing the greatest opportunity for reducing

	<p>housing in the areas of most need on the Island. Wards with the highest deprivation are within the primary settlements and are likely to benefit from investment in and adjacent to these communities. Increase potential to improve the existing public realm. Both health care and education provision (above primary) are located within the primary settlements so will be supported by the addition population providing access to services and provision. Could negatively impact the potential for the distribution of affordable housing across the Island.</p> <p><b>Economic</b> New development helps to sustain existing business and generate the demand for economic growth locally. Potentially locates employees in proximity to job opportunities. By concentrating development in the lower value areas the economic viability for growth is reduced. Focusing growth in the primary settlements reduces the level of development and investment in the smaller settlements of the Island which could negatively impact potential for economic growth.</p> <p><b>Sustainable Development</b> Significant benefits by locating development in proximity to goods and services and likely main public transport provision, increasing the potential for access by sustainable means and reducing reliance on private transport. Focusing growth in the primary settlements reduces the level of development and investment in the smaller settlement of the Island which may positively contribute through a proportionate distribution of growth related to infrastructure.</p>	<p>adjacent a settlement boundary, immediately adjacent settlement boundary. Climate change adaptation and resilience approaches should be considered where development cannot be located in areas of lowest flood risk.</p> <p>Link development to a co-ordinated approach of regeneration focussing on specific elements of a settlement (e.g. high street, esplanade/seafront, tourism uses etc) as relevant.</p>	<p>the need to travel and where journeys are made then by sustainable means. Uncertainty over whether this would deliver sufficient sites of the size likely to be delivered over the lifetime of the plan.</p>
<p><b>1. Option</b></p>			

<p style="text-align: center;"><b>F</b></p>	<p><b>Focus additional development to within or immediately adjacent secondary settlement boundaries. West Wight, Bembridge, Ventnor, Wootton</b></p> <p>Figure X identifies the areas of potential growth associated with the secondary settlements by a red line boundary around each of the secondary settlements, being Wootton, Bembridge, Ventnor and West Wight (Freshwater and Totland). 3 of the settlements are located on the edges of the Island, as far from the centre of Newport as possible. The exception to this is Wootton that is located between East Cowes, Newport and Ryde. Outside of these 4 settlements there are no indicated areas of growth across the Island.</p>		
<p><b>2. Reasons for identification</b></p>	<p><b>3. Likely significant effects</b></p>	<p><b>4. Mitigation</b></p>	<p><b>5. Conclusion</b></p>
<p>Directing additional development to help sustain the services and facilities at this size of settlement. Increases the potential for multigenerational living within the same settlement.</p>	<p><b>Environment</b> Of the 4 secondary settlements 3 (Bembridge, West Wight and Ventnor) are particularly vulnerable to elements of climate change. In terms of landscape impacts Wootton is the least constrained with the other 3 potentially generating impacts from additional growth.</p> <p><b>Social</b> Potential to enable multiple generations to live within the same settlement, contributing to rebalancing an aging demographic. All secondary settlements provide a level of service provision, so additional growth is likely to lead to positive impacts through continuing viability of goods and service provision (including education and health care). The size of the settlements enable the proposed growth to be accommodated in a proportionate way. Potential negative effect of development sector delivering growth of a type and size that aligns with the character of the settlements which may not meet the identified local need.</p> <p><b>Economic</b> Potential positive impact from growth contributing to sustaining businesses and employment and potentially increasing demand and growth.</p>	<p>Take an approach that bias growth to the settlement/s with the least constraints and least vulnerable to climate change.</p> <p>Consider a flexible and adaptive approach if necessary, utilising, resilience and adaptation measures, including flexible uses and permissions (i.e. changing uses with vulnerability and time limited consent for more vulnerable uses).</p> <p>Prioritising housing delivery that meets identified local need.</p> <p>Ensure growth pattern informs iteration of Local Transport Plan to identify potential areas of investment that could lead to less private car journeys.</p>	<p>This tier of settlements is too (physically) constrained to provide any certainty that sufficient sites could be identified and delivered without significant environmental implications (including from climate change). There are likely to be some sites that could be delivered, and in terms of sustainable development generally these settlements are well served (both in terms of service provision reducing the need to travel and transport provision). However, reliance on secondary</p>

	<p>A potential positive is Ventnor being wholly outside of the SPA contribution buffer, providing greater viability potential for development (and planning gain). Potential positive impact for development sector from matching size of development to developer capacity and delivering higher value properties.</p> <p><b>Sustainable Development</b></p> <p>All of the secondary settlements are served by public transport providing a sustainable travel option, also increasing local population is likely to increase demand to maintain (or potentially improve) services. All of the secondary settlements are located on the Island’s strategic road network providing access to the Island’s primary settlements and cross-Solent links. Potential negative impact from the need to travel to the primary settlements to access key services (including retail, health care, education and employment) therefore increasing traffic.</p>		<p>settlements to deliver the majority of growth will not work in terms of meeting the plan objective on climate change.</p>
<b>1. Option</b>			
<b>G</b>	<p><b>Focus additional development to within or immediately adjacent settlement boundaries of rural service centres.</b></p> <p>Figure X identifies the areas of potential growth associated with the rural service centres by a red line boundary around each of the rural service centres, being Arreton, Brading, Brighstone, Godshell, Niton, Rookley, St Helens, Wroxall, and Yarmouth. Of these 9 settlements 3, Yarmouth, Brading and St Helens, are located in the north of the Island, with the remaining 6 distributed across the southern, primarily rural half of the Island. Yarmouth is the only rural service centre to be located on the north coast of the Island and has one of the Islands 3 cross-Solent vehicle ferry services (linking to Lymington on the Hampshire coast). Outside of these 9 settlements there are no indicated areas of growth across the Island.</p>		
<b>2. Reasons for identification</b>	<b>3. Likely significant effects</b>	<b>4. Mitigation</b>	<b>5. Conclusion</b>
<p>Help to sustain the settlement and increase the potential for</p>	<p><b>Environment</b></p> <p>All of the rural service centres have an element (either within or immediately adjacent to) of either landscape designation</p>	<p>Limit the size of any single site and consider the cumulative effects of multiple sites on a</p>	<p>The cumulative effects of multiple sites on rural service centres in terms</p>

<p>multigenerational living within the same settlement.</p>	<p>or flood risk, therefore options for growth at scale are likely to be limited. Increased likelihood of tree and/or hedgerow removal to facilitate development.                  Dependent on scale, potential for negative impacts from development on the setting and character.</p> <p><b>Social</b>                  Potential for significant negative impacts on character and setting. Potential positive effects by increasing the potential for multiple generations to live within the same rural settlement. Additional population would also positively contribute to the viability of any services. Potential negative effect of development sector delivering growth of a type and size that aligns with the character of the settlements which may not meet the identified local need.</p> <p><b>Economic</b>                  Potential benefit to increasing support for local business and employers. Provision of smaller sites more likely to suit the Island SME development sector.</p> <p><b>Sustainable Development</b>                  Lower tier settlements are by their nature less well connected with poorer sustainable transport options, therefore likely to increase car journeys for the majority of goods and services as well as employment, education and health care. Additional population would positively contribute to the viability of any transport provision.</p>	<p>settlement, based upon the size of a proposal in comparison to the host settlement and the proportion of new development to established existing settlement.                  Develop a design guide with specific local vernacular to include form, size, massing and materials, noting where specific differences and characteristics exist from settlement to settlement. Where an identified local need exists ensure consideration of this is a requirement.                  Development will need to demonstrate the ability to provide safe pedestrian access to sustainable modes of transport.</p>	<p>of character, setting and visual impact will be difficult to assess, manage and mitigate. This will put significant emphasis on the decision-making process through development management, decreasing certainty of delivery of a site through allocations.</p> <p>There are positives with this tier of settlements, matching land supply to the Island’s SME development sector and potentially providing for unmet housing need in hard-to-reach wider rural areas.</p>
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4.4.10 Having carried out the initial options generation and screening, it was felt that while there were positives with some options over others, there was no single option that was likely to perform better than others and address concerns raised previously (see para. 4.4.5 above). A decision was made to review and assess a further option, Option H: Focus majority of development to within the settlement boundaries, with additional development immediately

adjacent rural service centres boundaries.

4.4.11 This option is in effect a hybrid approach that uses the opportunities provided in sites coming forward in options F & G, giving an option that is more flexible in its approach to growth and better able to provide for a range of sites across various levels of settlements. It was felt that this option better addresses the issues around policy flexibility for smaller scale developments to come forward to support the smaller settlements on the island and help the SME housebuilding sector, as identified during the examination hearing sessions and by the Inspectors in their post hearings letter.

**Table 4.5: Spatial strategy hybrid option considered reasonable alternative**

1. Option			
<b>H</b>	<p><b>Focus majority of development to within the settlement boundaries, with additional development immediately adjacent rural service centres boundaries</b></p> <p>Figure X identifies the areas of potential growth via shaded areas associated with primary and secondary settlements, with a red line boundary identifying a 100m buffer around the rural service centres. With 3 tiers of settlement identified as providing growth there are 18 settlements of varying sizes, located across the Island. There are large areas of the Island where no potential growth is identified, generally reflecting the rural parts. While the secondary and rural service centres are distributed across the Island, 4 of the 5 primary settlements are in the northern half of the Island (with 3 of these being further concentrated in the north-eastern quarter of the Island).</p>		
2. Reasons for identification	3. Likely significant effects	4. Mitigation	5. Conclusion
<p>Maximising the potential to bring forward available sites across a range of settlement sizes. Meeting both overall/authority and local need. Evidence from examination and ability to support rural housing and Island SMEs have resulted in a bespoke approach to rural service centres.</p>	<p>Overall effects (positive and negative) likely to be reduced with dispersal across a range of settlements.</p> <p><b>Environment</b></p> <p>Increased potential to locate development on brownfield sites (or reuse existing buildings) reducing greenfield requirement.</p> <p>Potential risks from climate change (land stability and flooding) with development in secondary settlements.</p> <p>Increasing likelihood of impacts on designations (particularly landscape) and character moving down the size of settlement. Majority of brownfield sites are within primary</p>	<p>Limit the size of any single site and consider the cumulative effects of multiple sites on a settlement, based upon the size of a proposal in comparison to the host settlement and the proportion of new development to established existing settlement.</p>	<p>Multiple benefits of this approach, with the potential to contribute to the regeneration of established settlements where investment is needed to unlock redundant buildings and vacant sites. Enables proportionate growth at rural settlements,</p>

<p>Enabling sites under the allocation threshold of 10 units to come forward and provide housing to meet identified local need. The rural nature of rural service centres and the prevalence of designations (particularly National Landscape) polices any potential growth of these settlements in terms of scale and character. By the nature of their sizes there is more opportunity for windfall sites within primary and secondary boundaries, so additional land outside boundaries is not necessary (beyond allocations).</p>	<p>and secondary settlements, therefore defining a boundary increases the potential for these sites to be redeveloped, making use of derelict sites and reducing potential greenfield footprint.</p> <p><b>Social</b> Settlement coalescence more likely for primary and secondary centres so maintaining a more definitive approach to boundaries will help to maintain settlement identities and preserve existing settlement gaps. Wards with the highest deprivation are within the primary settlements and are likely to benefit from investment in and adjacent to these communities. Both health care and education provision (above primary) are located within the primary settlements so will be supported by the addition population providing access to services and provision. Potential positive effects by increasing the potential for multiple generations to live within the same settlement. Additional population would also positively contribute to viability such as high streets and/or services. Potential negative effect of development sector delivering growth of a type and size that aligns with the character of the settlements which may not meet the identified local need, particularly for secondary and rural service centres.</p> <p><b>Economic</b> New development helps to sustain existing business and generate the demand for economic growth locally. Potentially locates employees in proximity to job opportunities. By concentrating development in the lower value areas the economic viability for growth is reduced.</p>	<p>Where an identified local need exists ensure consideration of this is a requirement. Development will need to demonstrate the ability to provide safe pedestrian access to sustainable modes of transport.</p>	<p>helping to support local services and meet local need. A more sustainable option providing some opportunity for reducing the need to travel.</p>
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	<p>Enabling growth in rural service centres potentially increases demand and viability for local services.                  Potential positive impact for development sector from matching size of development to developer capacity</p> <p><b>Sustainable Development</b></p> <p>Lower tier settlements are by their nature less well connected with poorer sustainable transport options, therefore likely to increase car journeys for the majority of goods and services as well as employment, education and health care.                  Additional population would positively contribute to the viability of any transport provision.</p>		
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4.4.12 Following the options generation and screening, the options spatial performance was then considered through the use of an indicative growth map for each option (see Appendix 2 Spatial strategy options indicative growth maps). This was done to aid understanding of the likely spatial impacts associated with each option and thereby the differences between them. The output of this is a description of each spatial option that has been included in the ‘Option’ commentary in step 1 (Tables 4.4 & 4.5 above) to help link the spatial options under consideration with the mapped extent of proposed growth with each option.

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

4.5.1 The outputs from the initial options generation and screening and the spatial performance have then been used to assess each option against the ISA framework. This assessment identifies any likely significant effects<sup>18</sup> (strengths and negatives), potential mitigation measures and conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives.

4.5.2 The 5 spatial options have been assessed in the context of delivering 703 units per annum over 5 years. Table 4.6 provides a summary, while the full assessment can be viewed in Appendix 2.

4.5.3 Of these, options C, F and G are the worst performing, with C and F recording 7 negative impacts against ISA objectives and G with 9 (out of a total of 17 ISA objectives). A number of the negative impacts were similar or the same, including landscape and tranquillity, character and setting and delivering growth of a type and size that aligns with the character of the settlements which may not meet the identified local need. This is to be expected given all 3 of these options’ focus growth to more rural areas of the Island and/or smaller (secondary and rural service centre) settlements.

4.5.4 Perhaps the most significant impacts with all 3 of these options were those associated with air quality, emissions and access. Where options C, F and G by their nature are less well connected with poorer sustainable transport options, therefore likely to increase car journeys for the majority of goods and services as well as employment, education and health care.

4.5.5 These options also had some unique (negative) assessment outcomes, including expanding the urban footprint in the wider rural area (option C), vulnerability to particular

<sup>18</sup> Criteria for determining the likely significance of effects on the environment are set out in [schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004](#)

elements of climate change (ground instability primarily through coastal erosion, and flood risk) (option F) and increased likelihood of tree and/or hedgerow removal to facilitate development (option G).

- 4.5.6 Overall, the benefits are likely to be outweighed by the negative impacts associated with locating development in areas not previously considered and solely at lower tier settlements, including landscape/visual and character, and nature conservation. Most significant in terms of both impact and the inability to mitigate this will be the sustainable development implications of locating all new additional development outside of the established settlement hierarchy, subsequent reduced sustainable transport provision combined with an increased need to travel, likely resulting in increasing car use. **Options C, F and G are rejected.**
- 4.5.7 As both options E and H locate development in the primary settlements they share a number of positive impacts, including increased potential to locate development on brownfield sites (or reuse existing buildings) reducing greenfield requirement; wards with the highest deprivation are within the primary settlements and are likely to benefit from investment in and adjacent to these communities; and, both healthcare and education provision (above primary education) are located within the primary settlements so will be supported by the additional population providing access to services and provision.
- 4.5.8 However, as their approach to the distribution of development is different (option E concentrates development to just the primary settlements, whereas option H distributes development to all 3 tiers of settlements, including immediately adjacent rural service centre boundaries) there are differences in both positive and negative impacts.
- 4.5.9 Option E will reduce potential for impacts on environmental designations due to the location of the designations (including landscape) in relation to primary settlements. Option E also has increased potential to help with the viability of services and more generally high streets as commercial centres; and to improve the existing public realm.
- 4.5.10 In terms of positive impacts, Option H increases the potential for multiple generations to live within the same settlement; potentially increases demand and viability for local services; potential positive impact for development sector from matching size of development to developer capacity; and, additional population would positively contribute to the viability of any transport provision. Option H provides a greater variety (not number) of positive impacts, but by spreading growth more widely, the positive impacts that are shared with option E are reduced in significance.
- 4.5.11 While options E and H have a similar number of negative impacts (2 and 3 respectively) it should be noted that these are against different ISA Objectives, highlighting different negative impacts associated with each option.
- 4.5.12 One of the negative impacts identified with option E relates to ISA objective 9 Climate change resilience, where there may be restricted opportunity to take a sequential approach to flood risk that locates all development in areas of lowest risk. Being an island has influenced the evolution of the primary settlements, with all of these either on the

coast or estuary. As these settlements have grown, the risk of flooding has increased over time as a result of climate change. There are likely to be increasing instances of brownfield sites, within primary settlements, experiencing changing flood risk over time.

- 4.5.13 The other negative impacts identified with option E relates to ISA objective 12 Health and population, where the option could negatively impact the potential for the distribution of affordable housing across the Island. Focusing growth in the primary settlements reduces the level of development and investment in the smaller settlements of the Island which could negatively impact potential for economic growth and distribution of new housing (and other associated benefits such as multigenerational living within the same settlement).
- 4.5.14 The 3 ISA objectives with potential negative impacts against option H are 2 Coasts, 4 Landscape and noise, and 8 Climate change emissions. The impacts against 2 Coasts have primarily been generated through the inclusion of secondary settlements as growth options. Of the 4 secondary settlements 3 (Bembridge, West Wight and Ventnor) are particularly vulnerable to elements of climate change, including flood risk and land instability associated with their coastal locations.
- 4.5.15 In terms of Landscape impacts, again the same 3 secondary settlements as identifying having negative impacts for Coasts are identified as potentially generating impacts from additional growth on ISA objective 4 Landscape and noise (with Wootton being the least constrained in this regard also). This has been primarily based upon the location of each settlement in relation to the National Landscape and proposed dark skies designation.
- 4.5.16 Considering the impacts against ISA objective 8 Climate change emissions, the lower tier settlements that make up part of option H, are by their nature less well connected, with poorer sustainable transport options, therefore likely to increase car journeys for the majority of goods and services as well as employment, education and health care. A counter potential positive impact was identified in terms of additional population contributing to the viability of any transport provision, but given the dispersed nature of growth for this option and the certainty of increased use of private transport use with more rural development, this was outweighed by the likely negative impacts.
- 4.5.17 **Option H *Focus majority of development to within the settlement boundaries, with additional development immediately adjacent rural service centres boundaries has been identified as the preferred option in terms of ISA.***
- 4.5.18 Overall, the sustainability performance between options E and H is similar, albeit there are marked differences with regards to which ISA objectives record negative impacts. This relates directly to the spatial pattern of development and how this influences both direct impacts (such as landscape or flood risk) or indirect impacts such as modes of transport or helping to maintain local economies.
- 4.5.19 In terms of positive impacts again there are many that are shared, by virtue of the fact both options include primary settlements as a mechanism for delivering growth. However, some of these benefits will not be so significant with option H, but broader

(spatially) where it looks to distribute growth more evenly across the Island, as opposed to the concentration of just the primary settlements with option E.

- 4.5.20 In the context of delivering 703 units per annum over 5 years, option H outperforms option E. Option H better addresses the issues around policy flexibility and therefore certainty in ability to deliver the quantum of development required over the (5 year) lifetime of the proposed plan. This option will allow a range of sites in terms of both location and size to come forward that effectively ‘spread the risk’ rather than focusing on one development scenario. The option is also more likely to meet the requirements of the SMEs that make up the Island’s development industry, with associated economic and social benefits. This option more than any other will share both the benefits and impacts associated with new development across the wider community of the Island.
- 4.5.21 To maximise the benefits of option H and mitigate any negative impacts, the mitigation identified in the assessment of the option should be explored if developing a spatial strategy policy based upon option H. While one of the suggested measures can be simply implemented through policy wording (where an identified local need exists ensure consideration of this is a requirement) the other elements will need to inform the site selection process in order to ensure potential allocated sites don’t perform negatively when considered against the ISA objectives. These include consideration of the size of any single site and the cumulative effects of multiple sites on a settlement, based upon the size of a proposal in comparison to the host settlement and the proportion of new development to established existing settlement; and that development will need to demonstrate the ability to provide safe pedestrian access to sustainable modes of transport.

**Table 4.6: Summary Assessment of Spatial Strategy Reasonable Options**

	ISA Objectives																Summary Conclusion	
	Environmental									Social				Economic				
<b>G2: priority locations for housing development and growth</b>	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	
<b>C</b> Growth in locations not previously considered	-	0	?	-	?	?	0	-	-	-	0	?	?	?	-	-	?	This option is rejected.
<b>E</b> Focus significant majority of development to within OR immediately adjacent to the primary settlement boundaries	+	+	+	+	?	+	+	+	-	+	?	-	?	+	+	+	?	This option is rejected.
<b>F</b> Focus additional development to within or immediately adjacent secondary settlement boundaries	-	-	+	-	?	0	0	-	-	?	0	?	-	?	-	+	+	This option is rejected.
<b>G</b> Focus additional development to within or immediately adjacent settlement boundaries of rural service centres	-	-	?	-	?	-	0	-	?	?	0	+	-	-	-	-	+	This option is rejected.
<b>H</b> Focus majority of development to within the settlement boundaries, with additional development immediately adjacent rural service centres boundaries	?	-	+	-	?	0	+	-	+	+	0	+	+	0	+	+	+	<b>This option has been identified as the preferred option.</b>

## 4.6 B1-B5: Testing the Plans Policies against the ISA Objectives

4.6.1 In this section of the Report, the policies themselves are explored to ensure the principles of sustainability are fully integrated into the IPS.

4.6.2 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).

4.6.3 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).

4.6.4 The policies that the council have considered through the updated ISA (2025) and therefore have been (re)assessed through options appraisal are detailed below. It is worth re-iterating the first assumption above that the reason for considering these policy options is to help address the identified housing shortfall of 315 units. This number is calculated in the council’s ‘Housing Trajectory Update’ which provides an up-to-date position as of 1st April 2025 of permissions and completions on the island.

### G2 Spatial Strategy

- H4: Infill opportunities outside settlement boundaries
- H7: Rural and first homes exception sites
- H9: New housing on previously developed land

H1: Planning for housing delivery/approach to windfall

E8: Supporting high quality tourism, approach to tourism uses

EV5: Trees, woodland and hedgerows

C1: High quality design for new development

C11: Net zero carbon and lowering energy consumption in new development

4.6.5 The options assessment for each of these policies follows a similar stepped approach as that of the spatial strategy options, being;

1. **Initial options generation and screening** – applying the options generation and testing framework (detailed above) to all potential options;

2. **Assessment of the policy options against ISA objectives and identification of a preferred option** - Builds on the screening of the viable options by taking the option descriptions generated and applying the ISA framework, considering the ISA objectives and assessment criteria. Identifies a preferred option in terms of performance against the ISA objectives.
3. **Conclusions on ISA performance, recommendations (including mitigation)**

- 4.6.6 Consideration of the preferred option within it's family of policies in order to take into account any incombination effects is covered via an update to the summary assessment of each group of policies in section 4.7.
- 4.6.7 As the purpose of the H policies is to facilitate the delivery of housing, the options generation for these H policies under assessment has been predicated by the identified preferred spatial option (H) from the assessment of spatial strategy options in policy G2. Any H policy option that did not positively contribute to the delivery of policy G2 Spatial Strategy option H was discounted.
- 4.6.8 It was therefore necessary to carry out a conformity check to ensure that the relevant H policies still align with the spatial option H identified above, or whether any policy adjustment / re-assessment is required. This is set out below.

