

Gurnard Neighbourhood Development Plan

Summary Sustainability Assessment and Screening Reports for Strategic Environmental Assessment and Habitats Regulations Assessment

Version 2

September 2016



Aim of this document

This document is a statement of the implications for sustainability of neighbourhood plan policies and an assessment of whether or not the policies trigger the need for full Strategic Environmental and Habitats Regulations Assessments in accordance with the Law.

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Section 1: Introduction

- 1.1 A Neighbourhood Plan is not a development plan document and therefore does not legally require a Sustainability Appraisal. A Sustainability Statement rather than a Sustainability Appraisal has been included to provide context to the screening reports and to demonstrate that the Gurnard Neighbourhood Plan (GNP) has sustainability principles at its core and aims to support the health and vitality of the parish. This evidence is needed to meet the Basic Conditions needed for the neighbourhood plan to come into force.
- 1.2 This screening report will determine whether or not the Gurnard Neighbourhood Plan policy proposals trigger the need for a full:
 - Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.
 - Habitats Regulations Assessment (HRA) in accordance with Article 6(3) of the EU Habitats Directive and with Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended).
- 1.3 A HRA is required when it is deemed that likely negative significant effects may occur on protected European Sites (Natura 2000 sites) as a result of the implementation of a plan/project. As a general ‘rule of thumb’ it is identified that sites with pathways of 10-15km of the plan/project boundary should be included within a HRA.
- 1.4 The legislative background set out in the following section outlines the regulations that require the need for this screening exercise. Section 3, provides a screening assessment of both the likely significant environmental effects of the GNP and the need for a full SEA. Section 4, provides a screening assessment of the likely significant effects of the implementation of the GNP and the need for a Habitats Regulation Assessment.

The neighbourhood plan area

- 1.5 The agreed boundary for the Neighbourhood Area was approved by the Isle of Wight Council in June 2012. The neighbourhood plan area is that within the parish boundary shown in blue on the following map.

Gurnard Parish Boundary, the 'Neighbourhood Plan Area'



Section 2: Legislative Background

Introduction

- 2.1 The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC and was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations.

Sustainability Appraisal (SA)

- 2.2 The 2008 Planning Act amended the requirement so only development plan documents (DPD's) need to be subject to a Sustainability Appraisal (SA). A Neighbourhood Plan is not a development plan document and therefore does not legally require a SA.
- 2.3 In Section 3 there is an analysis of GNP policies to illustrate that the plan will help to deliver sustainable development. The chapter is not designed to be a full SA, it is more properly described as a Sustainability Statement. It aims to provide a context for the SEA and HRA and comply with the Basic Conditions that are to be met if the neighbourhood plan is to come into force.

Strategic Environmental Assessment (SEA)

- 2.4 To identify if the GNP requires a SEA, a screening for a SEA and the criteria for establishing whether a full assessment is needed is undertaken in Section 4 of this report.

Habitats Regulations Assessment (HRA)

- 2.5 Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended) states that if a plan is likely to have a significant effect on a European site then an appropriate assessment must be made of the implications of the plan for that European site in view of that site's conservation objectives.
- 2.6 To fulfil the legal requirements to identify whether significant effects are likely to occur upon any European site with the implementation of the GNP, an HRA screening assessment has been undertaken in Section 5 of this report.

Section 3: Sustainability Statement

Introduction

- 3.1 The aim of this section is to provide an analysis of GNP policies to illustrate that the plan will help to deliver sustainable development. The chapter is not designed to be a full SA. It aims to provide a context for the SEA and HRA and provide evidence for the Basic Conditions statement.

Aim of the GNP

- 3.2 The outcome of public and stakeholder consultation has led to the adoption of the following vision and neighbourhood plan policies for Gurnard.

Vision:

Maintain and enhance the separate and distinct identity of Gurnard, its range of services and facilities, whilst allowing small scale development which meets the identified needs of the local community.