#### **H policy conformity check with G2: Priority locations for housing development and growth**

**Preferred Option - Spatial Strategy Option H: Focus majority of development to within the settlement boundaries, with additional development immediately adjacent rural service centres boundaries.**

##### **H4 – Infill opportunities outside settlement boundaries**

Policy text as submitted: supports housing outside of settlement boundaries where it infills a small gap, meets a local need that has been identified and is between 1 and 3 dwellings.

Impact of spatial option H: none as policy wording still applicable and no change to definition of land outside of settlement boundaries

Conformity check: ✓ Policy H4 as submitted conforms with spatial option H for Policy G2

##### **H6 – New homes in the countryside outside of settlement boundaries**

Policy text as submitted: supports single homes outside of settlement boundaries if they are for agricultural workers, re-use a redundant building / heritage asset or are of exceptional design (as permitted by paragraph 84 of the NPPF).

Impact of spatial option H: none as policy wording still applicable and no change to definition of land outside of settlement boundaries

Conformity check: ✓ Policy H6 as submitted conforms with spatial option H for Policy G2

##### **H7 – Rural and First Homes exception sites**

Policy text as submitted: supports the principle of rural and first homes exception sites, both of which are defined in the NPPF.

Impact of spatial option H: none as definitions of the exception sites as set out in national policy apply to land not normally used for housing, outside of settlement boundaries.

Conformity check: ✓ Policy H7 as submitted conforms with spatial option H for Policy G2

**H9 – New housing on previously developed land (pdl)**

Policy text as submitted: includes a distinction between pdl sites within and outside settlement boundaries, support outside subject to meeting a local need and reflecting previous scale of buildings / development

Impact of spatial option H: none as spatial option does not change the distinction set out in this policy

Conformity check: ✓ Policy H9 as submitted conforms with spatial option H for Policy G2

**H10 – Self and custom build**

Policy text as submitted: supports development for self and custom build, and outside of settlement boundaries where this meets a specific local need

Impact of spatial option H: none as spatial option does not change the distinction set out in this policy

Conformity check: ✓ Policy H10 as submitted conforms with spatial option H for Policy G2

**H1: Planning for housing delivery**

4.6.9 Through consideration of spatial option H, the part of policy H1 that then follows as requiring assessment is the identified windfall allowance and whether the more flexible policy approach through spatial option H could mean a higher (or lower) windfall allowance in policy H1. As submitted, this was identified as 100 dwellings per year on the basis of the submitted spatial approach of supporting development within the settlement boundaries across the settlement hierarchy. Windfall sites are defined as dwellings delivered on sites with a net gain of less than 10 dwellings. The definition of windfall is not subject to change.

4.6.10 As evidenced in ED18 ‘Matter 7 Further windfall analysis relating to settlement boundaries’ the island has consistently seen delivery on windfall sites within settlement boundaries at an average of 103 dwellings per annum over the past 8 years, justifying the submitted policy position. In ED21 ‘Post Hearings Letter’ the Inspectors note at paragraph 32 that a higher windfall allowance could be generated through a more flexible policy approach. The council concur and therefore have considered the options set out below.

**Table 4.7: H1 windfall allowance options generation and screening**

1. Option		2. Reasons for identification	3. Likely significant effects	4. Mitigation	5. Conclusion
A	Windfall allowance as submitted for examination at 100dpa.	Maintain submitted position of 100dpa and do not provide an evidenced quantification of spatial policy change but rely on recognition that this will allow higher levels of growth.	<p><b>Environment</b>                      More likely to be greenfield sites, increasing likelihood of delivery, but impacting by increasing developed footprint on the Island.                      Potential for windfall to be located in areas where foul water does not go to Sandown WwTW, therefore nitrates impact.                      As small scale development could be located in areas with environmental constraints and designations, e.g. National Landscape.</p> <p><b>Social</b>                      Positive impact on providing residential uses in a range of locations, potentially contributing to needs in more rural areas of the Island.</p> <p><b>Economic</b>                      Size of sites brought forward will match local development capacity (in terms of construction) helping to maintain and grow this SME sector.                      Small size of sites increases certainty of delivery within the plan timescales (i.e. 1 – 5 years). If sites located in rural settlements or areas, can make a contribution towards viability of local services and facilities.</p> <p><b>Sustainable Development</b>                      By it's nature windfall is unplanned development (as opposed to allocations) therefore reliance on this form of supply is likely to result in additional demand on infrastructure met in an ad hoc manner that could</p>	<p>Infrastructure Delivery Plan assesses a higher level of growth than would be anticipated over the 5 year period from maintaining windfall allowance at 100dph but allowing more through a spatial policy change.                      Other policies of the plan will provide a level of control over environmental impacts, e.g. policies relating to development in the National Landscape or where there are international, national or local designations.                      Policies relating to sustainable transport will provide a level of assurance that even small scale development should be accessible by means other than the private car.</p>	Does not quantify spatial policy change to assist with certainty over delivery of increased housing number but maintains submitted policy position.

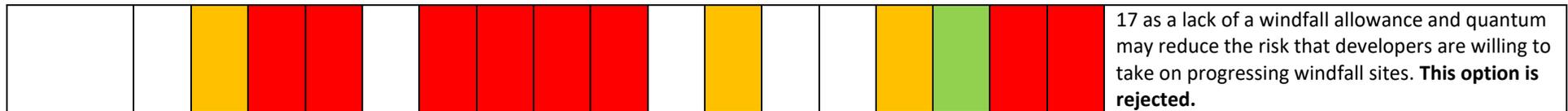
			impact overall capacity. An increase in smaller developments across the Island is likely to result in increased car journeys, impacting negatively air quality, noise and traffic.		
B	Increase the windfall allowance in line with evidence.	Provides a quantified judgement of the level of development that can be expected outside of the proposed allocations and existing permissions, taking into account the preferred spatial option and recognising the more flexible approach this would allow.	<p>Proportionate increase to the likely significant impacts (positive and negative) identified with Option A above and replicated below.</p> <p>Environment More likely to be greenfield sites, increasing likelihood of delivery, but impacting by increasing developed footprint on the Island. Potential for windfall to be located in areas where foul water does not go to Sandown WwTW, therefore nitrates impact. As small scale development could be located in areas with environmental constraints and designations, e.g. National Landscape.</p> <p>Social Positive impact on providing residential uses in a range of locations, potentially contributing to needs in more rural areas of the Island.</p> <p>Economic Size of sites brought forward will match local development capacity (in terms of construction) helping to maintain and grow this SME sector. Small size of sites increases certainty of delivery within the plan timescales (i.e. 1 – 5 years). If sites located in rural settlements or areas, can make a contribution towards viability of local services and facilities.</p> <p>Sustainable Development</p>	<p>Given the similarities with Option A, the proposed mitigation is the same and replicated below.</p> <p>Infrastructure Delivery Plan assesses a higher level of growth than would be anticipated over the 5 year period from maintaining windfall allowance at 100dph but allowing more through a spatial policy change. Other policies of the plan will provide a level of control over environmental impacts, e.g. policies relating to development in the National Landscape or where there are international, national or local designations. Policies relating to sustainable transport will provide a level of assurance that even small scale</p>	This would see a quantified and evidence based option for the spatial policy change that provides a degree of certainty of delivery.

			<p>By its nature windfall is unplanned development (as opposed to allocations) therefore reliance on this form of supply is likely to result in additional demand on infrastructure met in an ad hoc manner. that could impact overall capacity. An increase in smaller developments across the Island is likely to result in increased car journeys, impacting negatively air quality, noise and traffic.</p>	<p>development should be accessible by means other than the private car.</p>	
C	<p>Remove a specific allowance for windfall.</p>	<p>Rather than quantify a windfall allowance, provide generic policy wording that development outside of proposed allocations and existing permissions that aligns with the preferred spatial option will form part of the supply to meet the level of planned growth.</p>	<p>Environment                  More likely to be greenfield sites, increasing likelihood of delivery, but impacting by increasing developed footprint on the Island.                  Potential for windfall to be located in areas where foul water does not go to Sandown WwTW, therefore nitrates impact.                  As small scale development could be located in areas with environmental constraints and designations, e.g. National Landscape.                  Lack of windfall allowance and quantum being applied means more pressure to identify additional allocations given the certainty required over delivery of the increased housing number.</p> <p>Social                  The lack of a windfall allowance and quantum may reduce the risk that developers are willing to take on progressing windfall sites, reducing the positive impact from smaller developments.</p> <p>Economic                  Takes away certainty of provision provided by a quantum and in doing so takes away ability to anticipate and plan for supply, that a quantum gives.</p>	<p>The primary mitigation for addressing the likely significant effects identified in the adjacent column would be to provide a windfall allowance / quantum, which is Options A and B.</p>	<p>Lack of certainty over the quantum of growth that could be attributed to a key source of housing supply. In turn this lack of quantum and associated uncertainty would increase the likelihood of having to identify further allocated sites.</p>

		<p>Sustainable Development</p> <p>By its nature windfall is unplanned development (as opposed to allocations) therefore reliance on this form of supply is likely to result in additional demand on infrastructure met in an ad hoc manner that could impact overall capacity. An increase in smaller developments across the Island is likely to result in increased car journeys, impacting negatively air quality, noise and traffic. By not quantifying windfall, additional pressure to also identify more allocations, which could be located in sustainable places, but may provide for a level of growth that exceeds the housing number in an unplanned way.</p>		
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Table 4.8: ISA Assessment of H1 windfall allowance options

H1: Planning for housing delivery – windfall allowance	ISA Objectives*																	Commentary
	Environmental									Social				Economic				
	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	
A	?	0	-	-	?	-	-	-	-	+	0	+	+	0	+	-	+	By it's nature windfall is unplanned development (as opposed to allocations) therefore likely
B	?	0	-	-	?	-	-	-	-	+	0	+	+	0	+	-	+	Proportionate increase to the likely significant impacts (positive and negative) identified with Option A above. However as this option provides a quantified judgement of the level of development expected (outside of allocations) it provides greater certainty to the Islands SME development sector and therefore increases the positive performances against objectives 12, 13 and 17. <b>This option has been selected as the preferred option.</b>
C	?	0	-	-	?	-	-	-	-	?	0	?	?	0	+	-	-	Increased number of unknowns as due to increased uncertainty associated with taking away any provision allowance. Additional (to options A & B) negative impact against objective



4.6.11 Windfall sites, by their nature can occur anywhere, from primary settlements through to the wider rural areas of the Island. This lack of certainty means it’s difficult to be certain of any impacts in relation to air quality, but there is likely to be reduced (in comparison to allocated sites) sustainable travel options and therefore impacts on emissions (objective 8). Greenfield sites are more likely to have negative impacts on environmental objectives, including impacts upon landscape, tranquillity and biodiversity. A lack of infrastructure increases likelihood of water quality impacts (particularly given the Island’s vulnerability to nitrates). However the size of windfall sites (less than 10 dwellings) provides a form of ‘built in’ mitigation to the significance of any negative impacts.

4.6.12 While it is assumed (due to the other policies in the plan) that no new development will be located in a vulnerable coastal location (i.e. CCMA’s), by occurring in an unplanned manner, development will not be as likely to benefit from the provision of formal infrastructure, including flood defence measures. This also applies to the provision of goods, services, employment and education, again emphasising the significance of location in sustainability terms and increasing or reducing the need and means to travel.

**Conclusions on ISA performance, recommendations (including mitigation)**

4.6.13 As should be expected, the performance of options A and B against the ISA objectives are the same in terms of which objectives they perform against negatively, positively etc. The main points of difference between these 2 options are;

- the evidenced increased quantum provided for in option B can generally be translated as increasing the areas of performance (both positive and negative) against the ISA objectives; and,
- the increased level of certainty option B provides over option A to the Islands SME development sector.

4.6.14 Option C has more unknown (?) impacts than options A and B, due to the increased uncertainty associated with no windfall provision. Where there is certainty with this option is the additional negative impact against ISA object 17 Employment and economy. Option C takes away certainty of provision provided by a quantum and in doing so takes away ability to anticipate and plan for supply, that a quantum gives. This is likely to be seen as increasing

risk to the Island development sector when considering non-allocated development.

**4.6.15 Option B Increase the windfall allowance in line with evidence, has been identified as the preferred option in terms of ISA.**

4.6.16 Infrastructure Delivery Plan assesses a higher level of growth than would be anticipated over the 5 year plan period from maintaining windfall allowance at 100dph but allowing more through a spatial policy change. Other policies of the plan will provide a level of control over environmental impacts, e.g. policies relating to development in the National Landscape or where there are international, national or local designations, or other environmental constraints such as water bodies sensitive to nitrates. Policies relating to sustainable transport will provide a level of assurance that even small scale development should be accessible by means other than the private car.

**H5: Delivering affordable housing**

4.6.17 Policy H5 requires all qualifying development (sites with a net gain of 10 or more homes) to provide on site affordable housing (as defined in Policy AFF1 of the IPS) at a rate of 35%. The policy goes on to note that it expects a target mix for the affordable provision to be 80% rented and 20% other 'intermediate' affordable housing products (e.g. shared ownership).

4.6.18 In ED21 Post Hearings Letter, the Inspectors raised a soundness concern over the viability of the cumulative policy requirements of the submitted version of the IPS. At paragraphs 51 to 53, the Inspectors set out these concerns and required the council to revisit and update the Local Plan Viability Report (LPVR). The council have undertaken the required update to the LPVR, with one of the key outcomes being that the updated evidence demonstrates the 35% policy requirement in policy H5 is unviable for many housing typologies.

4.6.19 Therefore, the council are considering a revision to Policy H5 to reduce the % of affordable housing required from development sites. The evidence from the updated LPVR demonstrates that a tiered approach to affordable housing % could be accommodated depending on site type, size and location, which would enable the deeper discounts from market value required by Policy AFF1 to remain in place. The options set out in Table 4.9 represent possible approaches to policy H5.

**Table 4.9: H5 Delivering affordable housing options generation and screening**

1. Option		2. Reasons for identification	3. Likely significant effects	4. Mitigation	5. Conclusion
A	H5 as submitted for examination (retaining a blanket 35% affordable housing requirement from all qualifying development).	Maintains a consistent policy position that secures the same level of affordable housing from every qualifying site.	Environmentally, requiring all qualifying residential development to provide only a certain % of affordable housing may increase the number of development sites that are required to meet identified need. Socially, requiring the provision of affordable housing will enable more households to be removed from the housing register, whilst positively impacting areas of high deprivation on the island. Economically, this option may have significant negative impacts on housebuilders who may not be able to afford to meet the policy requirement. AH at deeper discounts will mean better access to AH for many island residents, with positive economic impacts.	None as this option relates to the policy wording as submitted.	No change from previous policy position. Evidence demonstrates this is unviable, therefore unsound and not in line with national policy (NPPF).
B	H5 to be revised in line with the evidence in the updated LPVR that would see a tiered approach to AH provision depending on	Is supported by up-to-date evidence and provides a policy option that maximises the % of AH that sites must provide through different % in	Environmentally, requiring all qualifying residential development to provide only a certain % of affordable housing may increase the number of development sites that are required to meet identified need, with negative environmental impacts on	Mitigation would be to ensure the policy wording reflects the evidence in relation to location, size and type of development site to	Option would introduce a policy approach that maximises the amount of AH that a development site must provide whilst remaining viable.

	location, size and type of site – introduction of Lower Value and Higher Value Zones and different %'s for different size (over or under 50 units) and type (g/f or b/f) of site.	different areas of the island and on different types of site.	designations and landscape. Socially, maximising the provision of affordable housing will enable more households to be removed from the housing register, whilst positively impacting areas of high deprivation on the island. Economically, this option may have some limited negative impacts on housebuilders should development costs increase. AH at deeper discounts will mean better access to AH for many island residents, with positive economic impacts.	maximise the AH provided and secure the best social and economic outcomes for island residents.	
C	Revise policy H5 to maintain a single AH % requirement for all qualifying development, at a lower level that the updated LPVR shows to be viable.	Would provide a consistent policy position that secures the same level of affordable housing from every qualifying site in a viable way.	Environmentally, requiring all qualifying residential development to provide only a certain % of affordable housing (which is less than the level some could viably provide) may increase the number of development sites that are required to meet identified need, with negative environmental impacts on designations and landscape. Socially, having a blanket AH level, when some sites could provide more, would not maximise the provision of affordable housing. This may have the negative impact of less households to be removed from the housing register, but	Mitigation would be to set the % level of AH across all types and locations of development at the 'minimum' identified by the evidence to ensure the positive financial impacts for the development sector.	Option would maintain a consistent approach to the delivery of AH that is the same for all development, thereby increasing certainty for future development regardless of location or size.

			<p>would positively impact areas of high deprivation on the island. Economically, this option may have some positive impacts on housebuilders as some sites would be providing a lower level of AH than a site could viably afford to provide. AH at deeper discounts will mean better access to AH for many island residents, with positive economic impacts.</p>		
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Table 4.10: Assessment of H5 Delivering affordable housing options

H5: Delivering affordable housing	ISA Objectives*																	Commentary
	Environmental									Social				Economic				
	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	
A	?	0	0	-	?	?	-	?	0	?	0	+	+	0	0	-	-	There are positive impacts with this option, as requiring the provision of affordable housing will enable more households to be removed from the housing register, whilst positively impacting areas of high deprivation on the island. However, it is this requirement that generates negative economic impacts as the Islands SME development sector may not be able to afford to meet the policy requirement, as well impacting on wider viability and likelihood (or otherwise) of contributions to other development related needs such as sustainable transport provision. <b>This option is rejected.</b>

B	?	0	0	-	?	?	-	?	0	+	0	+	+	0	0	?	?	<p>There are positive impacts through maximising the provision of affordable housing. This will enable more households to be removed from the housing register, whilst positively impacting areas of high deprivation on the island.</p> <p>Economically there are some uncertainties in relation to how future development costs may negatively impact this option. Conversely, affordable housing at deeper discounts will mean better access to such housing for many island residents, with associated positive economic impacts. <b>This option has been selected as the preferred option.</b></p>
C	?	0	0	-	?	?	-	?	0	-	0	-	-	0	0	+	+	<p>There are potential negative impacts, particularly around the Social ISA Objectives. These relate to the blanket approach to affordable housing, which would likely result in over burdening some sites, possibly beyond viability, whilst at the same time failing to maximise provision (of affordable housing) from sites that could provide more. This may have the negative impact of less households to be removed from the housing register.</p> <p>The option may have some positive impacts on housebuilders as some sites would be providing a lower level of affordable housing than a site could viably afford to provide. Affordable housing at deeper discounts will mean better access to such housing for many island residents, with positive economic impacts. <b>This option is rejected.</b></p>

**Conclusions on ISA performance, recommendations (including mitigation)**

- 4.6.20 All 3 options generate a number of uncertainties (?), mostly in relation to the Environmental objectives. This is because without knowing where or what the location criteria are, it's not possible to discern if there could (or not) be any significant impacts against these objectives.
- 4.6.21 All 3 options have scored negative impacts against Landscape and noise (4) and Land use (7) ISA objectives. This reflects the fact that all options are likely to increase the number of development sites that are required to meet identified need, with negative environmental impacts on designations more vulnerable to increased land take (e.g. landscape designations and rural land uses including agriculture and mineral resources).
- 4.6.22 The most significant point of difference in terms of sustainability performance between the 3 options is when considering ISA Objectives 16 Material assets and 17 Employment and economy. The current proposed approach of a blanket 35% affordable housing requirement from all qualifying development (Option A) may have significant negative impacts on housebuilders who may not be able to afford to meet the policy requirement. Given the composition of housing providers primarily consists of Island-based SMEs, the risks of this impacts are likely.
- 4.6.23 A revised approach to the existing draft policy that maximises the % of affordable housing that sites must provide through different % in different areas of the island and on different types of site (Option B), has some uncertainty as to the economic performance due to the vulnerable nature of SMEs to wider market variations, such as changing land and property prices, or changes in build costs (including materials and employment).
- 4.6.24 Revising the current approach of policy H5, to maintain a single AH % requirement for all qualifying development, at a lower level that the updated LPVR shows to be viable (Option C), would provide a consistent policy position that secures the same level of affordable housing from every qualifying site in a viable way. This option may have some positive impacts on housebuilders as some sites may provide greater profits (also increasing likely viability of some sites that might otherwise be marginal in development terms). Providing affordable housing at deeper discounts will mean better access to such housing for many island residents, with positive economic impacts, although this should be balanced against the possibility that some sites may not provide as much affordable housing as they could under this option.
- 4.6.25 While there are some economic uncertainties with option B, having a flexible approach is likely to result in a policy that is better able to cope. Where option B outperforms option C is the potential to maximise the amount of affordable housing provided, whereas option C could result in some sites not providing the full/viable potential, while option A will likely limit provision due to viability issues.

- 4.6.26 **Option B H5 to be revised in line with the evidence in the updated LPVR that would see a tiered approach to AH provision depending on location, size and type of site – introduction of Lower Value and Higher Value Zones and different %'s for different size (over or under 50 units) and type (g/f or b/f) of site, has been identified as the preferred option in terms of ISA**
- 4.6.27 In order to minimise any negative impacts it is recommended that any revised policy wording reflects the evidence in relation to location, size and type of development site, to maximise the affordable housing provided and secure the best social and economic outcomes for island residents.

### **E8: Supporting high quality tourism**

- 4.6.28 In [ED4 'Inspectors Matters, Issues and Questions'](#) questions 8.15 and 8.16 asked whether the approach in the IPS to core tourist accommodation areas (CTAA) was justified and consistent with national planning policy.
- 4.6.29 The council's [Matter 8 Hearing Statement](#) provided an initial response (pages 17-20) prior to the issue being explored in more detail during the examination hearings. At the request of the Inspectors, immediately after the completion of the hearings the council provided a [detailed analysis of both of the Core Tourist Accommodation Areas \(ED19\)](#), one in Sandown and one in Shanklin. This evidence showed that whilst there was a higher proportion of buildings / sites either in tourist accommodation use or vacant tourist accommodation in Sandown (62% in comparison to 54% in Shanklin), in Shanklin there were 42 different tourist accommodation buildings /sites within the identified CTAA compared to 21 for Sandown.
- 4.6.30 The difference between the 2 proposed CTAs becomes more pronounced when vacancy is considered. Of the 42 different tourist sites in Shanklin, 7 were identified as vacant (and/or derelict). Of the 21 different tourist sites in Sandown, 12 were recorded as vacant. This provides a comparative vacancy rate (at time of survey March 2025) of 17% for Shanklin against 57% for Sandown.
- 4.6.31 In the council's **Housing Shortfall Methodology** document, the council recognise that Policy E8 is one where a change in approach could provide a way of delivering additional housing on brownfield land to help meet the shortfall.
- 4.6.32 As submitted, Policy E8 resists the loss of tourist accommodation uses within the CTAs unless robust evidence is provided that the site is no longer viable for such a use. It is this element of the policy wording that provides an opportunity for a different approach.

**Table 4.11: E8 tourism accommodation options generation and screening**

1. Option		2. Reasons for identification	3. Likely significant effects	4. Mitigation	5. Conclusion
A	E8 as submitted for examination re. resist the loss of tourist accommodation within the CTAAAs.	Protectionist approach that seeks to resist the loss of tourist accommodation in identified key areas that reflect long-standing tourism accommodation uses.	Positive impacts from the protection of tourist accommodation, maintaining the established identity of core areas of tourism on the Island and the subsequent associated benefits such as co-location of associated tourism uses/attractions. Negative impacts as both recent and long-term vacant tourism sites decline into disrepair and derelict, increasing unlikelihood or re-use as tourism accommodation due to the required investment in a brownfield site against viability. Reducing the possibility of vacant tourist accommodation redevelopment through protection will impact on the overall attractiveness of the area and the quality of the tourism offer locally.	Set criteria on how long a tourism accommodation site can remain vacant before reviewing and then removing protection. Explore tourism demand and market on the Island to develop a long-term strategy that considers all tourism related uses and needs.	The approach acknowledges key tourist accommodation areas but fails to adapt to current status of sites in terms of vacancy and dereliction. Policy approach will likely continue and exacerbate these issues.
B	E8 with a revised tourist accommodation area(s).	Provides a level of protection, based upon recent survey work to more closely reflect the reality of the state of tourism accommodation. Being sensitive to where investment through redevelopment, by release of restrictions, may be preferable to protection, and equally where protection based upon existing provision is still valid.	Will help to improve the overall existing quality of tourism accommodation and is therefore more likely to be maintained, attract new tourism accommodation development and other tourism related uses to the area. Release of sites may contribute to local housing need in a physically restricted area of supply (Sandown Bay). Potential negative impacts through clashes of different uses.	Review spatial implications of a revised tourism accommodation area to identify potential impacts through changes of use with a view to understanding any mitigation requirements that could be condition as part of site release (e.g. parking, boundary treatment, noise etc).	Protects tourism accommodation use where this is a current use (as opposed to a vacant site) and maintains a spatial anchor for tourism related uses around a defined area. Tourism accommodation sites vacant and derelict and unlikely to return to tourism uses, are more likely to be considered for redevelopment, increasing the possibility of

					addressing vacant and eyesore sites, thereby improving the local area.
C	E8 with removed core tourism accommodation areas(s).	Allows an unrestricted (in land use planning terms) approach to tourist accommodation and potential change to other uses. May aid redevelopment of tourism sites no longer viable for said use.	Will allow the market to react to demand and viability, resulting in increased possibility of redeveloping vacant sites. Viable tourism accommodation will be vulnerable to change of use to realism short term profit over longer term investment (e.g. change of use from tourism accommodation to residential). This also increases the potential for unanticipated impacts through clashes of different uses. More likely to disperse tourism accommodation use across the Island and will therefore lose the benefits associated with having a defined tourism area.	Set policy requirements for the release of individual tourism accommodation sites that takes into account the likely effect on any surrounding tourism accommodation uses, based upon occupancy/vacancy.	Even where viable, tourism accommodation uses will be vulnerable to changes of use. This could precipitate the erosion of established areas of tourism in the Bay area.

Table 4.12: ISA Assessment of E8 tourism accommodation options

		ISA Objectives*															Commentary		
		Environmental									Social			Economic					
E8: Supporting high quality tourism		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	
		A		0	0	0	0	?	0	-	0	0	-	-	0	0	0	0	-

B	0	0	0	0	?	0	+	0	+	+	0	+	+	+	0	+	+	Multiple positive impacts from a nuanced approach to protection of tourism accommodation, likely leading to virtuous cycles of related benefits, including improvements in the local area, increased investment and employment opportunities. Release of sites may contribute to local housing need in a physically restricted area of supply that is well served in provision of services and facilities (including education) and well connected (with the Island’s only rail link). <b>This option has been selected as the preferred option.</b>
C	0	0	0	0	?	0	+	0	+	?	0	+	+	+	0	+	?	Allowing a free-market approach creates significant uncertainties, particularly with regards to local identity in terms of remaining a centre for tourism (at least in it’s current form) and potential loss of employment. Of particular note is the potential impact upon the ISA Objective ‘Facilitate high and stable levels of employment so everyone benefits from economic growth.’ where the assessment criteria includes, ‘Does the Plan support tourism?’ It is difficult to understand what impact this option might have upon tourism, resulting in a ‘Unknown’ judgement, but this should be viewed as a potential risk, given the significance of tourism to the Island as a whole, and this primary settlement in particular. <b>This option is rejected.</b>

4.6.33 When assessing the impacts of each option against the baseline of existing tourism uses many of the ISA objectives are recorded as ‘Negligible or no effect on the objective’ (recorded as a ‘0’). This is based upon the assumption that regardless of the specific use, the generic use, i.e. some form of accommodation on a site already in such use (albeit some may be vacant) in an established residential area is unlikely to result in significant effects. With regards to

considering the options for policy E8 and tourism accommodation this is particularly the case for the Environmental objectives of the ISA assessment framework.

#### **Conclusions on ISA performance, recommendations (including mitigation)**

- 4.6.34 Option A (E8 as submitted) is the only option to record negative impacts against ISA objectives. These are all linked to the existing levels of vacancy, with some tourism sites evidently being vacant for sufficient periods of time as to become derelict. This has subsequent negative effects, where the sites are within a primary settlement, at varying scales, from the immediate street scene, wider local urban environment and the overall experience (for both visitor and resident) of the area. Maintaining the level of protection is unlikely to attract the inward investment necessary to bring many of these sites back into use, due to the investment required versus return, certainly in terms of tourism related uses.
- 4.6.35 Option B (E8 with a revised tourist accommodation area) records the highest number of positive impacts against the ISA objectives and no unknowns (?) (other than against 5. Cultural heritage, see para. 4.6.57 re. approach to HE comments). ISA objectives where there are positive impacts not recorded for either option A or C are against 10 Culture and 17 Employment and economy, reflecting the likely positive benefits relating to improvements in the local area and increased investment and employment opportunities.
- 4.6.36 Option C (E8 with removed core tourism accommodation areas(s)) has the most number of uncertainties (? Unknown) of impacts against the ISA objectives. These impacts are based around the economy and identity of the core tourism areas within the Bay area. While a free-market approach may attract investment, a lack of control will make all tourism sites vulnerable to more profitable investments, particularly changes of use from tourism to residential. While this would be beneficial in terms of those vacant and derelict sites that are beyond the likely financial scope for tourism use, the potential threat to the existing tourism uses and related tourism employment of the Bay area is unknown.
- 4.6.37 **Option B E8 with a revised tourist accommodation area(s) has been identified as the preferred option in terms of ISA.**
- 4.6.38 In order to maximise the potential benefits of option B a review spatial implications of a revised tourism accommodation area to identify potential impacts through changes of use should be carried out, with a view to understanding any mitigation requirements that could be condition as part of site release (e.g. parking, boundary treatment, noise etc). It is likely that these impacts (particularly where they are site-specific) will be addressed through the other policies of the IPS relevant to the proposed use, however a wider understanding of the potential impacts (positive and negative) on the local economy and the Island's tourism industry, possibly through a tourism strategy that links to longer term plan epochs, could help ensure an iterative approach between

the policy option and its effects in context, such that measures and adjustments could be made through future plan cycles. For the plan itself it is recommended that annual monitoring includes reporting on permissions (including non-tourism uses, in particular residential/changes of use from tourism) within both the wider primary settlement boundary of the Bay and the revised accommodation boundary area to inform how the (tourism) protected areas are performing and what the effects are on the wider settlement. This should form the baseline for any subsequent review.

**EV5: Trees, woodland and hedgerows**

4.6.39 Bullet d of Policy EV5 details that at least a 50 metre buffer should be provided between new development and ancient woodland. In [ED4 ‘Inspectors Matters, Issues and Questions’](#) question 4.2 asked whether the proposed 50m buffer to ancient woodland in Policy EV5 was justified and consistent with national policy. The council’s Matter 4 Hearing Statement (page 8) provided an initial response, before this particular issue was discussed in more detail at the examination hearings. The current standing advice provided by Natural England / Forestry Commission is that a minimum buffer should be 15 metres.

4.6.40 In ED21 Post Hearings Letter, the Inspectors clearly set out at paragraph 55 that they will be recommending a main modification that reduces the buffer from 50 metres to 15 metres. As such, the proposed policy options to consider are set out below, solely dealing with bullet (d) of the policy.

**Table 4.13: EV5 point d tree buffer options**

1. Option		2. Reasons for identification	3. Likely significant effects	4. Mitigation	5. Conclusion
A	EV5 point d as submitted (minimum 50m buffer) for examination.	Provides larger area of protection above guidance or requirements.	Potentially sterilises areas of a development site unnecessarily, reducing potential site yield and viability.	Make the application of the 50m buffer dependent upon criteria, based upon tree species and development type.	A 50m buffer does not align with national guidance and is likely to be viewed as excessive by the development sector. This will likely lead to challenge and there is uncertainty on robustness given the level of evidence.

B	EV5 removal of point d.	Continues existing level of protection.	Trees that are not specifically protected (i.e. Ancient, veteran & TPOs) will have the same level (as existing) of vulnerability to harm or removal.	Site survey requirements to include consideration of all trees. This would need to be checked and verified by the council.	Continues a reactive approach that draws on existing limited council resource. No improvement in the level of protection afforded trees.
C	EV5 revision of point d to a reduced 15m buffer.	Aligns with guidance, provides a consistent approach, particularly for developers operating across multiple LPA areas. Provides a level of protection for all trees without significant landtake/footprint.	Positive benefit in providing protection to trees. Minor negative with some area of potential development sites being taken out of consideration. Consistent (with national guidance) approach so reduced likelihood of challenge.	Ensure revised requirements are included in an updated proposals map, so that consideration of applicable buffer is at the earliest possible point of consideration (i.e. pre-application) to avoid any potential impacts on yield and/or viability. Consider whether on-site buffer allowance could also be included in any biodiversity provision, dependent on requirements and proposals.	Provides an increase level of protection over existing local provision that aligns with national guidance.

Table 4.14: ISA Assessment of EV5 point d tree buffer options

		ISA Objectives*															Commentary		
		Environmental									Social			Economic					
EV5: Trees, woodland and hedgerows	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																		

<p><b>A</b></p>	<p>0</p>	<p>+</p>	<p>0</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>0</p>	<p>+</p>	<p>?</p>	<p>0</p>	<p>-</p>	<p>-</p>	<p>0</p>	<p>+</p>	<p>0</p>	<p>-</p>	<p>There are a number of positive impacts from a larger buffer, all environmentally based (the benefit from the ISA topic area 15 <i>Accessibility</i> relates to the assessment criteria '<i>Does the Plan provide additional opportunity for access to green infrastructure?</i>'). This is the only option with negative impacts, again reflecting the consequences of a larger buffer and how this could impact both the viability and amount/yield on a site with trees. An 'Unknown' effect has been recorded against ISA topic area 10 <i>Culture</i>, as it's not possible to determine if the 50m buffer would have a positive (by helping to conserve) or negative (by stymying redevelopment and investment) effect when considering the assessment criteria '<i>Does the Plan support the local identity of individual settlements?</i>'. <b>This option is rejected.</b></p>
<p><b>B</b></p>	<p>0</p>	<p>Remaining with the status quo will result in no change from the existing baseline when considering potential impacts against the various ISA topic areas and assessment criteria. Similarly, there are no positive benefits realised. <b>This option is rejected.</b></p>																

C	0	0	0	0	0	+	+	0	+	+	0	0	0	0	+	0	0	<p>A range of positive impacts come from an increase (over existing) level of protection. By not being as extensive (as 50m in option A) a positive impact is also recorded against ISA topic area 10 Culture, assessment criteria ‘Does the Plan support the local identity of individual settlements’ by allowing the protection of trees to make a positive contribution to the character and setting of a settlement, without impacting on investment through redevelopment and growth.</p> <p><b>This option has been selected as the preferred option.</b></p>
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**Conclusions on ISA performance, recommendations (including mitigation)**

- 4.6.41 Option A (EV5 point d as submitted, minimum 50m buffer, for examination) is the only option to record negative impacts, being against 12 Health and population, 13 Equality, and 17 Employment and economy. These are related to the size of the extended buffer and how it could impact on site yield, with subsequent impacts on provision and viability, which could ultimately impact on the potential for the provision (or contribution to) affordable housing. Also of note are the number of positive impacts, these are focused around the Environmental ISA objectives and related to a physically increased area of protection and the subsequent benefits that affords in terms of green space, biodiversity, landscape and climate change (resilience).
- 4.6.42 Option B (EV5 removal of point d) is benign in as far as likely having no significant impacts (positive or negative) against any of the ISA objectives. This is on the basis that remaining with the status quo will result in no change from the existing baseline when considering potential impacts against the various ISA topic areas and assessment criteria.
- 4.6.43 Option C (EV5 revision of point d to a reduced 15m buffer) has a number of positive impacts against ISA objectives 6 Biodiversity, 7 Landuse, 9 Climate Change resilience, 10 Culture, and 15 Accessibility. By offering an increased level of protection (over existing) but not being as physically extensive as option A, option C is able to strike a balance that has many of the benefits from option A (such as biodiversity, landuse and climate change) without incurring the negative impacts experienced by option A. In addition, a positive impact is also recorded against ISA objective 10 Culture, where the assessment criteria asks ‘Does the Plan support the local identity of individual settlements’, by allowing the protection of trees to make a positive

contribution to the character and setting of a settlement, without impacting on investment through redevelopment and growth. While not as many positive impacts against ISA objectives as option A (5 for option C versus 7 for option A), unlike option A, option C has no negative impacts, whereas option A records 3 ISA objectives with potential negative impacts.

**4.6.44 Option C EV5 revision of point d to a reduced 15m buffer has been identified as the preferred option in terms of ISA.**

4.6.45 A potential minor impact was identified in relation to the physical area of potential development sites being taken out of consideration. In order to minimise this potential impact it is recommended that revised requirements are included in an updated proposals map, so that consideration of applicable buffer is at the earliest possible point of consideration (i.e. pre-application) to avoid any potential impacts on yield and/or viability. Also, consideration should be given as to whether on-site buffer allowances could also be included in any biodiversity and/or SuDS provision, dependent on requirements and proposals. Some cross-referencing in either policy wording or supporting text may help to ensure this.

**C1: High quality design for new development**

4.6.46 In the council's **Housing Shortfall Methodology** document, paragraph 21 highlights that policy C1, which sets out the core design principles and requirements for new development, could provide a mechanism to introduce minimum density requirements. Such requirements may then contribute to additional housing by ensuring that development sites do not fall below certain density levels, and a quantified level of growth can be calculated from the amount of land allocated and more accurately estimated from any windfall allowance.

4.6.47 As submitted, bullet (b) of Policy C1 provides generic wording that requires sites to maximise the potential of a site through appropriate density that has regard to the existing constraints of a site.

*b maximise the potential of the site through appropriate density that has regard to existing constraints, such as adjacent buildings and topography and takes account of and protects and enhances where appropriate views, watercourses, hedgerows, trees, incidental green space, wildlife corridors or other features which significantly contribute to the character of the area;*

It is this bullet where alternative options have been set out below.

**Table 4.15: C1 point b site density options**

1. Option		2. Reasons for identification	3. Likely significant effects	4. Mitigation	5. Conclusion
A	Keep existing requirements in bullet point b.	Ensure development is appropriate in terms of density, for it's location.	Mitigation identified in the previous (2024) ISA has been actioned (i.e. removal of 'where possible') to improve this option's performance against the ISA Biodiversity objective.	Mitigation identified for this option has already been actioned through amended policy wording.	No change from previous policy position.
B	Set a minimum density for all development in all locations (e.g. 40dpa).	Provides a uniform approach to all sites, increases certainty in quantum.	Potential for harm to designated heritage assets and environmental designations as setting minimum densities not based on individual site characteristics may lead to inappropriate design solutions.	None is available as a plan making stage as providing detailed minimum densities for all allocated sites and windfall sites is not possible.	The potential harm caused by introducing a minimum site density can't be quantified as every site will have different characteristics. Due to this uncertainty, under a precautionary approach, all development would have to be identified as having the potential to cause significant harm to heritage assets and environmental designations were it located in close proximity to these features.
C	Set varying densities dependent upon location (eg set quantum's per settlement hierarchy such as 40dph in primary, 30dph in secondary	Provides a more structured approach to minimum densities, using settlement size as a way of helping to gauge the required density.	Potential for harm to designated heritage assets and environmental designations as setting minimum densities not based on individual site characteristics may lead to inappropriate design solutions. Potential positive of increasing viability of some sites where lower numbers of units could lead to viability issues.	A degree of mitigation can be provided by using lower densities in the smaller settlements that should help to mitigate some potential harm in these areas.	The potential harm caused by introducing a minimum site density can't be quantified as every site will have different characteristics. Even with lower densities in smaller settlements, there remains a high level of uncertainty and under a precautionary approach, all development would have to be identified as having the potential to cause significant harm to heritage

	and 20 dph in rural settlements).				assets and environmental designations were it located in close proximity to these features.
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Table 4.16: ISA Assessment of C1 point b site density options

C1: High quality design for new development	ISA Objectives*																Commentary	
	Environmental									Social				Economic				
	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
A	0	+	0	+	+	+	+	0	+	+	0	0	0	0	+	0	0	Allows a proposal to adapt to site conditions and it's surroundings. This is likely to result in new development being sympathetic to the host settlement by matching proposed density with existing, in addition to taking into account other site-specific factors. While the option doesn't reduce development in absolute terms, it will only lead to maximising yield potential in a controlled (appropriate) fashion. <b>This option has been selected as the preferred option</b>

B	-	-	-	-	-	-	-	-	-	-	-	+	0	0	-	-	+	<p>Takes away the ability a site to adapt to it's constraints and surroundings (e.g. flood risk, wastewater infrastructure capacity, biodiversity and historic environment). Negative impacts on character and setting of different scales of settlements, further exacerbated by an Island-wide uniform approach to site density. Positive impacts relate to certainty in level of provision of housing regardless of location and employment and investment opportunities. <b>This option is rejected.</b></p>
C	-	-	+	?	-	-	-	-	-	-	0	+	+	0	?	-	+	<p>Matching density to settlement scale likely to match or reduce impacts on existing infrastructure provision. Reduces the ability of a site to adapt to the specific constraints and conditions of that site and it's surroundings. Potential for harm to designated heritage assets and environmental designations as setting minimum densities not based on individual site characteristics may lead to inappropriate design solutions. Potential positive of increasing viability of some sites where lower numbers of units could lead to viability issues. Uncertain how this option would affect access, particularly to green infrastructure. <b>This option is rejected.</b></p>

**Conclusions on ISA performance, recommendations (including mitigation)**

4.6.48 Option A has the highest number of positive impacts against ISA objectives at 8, double the next highest performing option (C with 4 positive impacts). Most (6) of these are within the environmental group of objectives and reflects the ability of this option to adapt to it's physical surroundings. While there

are 9 'no' or 'negligible' impacts there are no negative impacts for this option. It should be noted that this option has already been assessed through the ISA process, with the identified mitigation having already been implemented through amended policy wording.

- 4.6.49 Option B scored the highest number of negative impacts against the ISA objectives, including all 9 of the environmental group of objectives. This is due to the fixed nature of the policy option, which removes the ability for a site to adapt to the conditions and surroundings. No viable mitigation was identified which sustains the negative performance of the option. There are positive impacts in relation to certainty in level of provision of housing regardless of location and employment and investment opportunities.
- 4.6.50 Option C has a high number of negative impacts against 9 ISA objectives. Similar to option B, the majority of these (7) are against environmental objectives, reflective of a similar structured approach that reduces the ability of a site to adapt to the specific constraints and conditions of that site and its surroundings. There are more positive impacts with option C in comparison to option B (4 versus 2 respectively) as a consequence of option C having a more nuanced approach of matching density to settlement scale, and therefore likely to match or reduce impacts on existing infrastructure provision, and potential of increasing viability of some sites where lower numbers of units could lead to viability issues.
- 4.6.51 **Option A, Keep existing requirements in bullet point b has been identified as the preferred option in terms of ISA.**
- 4.6.52 There are no significant negative impacts identified against the preferred option, option A. Mitigation identified for this option has already been actioned through amended policy wording.

#### **C11: Net zero carbon and lowering energy consumption in new development**

- 4.6.53 Policy C11 requires all new residential homes to be net zero carbon and details four separate performance thresholds (KPIs) for development to adhere to. These cover Space heating demand, energy use intensity, renewable energy and embodied carbon.
- 4.6.54 In [ED4 'Inspectors Matters, Issues and Questions'](#) question 5.6 asked whether the proposed requirements of policy C11 were justified and consistent with national policy having regard to the written ministerial statement (WMS) of 23 December 2023. The council's Matter 5 Hearing Statement (pages 9-11) provided a detailed response, before this particular issue was discussed in more detail at the examination hearings.

4.6.55 In ED21 Post Hearings Letter, the Inspectors clearly set out as their ‘Key Soundness Issue 3’ that they considered this policy, as submitted, to be unsound. At paragraph 50, the Inspectors set out what they believe are the three options available to the council and these are reproduced below:

- a) delete the policy;
- b) replace with a generic policy;
- c) reformat the policy in line with the WMS

4.6.56 The options set out below address some of the options above, whilst the council also believe that retaining the policy in its current form also represents a realistic option given recent policy development in other parts of the country where Inspectors have adopted policies with the same performance thresholds.