- 3.3 The following table summarises the policies contained in the GNP and provides commentary on how the policies will ensure that sustainable development takes place, including protection and enhancement of the natural and historic environment and delivery of economic and social benefits.

Policy ref.	Policy Theme	Policy summary	How it ensures sustainable development
H1.1	Housing development – size	Limit development to within settlement boundary or sites A and C . Designed to meet local need.	Minimise the impact on the character environment and infrastructure of the parish.
H1.2	Housing development – type	Development must meet local needs as defined by the housing needs assessment (HNA).	Enables residents to remain in the parish as their needs change and supports community cohesion.
H1.3	Housing development - use	First occupiers must be residents of the Isle of Wight with a local connection.	Prevents initial use as second homes so that local needs are met. Preserves character as residential rather than holiday use. Supports community cohesion.
LE1.1	Business and retail – new build and	Supports business and retail development within the settlement boundary or conversion of redundant	Benefits are potentially economic and provision of services for which there is demand. Conversion will ensure that existing buildings are occupied,

Policy ref.	Policy Theme	Policy summary	How it ensures sustainable development
	conversion	buildings. No harmful impacts on residents or neighbouring uses.	avoiding the negative effect on vibrancy of long term vacant buildings.
LE1.2	Business and retail – change of use	Permitted if existing use is no longer viable.	Benefits are potentially economic and provision of services for which there is demand.
LE2.1	Visitor facilities	Development is supported within the settlement boundary; development in the wider rural area is restricted to protect the landscape and must demonstrate a rural location is required.	Maintaining or growing the number of visitors will help to sustain the local economy for the benefit of residents and visitors.
LE2.2	Loss of visitor facilities	Alternative use must provide equal or greater benefits.	In these circumstances change of use will help to sustain the local economy for the benefit of residents and visitors.
LE3	Gurnard Pines	Permits development to improve its leisure offer to visitors and local residents.	Allowing the facility to develop in step with visitor expectations will help sustain the business, benefit the local economy and local residents.
T1	Private parking	Adequate off-street provision.	Will minimise the need for on-street parking, avoiding bottlenecks and risk to pedestrians and cyclists.
T2	Public Parking	Priorities for additional public parking.	As for Policy T1. Will also make access to shops and local services easier and safer.
T3	Footpath and cycle ways	Priorities for establishing additional routes. Developments resulting in loss of such facilities will be resisted.	Will enable more people to walk and cycle to shops, services and the school. Benefits the local economy for health and community cohesion. Fewer vehicle emissions benefiting the environment.
CS1	New community facilities	Proposals for health facilities; sport and recreation will be supported.	Improves health and community cohesion. Will reduce travelling to facilities in other parishes and towns. Fewer vehicle emissions will benefit the environment.
CS2	Local green space	Local designation to protect green spaces of community significance.	Preservation of these features will help to maintain spaces important for community events, formal and informal recreation and village character. Direct benefits for community cohesion, health

Policy ref.	Policy Theme	Policy summary	How it ensures sustainable development
			and wellbeing and the character of the village. This will indirectly help to maintain the popularity of the village as a place to live and visit, benefiting the local economy.
CS3	Assets of Community Value	Support proposals to benefit community facilities and resist their loss unless proved to be not viable	Improves health and community cohesion
E1	Landscape protection and green gaps	This policy is chiefly concerned with resisting development in locations which would harm the settlement setting of Gurnard Village, lead to coalescence with Cowes or harm the landscape character of Gurnard Parish.	Preservation of these features will help preserve the identity, landscape setting and character of the village and maintain the popularity of the village as a place to live and visit. The policy has no negative impacts on the sustainability of the natural environment and will also contribute to the long term economic and social sustainability of the village.
E2	Protect and enhance biodiversity	All development proposals should conserve and enhance biodiversity.	Sites, species habitat and ecological networks will be protected benefiting biodiversity. Preservation of these features will also help preserve the character of the village and maintain the popularity of the village as a place to live and visit benefiting the local economy.