**Table 4.17: C11 Net zero carbon options generation and screening**

1. Option		2. Reasons for identification	3. Likely significant effects	4. Mitigation	5. Conclusion
A	C11 as submitted for examination (with higher energy efficiency standards expressed through Energy Use Intensity and Space Heating Demand metrics).	Recent development plan documents adopted or emerging elsewhere (e.g. Lancaster, Uttlesford, Salt Cross) ) and a recent High Court judgement ( <i>Rights: Community: Action Ltd) v Secretary of State for Housing, Communities and Local Government [2025] EWCA Civ 990</i> ) have provided a clear rationale for an LPA to not be bound by the WMS, but take forward a local, evidenced based policy such as C11. Previous ISA work in 2021 also concluded that such a policy should include	Environmentally, requiring all new residential development to meet net zero standards will have significant positive benefits through the associated reduction in carbon. Socially, occupants of net zero housing will benefit from lower energy bills. From an economic perspective, the additional cost burden per dwelling of meeting net zero thresholds set out in the policy could contribute to wider viability issues. Local requirements may not be consistent with surrounding authority areas which may affect	Consider an element of flexibility where a development could achieve the required standards, such as phased introduction over several years may provide some flexibility to help the market adjust.	No change from previous policy position.

		ambitious and measurable targets to help achieve zero emissions by 2050.	attractiveness of the Island to national housebuilders and could impact housing delivery.		
B	C11 Amended to align with written ministerial statement by expressing higher energy efficiency standards as a percentage uplift of a dwellings Target Emission Rate (TER).	Identified by the Inspectors as a potential option following examination hearings and post hearings letter so that policy aligns with the WMS.	Environmentally, whilst the principle of higher energy efficiency standards in this option has the potential positive impact of reducing carbon, the practical implementation of using an approach based on a % improvement (TER) is detrimental and is unlikely to lead to significant benefits. TER is based on a required improvement over a baseline: the 'notional building' which creates two main issues – The setting of the notional building, in particular the fact that it has to be the same shape, orientation and, up to a point, glazing proportions as the actual building; The approach based on relative performance compared to the notional building instead of an absolute performance level, which creates confusion and makes a post-construction verification and feedback loop more complicated. For the reasons above, the likely environmental benefits of this option cannot be guaranteed.	Mitigation would be to change the measurable metrics in policy, which is Option A above, so no mitigation available for Option B.	Option would introduce a performance metric in policy that could be measured in some way, however the metric would generate additional issues in monitoring and implementing. Whilst the option would align with current national guidance, it may not lead to significant environmental benefits. Option to be assessed.

			<p>Socially, occupants of net zero housing will benefit from lower energy bills.</p> <p>From an economic perspective, the additional cost burden per dwelling of meeting net zero thresholds set out in the policy could contribute to wider viability issues.</p> <p>Negative impact on viability and consequent impact on housing delivery.</p>		
C	Remove policy C11 in its entirety and rely solely on national policy, guidance and standards.	Identified by the Inspectors as a potential option following examination hearings and post hearings letter – evolving building regulations and forthcoming Future Homes Standard will set framework for this topic.	Not having a locally set policy is likely to extend the timeframe for development on the island to meet net zero standards meaning negative environmental impacts due to continued use of carbon. Financially, the viability of development will be positively impacted and relying on national scale implementation may also bring economies of scale, further reducing costs.	Relying on national policy means there is no local level mitigation that can be applied to offset the identified likely significant effects.	The option would wholly align with national policy and would also allow a consistent approach to the topic on a national level, with associated supply chain and competition benefits. There may be a delay in securing the associated environmental benefits however option to be assessed.
D	Revise policy C11 to remove specific metrics and targets and provide general in principle support for net zero/energy	Identified by the Inspectors as a potential option following examination hearings and post hearings letter as this would maintain policy support for the topic but not be prescriptive or require it as a policy outcome.	A generic policy would provide social benefits of potential increased awareness of net zero and energy efficient development. Financially, from a viability perspective there would be positive impacts on development as no	No mitigation available for the option as generic policy wording making no requirements on development cannot	<b>Option not to be taken forward for assessment</b> as in principle general support for renewable and energy efficient development is already provided in other IPS

	efficient development		associate additional costs as no specific policy requirements to meet.	lead to specific mitigation to offset impacts as impacts will be unquantified and unknown.	policies (C1 and C10) and also in the NPPF.
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Table 4.18: ISA Assessment of C11 net zero carbon policy options

	ISA Objectives*																	Commentary
	Environmental									Social				Economic				
C11: Net zero carbon and lowering energy consumption in new development	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	
A	+	0	0	0	?	0	0	+	0	0	0	-	-	+	0	0	+	Positive impacts through the associated reduction in carbon and lower energy bills. Impact on viability, in turn reducing delivery of affordable housing. Would support the growth of a local renewables sector. Negative impacts relating to the cost of implementing and effect on delivery. <b>This option is rejected.</b>
B	0	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	<b>This option is rejected.</b>
C	0	0	0	0	?	0	0	-	0	0	0	0	0	0	0	0	+	Negative impacts due to continued use of carbon. Viability of development will be positively impacted and relying on national scale implementation may also bring economies of scale, further reducing costs. Associated positive impact on delivery of housing being more likely. <b>This option is selected as the preferred option.</b>

4.6.57 Delivery of zero carbon development by its nature will be technology-led, so the potential impacts on the historic environment are unknown. Design (at both site and individual building level) will be significant in a development's ability to mitigate visual impacts. As Historic England raised more generally in terms of a development's ability to contribute negatively or positively to an existing heritage asset, the same stance can be taken with a zero carbon approach to development, which the council would expect to become the norm over time.

**Conclusions on ISA performance, recommendations (including mitigation)**

4.6.58 Option A is the only option to record negative impacts, against 2 ISA objectives, being 12 Health and population, and 13 Equality. These negative impacts relate to the wider financial implications of the option, being the additional cost burden per dwelling and how this could impact viability, and how a bespoke authority approach (diverging from government advice) could affect attractiveness of the Island to national housebuilders and could impact housing delivery. Conversely, this is also the only option to record positive impacts against ISA objectives, of which there are 4, spread through the 3 (Environmental, Social, Economic) objective groupings. Requiring all new residential development to meet net zero standards will have significant positive benefits through the associated reduction in carbon, and occupants of net zero housing will benefit from lower energy bills.

4.6.59 Option B records all negligible impacts (ISA objective 5. Cultural heritage aside, see para. 4.6.57 re. Historic England) reflective of the fact that the practical implementation of using an approach based on a % improvement (TER) is unlikely to lead to significant impacts (positive or negative). Whilst the principle of higher energy efficiency standards in this option has the potential positive impact of reducing carbon, the practical implementation of using an approach based on a % improvement (TER) is detrimental and is unlikely to lead to significant benefits.

4.6.60 Option C records all negligible impacts, except for 2 ISA objectives, being 8. Climate change emissions and 17. Employment and economy. There is a potential negative impact against ISA objective 8. Climate change emissions, as not having a locally set policy is likely to extend the timeframe for development on the island to meet net zero standards meaning negative environmental impacts due to continued use of carbon. There is a positive impact against ISA objective 17. Employment and economy, where the viability of development will be positively impacted and relying on national scale implementation may also bring economies of scale, further reducing costs.

4.6.61 **Option C, deleting policy C11 as submitted for examination has been identified as the preferred option in terms of ISA primarily due to the positive impact on viability and therefore delivery.**

4.6.62 There is no mitigation identified with this option as deleting the policy would mean a reliance on nationally set policy through the Building Regulations and/or Future Homes Standard.

## 4.7 Findings of the Assessment of the Policies

4.7.1 The full assessment of the policies (not reassessed in 2025 re. above) 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 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 findings<sup>19</sup>.

### **Growth (G1- G5);**

4.7.2 Table 4.19 provides a snapshot visual summary of the sustainable development and growth group of five policies relating to sustainable development.

**Table 4.19: 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

4.7.3 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

<sup>19</sup> 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 is no way affects the assessment.

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.

4.7.4 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.

4.7.5 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 (Option H) Focus majority of development to within the settlement boundaries, with additional development immediately adjacent rural service centres boundaries:** Limit the size of any single site and consider the cumulative effects of multiple sites on a settlement, based upon the size of a proposal in comparison to the host settlement and the proportion of new development to established existing settlement. Where an identified local need exists ensure consideration of this is a requirement. Development will need to demonstrate the ability to provide safe pedestrian access to sustainable modes of transport.
- **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)**

4.7.6 Table 4.20 provides a snapshot visual summary of this group of policies relating to housing delivery.

**Table 4.20: 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	?	0	-	-	?	-	-	-	-	+	0	+	+	0	+	-	+
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	?	?

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

4.7.7 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.

4.7.8 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 impacts.

4.7.9 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.

4.7.10 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 (revised):** In order to minimise any negative impacts it is recommended that any revised policy wording reflects the evidence in relation to location, size and type of development site, to maximise the affordable housing provided and secure the best social and economic outcomes for island residents.
- **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 meet 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);**

4.7.11 Table 4.21 provides a snapshot visual summary of this group of policies relating to the economy.

**Table 4.21: Summary of Supporting and growing our economy\_assessment**

IPS	ISA Objectives*							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 Air	2. Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use										
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	+	+
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	+

4.7.12 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.

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

4.7.14 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.

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

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

4.7.17 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.
- **E8 Supporting high quality tourism** - with a revised tourist accommodation area(s). In order to maximise the potential benefits of option B a review of spatial implications of a revised tourism accommodation area to identify potential impacts through changes of use should be carried out, with a view to understanding any mitigation requirements that could be condition as part of site release (e.g. parking, boundary treatment, noise etc). It is likely that these impacts (particularly where they are site-specific) will be addressed through the other policies of the IPS relevant to the proposed use, however a wider understanding of the potential impacts (positive and negative) on the local economy and the Island's tourism industry, possibly through a tourism strategy that links to longer term plan epochs, could help ensure an iterative approach between the policy option and it's effects in context, such that measures and adjustments could be made through future plan cycles. For the plan itself it is recommended that annual monitoring includes reporting on permissions (including non-tourism uses, in particular

residential/changes of use from tourism) within both the wider primary settlement boundary of the Bay and the revised accommodation boundary area to inform how the (tourism) protected areas are performing and what the effects are on the wider settlement. This should form the baseline for any subsequent review.

- **E9, 10 and 11 Tourism, the Bay and Ryde:** Consider combining the policies relating to tourism.

**Transport (policies T1-T 6)**

4.7.18 Table 4.22 provides a snapshot, visual summary of this group of policies relating to transportation.

**Table 4.22: Summary of Better Connected Island ISA Assessment**

IPS Policy Better connected Island	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
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

4.7.19 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).

4.7.20 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.

- 4.7.21 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).
- 4.7.22 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.
- 4.7.23 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.
- 4.7.24 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);**

- 4.7.25 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 4.23).
- 4.7.26 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.
- 4.7.27 Policy C10 (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). The preferred option for policy C11 Net zero carbon and lowering energy consumption in new development has been reassessed (during examination pause 2025) as *'Remove policy C11 in its entirety and rely solely on national policy, guidance and standards.'* The ISA performance of removing this policy has been included below to ensure the incombination effects for the Community group of policies in the plan is understood. If the preferred ISA option is taken forward into the plan this would result in the removal of this policy.
- 4.7.28 These policies contain specific schemes (health related), the effects of which are considered in the site allocation (section 5.6).

**Table 4.23: 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
C2	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
C10	+	-	0	-	?	?	?	+	+	0	0	0	0	0	0	0	0
C11 (deletion of)	0	0	0	0	?	0	0	-	0	0	0	0	0	0	0	0	+
C12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
C13	?	?	+	?	0	?	?	0	0	0	0	0	0	0	0	+	0
C14	0	0	0	0	0	0	0	0	0	+	0	0	0	+	+	+	0
C15	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

4.7.29 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 Remove policy C11 in its entirety and rely solely on national policy, guidance and standards:** Relying on national policy means there is no local level mitigation that can be applied to offset the identified likely significant effects.
- **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)**

- 4.7.30 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).
- 4.7.31 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 4.24 for the summary of the assessment of the EV policies.
- 4.7.32 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.

Table 4.24: 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
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

4.7.33 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.

4.7.34 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** - revision of point d to a reduced 15m buffer. A potential minor impact was identified in relation to the physical area of potential development sites being taken out of consideration. In order to minimise this potential impact it is recommended that revised requirements are included in an updated proposals map, so that consideration of applicable buffer is at the earliest possible point of consideration (i.e. pre-application) to avoid any potential impacts on yield and/or viability. Also, consideration should be given as to whether on-site buffer allowances could also be included in any biodiversity and/or SuDS provision, dependent on requirements and proposals. Some cross-referencing in either policy wording or supporting text may help to ensure this.
- **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.

## 4.8 B1-B5: Testing the Sites against the ISA Objectives

### Housing

4.8.1 With respect to considering alternative sites for housing allocations, a long list was developed from the SHLAA<sup>20</sup>. 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 size<sup>21</sup>. The remaining sites form a shortlist, total 162 sites. Table 4.25 sets out how this total is composed, taking into account the sites considered prior to submission of the IPS for examination and then the addition of sites following a subsequent refresh in 2025 during the pause in plan examination.

**Table 4.25: Evolution of the number of sites**

Number of sites	Running total	Source	Plan stage
148	148	SHLAA prior to plan submission in 2024 and assessed through ISA	Pre-submission
30	-	Allocations identified through the plan process	Submission
17	165	SHLAA refresh 2025	Examination (pause)
-3	162	3 of the new 2025 site identified as under 10 units	Examination (pause)
162	162	Updated sites total assessed for (ISA) impacts, mitigation and suitability in SA terms	Examination (pause)
30 + 8	38	Submission allocations plus additional allocations to meet shortfall raised during examination and identified through updated plan process (re. Evidence Paper E)	Examination (pause)
50	50	ISA assessment of in-combination effects	Examination (pause)
50	50	IPS Allocations (revised 2025 update)	Examination resumption 2025 - 2026

<sup>20</sup> Strategic Housing Land Availability Assessment (SHLAA)

<sup>21</sup> All sites less than 10 units excluded from assessment, but to fall in windfall numbers.

4.8.2 All sites in the SHLAA have been assessed in accordance with the methodology outlined in section 3 and Table 3.6. Full details of the individual assessments of these sites can be found in Appendix 3. Not all of the sites assessed have been selected for allocation, those assessed but not allocated may be considered alternative sites to those selected for allocation.

4.8.3 An assessment of (14) sites in 2025 has been carried out that is consistent with how all the previous sites have been assessed. This has provided a set of site assessment tables that are directly comparable to those carried out in the previous assessment and Appendix 3 has been updated to contain all (162) site assessment sheets. Table 4.26 provides a summary of how all the new sites have performed against ISA objectives.

**Table 4.26: Summary of ISA assessment of additional sites in 2025**

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
155 Staplers Rd	+	?	0	+	?	0	0					?	?	?		-	?
Old Diary Farm	+	?	?	+	?	0	+					?	?	?		-	?
266 Gunville	+	?	?	+	?	?	0					+	?	?		-	?
Horse Hill	+	?	?	+	0	0	+					?	?	?		+	?
Ashey Road	+	?	?	+	?	0	0					?	?	?		-	?
Ryde Theatre	+	?	?	+	-	0	+					+	?	?		+	?
St Vincents	+	?	?	+	?	0	+					?	?	?		+	?

Highwood Grove, Rookley	+	?	?	+	?	0	0					?	?	?		0	?
Eddington Rd Nettlestone	+	?	?	+	?	0	0					+	?	?		-	?
Sandown Airport	+	?	?	+	?	?	+					?	?	?		-	?
Chatfield Rd Niton	+	?	?	-	?	0	0					?	?	?		0	?
The Lodge Rookley	+	?	?	-	?	0	0					?	?	?		0	?
Elm Lane Calbourne	+	?	?	?	?	0	0					?	?	?		-	?
Merlins Farm Calbourne	+	?	?	?	?	0	0					?	?	?		-	?

4.8.4 Following the assessment of the new sites in 2025, this ISA has collated the performance of all the sites detailed in the individual site assessments, into a single summary assessment. This identifies which sites would not be suitable on ISA grounds, to take forward to allocations and includes details against the relevant ISA objective as to why. For those that are identified as potentially suitable any mitigation identified in the individual site assessments should be considered through an update to the mitigation requirements of allocations (as set out in Appendix 3 of the IPS).

4.8.5 Table 4.27 sets out all sites, the ISA objectives against which any impacts have been identified ('ISA Impacts') and if there is any mitigation. The final column 'SA suitability' makes a judgement based upon both the nature of any impacts identified and the ability (or otherwise) to mitigate these, whether or not the site would be suitable (again, it should be stressed, this is purely in SA terms and does not apply any plan or site selection principles such as preferred spatial strategy etc).

**Table 4.27: Summary site assessment SA suitability**

Site	ISA Impacts	Mitigation	SA suitability
1   155 Staplers Rd	16	Yes	Yes
2   Old Diary Farm	16	Yes	Yes
3   266 Gunville	16	Yes	Yes
4   Horse Hill	None	n/a	Yes

5	Ashey Road	16	Yes	Yes
6	Ryde Theatre	5	Yes	Yes
7	St Vincents	None	n/a	Yes
8	Highwood Grove, Rookley	3	Yes	Yes
9	Eddington Rd Nettlestone	3,16	Yes	Yes
10	Sandown Airport	3, 16	Yes	Yes
11	Chatfield Rd Niton	4	Yes	Yes
12	The Lodge Rookley	3, 4	Yes	Yes
13	Elm Lane Calbourne	16	Yes	Yes
14	Merlins Farm Calbourne	16	Yes	Yes
15	IPS007 Church Field, Copse Lane, Freshwater,	4, 5, 6	Yes	Yes
16	IPS025 Winchester House, Shanklin	1	Yes	Yes
17	IPS034 Old Hosiden Besson Site, Binstead Road Ryde	3, 4	Yes	Yes
18	IPS035 Green Gate Industrial Estate, Thetis Road	3, 6 – 3, Flood Zone 3 (tidal/fluvial) inability to make development safe over it's lifetime.	No	No
19	IPS042, Former Somerton Reservoir, Newport Road	1, 17	Yes	Yes
20	IPS065 Learning Centre, Berry Hill, Lake	1, 6	Yes	Yes
21	IPS071, Heathfield Campsite, Heathfield Rd, Freshwater	7	Yes	Yes
22	IPS074 23 Carter Street, Sandown	1, 5	Yes	Yes
23	IPS077 Former Sandham Middle School Site, Perowne Way Sandown	1	Yes	Yes
24	IPS081 Sandown Town Hall, Grafton Street, Sandown	5	Yes	Yes
25	IPS082a Land and School buildings at Weston Primary School, Weston Road, Totland Bay	6, 14	Yes	Yes
26	IPS098 Palmers Farm Brocks Copse Road, Wootton Bridge	1, 7	Yes	Yes
27	IPS150 Westridge Cross Dairy and land to the north of Bullen Road, Ryde	3, 7	Yes	Yes
28	IPS183 Land north of Mill Road and east of High Street, Bembridge	6	Yes	Yes
29	IPS184 Land east of Hillway Road and south of Steyne Road, Bembridge	4, 7	Yes	Yes
30	IPS189 Land to the east of Football Club, Camp Road, Freshwater	4	Yes	Yes
31	IPS199 Land rear of 84 Wyatts Lane	1, 7	Yes	Yes
32	IPS200 Acorn Farm, Horsebridge Hill, Newport	4, 7	Yes	Yes
33	IPS231 Land West of Sylvan Drive, Newport	7	Yes	Yes

34	IPS233 Land east of Gunville Road and west of playing fields, Newport	1, 7	Yes	Yes
35	IPS234 Land to rear of Gunville Road, Newport	1, 7	Yes	Yes
36	IPS237 Land adjoining Scotland Farm and Tresslewood Care Village, Scotland Corner, Godshill	4, 7	Yes	Yes
37	IPS271 Land off Quarry Road, Ryde	None	n/a	Yes
38	IPS290 Crossway, East Cowes	1, 4	Yes	Yes
39	IPS317 Land rear of Harry Cheek Gardens, Northwood	7	Yes	Yes
40	IPS318 Land adjoining Lushington Hill & Hunters Way, Wootton	1, 4, 6, 7	Yes	Yes
41	IPS323 Somerton Farm, Newport Road, Cowes,	4, 6, 7	Yes	Yes
42	IPS342 Land off Gunville Road, Newport	3, 7	Yes	Yes
43	IPS358 Land South of Noke Common, Newport	4, 7	Yes	Yes
44	IPS371 Newport Harbour, Newport	3, 5, 6	Yes	Yes
45	IPS382 Land adjacent to Carisbrooke College	1, 7	Yes	Yes
46	IPS383 Former library HQ, Newport	1, 5, 6	Yes	Yes
47	IPS386 Land off Broadwood Lane, Newport	7	Yes	Yes
48	IPS394 Medina Yard, Cowes	3, 6 – 3, Flood Zone 3 (tidal/fluviat) inability to make development safe over it's lifetime.	No	No
49	IPS403 Land rear of Lanes End, Totland	2, 4, 6 – 2, Located within Coastal Change Management Area (proposed re. IPS policy EV16).	No	No
50	IPS406 Former HMP site Newport	1, 4, 6	Yes	Yes
51	IPS410 Land east of Birch Close, Freshwater	None	n/a	Yes
52	IPS411 Former Polars Guest House Newport	None	n/a	Yes
53	IPS412 St Marys RC Church, High Street Ryde	5	Yes	Yes
54	IPS413 Moreys Timberyard, Newport	None	n/a	Yes
55	IPS414 Land at Red Funnel, East Cowes	3, 5, 6	Yes	Yes
56	IPS 415 Land at Harcourt Sands, Ryde	5, 6, 7	Yes	Yes
57	IPS009 School Ground, Copse Lane, Freshwater, Isle of Wight, PO40 9DL	1, 4, 16	Yes	Yes

58	IPS010 Regina Field, Copse Lane, Freshwater, Isle of Wight, PO40 9DL	4, 7, 16	Yes	Yes
59	IPS019_WROXALL_Castle Works, Castle Road, Wroxall, Isle of Wight, PO38 3ED	1, 4, 5	Yes	Yes
60	IPS021 Land to the rear of 34 High Street, Oakfield, Ryde, Isle of Wight	None	n/a	Yes
61	IPS027 Former Flamingo Park, Oakhill Road, Seaview, Isle Of Wight, PO34 5AP	3, 5, 7, 16	Yes	Yes
62	IPS030 Highwood Nursery, Main Road, Rookley	4, 5, 7, 16 – 4, site wholly within the AONB (proposed major development).	No	No
63	IPS041 Former industrial building and land on the east side of Main Road, Rookley, PO38 3NG	3, 4, 16	Yes	Yes
64	IPS043 Land at Moor Farm, Godshell and located to the rear of the Council Car Park	4, 5, 7, 16	Yes	Yes
65	IPS051_WROXALL_Land adjacent to Castleworks, Castle Lane Wroxall Isle of Wight PO38 3DS	4	Yes	Yes
66	IPS053 117 Medina Avenue, Newport	3	Yes	Yes
67	IPS055 6-8 George Street, Ryde, IOW, PO33 2EB	5, 6	Yes	Yes
68	IPS060 Coppid Hall Farm, Main Road, Havenstreet, Isle of Wight, PO33 4DH	16	Yes	Yes
69	IPS066 Barton School Site, Green Street, Royal Exchange, Newport	1	Yes	Yes
70	IPS067_VENTNOR_Depot site at Lowtherville Road, Ventnor, Isle of Wight	1, 3, 6, 17 – 17, allocated employment site.	No	No
71	IPS072 Havenstreet Garage, Main Road, Havenstreet, Ryde, Isle of Wight	4, 16	Yes	Yes
72	IPS073 Former Worsley Inn, High Street Wroxall	4, 5, 16	Yes	Yes
73	IPS078 Test Centre site, 23 Medina Avenue Newport PO30 1EL	3	Yes	Yes
74	IPS079 Ventnor Youth Club, Victoria Street Ventnor	2, 16 – 2, within area at risk of future ground instability.	No	No
75	IPS080 St Thomas Street Car Park, Ryde	5, 6	Yes	Yes
76	IPS086 Land between Grasmere Avenue & Thornton Close, Appley Road, Ryde	7	Yes	Yes

77	IPS090 Land to the north west of Regina Road, Freshwater, Isle of Wight, PO40	7, 16	Yes	Yes
78	IPS091 Land to the east of Ventnor Road, Apse Heath, PO36 OJT	7, 16	Yes	Yes
79	IPS096 Land at Main Road, Wellow, Isle of Wight, PO41 OSZ	7, 16	Yes	Yes
80	IPS102 Land Near Brading Roman Villa Land off Morton Road Brading	4, 7, 16	Yes	Yes
81	IPS104 Land off Solent View Road Seaview PO35 ( Land to the rear of 51 - 67 )	6, 7, 16	Yes	Yes
82	IPS105 Land Adjoining Puckpool Hill ( The Archery Field) Ryde ( Appley Butts, Appley Playing Field)	5, 7	Yes	Yes
83	IPS115 Land East of Alverstone Road, Apse Heath, Sandown PO36 0LJ	4, 7, 16	Yes	Yes
84	IPS117 LAND REAR OF HIGH STREET WHITWELL WITH ACCESS	3, 5, 16	Yes	Yes
85	IPS125 Land at Seagrove Farm Road, Seaview	6, 7, 16	Yes	Yes
86	IPS126 Taylor Road, Carisbrooke PO30 5QU	1, 14	Yes	Yes
87	IPS131 Land at Baring Road Cowes	16	Yes	Yes
88	IPS135 Land north of Perowne Way and west of Brook Close, Sandown, Isle of Wight.	3, 7, 16 – 3, Flood Zone 3 (fluvial) inability to make development safe over it's lifetime.	No	No
89	IPS137 Land at Lower Bramstone Farm, Newport Road, Chale Green, Isle of Wight.	4, 7, 16	Yes	Yes
90	IPS145a Land north of Quay Lane, Brading	6, 7, 16	Yes	Yes
91	IPS147 Land to east of Chale Street and north of Upper House Lane, Isle of Wight	4, 5, 7, 16 - 4, site wholly within the AONB (proposed major development).	No	No
92	IPS154 Land to west of Newport Road, NORTHWOOD	7, 16	Yes	Yes
93	IPS157 Land between The Spinney & The Linhay, Park Road	1, 4, 16	Yes	Yes
94	IPS160 The Bayhouse Hotel, 8 Chine Avenue, Shanklin, Isle of Wight, PO37	None	n/a	Yes
95	IPS161 Land between 156 and 162 Gunville Road, Newport, Isle of Wight, PO30 5LS	7	Yes	Yes
96	IPS162 Merstone Valley Nurseries, Merstone Lane	7, 16	Yes	Yes

97	IPS177 Chester Lodge Hotel, 7 Beachfield Road, Sandown	None	n/a	Yes
98	IPS192 Land to South of Clayton Road, Freshwater (Land Area 1 on Plan)	3, 16	Yes	Yes
99	IPS196 Land at Puckwell Farm, adjacent to Niton Primary School, Niton.	1, 4, 16	Yes	Yes
100	IPS197 Land off Chatfield Road, Niton	4, 16	Yes	Yes
101	IPS198 Land at eastern end of Allotment Road, Niton	4, 16	Yes	Yes
102	IPS204 12 Wyatts Lane, Northwood	None	n/a	Yes
103	IPS205 Land rear of 37 Pallance Road, Northwood	None	n/a	Yes
104	IPS213 Wrax Farm, New Road, Brading	4, 6, 7, 16	Yes	Yes
105	IPS215 Manor Farm (West Field), Wellow Top Road, Wellow, Yarmouth, Isle of Wight PO41 0TB	3, 5, 7, 16	Yes	Yes
106	IPS217 Land adjacent Perowne Way, Sandown	3, 7, 16 – 3, Flood Zone 3 (fluvial) inability to make development safe over it's lifetime.	No	No
107	IPS220 Land at Lower Bramstone Farm, Newport Road, Chale Green t	4, 7, 16 - 4, site wholly within the AONB (proposed major development).	No	No
108	IPS222 Land at Tithe Barn Farm, adjacent Newport Road, Chale	4, 5, 7, 16 - 4, site wholly within the AONB (proposed major development).	No	No
109	IPS225 Holme Farm, Church Road, Shanklin	4, 7, 16 – 4, site wholly within the AONB (proposed major development).	No	No
110	IPS226 Westmeanth , Land at White Dymes, Main Road, NewChurch	7, 16	Yes	Yes
111	IPS247 Land opposite Holme Farm, Church Road, Shanklin	4, 7, 16 – 4, site wholly within the AONB (proposed major development).	No	No
112	IPS250 Popes Farm, High Street, Newchurch	1, 3, 5, 7, 14, 16	Yes	Yes
113	IPS263 Land off Chatfield Road & Allotment Road, Niton	Already assessed as new site	n/a	n/a
114	IPS281 Gibb Well Field, off Seaview Lane, Seaview	1, 5, 7, 16	Yes	Yes
115	IPS283 31 Ventnor Road, Apse Heath, Isle of Wight, PO36 0JT	4, 7, 16	Yes	Yes

116	IPS285 Land off Alum Bay New Road, Totland	4, 6, 16	Yes	Yes
117	IPS286 Site of former Southview Cottages, Niton Road, Rookley	3, 4, 7, 16	Yes	Yes
118	IPS297 Land at St John's Road, Wroxall_OUTSIDE WROXALL RSC_	4, 6, 7, 16	Yes	Yes
119	IPS300a Land fronting Thorley Street (small site), Thorley	6, 7, 16	Yes	Yes
120	IPS306 Land at Moor Lane (2), Brighstone	4, 7, 16 – 4, site wholly within the AONB (proposed major development).	No	No
121	IPS307 Land south of 45 Noke Common, Newport, PO30 5TY	4, 7, 16	Yes	Yes
122	IPS312_WOOTTON_Reynards Cattery, Palmers Road, Wootton	7	Yes	Yes
123	IPS316 Medham Farm, Medham Farm Lane (2), Northwood	7, 16	Yes	Yes
124	IPS319 The Builder's Yard, Yarbridge, Brading	4, 7, 16 – 4, site wholly within the AONB (proposed major development).	No	No
125	IPS322 Land at Elm Lane, (adjacent to Tennyson View), Calbourne	Already assessed	n/a	n/a
126	IPS331 Guildford Park Caravan Site, ST Helens	5, 6, 7, 16	Yes	Yes
127	IPS336 The Apple Farm, Newport Road, Freshwater	4, 6, 7, 16 – 4, site wholly within the AONB (proposed major development).	No	No
128	IPS337 Luton Farm (East of Wyatts Lane)	1, 16	Yes	Yes
129	IPS340 Land at Deacons Nursery, Moor View, Godshill	4, 7, 16	Yes	Yes
130	IPS347 Fakenham Farm, Eddington Road, St Helens	6, 7, 16	Yes	Yes
131	IPS349 Land to east of at Rookley Green	3, 7, 16	Yes	Yes
132	IPS350 Buildings at Lee Farm, Wellow	3, 5, 7, 16	Yes	Yes
133	IPS352 187 Baring Road, Cowes Isle of Wight	7, 16	Yes	Yes
134	IPS357 Yard at 45 Noke Common, Newport, PO30 5TY	4, 7	Yes	Yes
135	IPS367 Parklands Centre Park Road Cowes	1	Yes	Yes
136	IPS368 Land off Chestnut Drive, Willow Close, Ventnor	3, 4, 16	Yes	Yes
137	IPS373 Shanklin Esplanade Car Park, Shanklin	none	n/a	Yes

138	IPS376 Land at Fairlee Road, Hillside, Newport	5	Yes	Yes
139	IPS387 Kingswell Dairy, Newport Road	4, 7, 16	Yes	Yes
140	IPS393 Fairfield Lodge, Priory Road, Shanklin. PO37 6SA	16	Yes	Yes
141	IPS400 Land at Warlands, Shalfleet	4, 7, 16	Yes	Yes
142	IPS122 Cockleton Farm	4, 7, 16	Yes	Yes
143	IPS219 Land at Dodnor Lane	4, 6, 7, 16	Yes	Yes
144	IPS304 Land at Worsley Road	None	n/a	Yes

4.8.6 Of the 144 sites in Table 4.27 16 were identified as not being suitable for further consideration due to the inability to mitigate a potential impact. 126 sites were identified as being suitable (in SA terms) for consideration as an allocation. 2 sites were duplicates (new assessment of a site having been previously assessed, reflecting a resubmission of a site as part of the council’s site search refresh during the pause in examination 2025).

4.8.7 The 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 B and briefing paper E. A total of 50 housing sites have been selected to be taken forward for allocation

4.8.8 The cumulative effects of the housing allocations have been considered in section 6. For ease of discussion, the 50 allocated sites have been grouped into settlements. A summary of the sites within each settlement area is provided in Table 4.28. The sites under column A: Allocated sites that are green have planning permission.

**Table 4.28: Site Allocations Summary**

Settlement Area	Sites considered for allocation	
	A: Allocated sites	B: Not Allocated
	ID* of allocated sites HA# = IPS allocation reference (where relevant) IPS# = SHLAA reference	ID sites assessed but not allocated IPS# = SHLAA reference
Bembridge Secondary settlement	HA064 (IPS183) Land north of Mill Road and east of High Street HA065 (IPS184) Land east of Hillway Road and south of Steyne Road	N/A
Brading Rural Service centre	None	IPS102, IPS145, IPS213, IPS319
Brighstone Rural Service Centre	None	IPS306, IPS322
Cowes / Northwood Primary Settlement	HA020 (IPS042) Former Somerton Reservoir, Newport Road HA022 (IPS323) Somerton Farm, Newport Road HA025 (IPS199) Land rear of 84 Wyatts Lane	IPS035, IPS131, IPS154, IPS204, IPS205, IPS219, IPS304, IPS316,

	Sites considered for allocation	
	A: Allocated sites	B: Not Allocated
Settlement Area	ID* of allocated sites HA# = IPS allocation reference (where relevant) IPS# = SHLAA reference	ID sites assessed but not allocated IPS# = SHLAA reference
	HA028 (IPS387) Kingswell Dairy, Newport Road HA118 Bucklers View, Worsely Road HA121 (IPS317) Land rear of Harry Cheek Gardens, Northwood HA122 (IPS122) Cockleton Farm, Place Road	IPS337, IPS352, IPS367, IPS394
East Cowes Primary Settlement	HA046 (IPS290) Land at Crossway HA120 (IPS414) Land at Red Funnel	N/A
Godshill Rural Service Centre	IPS237 Land adjoining Scotland Farm and Tresslewood Care Village, Scotland Corner	IPS043, IPS162, IPS340
Newport Primary Settlement	HA031 (IPS126, IPS161, IPS233, IPS234 & IPS382) Various land adjacent to and east of Carisbrooke College HA032 (IPS200) Acorn Farm, Horsebridge Hill HA033 (IPS231) Land West of Sylvan Drive HA036 (IPS307 & IPS358) Land south of 45 Noke Common HA037 (IPS383) Former library HQ HA038 (IPS386) Land off Broadwood Lane HA039 (IPS406) Former HMP site HA044 (IPS371) Newport Harbour HA110 (IPS413) Land at Moreys HA115 (IPS411) Former Polars Home HA125 (IPS346) Land at 155 Staplers Road HA126 (IPS390) Land at Horsebridge Hill (between Old Dairy Farm and 80 HH) HA127 (IPS390) Land at Horsebridge Hill (west of Acorn Farm development)	IPS005, IPS053, IPS066, IPS078, IPS219, IPS270, IPS310, IPS311, IPS342, IPS357, IPS359, IPS376
Niton Rural Service Centre	None	IPS114, IPS117, IPS137, IPS147, IPS196, IPS197, IPS198, IPS220, IPS222, IPS263
Rookley Rural Service Centre	HA128 Land rear of The Lodge, Main Road HA129 (IPS041) Land adjacent to Highwood Grove	IPS030, IPS286, IPS349
Ryde Primary settlement	HA055 (IPS034) Old Hosiden Besson Site, Binstead Road IPS086, IPS150 Westridge Cross Dairy and land to the north of Bullen Road HA112 (IPS415) Land at Harcourt Sands HA116 (IPS412) Former St Marys Convent HA119 Land at Pennyfeathers HA131 Land west of Ashley Road	IPS021, IPS027, IPS055, IPS060, IPS072, IPS080, IPS086, IPS104, IPS105, IPS125, IPS271, IPS281

	Sites considered for allocation	
	A: Allocated sites	B: Not Allocated
Settlement Area	ID* of allocated sites HA# = IPS allocation reference (where relevant) IPS# = SHLAA reference	ID sites assessed but not allocated IPS# = SHLAA reference
	HA133 Land rear of St Vincents Care Home	
St Helens Rural Service Centre	None	IPS331, IPS347
The Bay Primary Settlement	HA077 (IPS025) Winchester House, Shanklin HA078 (IPS065) Learning Centre, Berry Hill, Lake <a href="#">HA079 (IPS074) 23 Carter Street, Sandown</a> HA080 (IPS077) Former Sandham Middle School Site, Perowne Way Sandown <a href="#">HA081 (IPS081) Sandown Town Hall, Grafton Street, Sandown</a> HA084 (IPS068) Former SPA Hotel, Shanklin Esplanade HA117 Former Laurels <a href="#">HA123 Former Esplanade Hotel 40-44 High Street Sandown</a> HA130 Land at Sandown Airport	IPS091, IPS115, IPS117, IPS135, IPS160, IPS177, IPS217, IPS225, IPS226, IPS247, IPS250, IPS283, IPS373, IPS393
Ventnor Secondary Settlement	None	IPS067, IPS079, IPS368
West Wight Secondary Settlement	HA002 (IPS082a) Land and School buildings at Weston Primary School, Weston Road, Totland Bay HA005 (IPS189) Land to the east of Football Club, Camp Road, Freshwater HA006 (IPS071) Heathfield Campsite, Heathfield Rd, Freshwater <a href="#">HA114 (IPS410) Land east of Birch Close, Freshwater</a>	IPS007, IPS009, IPS010, IPS090, IPS096, IPS192, IPS285, IPS336, IPS403
Wootton Secondary Settlement	<a href="#">HA051 (IPS098) Palmers Farm Brocks Copse Road, Wootton Bridge</a>	IPS157, IPS312, IPS318
Wroxall Rural Service Centre	None	IPS019, IPS051, IPS073, IPS297
Yarmouth Rural Service Centre	None	IPS215, IPS300, IPS350, IPS400

4.8.9 There are 6 employment sites. The selection of the employment sites has been informed by the Employment Land Study. 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.

4.8.10 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.

## **Health**

4.8.11 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**

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

SA/SEA Objective	Monitoring Suggestions
	<ul style="list-style-type: none"> <li>• Applications granted which included a remedial action a plan.</li> </ul>
8. Climate Change Emissions	<ul style="list-style-type: none"> <li>• Number of new electric vehicle points.</li> <li>• Amount of renewable energy generated.</li> </ul>
9. Climate Change Resilience	<ul style="list-style-type: none"> <li>• Amount of land granted for green infrastructure.</li> <li>• Amount of land developed in flood zone 3</li> </ul>
10. Culture	<ul style="list-style-type: none"> <li>• Number of dwelling approved outside of primary and secondary settlements.</li> <li>• Number of dwellings granted in priority locations.</li> </ul>
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"> <li>• Number applications granted for or including health care provision.</li> </ul>
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"> <li>• % affordable housing granted</li> <li>• Number gypsy traveller sites granted</li> <li>• Number of applications granted in area with deprivation index 1-3.</li> </ul>
14. Education and training	<ul style="list-style-type: none"> <li>• Number of applications for or including education facilities approved.</li> </ul>
15. Accessibility	<ul style="list-style-type: none"> <li>• Number of applicants granted water-based access.</li> <li>• Number of new SANGs.</li> <li>• Total developer contributions.</li> <li>• New Rights of Way</li> </ul>
16. Material Assets	<ul style="list-style-type: none"> <li>• Number of housing units granted per annum.</li> </ul>
17. Employment and Economy	<ul style="list-style-type: none"> <li>• Floor space granted for retail/ employment granted per annum</li> </ul>

## 6 Cumulative, Indirect, Synergistic, Long Term Effects

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### 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 intra<sup>22</sup> plan (synergistic) effects of the Objectives of the IPS have been considered within the ‘at a glance summary’ Tables in 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 areas 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 (7 sites);
- Newport (13 sites);
- Ryde (7 sites); and,

<sup>22</sup> Within the LTP

- The Bay (9 sites).

6.2.5 Tables 6.1-6.4 provide an ‘at a glance’ summary of the potential cumulative effects of the housing allocations within the settlement areas. Each table is accompanied by a map showing the location of the proposed allocations in relation to the host settlement and each other to provide further insight into the likely spatial cumulative effects (this also includes permissions to ensure proper consideration to all potential cumulative impacts from development). It should be noted that while Newport is listed as having 13 sites, HA031 has been subdivided into 5, thus there are 18 sites within the cumulative effects for Newport.

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

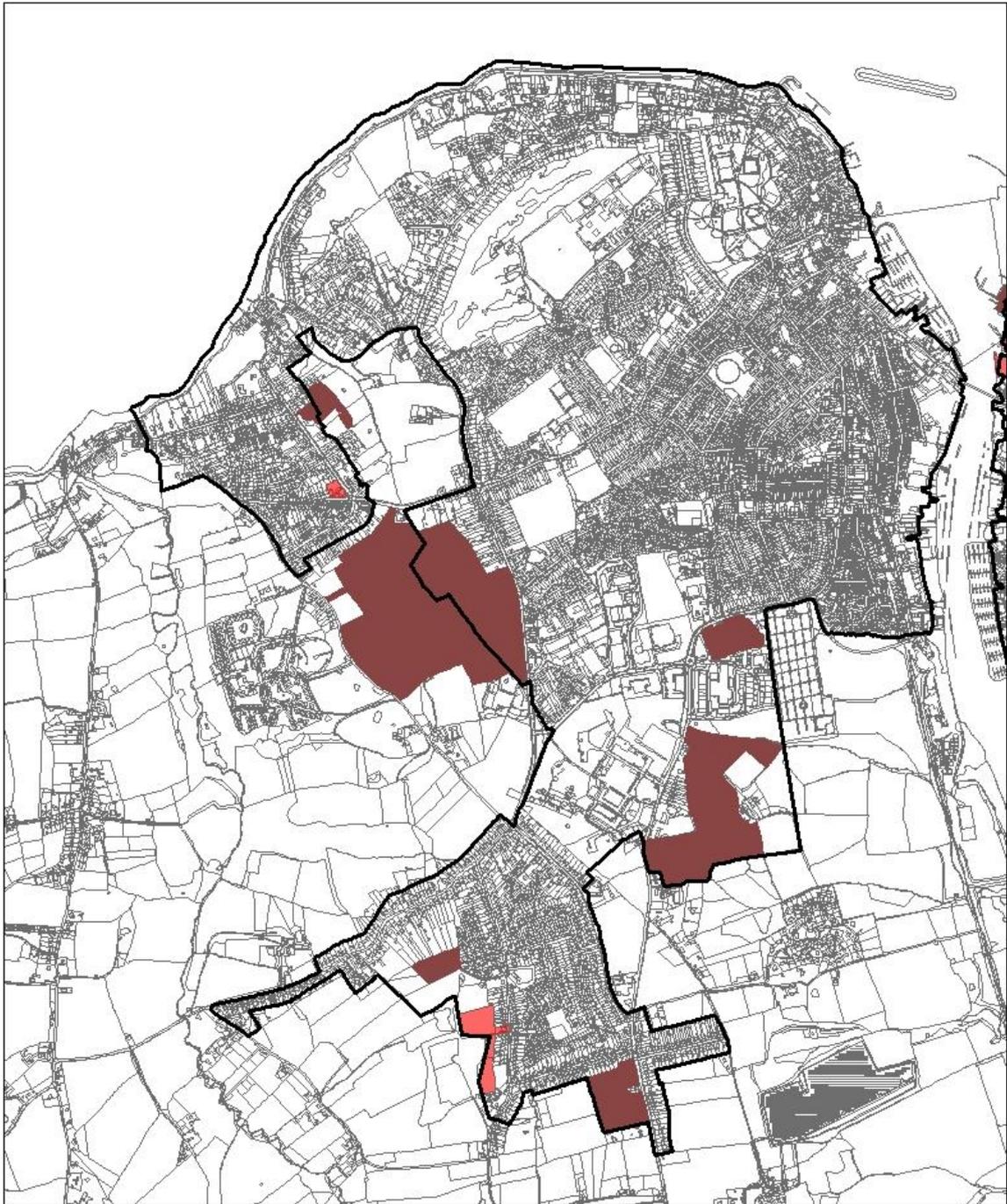
IPS	ISA Objectives*																
	1 Air	2 Coasts	3 Water	4 Landscape and Noise	5 cultural heritage	6 Biodiversity	7 Land use	8 Climate change emissions	9 Climate change resilience	10 Culture	11 Crime and Safety	12 Health and Population	13 Equality	14 Education and Training	15 Accessibility	16 Material Assets	17 Employment and Economy
IPS042	-	?	0	+	0	0	+					?	?	?		+	-
IPS317	0	?	?	+	0	?	-					?	?	?		+	?
IPS323	0	?	0	-	0	-	-					?	?	?		+	-
IPS199	-	?	?	+	0	0	-					?	?	?		+	?
IPS387	0	?	?	-	?	0	-					?	?	?		-	?
HA118	0	?	-	+	?	0	+					+	?	?		+	?
IPS122	0	?	-	+	?	0	0					?	?	?		-	?

Grey = cannot be assessed spatially

6.2.6 There are 3 objectives where cumulative impacts can be identified as a result of the sites proposed for allocations in Coves. There are potential negative cumulative impacts against the Land use ISA objective (7), where the sites have been identified as being partially or wholly within areas with a potential mineral resource value or graded agricultural land. Looking at the location and distribution of the sites on the map, all of the sites are either within or cross-over the settlement boundary and are not grouped together to extend far out into the wider rural area. It is reasonable to conclude that due to their location none of the sites will impact on potential mineral production or agricultural as their proximity to existing residential development would likely lead to incompatible development from these (mineral and agricultural) activities associated with likely impacts (noise, dust & air quality, traffic, disturbance etc). When considering the land-take from potential areas of mineral resources or agricultural (suitability of location for such activities aside) when viewed at a plan and authority/Island level the

amount lost is so small as to be insignificant.