3.4 In conclusion it is apparent that the plan will ensure that appropriate development takes place that will improve the sustainability of the parish, protect and enhance the natural environment and community and historic assets through policies that will:

- protect landscape character areas, views, habitat and open spaces;
- ensure that appropriate housing is provided to meet the changing needs of local people without impacting on the character of the parish
- sustain and enhance local services especially in relation to the health and wellbeing of residents;
- protect residents and the natural environment from the damaging effects of motor transport by improving walkways and cycle ways connecting key parts of the village and parish. In so doing promote health and wellbeing of residents and visitors.

Section 4: SEA Screening

Criteria for Assessing the Effects of the GNP

4.1 Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC are set out below:

The Characteristics of plans and programmes having regard to:

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme;
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).

Source: Annex II of SEA Directive

Characteristics of the effects and of the area to be affected having regard to:

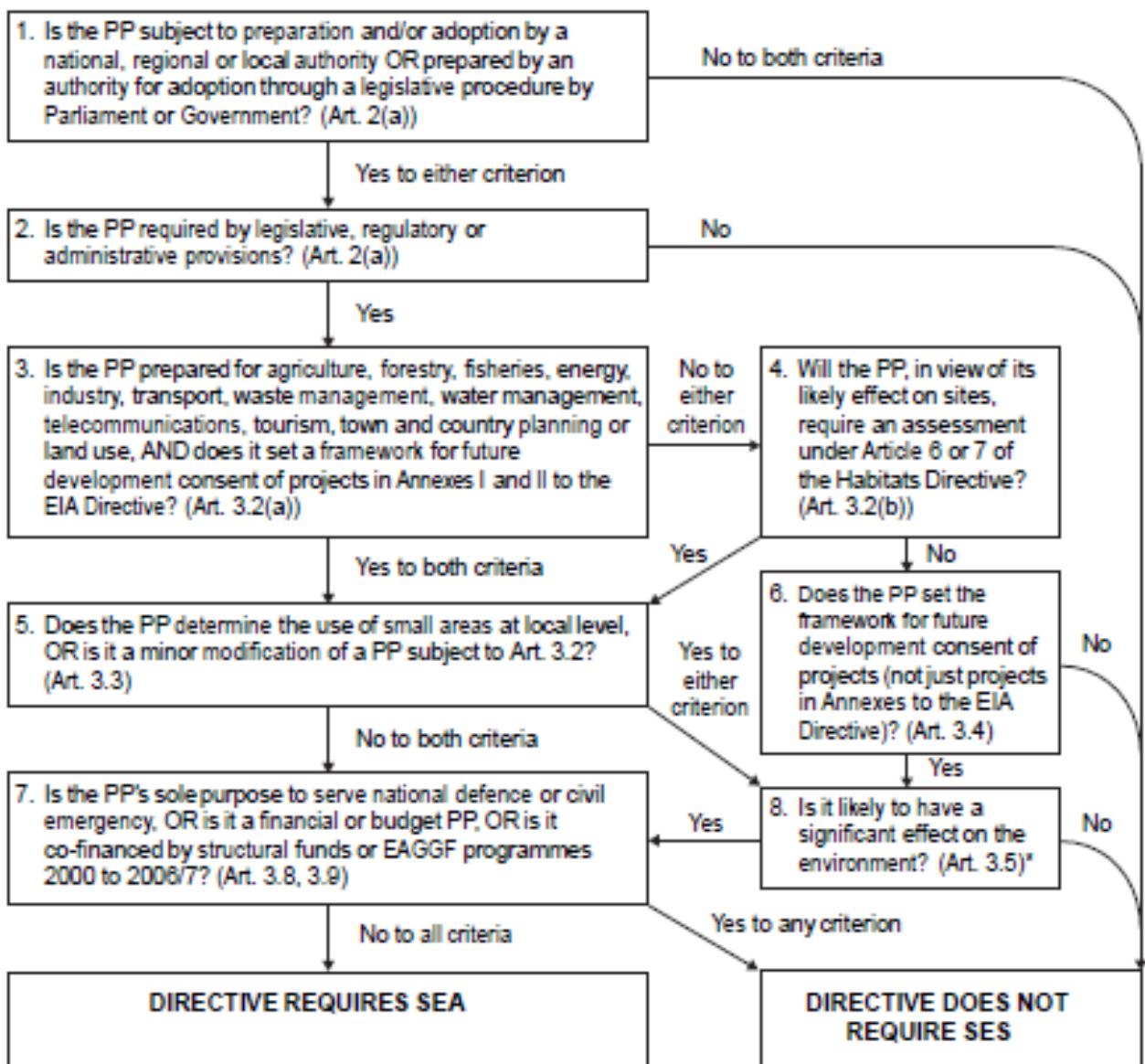
- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use;
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