**Allocated sites proposed for Cowes**



**Legend**

- Allocations\_Oct\_2025
- Permissions\_Oct\_2025



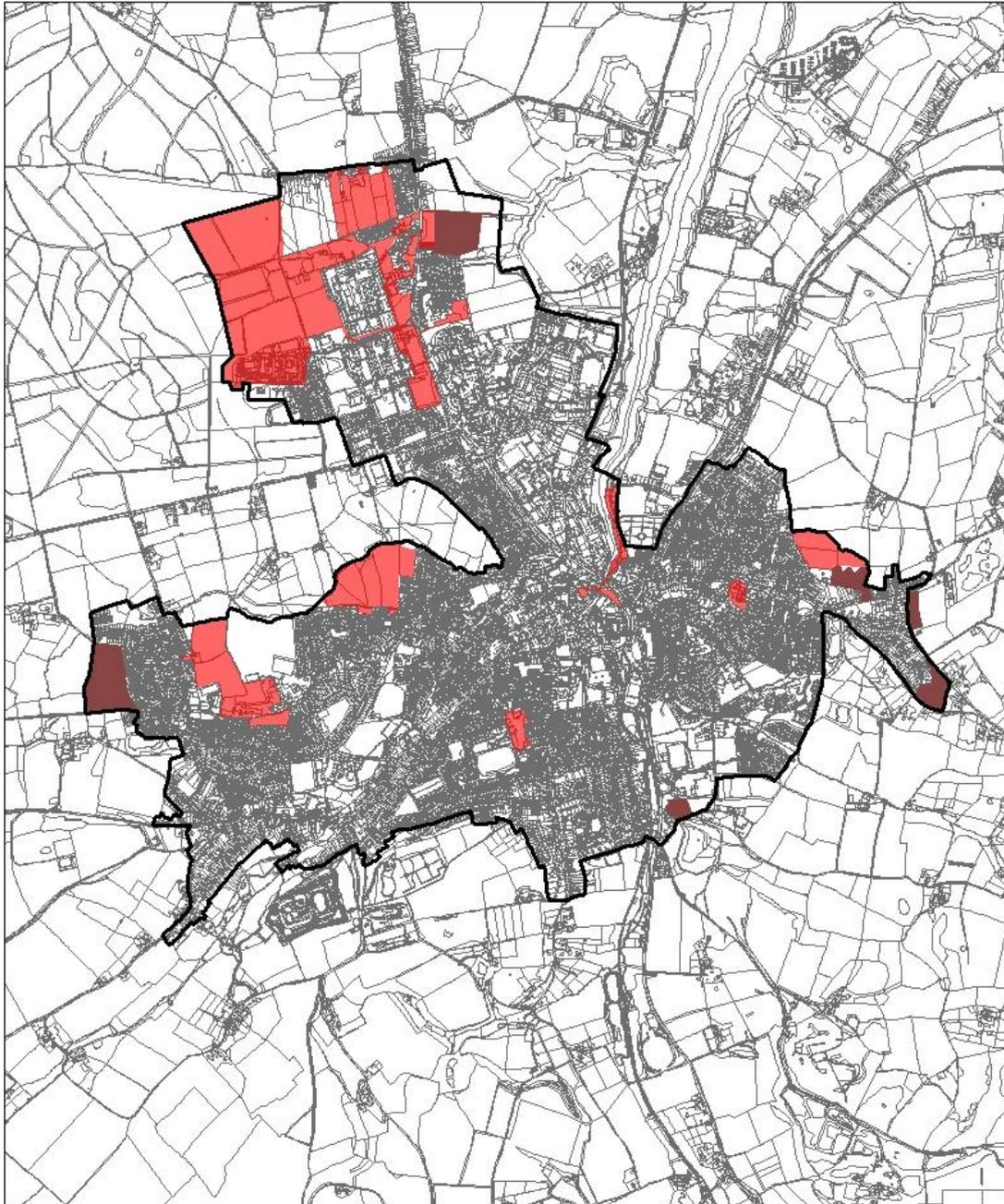
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6.2.7 5 sites identify potential positive impacts against Landscape and noise (4) and Material assets (16) ISA objectives for Cowes. With the location of the sites all being urban or edge of urban locations and well away from any landscape or associated designations, directing development to such location results in positive impacts by avoiding sensitive receptors. These sites are also well connected in terms of supporting public transport, walking and cycling routes, and the positive cumulative effects will help to alleviate potential increases in traffic and associated impacts, particularly when considering the transport links between Cowes and Newport.

**Table 6.2: 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	-	?	?	+	?	?	-					?	?	?		+	?
IPS358	0	?	0	-	0	0	-					?	?	?		+	?
IPS382	-	?	?	+	?	?	-					?	?	?		+	?
IPS383	-	?	?	-	-	-	+					?	?	?		+	?
IPS386	0	?	0	+	0	?	-					?	+	?		+	?
IPS406	-	?	0	-	0	-	-					?	?	?		+	?
IPS413	0	?	?	+	0	0	+					?	?	?		+	?
IPS411	0	?	?	+	0	0	+					?	+	?		+	?
IPS126	-	?	?	+	?	?	-					?	?	-		+	?
IPS161	0	?	?	+	?	?	-					?	+	?		+	?
IPS307	0	?	?	-	0	0	-					?	?	?		-	?
IPS371	0	?	?	+	-	-	+					?	+	?		+	?
IPS346	+	?	0	+	?	0	0					?	?	?		-	?
IPS390 /HA126	+	?	?	+	?	0	+					?	?	?		-	?
IPS390 /HA127	+	?	?	+	0	0	+					?	?	?		+	?

**Allocated sites proposed for Newport**



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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. All of these sites form natural extensions to the existing settlement and while the take of greenfield sites within the revised settlement boundary is significant, when considered within the wider context of the Island plan area, particularly from a

greenfield/agricultural land perspective, these impacts can be considered minor.

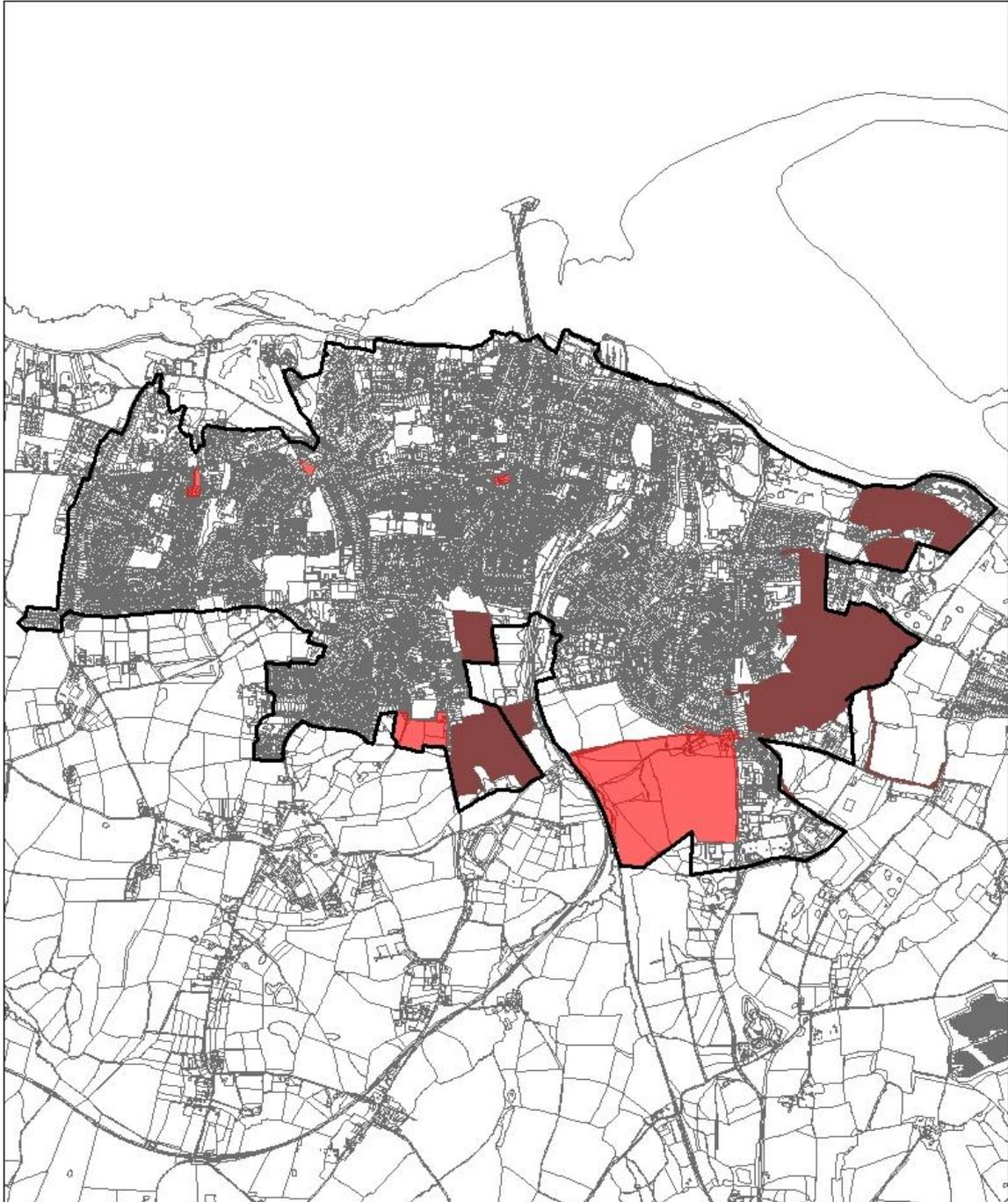
6.2.9 There are also potential impacts on the Air ISA Objective (1) due to the proximity of sensitive receptors such as schools and the main hospital. However, their very proximity combined with being located in a primary settlement on balance means this is unlikely to be significant given the opportunity such a sustainable location provides in terms of sustainable transport, access and air quality. Furthermore, the sites are evenly distributed around the settlement of Newport, decreasing the likelihood of cumulative effects from the sites with regards to air.

6.2.10 Similar to Cowes, there are multiple sites that identify potential positive impacts against Landscape and noise (4) and Material assets (16) ISA objectives for Newport. Again, with the location of the sites all being urban or edge of urban locations and well away from any landscape or associated designations, directing development to such location results in positive impacts by avoiding sensitive receptors. These sites are also well connected in terms of supporting public transport, walking and cycling routes, and the positive cumulative effects will help to alleviate potential increases in traffic and associated impacts, particularly when considering the transport links that Newport provides at the hub of the Island’s transport network, connecting the rest of the Island.

**Table 6.3: 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	-					?	?	?		+	?
IPS412	+	?	0	+	-	0	+					?	+	?		+	?
IPS415	0	?	0	+	-	-	-					?	?	?		+	?
HA119	0	?	-	+	?	-	0					?	+	?		-	?
HA131	+	?	?	+	?	0	0					?	?	?		-	?
HA133	+	?	?	+	?	0	+					?	?	?		+	?

**Allocated sites proposed for Ryde**



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- 6.2.11 While there are multiple negative impacts identified for sites in Ryde, there are few occurring across multiple sites such that they could work in concert to generate cumulative impacts. The only ISA Objective where this could possibly happen is against Water (3), although this is only for 3 sites. The water impacts primarily relate to the main/ordinary watercourse of Monktonmead, that sites either border or are in the catchment of. However, the issues associated with this watercourse and future potential development have already been recognised in the IPS, with draft policy (EV15: Monktonmead catchment area) specifically focussed on addressing this. In addition, the council adopted the Sustainable Drainage Systems SPD in 2024, which if applied to applications within the catchment will further help mitigate any potential cumulative impacts (both water quality and flood risk). There are no other ISA objectives identified as having potential cumulative negative impacts from the proposed allocations for Ryde.
- 6.2.12 In common with the other settlements assesses for cumulative impacts, 5 of the sites in Ryde have the potential for positive cumulative impacts against ISA Objectives Landscape and noise (4) and Material assets (16). Again, with the location of the sites all being urban or edge of urban locations and well away from any landscape or associated designations, directing development to such location results in positive impacts by avoiding sensitive receptors. These sites are also well connected in terms of supporting public transport, walking and cycling routes, and the positive cumulative effects will help to alleviate potential increases in traffic and associated impacts, particularly when considering the transport links that Ryde uniquely offers in terms of both cross-Solent travel connections to the mainland and 3 stations on the Island’s only rail network.
- 6.2.13 However, what does become evident from the map of proposed sites for Ryde that isn’t shown in the cumulative effects assessment table, is the distribution and location of 3 large sites to the east of Ryde (2 are sites with permission which explains why the assessment table has not identified the potential impact). There are likely to be impacts in relation to Air (1) and Material Assets (16) associated with additional demand on critical key junctions, particularly the intersection at Great Preston Road, Marlborough Road, Bullen Road and Brading Road. While this junction has been identified in the Infrastructure Delivery Plan Schedule accompanying the IPS, to ensure any potential cumulative impact are mitigated the proposed allocation HA119 Land at Pennyfeathers should include provision for both assessment of impacts (linked to potential site yield in combination with the other sites identified in the map of proposed allocation for Ryde) and then any required mitigation, including junction improvements and/or sustainable transport as appropriate.

**Table 6.4: Cumulative Effects of Allocated Sites (The Bay)**

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
HA077 /IPS025	-	?	0	?	?	0	+					?	+	?		+	?
HA078 /IPS065	-	?	?	+	?	-	?					?	+	?		+	+
HA079 /IPS074	-	?	?	+	-	0	+					?	?	?		+	?
HA080 /IPS077	-	?	?	+	?	0	+					?	+	?		+	?
HA081 /IPS081	+	?	?	+	-	0	+					?	+	?		+	?
HA084 /IPS068	+	-	0	-	0	0	+					?	+	?		+	?
HA117	0	?	?	+	-	?	+					?	?	?		+	?
HA123	0	?	-	+	-	-	+					?	?	?		+	?
HA130	+	?	?	+	?	?	+					?	?	?		-	?

6.2.14 There is a concentration of negative impacts from sites in the Bay associated with the Air objective. This is due to the proximity of sensitive receptors in the form of schools, however their very proximity combined with being located in a primary settlement on balance means this is unlikely to be significant given the opportunity such a sustainable location provides in terms of movement, access and air quality. No site has more than 2 negative impacts and, Air aside, none of these are concentrated around any particular ISA objective.

6.2.15 Conversely, there is a concentration of potential positive impacts with sites in the Bay against ISA objectives Landscape and noise (4), Landuse (7), Equality (13) and Material assets (16). The location of the sites will steer development away from sensitive land receptors such as the National Landscape, dark skies and graded agricultural land. The Bay also has areas of deprivation which would benefit from investment in new housing and any associated contributions to more affordable accommodation.

Allocated sites proposed for The Bay



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### 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. Changes made to the IPS and reasons why as a result of the ISA findings are set out in Appendix 5, while Appendix 6 provides ISA screening of post Regulation 18 consultation plan amendments.

### 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 to 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 Study<sup>23</sup>. 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 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.

<sup>23</sup> Employment Land Study Isle of Wight Council Final Report March 2015 Prepared by GL Hearn Limited

- 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 dwellings within each allocation.
- 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

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- 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 50 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 When assessing the potential cumulative impacts of sites for Cowes, Newport and the Bay, there is a common concentration of negative impacts associated with the Air objective. This is due to the proximity of sensitive receptors (such as schools, or the hospital etc.) however their very proximity combined with being located in primary settlements, on balance means this is unlikely to be significant given the opportunity such a sustainable location provides in terms of movement, access and air quality.
- 7.1.18 There are likely to be cumulative effects associated with the proposed allocations for Ryde. These relate to Air (1) and Material Assets (16) associated with additional demand on critical key junctions, particularly the intersection at Great Preston Road, Marlborough Road, Bullen Road and Brading Road. While this junction has been identified in the Infrastructure Delivery Plan Schedule accompanying the IPS, to ensure any potential cumulative impact are mitigated the proposed allocation HA119 Land at Pennyfeathers should include provision for both assessment of impacts (linked to potential site yield in combination with the other sites identified in the map of proposed allocation for Ryde) and then any required mitigation, including junction improvements and/or sustainable transport as appropriate.

## 8 Final Report Amendments

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8.1.1 This section of the ISA considers the following areas of work that have occurred subsequent to Regulation 18 consultation on the draft plan and ISA Environmental Report;

- ISA recommendations (& workshop outcomes)
- Consultation amendments
- New policy assessment
- HRA outcomes
- SFRA outcomes

### 8.2 ISA recommendations (& workshop outcomes) – changes made to the plan as a result of the ISA

8.2.1 A draft version of the IPS was consulted on from Friday 30 July 2021 until 5pm Friday 1 October 2021. While this included consultation on various supporting documents, including the draft interim ISA, HRA and SFRA, the version of the plan consulted on had not taken the outputs of the draft ISA into account.

8.2.2 The draft interim ISA Environmental Report stated in its findings (see section 7 Conclusions and Recommendations above) that the suggested amendments (Tables 1-6, Appendix 1) be made to the draft policies to ensure outstanding aspects were appropriately incorporated into the plan to facilitate required change.

8.2.3 A series of workshops (March 2022) between the council and the ISA lead (Hampshire County Council) were carried out to consider all recommendations made by the ISA on the consultation draft IPS. Where determined appropriate, changes to the IPS were made as a result of the ISA (see Appendix 5 *ISA Island Planning Strategy Workshop March 2022 Outputs* that includes changes made and reasons why).

### 8.3 Consultation amendments

8.3.1 Public comments were invited over a 9 week consultation period which ran between Friday 30 July 2021 until 5pm Friday 1 October 2021. The documents consulted on are detailed in the IPS Regulation 18 Consultation Summary Statement but included the draft IPS and draft ISA Environmental Report. Every comment made was logged and reviewed in the formulation of the Regulation 19 submission version of the IPS.

8.3.2 Following the IPS consultation further evidence was commissioned to inform the next stage of the Plan and to explore some of the issues raised (Regulation 19 Pre-Submission). The comments submitted during the consultation have been considered along with the further evidence and updates to the policy context and have helped to inform the pre submission Regulation 19 version of the Plan.

- 8.3.3 Guidance states (para. 021, NPPG) that *“The sustainability appraisal report will not necessarily have to be amended if the plan is modified following responses to consultations. Modifications to the sustainability appraisal should be considered only where appropriate and proportionate to the level of change being made to the plan. A change is likely to be significant if it substantially alters the plan and/ or is likely to give rise to significant effects.”* Furthermore, *“Changes to the plan that are not significant will not require further sustainability appraisal work.”*
- 8.3.4 The council undertook a screening exercise of all the proposed plan modifications. The screening asked 2 questions;
- Does the change substantially alter the plan?
  - Is the change likely to give rise to significant effects?
- 8.3.5 These questions were used to determine if proposed changes were likely to be significant and/or give rise to significant effects (criteria for determining the likely significance of effects on the environment are set out in [schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004](#)). The responses to these 2 filters then determined the final judgement on whether further assessment through the ISA was required. Appendix 6 sets out the screening assessment, based upon the structure of the plan.
- 8.3.6 The screening exercise didn’t identify any likely significant effects associated with proposed changes, however it was felt that the 5 new policies proposed do substantially alter the plan and these have been subject to ISA assessment as set out below.

## 8.4 New policy assessment

- 8.4.1 5 new policies have been generated as a result of work since the Regulation 18 consultation. This is important in understanding if there is any reasonable alternative for delivering the outcomes that each policy is seeking to achieve. The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves. Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made.
- 8.4.2 Below is an explanation on how each new policy was developed, it’s purpose and the consideration of any alternatives.
- 8.4.3 **CC1** – Having reviewed consultation responses during both rounds of Regulation 18 public consultation, it was felt necessary to provide more clarity on the proactive role of planning in helping to tackle climate change, in line with paragraph 153 of the NPPF. The purpose of this new strategic policy is to set a clear direction and link between the Council’s Climate & Environment Strategy, Mission Zero commitment, planning policy and the island’s designation as a UNESCO Biosphere.

- 8.4.4 *Alternatives: No other alternatives were actively considered as policy CC1 sits as a strategic policy within the IPS that feeds a number of more detailed policies, primarily within the Environment section of the plan.*
- 8.4.5 **AFF1** – As part of the evidence base looking into the island housing market and the barriers to delivery that exist (UoP & Three Dragons reports), work was undertaken to appraise why levels of affordable housing delivery had been so low since 2015 and what some of the implications of this were on the island housing register. Public and stakeholder consultation responses during Regulation 18 periods also highlighted the severe lack of truly affordable housing for many island residents. The purpose of this new strategic policy is to set an island definition for affordable housing with regards to discounts from market value. The policy is necessary due to evidence supporting the IPS (2019 Affordability Assessment & 2022 update) that demonstrates ‘policy compliant’ affordable housing in line with the generic NPPF definition (up to 80% of market value) that has been secured in previous years does not meet island needs, where income and house prices suggest deeper discounts are required.
- 8.4.6 *Alternatives: The alternative is to not set an ‘island definition’ and continue to fail to meet the needs of island residents.*
- 8.4.7 **INF1** – How the IPS set out the requirements for development to provide supporting infrastructure was a key topic of the Regulation 18 consultation in the summer of 2021. The purpose of this strategic policy is to ensure that infrastructure provision is supported across the island and that development makes an appropriate contribution (which could be physical or financial, or both) to ensure that new infrastructure is provided or existing is upgraded. The policy also provides an explicit link to the Infrastructure Delivery Plan and the necessity for this ‘live’ document to inform development across the plan period.
- 8.4.8 *Alternatives: The alternative is to not include INF1 and rely solely on the original wording of policy C12 that did not make a distinction between strategic utility infrastructure and infrastructure to support development.*
- 8.4.9 **E9** – Evidence base work related to housing affordability has demonstrated that a significant proportion of the island’s rented sector has disappeared in the last 1-2 years (over 80%). Part of the reason for this is due to the attractiveness of short term let holiday accommodation and many landlords moving from traditional rental to holiday rental. The knock-on effect is to further restrict available properties on the market in a sector that has not met demand (i.e. new houses built) for over 10 years. The purpose of the policy is to provide clarity on the locations where the council would support any changes of use to short term holiday let accommodation, should they be necessary, and where support would not be offered to try and have a positive impact on the rented sector.

- 8.4.10 *Alternatives: A more stricter policy wording was considered that required a change of use to short term holiday let linked to days of use, however legal advice suggested this would not be possible due to current planning legislation (see supporting evidence paper). As such, a locational policy was included.*
- 8.4.11 **E12** – After being shortlisted by the Government in 2021, the Solent Freeport was officially launched in June 2022 with the Isle of Wight being located within the wider Freeport zone. At the time of the Regulation 18 consultations, there was insufficient certainty over the Solent Freeport to write policy. Whilst the benefits and advantages of the Freeport location for the island will start to emerge as the Solent Freeport evolves, given the now certain designation the purpose of the policy is to act as a both a place holder should any island specific sites form part of any of the tax and duty benefits associated with Freeport status, whilst also providing support for existing or new commercial operations on the island hoping to take advantage of any Freeport related opportunities.
- 8.4.12 *Alternatives: The alternative would be no specific Freeport policy and instead relying on a single sentence as originally drafted in policy E2.*
- 8.4.13 To ensure consistency with the assessment of policy within the ISA, the same proforma was used for the assessment of the new policies. The proforma also provides possible mitigation for negative effects and where applicable enhancement of positive effects (refer Table 3.4). Further details on the ISA assessment proforma and it's application can be found in section 3.5 Task A4: Developing the ISA Framework. Table 8.1 sets out the performance of the new policies when assessed against the ISA objectives and using the Assessment Criteria from Table 3.2 Environmental Assessment Framework.

Table 8.1 Assessment of new policies

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	
CC1 Climate Change	+	+	+	+	+	+	+	+	+	+	0	0	0	0	+	+	?	<p><b>Strengths:</b> Sets the council as a leader in addressing climate change locally. The benefits of supporting a sustainable approach to development have the potential to be broad (from environment and cultural to</p>

																		<p>economic such as tourism) and far reaching in terms of the long term (positive) implications for the Islands community and natural environment.</p> <p><b>Negatives:</b> Being strategic and all-encompassing in nature will make it difficult to measure in any meaningful way how successful this policy is.</p> <p><b>Improvements:</b> Some clarity on how and/or when this policy is expected to be used/referenced.</p>
<p><b>AFF1 Isle of Wight Affordable Housing</b></p>	0	0	0	0	0	0	0	0	0	+	0	+	+	0	+	+	0	<p><b>Strengths:</b> Sets the context for what is affordable housing on the</p>

																		<p>Isle of Wight, supports local communities in carrying out their own housing needs surveys and in doing so will make a significant (positive) impact on a major social issue for the Island.</p> <p><b>Negatives:</b> None</p> <p><b>Suggested Improvements:</b> n/a</p>
<p><b>INF1 Infrastructure</b></p>	+	+	+	0	0	+	+	+	+	+	0	0	+	+	+	+	0	<p><b>Strengths:</b></p> <p>Ensures that infrastructure provision is supported across the island and that development makes an appropriate contribution (which could be physical or financial, or both).</p>

																			<p>Is very broad in defining 'infrastructure' which should help to capture all the supporting needs of future development.</p> <p><b>Negatives:</b> No explicit reference to future technologies that might be involved in the provision of infrastructure (e.g. internet access and the rapidly evolving electrification of transport).</p> <p><b>Suggested Improvements:</b> A reference to future infrastructure in terms of technology (in addition to need and provision).</p>
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<p><b>E9 Short term let holiday accommodation</b></p>	+	0	0	+	0	0	0	0	0	-	0	-	-	0	0	+	+	<p><b>Strengths:</b> Provides a framework for the evolving area of holiday let accommodation to minimise impacts on housing stock and Island communities.</p> <p><b>Negatives:</b> Policy wording is open i.e. <i>“Planning permission may be required ...”</i> and there is no requirement in the policy to take account of the potential impact on existing housing stock (for example by considering local housing needs and waiting lists) or the impact on local settlement</p>
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																		<p>identity and community.</p> <p><b>Suggested Improvements:</b></p> <p>Make reference in policy wording to no adverse impacts on local housing stock and supply, and settlement identity and community.</p> <p>Define what is meant by “<i>may</i>” i.e. the circumstances when the policy should be applied.</p>
<p><b>E12 Solent Freeport</b></p>	<p>0</p>	<p>-</p>	<p>-</p>	<p>-</p>	<p>0</p>	<p>-</p>	<p>+</p>	<p>+</p>	<p>0</p>	<p>+</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p>+</p>	<p><b>Strengths:</b></p> <p>Provides a policy link to a sub-regional economic strategy that could provide significant economic benefits to the Island economy,</p>

																		<p>particularly marine related employment.</p> <p><b>Negatives:</b></p> <p>Through the support of site intensification and/or expansion of employment sites related to the Solent Freeport there is a high likelihood that this will include waterfront located sites. Where this is the case sites will be at increasing risk from climate change and generating impacts on the natural environment (both physical processes and biodiversity).</p>
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																		<p><b>Suggested Improvements:</b>          Define <i>“The Council will support sustainable development proposals ...”</i> e.g. where there are no other impacts or these can be mitigated.</p>
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8.4.14 Following the assessment the suggested improvements set out in the *Commentary* column have been considered for iteration within the Regulation 19 version of the plan. Table 8.2 below summarises this iteration between plan and sustainability appraisal.

Table 8.2 ISA and IPS iteration on SA outcomes of the 5 new policies

Policy	ISA Improvements	Reg. 19 Plan Iteration
CC1 Climate Change	Some clarity on how and/or when this policy is expected to be used/referenced.	Policy revised to provide greater clarity on how and when the policy is expected to be used.
AFF1 Isle of Wight Affordable Housing	n/a	None required
INF1 Infrastructure	A reference to future infrastructure in terms of technology (in addition to need and provision).	Policy revised with reference to future technological infrastructure.
E9 Short term let holiday accommodation	Make reference in policy wording to no adverse impacts on local housing stock and supply, and settlement identity and community. Define what is meant by “ <b>may</b> ” i.e. the circumstances when the policy should be applied.	Cannot make change as the ‘ <i>may</i> ’ is on a case by case basis given current planning legislation and use classes order.
E12 Solent Freeport	Define “ <i>The Council will support <b>sustainable development proposals</b> ...</i> ” e.g. where there are no other impacts or these can be mitigated.	Policy revised, defining sustainable development proposals as being those where there are no other impacts, or these can be adequately mitigated.

8.4.15 The intra plan (synergistic) effects and cumulative impacts of the new IPS policies have been considered below, building on the assessments made around synergistic effects within each group of policies set out previously in section 4.5. Where applicable discussions around synergistic effects within each group of policies are discussed.

8.4.16 Strategic Policies

- CC1 Climate Change
- AFF1 Isle of Wight Affordable Housing
- INF1 Infrastructure

8.4.17 The screening of the 3 new strategic policies (see Appendix 6 ISA Regulation 18 Amendment Screening) determined that none of the policies are likely to either substantially alter the plan, or give rise to significant effects in terms of ISA. Despite this the policies have been assessed against the ISA objectives (see Table 8.1 above) which

confirmed there are no significant negative impacts from the 3 new strategic policies when considered against the ISA Objectives. Given these findings no further assessment of effects has been carried out for the new strategic policies as such an assessment is not required to go into any more detail and is not necessary.

#### 8.4.18 Economy Policies

- E9 Short Term Let Holiday Accommodation
- E12 Solent Freeport

8.4.19 While the screening of the 2 new economy policies determined that neither policy is likely to either substantially alter the plan or give rise to significant effects in terms of ISA, both policies had significant potential negative effects identified when assessed against the individual ISA Objectives. The ISA Objectives against which potential negative effects were identified are;

- New policy E9 - Culture, Health and Population, Equality
- New policy E12 - Coasts, Water, Landscape and Noise, Biodiversity

8.4.20 With potential for negative impacts identified, further assessment work has been carried out to determine the potential for intra plan (synergistic) effects and cumulative impacts of the new IPS policies.

8.4.21 This is a group of policies that are designed to support economic growth. Both new policies generate a positive effect on ISA objective 17 (Employment and economy), strengthening the delivery of this section of the plan. It should be noted that since the previous Regulation 18 version of the plan, policy E9 has become E8 and E8 merged into E7.

#### **Synergistic and cumulative impacts of policy E9 Short term let holiday accommodation**

8.4.22 The potential negative effects identified with policy E9 are unique to it and therefore unlikely to go beyond the effects identified in the assessment of the policy or be amplified through an intra-policy relationship. Policy E9 does have some positive effects that no other policy within the Economy section of the plan has. While the positive effect identified with Air Quality (due to focussing tourism activity in existing urban areas) is unlikely to have further implications when considering the other economy policies, the positive effect of E9 on the ISA objective Landscape and Noise may help to provide a counter to the negative effect identified against this objective to economy policy E8 Supporting High Quality Tourism. Again, by focussing new tourism development to existing settlements, particularly existing areas of tourism, re. *“Core Tourist Accommodation Areas as defined on the Policies Map or identified through Neighbourhood Plans”* of policy E9.

Table 8.3 Assessment of the synergistic and cumulative impacts of the Economy policies

IPS Policy	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	0	0	0	+
<b>E9</b>	+	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	+
<b>E12</b>	0	-	-	-	0	-	+	+	0	+	0	0	0	+	+	+	+

**Synergistic and cumulative impacts of policy E12 Solent Freeport**

8.4.23 While policy E12 has a range of potential negative effects (Coasts, Water, Landscape and noise, and Biodiversity), only 2 of these are shared with another policy, being Landscape and noise and Biodiversity with policy E4 Supporting the Rural Economy.

8.4.24 The negative impacts identified with policy E12 were based on the potential of site intensification and/or expansion of employment sites that may include waterfront locations. Where this is the case sites will be at increasing risk from climate change and generating impacts on the natural environment (both physical processes and biodiversity). The negative impacts identified with policy E4 were with respect to development outside of development boundaries and specifically in rural and agricultural areas particularly with respect to dwellings. So while the potential impacts fall into the same ISA Objectives, they are unrelated (different physical process and habitats). It is

therefore reasonable to assume that there is unlikely to be any synergistic/in-combination or cumulative effects between these 2 policies.

- 8.4.25 As long as the mitigation identified above through the suggested improvements is implemented for E12, there should be no negative effects associated with the use of this policy, either alone or in combination. It is accepted that the suggested improvements to E9 in terms of defining what is meant by ‘may’ in the policy cannot be changed due to current planning legislation and use classes order.

## 8.5 HRA outcomes

- 8.5.1 The final report of the IPS HRA was published in May 2024, prepared on behalf of the council by Land Use Consultants Ltd. The HRA carried out a series of screening of policies from the draft plan to identify those policies as having potential impact pathways to European sites and likely significant effects cannot be ruled out, being;

- C4: Health Hub and St Mary’s Hospital (land allocated on policies map)
- C10: Supporting Renewable Energy and Low Carbon Technologies
- G2: Priority Locations for Development and Growth
- H1: Planning for Housing Delivery
- H2: Sites Allocated for Housing
- KPS1: Key Priority Site 1: HA39 Camp Hill
- KPS2: Key Priority Site 2: HA44 Newport Harbour
- E1: Supporting and Growing our Economy
- EA1: Employment Allocation Land to the east of Pan Lane
- EA2: Employment allocation at Nicholson Road, Ryde
- EA3: Employment allocation at Somerton Farm, Cowes
- EA4: Employment allocation at Kingston, East Cowes
- EA5: Employment allocation at Lowtherville, Ventnor
- EA6: Employment allocation at Sandown Airport, Sandown
- E4: Supporting the Rural Economy
- E7: Supporting and Improving our Town Centres
- E10: The Bay Tourism Opportunity Area
- E11: Ryde Tourism Opportunity Zones

- 8.5.2 Appendix 7 sets out the required mitigation, how the IPS has or is intending to provide such mitigation and a conclusion that is taken directly from the HRA. The identified IPS mitigation provision has been checked against the following;

- relevant policies and supporting text in the IPS (particularly EV2 Ecological Assets and Opportunities for Enhancement, EV3 Recreation Impact on the Solent European Sites, EV4 Water Quality Impact on Solent Marine Sites, and EV6 Protecting and Providing Green and Open Spaces) to ensure mitigation provision; and,
- Schedule of changes from the draft IPS document that was published with committee papers in April 2022

### **New policies & HRA**

- 8.5.3 Table 8.4 below summarises how the 5 new policies have been considered through the HRA process. All 5 policies were assessed as part of the latest (May 2024) version of the

HRA and all were predicted to have no likely significant effect.

Table 8.4 HRA and the 5 new IPS policies

New Policy	HRA summary	Outcome
CC1 Climate Change	Para. 4.2 “...not expected to result in development and therefore will not result in significant effects on European sites”	No likely significant effect predicted
AFF1 Isle of Wight Affordable Housing		
INF1 Infrastructure		
E9 Short term let holiday accommodation		
E12 Solent Freeport		

8.5.4 The HRA concluded that no adverse effect on integrity will occur for European sites subject to the provision of safeguarding and mitigation measures. These measures are detailed in Chapter 5 of the HRA and implemented by a combination of direct policy measures (primarily the Environmental policy section) or through policy amendment (see Appendix 7).

8.5.5 HRA is an iterative process and as such is expected to be updated in light of newly available evidence and comments from key consultees. The HRA recommended that the report is subject to consultation with Natural England and the Environment Agency to confirm that the conclusions of the assessment are considered appropriate at this stage of plan-making. Both statutory consultees were informally consulted on the draft final HRA over July and August 2022.

8.5.6 Natural England provided comments on the draft final HRA<sup>24</sup>. Changes made as a result were to provide more evidence on the potential impacts of development proposals on designated sites and to provide clarification on mitigation. While the assessment has been updated, none of the amendments have led to changes in the HRA’s process or outcomes.

## 8.6 SFRA outcomes

8.6.1 Following the Regulation 18 consultation on the draft plan and supporting evidence (including the ISA and SFRA outputs) the EA made a number of comments in relation to how flood risk was addressed within the plan. Table 8.5 summarises the comments raised and how they have been addressed.

<sup>24</sup> Email RE: 2022-29-07 - Isle of Wight Local Plan Habitats Regulations Assessment 2022, 05/08/2022

- 8.6.2 While the SFRA has been a stand alone assessment of flood risk, it has evolved iteratively as the plan has developed. The initial flood risk layers from the SFRA have been used by both the SHLAA and ISA to take account of climate change when considering flood risk. The Level 2 SFRA outputs have been used in the policies allocating sites where there is an element of flood risk.
- 8.6.3 The one site for allocation where there is a significant element of flood risk that cannot be dismissed through a sequential approach (either to alternative sites or on-site) is Newport Harbour. This has required both it's own separate FRA and detailed evidence on implementing both the (flood risk) sequential and then exceptions tests in order to be able to demonstrate the site is both appropriate for the proposed development and can be developed safely, for the life time of the proposed uses. The council has worked closely with the EA to both agree revised policy wording to KPS2 Key Priority Site 2: HA44 Newport Harbour, including supporting explanatory text, and address all the concerns raised by the EA through their Regulation 18 consultation response.
- 8.6.4 The council's approach to flood risk and allocating sites is detailed in supporting IPS Housing Evidence Paper B, Revisiting the site allocations approach (June 2022). This includes detail on how flood risk has been considered in the site allocations process, the ISA and SFRA. For demonstrating the wider sustainability benefits to the community the evidence paper draws on the site assessment made in the ISA and the performance against the different ISA objectives.
- 8.6.5 To address the Environment Agency's comments on the assessment of flood risk to allocation sites where there is an element of flood risk, further work has been carried out (JBA Ltd, June 2024) to produce;
- an updated site screening for the 5 proposed allocations with an element of flood risk;
  - a Sequential Test methodology support document; and,
  - updated SFRA Level 2 site mapping to include ground water.

Table 8.5 Environment Agency comments on flood risk element of the IPS and how they have been addressed

<b>Policy Number</b>	<b>Do you agree with the content of this section</b>	<b>Please give reasons along with any evidence you have for your response above. Include references to paragraph numbers where applicable</b>	<b>Response</b>	<b>Actioned</b>
		<b>ENVIRONMENT</b>		
EV14 Managing flood risk in new development	Support	Support the inclusion of this policy of the plan Provided comment on the aspiration for no residual risk in our previous response. Refer back to comments in relation to the ability of proposed allocation sites to achieve safe development in this context. Include the requirement for new development to safeguard land for future flood risk management?	Review how the plan defines 'safe' in the context of flood risk and residual risk. Include the requirement for new development to safeguard land for future flood risk management.	Policy EV14 reviewed. Addition of point f) safeguard land required for current and future flood risk management. 01/04/2022
EV18 Improving resilience from coastal flooding and coastal risks	Support	Supportive of the inclusion and wording of this policy, which is critical to the delivery of the necessary future coastal defence improvements on the Island.	Check any amendment of policy wording maintains same meaning and requirement	Revised policy checked 01/04/2022
		<b>ECONOMY</b>		
EA1 Employment allocation land to the east of Pan Lane	General Comment	Site is partially within Flood Zone 2 and 3 and also likely includes the River Pan. No reference to this risk has been made within the policy and no FRIS has been completed to support allocation of this site for employment use.	Reference flood risk to the site and that a sequential approach is expected to be taken to developing the site, avoiding flood risk	EA1 revised with point f) undertake a site specific flood risk and g) maintain a suitable buffer zone to the river. Para 8.12 states 'A sequential approach is to

				be taken to developing the site, avoiding flood risk.' 01/04/2022
E10 The Bay tourism opportunity area	General Comment	New development, especially residential, needs to be carefully considered in the Bay Area due to the flood risk issues in the area. We are pleased to see that this is recognised in the policy which requires both current and future flood risk to be taken account of.	Noted	n/a
E11 Ryde tourism opportunity zones	General Comment	New development, especially residential, needs to be carefully considered in Ryde due to the flood risk issues in the area.	Noted	n/a
		<b>COMMUNITY</b>		
		None		
		<b>GROWTH</b>		
G3 Developer contributions	Support	Support inclusion of bullet 6 'Coastal and flood risk reduction, water management'.	Check any amendment of policy wording maintains same meaning and requirement	Revised policy checked 01/04/2022
		<b>HOUSING</b>		
H2 Sites allocated for housing	Object	Little evidence to demonstrate that the sequential test has been applied in the selection of sites for allocation. Level 2 SFRA Detailed Site Summary Tables raise the following 3 key points: - In some instances, the Site Summary	JBA work on sequential testing of SHLAA sites prior to shortlisting sites for allocation. The selection of sites is set out in the Island Planning Strategy: Evidence Paper B (Revised February 2022).	Evidence Paper B revised. Site-specific requirements ( Appendix 3) has been updated to include SFRA summary sheet requirements.

		<p>Tables do not provide a clear and robust assessment of flood risk as stated within our previous comments.</p> <ul style="list-style-type: none"> <li>- There is a disconnect between the Site Summary Tables and recommendations within them, and Island Planning Strategy.</li> <li>- The proportion of the sites at risk in Flood Zones is only estimated to include up to 70 years of climate change.</li> </ul>	<p>The council will ensure that the key, critical, development requirements identified in the Site Summary Tables are carried through into the Plan so that they form part of the Plan documentation.</p>	
HA018 Green Gate Industrial Estate, Thetis Road, Cowes	Object	<p>Green Gate Industrial Estate, Thetis Road The Level 2 SFRA Detailed Site Summary Table suggests that development should sequentially be located in Flood Zone 1, which is estimated to cover 40% of the site at the present day. The Council should confirm that this is achievable, particularly for the residential element.</p> <p>The primary source of flooding to the site is tidal flooding from the River Medina. The Guidance for site design and making development safe section of the Summary Table doesn't seem to reflect the nature of the risk and focuses on the management of fluvial and surface water flooding. Safe access and egress should be demonstrated in the</p>	<p>All residential uses should be located in flood zone 1 of the site and/or made safe. The council will confirm this is achievable.</p>	<p>Further work carried out by JBA and IWC to confirm predicted site yields can be delivered entirely within FZ1 with safe access, updated Evidence Paper B May 2024. Updated SFRA Level 2 assessment, JBA ltd June 2024.</p>

		<p>0.5% plus climate change event and not the 1% event as suggested. The Summary Table additionally doesn't provide an estimate of the predicted design tide level using current sea level rise allowances, and so does not estimate the likely depths, velocity, frequency and duration of flooding. Appropriate mitigation measures, and the deliverability of such measures cannot therefore be identified on the basis of the current information. It is not therefore clear if the site can be developed safely in the context of flood risk.</p>		
<p>HA033 Land west of Sylvan Drive</p>	<p>Object</p>	<p>Land west of Sylvan Drive It would bring greater clarity if it could be confirmed if the position of the red line boundary for the site includes or excludes the current Flood Zones 2 and 3 on the northern boundary of the site. The requirement for the application of the Exception Test, and the scope of the Flood Risk Assessment, will then be clearer. Currently, the Summary Table suggests that the Exception Test is not required, and that an FRA is required on the basis of the site being greater than 1 hectare in Flood Zone 1. This</p>	<p>The site boundary includes the watercourse in order to ensure the watercourse is included in consideration of biodiversity net gain (in addition to a buffer/set aside area, see requirements of policy EV2). This will not compromise the integrity of the site in terms of flood risk as all the development will be expected to be delivered in flood zone 1.</p>	<p>Further work carried out by JBA and IWC to confirm predicted site yields can be delivered entirely within FZ1 with safe access, updated Evidence Paper B May 2024. Updated SFRA Level 2 assessment, JBA Ltd June 2024.</p>

		will change, however, if the red line boundary extends to the watercourse as is suggested by the Housing Allocations map booklet. It could also be clearer that development should avoid the areas within Flood Zone 2 and 3, and be mindful of future increases in flood extents as a result of climate change.		
HA035 Land off Gunville Road (west)	Object	Land off Gunville Road (west) Some of the previous comments made still apply. The Summary Table recommends avoidance of the flood risk area, and further hydraulic modelling undertaken, which we would support and suggest should give consideration to the impact of climate change on predicted flood extents, which is currently unknown and could constrain the site further. It appears that this site has been removed from Appendix 2 and therefore we are unsure of where these requirements will be set out. The Summary Table/Island Planning Strategy also suggests that a watercourse crossing could be constructed on the site. Any such crossing will require a Flood Risk Activity Permit from the Environment	Further hydraulic modelling to include predicted impacts from and allowances for climate change.	No longer taken forward as an allocation 06/04/2022

		Agency and will only be permitted for clear span structures which are of the minimum possible width required for essential access purposes, and only where it can be demonstrated that they will not have an adverse impact upon flood risk or the watercourse itself (and associated biodiversity interest).		
KPS2 Key priority site 2: HA44 Newport Harbour	Object	At this time we do not feel that the flood risk to this site has been adequately considered and therefore the allocation of the site is unsound. We understand the need for regeneration in this area and the desire for redevelopment of many of the brownfield sites in and around Newport Harbour, including better links to the town centre. We are however currently very concerned that the planning of this regeneration and allocation of the site has not been evidence based and relies on future studies that have not yet been completed. It is therefore our opinion that the allocation is not sound. We are aware that there is ongoing work to address this void in evidence and we are happy to review these comments once this work has been completed. However at	Policy wording amended from <i>due consideration of flood risk has been taken into account in the design and layout utilising the site specific FRA that has been undertaken to the proposed development will be safe from flooding for its lifetime taking account of the vulnerability of its uses, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.</i> Additional supporting text requiring any proposal to have a site level FRA that complies with both the SFRA Level 2 site summary sheet and the Newport Harbour Masterplan FRA. The FRA will be	Policy amended 06/04/2022 Evidence Paper B updated May 2024. Updated SFRA Level 2 assessment, JBA ltd June 2024.

		<p>this time the previous comments that we have made regarding this site still stand.</p> <p>The Level 2 SFRA Detailed Site Summary Table identifies some potential mitigation measures, but doesn't provide any information on the flood characteristics likely to be experienced across the site. It is therefore not possible to conclude that these mitigation measures are deliverable or appropriate.</p> <p>Little information is available regarding the potential flood characteristics at the site over the lifetime of the development (i.e. depth, velocity, duration, onset etc.) beyond the fact that there appears to be a significant risk of inundation both at present day and increasingly over the coming century. The FRIS recommends further work before the site can be considered for allocation and we would support this conclusion. Currently, it cannot be demonstrated that the site can be delivered in compliance with the NPPF. It also currently seems that based on the little evidence available, development</p>	<p>expected to include a whole site sequential flood risk approach to locating development, making development safe AND a surface water drainage strategy.</p>	
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		<p>on this site, as proposed, would be contradictory to the policy requirements in the flood risk policy of this plan (EV14).</p> <p>Within the supporting test of this policy there is also reference to an approved masterplan. It is disappointing that this has been progressed despite our continued concerns regarding the lack of recognition the masterplan gives to the significant and complex flood risk issues on the site.</p>		
H3 Housing development general requirements	General Comment with suggested change	<p>We support bullet 4 within this policy which requires biodiversity enhancements for sites, including appropriately sized buffers around rivers. We would request that a further bullet is added to ensure that in terms of flood risk, a sequential approach is taken on individual sites to ensure that risk is not increased either on site or to others downstream.</p>	<p>Add a bullet requiring a flood risk sequential approach is taken on individual sites to ensure that risk is not increased either on site or to others downstream</p>	<p>Bullet point b) a sequential approach to flood risk within individual sites to ensure there is no increase to risk on site or downstream, added to policy H3 05/04/2022</p>

- 8.6.6 This section of the report has documented the work in relation to ISA that has occurred since the draft Environmental Report was consulted on. It 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.
- 8.6.7 This section has set out how;
- the recommendations from the draft ISA Environmental Report have been taken into account in the IPS;
  - amendments proposed as a result of the outputs from the Regulation 18 consultation responses have been screened for significance in terms of sustainability appraisal;
  - new policy developed as a consequence of the Regulation 18 consultation response has been both screened and where necessary, assessed through the ISA;
  - HRA outcomes have been considered in preparing the Regulation 19 version of the plan; and how,
  - the SFRA has informed and been informed by the ISA.
- 8.6.8 Following Regulation 19 consultation the council will need to determine if any proposed changes to the plan require further assessment through the ISA process.
- 8.6.9 Once the IPS is adopted the council should refer to the monitoring suggestions set out in section 5 of this report to ensure all viable and relevant metrics have been considered. Although it should be noted that these monitoring suggestions are neither exclusive, nor exhaustive.

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

**Table 1: Assessment of 'Growth**

	ISA Objectives*														Commentary			
IPS	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	

<p><b>G1 Our Approach Towards Sustainable Development and Growth</b></p>	?/-	0	0	0	0	?/-	+	0	0	0	0	?	?	?	?	?	<p><b>Strengths:</b> 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><b>Negatives:</b> 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</p>
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<p><b>G2</b> <b>Priority locations for development and growth</b></p>	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	<p><b>Strengths:</b> 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><b>Negatives:</b> 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><b>Suggested Improvements:</b> 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>
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<p><b>G3</b> <b>Developer contributions</b></p>	/-	0	?	?	0	?/+	0	0	0	?	0	?	?	?	?	?	0	<p><b>Strengths:</b> 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><b>Negatives:</b> 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</p>
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<p><b>G4</b> <b>Managing viability</b></p>	?	?	?	?	?	?	?	?	?	?	?	?	-	?	?	?	?	<p><b>Strengths:</b> 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><b>Negatives:</b> 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><b>Suggested Improvements:</b> Consider including specific statement that these</p>
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**Table 2: Assessment of ‘Housing’**

	ISA Objectives*																	Commentary
IPS	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	

<p><b>H1 Planning for housing delivery</b></p>	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	+	?	<p><b>Strengths:</b> 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><b>Negatives:</b> 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><b>Improvements:</b> Refer to comments provided for those policies referenced.</p>
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<p><b>H2 Sites Allocated for Housing</b></p>	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	+	?	<p><b>Strengths:</b> The policy mentions phasing of developments which potentially ensures delivery throughout the plan period.</p> <p><b>Negatives:</b> Does not have a negative impact on any of the other ISA objectives.</p> <p><b>Suggested Improvements:</b> Refer to specific site assessments in Appendix 2.</p>
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<p><b>H3</b> <b>General Requirements</b></p>	?	?	?	?	?	+	?	?	?	?	?	?	?	?	+	+	<p><b>Strengths:</b> 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><b>Negatives:</b> 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</p>
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<p><b>H4</b> <b>Infilling</b> <b>outside</b> <b>settlements</b></p>	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> 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><b>Negatives:</b> 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><b>Suggested Improvements:</b> 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>
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<p><b>H5 Affordable Housing</b></p>	0	0	0	-	0	0	0	0	0	0	0	0	+	+	0	0	0	0	<p><b>Strengths:</b> 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.</p> <p><b>Negatives:</b> 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.</p>
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<p><b>H7</b> <b>Rural and First Homes</b></p>	0	0	0	-	0	?	-	0	0	0	0	0	+	0	0	+	0	<p><b>Strengths:</b> 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.</p> <p><b>Negatives:</b> 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</p>
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<p><b>H8</b> <b>Ensuring</b> <b>Right Mix</b></p>	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	<p><b>Strengths:</b> 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).</p> <p><b>Negatives:</b> 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.</p> <p><b>Suggested Improvements:</b> Consider changing the word ‘should’ to ‘must’ to ensure the policy is robust.</p>
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<p><b>H9</b> <b>New housing on developed land</b></p>	0	0	0	?	0	?	+	0	0	0	0	?	0	0	0	0	0	<p><b>Strengths:</b> 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><b>Negatives:</b> 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><b>Suggested Improvements:</b> Consider tangible ways to support brownfield</p>
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																		<p>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><b>H10</b> Self and custom build</p>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	<p><b>Strengths:</b> No impacts of ISA objectives  <b>Negatives:</b> No impacts of ISA objectives  <b>Suggested Improvements:</b> Could this be included in policy H8 instead of a standalone policy.</p>

<p><b>H11</b> <b>Gypsy traveller and show people</b></p>	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	○	<p><b>Strengths:</b> 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><b>Negatives:</b> 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><b>Suggested Improvements:</b> 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>
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Table 3: Assessment of ‘Economy’

	ISA Objectives*																	Commentary	
IPS	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><b>Strengths:</b> This policy allocates specific sites for economic use, which are assessed in the allocated sites.</p> <p><b>Negatives:</b> It does not make clear the council’s policies for employment sites coming forward outside of these allocations.</p> <p><b>Improvements:</b> Consider including a statement regarding general principles of employment, explaining if employment will be allowed outside of these allocations.</p>

<p><b>E2</b> <b>Sustainable economic development</b></p>	0	0	0	0	0	?	?	0	0	0	0	0	0	0	0	0	+	<p><b>Strengths:</b> 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><b>Negatives:</b> 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><b>Suggested Improvements:</b> Remove repetition regarding water access. Include a statement regarding the need to show no negative aspects to the natural environment.</p>
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<p><b>E3</b> <b>Upskilling the island</b></p>	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	<p><b>Strengths:</b> 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><b>Negatives:</b> The policy does not specifically that it must be in line with other policies that protect the environment.</p> <p><b>Suggested Improvements:</b> Consider including an additional line stating must be in line with other policies that protect the environment or similar.</p>
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<p><b>E4</b> <b>Supporting the rural economy</b></p>	0	0	0	-	0	-	-	0	0	0	0	+	+	0	0	0	+	<p><b>Strengths:</b> 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><b>Negatives:</b> 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 mis used. 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</p>
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																		go far enough to ensure protection and does not consider other aspects of the environment such as tranquillity, dark skies, and biodiversity. <b>Suggested Improvements:</b> 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.
<b>E5 Maintaining employment sites with water access</b>	0	?	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	<b>Strengths:</b> Provides a framework for maintaining water access at employment sites scoring a positive for ISA objective 15 (accessibility). <b>Negatives:</b> The policy does not specifically state it supports the development of employment site with water-based access. <b>Suggested Improvements:</b> Consider including a statement regarding support of water based activities.

<p><b>E6</b> <b>Digital Infrastructure</b></p>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	<p><b>Strengths:</b> The policy scores positively for ISA objective 16 (material assets) as is provide framework mechanism to support digital infrastructure.</p> <p><b>Negatives:</b> 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><b>Suggested Improvements:</b> 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>
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<p><b>E7</b> <b>Supporting and Improving our Town Centers</b></p>	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	+	+	<p><b>Strengths:</b> 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><b>Negatives:</b> 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><b>Suggested Improvements:</b> 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>
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<p><b>E8</b> <b>Supporting the Evening Economy</b></p>	0	0	0	-/?	0	0	0	0	0	0	0	-/+	0	0	0	0	+	+	<p><b>Strengths:</b> 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><b>Negatives:</b> Increase in evening footfall potentially has a negative effect on the local noise environment.</p> <p><b>Suggested Improvements:</b> N/A</p>
<p><b>E9</b> <b>Supporting High Quality Tourism</b></p>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	<p><b>Strengths:</b> 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><b>Weaknesses:</b> N/A</p> <p><b>Suggested Improvements:</b> N/A</p>

<p><b>E10 The Bay Tourism Opportunity Area</b></p>	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	<p><b>Strengths:</b> 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. <b>Weaknesses:</b> N/A <b>Suggested Improvements:</b> Consider combining policies regarding tourism.</p>
<p><b>E11 Ryde Tourism Opportunity Zones</b></p>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	<p><b>Strengths:</b> The policy scores positively for ISA Objective 17 (economy) as it supports tourism. <b>Weakness:</b> <b>Suggested Improvements:</b> Consider combining policies regarding tourism.</p>

**Table 4: Assessment of ‘Transport’**

	ISA Objectives*													Commentary				
<b>IPS Policy Better connected Island</b>	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	

<p><b>T1 Better connected Island</b></p>		o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	o	<p><b>Strengths:</b> The concepts of sustainable transport options, accessibility, and reduction in the impacts on air quality are introduced.</p> <p><b>Negatives:</b> 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). 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. The policy states it supports ‘high quality places’ but doesn’t define what a ‘high quality place’ is or how it they will be</p>
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																									<p>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?</p> <p>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,</p>
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<p><b>T 2</b> <b>Sustainable transport</b></p>	+	0	0	0	0	0	0	?	0	0	0	0	0	0	+	0	0	<p><b>Strengths:</b> 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><b>Negatives:</b> 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><b>Suggested Improvements:</b> 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</p>
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																		environmental impacts consider including statement in this regard.	
<b>T3 Cross Solent Transport</b>	?	0	0	0	0	0	0	?	0	0	0	0	0	0	0	0	+	0	<p><b>Strengths:</b> This policy scores positively in accessibility as it specifically supports the Solent Crossing Network.</p> <p><b>Negatives:</b> It is not thought to have an impact on the other objectives.</p> <p><b>Suggested Improvements:</b> 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>
<b>T 4 Supporting Rail network</b>	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	<p><b>Strengths:</b> Scores positively for accessibility as it supports the rail network.</p> <p><b>Negatives:</b> Schemes put forward still have the potential to negatively impact the environment with respect to noise, biodiversity which are not considered.</p> <p><b>Suggested Improvements:</b> Consider including a statement which protects these aspects of the environment.</p>

<p><b>T 5 Electric charging vehicles</b></p>	+	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> Indirect positively impact air quality and emissions.</p> <p><b>Negatives:</b> No negative impacts were identified associated with SA objectives.</p> <p><b>Suggested Improvements:</b> 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>
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<p><b>T 6 Parking provision</b></p>	-/3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> The policy did not score any positives with respect to the ISA objectives.</p> <p><b>Negatives:</b> 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><b>Suggested Improvements:</b> 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>
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**Table 5: Assessment of 'Community'**

	ISA Objectives*																Commentary	
<b>IPS Policy Sustainable Strong and Healthy Communities</b>	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	

<p><b>C1</b> <b>High Quality Design for New Development</b></p>	0	0	0	+	0/+	?	0	0	0	0	+	+	0	0	+	0	0	<p><b>Strengths:</b> 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.</p> <p><b>Negatives:</b></p> <p><b>Suggested Improvements:</b> 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.</p>
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<p><b>C2</b> <b>Improving our Public Realm</b></p>	0	0	0	0	0	?	0	0/+	?	0	0	0	0	0	?	+	0	<p><b>Strengths:</b> 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).</p> <p><b>Negative:</b> No negative impacts identified according to the ISA objectives.</p> <p><b>Suggested Improvements:</b> 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</p>
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<p><b>C3</b>  <b>Improving our Health and Wellbeing</b></p>	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	+	0	<p><b>Strengths:</b> 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.</p> <p><b>Negatives:</b> No negative impacts identified according to the ISA objectives.</p> <p><b>Suggested Improvements:</b> Consider include wording to ensure the HIA include assessment outcomes must demonstrate clear benefits to the overall health and wellbeing impact of the development.</p>
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<p><b>C4</b> <b>Health Hub at St Mary's Hospital</b></p>	0	0	0	0	0	0	0	0	0	0	0	+	+	0	0	0	0	<p><b>Strengths:</b> 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.</p> <p><b>Negatives:</b> No negative impacts identified according to the ISA objectives.</p> <p><b>Suggested Improvements:</b> 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>
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<p><b>C 5</b> <b>Facilitating Independent Living</b></p>	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0	0	<p><b>Strengths:</b> 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.</p> <p><b>Negative:</b> No negative impacts identified according to the ISA objectives.</p> <p><b>Suggested Improvements:</b> 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><b>C 6</b> <b>Providing Annexe Accommodation</b></p>	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> N/A</p> <p><b>Negative:</b> May potentially have an impact on indirect impact on landscape.</p> <p><b>Suggested Improvements:</b> N/A</p>

<b>C 7</b> <b>Delivering</b> <b>Locality Hubs</b>	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	<b>Strengths:</b> The locality hubs require assessment under site allocations. <b>Negative:</b> N/A <b>Suggested Improvements:</b> N/A
<b>C 8</b> <b>Facilitating a</b> <b>Blue Light Hub</b>	0	0	0	0	0	0	0	0	0	0	0	?	0	0	0	0	0	<b>Strengths:</b> 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. <b>Negative:</b> The policy does have any effect on the ISA objectives because it simply states it will be considered as to whether its needed. <b>Suggested Improvements:</b> N/A
<b>C 9</b> <b>Education</b> <b>Provision</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	<b>Strengths:</b> The policy scored positively for ISA objective 14 (education) as it supports opportunities for improvements to educational facilities. <b>Negative:</b> N/A <b>Suggested Improvements:</b> N/A

<p><b>C 10</b>  <b>Supporting Renewable Energy and Low Carbon Technologies</b></p>	+	-	0	-	?	?	?	+	+	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> The policy scores positively for ISA objective 8 (emissions) and 9 (climate resilience) as it supports green infrastructure.</p> <p><b>Negative:</b> 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.</p> <p><b>Suggested Improvements:</b> 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</p>
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<p><b>C 11</b>  <b>Lowering Carbon and Energy Consumption in New Development</b></p>	<p>?</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>0</p>	<p>?</p>	<p>0</p>	<p><b>Strengths:</b> The policy introduces the concept of carbon 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.</p> <p><b>Negative:</b> 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.</p> <p><b>Suggested Improvements:</b> 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</p>									
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																			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.
<b>C 12 Utility Infrastructure Requirements for New Development</b>	<b>0</b>	<b>Strengths:</b> N/A <b>Negative:</b> N/A <b>Suggested Improvements:</b> N/A																	

<p><b>C 13</b>  <b>Maintaining Key Utility Infrastructure</b></p>	?	?	+	?	0	?	?	0	0	0	0	0	0	0	0	+	0	<p><b>Strengths:</b> 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.</p> <p><b>Negative:</b> 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.</p> <p><b>Suggested Improvements:</b> 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>
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<p><b>C 14</b> <b>Providing Social and Community Infrastructure</b></p>	0	0	0	0	0	0	0	0	0	0	+	0	0	0	+	+	+	0	<p><b>Strengths:</b> 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</p> <p><b>Negative: The statement regarding the approval of the loss of community infrastructure for the benefit of the economy</b> 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.</p> <p><b>Suggested Improvements:</b> Consider whether economic reasons are an appropriate justification for loss of community infrastructure. Consider</p>
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																		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.
<b>C 15 Community-led Planning</b>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<b>Strengths: N/A</b> <b>Negative: N/A</b> <b>Suggested Improvements:</b> The policy does not explain how conflict between said plans may be resolved.

**Table 6: Assessment of ‘Environment’**

	ISA Objectives*													Commentary				
IPS	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	

<p><b>EV1</b> <b>Conserving and enhancing historic environment</b></p>	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> 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><b>Negatives:</b> 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</p>
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																									<p>should be treated 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><b>Suggested Improvements:</b>          “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>
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<p><b>EV2</b>  <b>Ecological Assets and opportunities for enhancements</b></p>	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> 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 connectively networks.</p> <p><b>Negatives:</b> 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.</p>
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																									<p>Policy focus is protection but not enhancement.</p> <p><b>Suggested Improvements:</b> 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</p>
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																		hierarchy – i.e. that the expectation is that development first avoids impacts and then only compensates as a last resort.
<b>EV3 Recreation Impact on the Solent European Sites</b>	0	0	0	0	0	+	0	0	0	0	0	0	0	0	+	0	0	<p><b>Strengths:</b> 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><b>Negatives:</b> Only considers housing, does not include other types of development that can have an effect on designated site.</p> <p><b>Suggested Improvements:</b> 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><b>EV4</b>  <b>Water Quality</b>  <b>Impact on</b>  <b>Solent</b>  <b>European</b>  <b>Sites (nitrates)</b></p>	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> 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><b>Negatives:</b> Mentioning the council has a position statement does not ensure compliance.</p> <p><b>Suggested Improvements:</b> 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>
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<p><b>EV5</b> <b>Trees</b> <b>Woodland and</b> <b>hedgerows</b></p>	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> 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><b>Negatives:</b> The policy is not measurable and considers retention but enhancement to meet the required 12% increase by 2060.</p> <p><b>Suggested Improvements:</b> 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>
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<p><b>EV6</b> Protecting and providing green open spaces</p>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	<p><b>Strengths:</b> The policy is allocated a positive score for ISA objective 15 (accessibility) as it provides protection and contributes to public open spaces.  <b>Negatives:</b> Use of the term ‘are expected’ suggests it is optional. The policy is closely linked to EV3 with respect to SANGs and EV7.  <b>Improvements:</b> Consider changing the term ‘expected’ to ‘are required’ or ‘must’. Consider combining EV6 and EV7 to avoid repetition.</p>
<p><b>EV7</b> Local green spaces</p>	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	<p><b>Strengths:</b> The policy recognises the importance of local green spaces.  <b>Negatives:</b> The inclusion of the term ‘very special circumstances’ potentially allows for the loss of such sites representing a negative impact to ISA 15 (accessibility).  <b>Suggested Improvements:</b> Define special circumstances. Change wording consider to ‘support’ or ‘encourage’. Consider combining EV6 and EV7 to avoid repetition.</p>

<p><b>EV8</b> <b>Protecting high grade agricultural land</b></p>	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> 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).  <b>Negatives:</b> 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.  <b>Improvements:</b> Remove reference to large sites to avoid conflict and ensure it is in line with spatial strategy and exception policies.</p>
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<p><b>EV9</b> <b>Protecting our landscapes and seascapes</b></p>	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> The policy introduces an intention to preserve and enhance landscapes, which provides a positive score to ISA objective 4 (landscape).</p> <p><b>Negatives:</b> 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.</p> <p><b>Improvements:</b> 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</p>
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																			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.
<b>EV10 Preserving settlement identity</b>	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	<p><b>Strengths:</b> The policy aims to support the local identity of individual settlements by preventing coalescence.</p> <p><b>Negatives:</b> Potential conflict with spatial strategy.</p> <p><b>Improvements:</b> Consider whether the policy is needed with the existing spatial strategy.</p>

<p><b>EV11</b> <b>IOW AONB</b></p>	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> The policy seeks to protect and enhance the AONB so scores positively for ISA objective 4 (landscape).</p> <p><b>Negatives:</b> 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.</p> <p><b>Improvements:</b> 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</p>
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<p><b>EV12</b> <b>Dark Skies</b></p>	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> There is an acknowledgement of support of the principles of dark skies.</p> <p><b>Negatives:</b> 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.</p> <p><b>Improvements:</b> 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>
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<p><b>EV13: management water reoursces</b></p>	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> The policy scores positively for ISA objective 3 (water) as it seeks to protect water resources.  <b>Negatives:</b> N/A  <b>Improvements:</b> Consider combing with EV15.</p>
<p><b>EV14 Managing Flood risk</b></p>	0	0	+	0	0	0	0	0	+	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> The policy scores positively for ISA objective 3 (water) and 9 (climate resilience). It contains clear and explicit requirements for applicants.  <b>Negatives:</b> No negative impacts have been identified.  <b>Improvements:</b> Consider change of terminology regarding 'be safe from flooding'. Clarify whether this is applied to all sites regardless of size.</p>

<p><b>EV15: Monkmead Catchment</b></p>	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> The policy scores positively for ISA objective 3 (water) as it seeks to minimise adverse effects on the water environment.</p> <p><b>Negatives:</b> The policy only focuses on one area of the Island and has some cross-over with EV15.</p> <p><b>Improvements:</b> Consider removing the reference to a particular location and including a policy regarding the water environment of the Island (see EV15).</p>
<p><b>EV16 Managing our coasts</b></p>	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p>?</p> <p><b>Strengths:</b> The policy clearly states that residential developments will not be supported in CCMAAs and supports protection of risk via the requirement for vulnerability risk assessments, providing a positive score to ISA objective 2.</p> <p><b>Negatives:</b> The policy states that a 'practical' and sustainable approach should be taken, however this is not defined, and it is open to interpretation.</p> <p><b>Improvements:</b> Clarify what is meant by a sustainable and practical approach, is this in addition to a vulnerability assessment?</p>

<p><b>EV17</b> Facilitating relocation from coastal change management areas</p>	0	+/?	+/?	0	0	0	0	0	+	-	0	0	?	0	0	0	0	<p><b>Strengths:</b> 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><b>Negatives:</b> 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><b>Improvements:</b> 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>
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<p><b>EV18</b>  <b>Improving resilience form coastal flood and risk</b></p>	0	+	?	?	0	0	0	0	+	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> 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><b>Negatives:</b> 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><b>Improvements:</b> Recommend removal of first paragraph as it not a policy. Clarify when these requirements be applied and what definition will be</p>
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<p><b>EV19</b>  <b>Managing</b>  <b>Ground</b>  <b>Instability in</b>  <b>new</b>  <b>dvelopment</b></p>	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	<p><b>Strengths:</b> The policy scores positively for ISA objective 2 (coasts).  <b>Negatives:</b> Potentially conflicts with policy EV18 and EV16.  <b>Improvements:</b> The policy could be combined with EV18 and EV16.</p>
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**END**