Source: Annex II of SEA Directive

- 4.2 The process for screening a planning document against the criteria to determine whether a full SEA is required is shown in the following figure:

Figure 1 – Application of the SEA Directive to plans and programmes

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

SEA in the context of the GNP

- 4.3 It is required by the Localism Act (2011) that Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan. The Isle of Wight Core Strategy referred to hereafter as the Island Plan was adopted in March 2012 and was subject to a full Sustainability Appraisal which included a SEA. This concluded that either the implementation of the Core Strategy would not result in any likely significant environmental effects or sufficient mitigation measures were in place to address any effects.
- 4.4 The GNP is in general conformity with the adopted Core Strategy. Part of Gurnard is within the Area Action Plan Boundary of the Medina Valley Key Regeneration area and is regarded as a preferred location in the overall strategy for new development as set out in Policy SP1 of the Core Strategy. The remaining part is part of the wider rural area, although Policy SP2 does provide for rural areas to accommodate additional houses over the plan period, subject to strict criteria.
- 4.5 It is possible that development may be approved by the Isle of Wight Council within the Area Action plan boundary.
- 4.6 Consultation with residents and stakeholders revealed aspirations for the parish and many concerns about its future. For example residents are concerned that large scale housing development may change the character of the parish.
- 4.7 The neighbourhood plan aims to ensure that development in the village protects the features that residents value whilst ensuring that the housing needs of local residents are met and the local economy is protected and enhanced.
- 4.8 GNP policies have been arrived at taking into account evidence from public consultation, the work of 5 themed focus groups, a housing needs assessment and a landscape quality survey. Policies aim to protect the character and setting of the village and the rest of the parish, including the local heritage assets, green spaces and community facilities.
- 4.9 In Section 3 we explained how policies were designed to meet the aims of sustainable development and the protection of heritage assets, landscape and key views. (Policy CNP6) and resist the loss of trees and key views. Policies also aimed at the protection and improvement of the environment, sustainable forms of transport and a mix of housing to meet local needs and are unlikely to have significant negative effects on the environment. There is scope for positive effects through the improvements to greenspace, heritage assets, landscaping, cycle ways, bridleways and footpaths, public transport and housing mix.
- 4.10 Using the process and questions set out in Figure 1, an assessment of whether the GNP will require a full SEA has been undertaken and the findings are set out below.

Stage	Y/N	Reason
1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	Neighbourhood Plans are made by a 'qualifying body' (Parish/Town Council or designated Neighbourhood Forum) under the provisions of the Town and Country Planning Act 1990 as amended by the Localism Act 2011. A neighbourhood plan is subject to an examination and referendum. If it receives 50% or more 'yes' votes at referendum, it will be 'made' by The Isle of Wight Council as the Local Planning Authority.
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	N	Communities have a right to be able to produce a Neighbourhood Plan however they are not required to do so by legislative, regulatory or administrative purposes. However once the neighbourhood plan is 'made' it will form part of the statutory development plan for the area and be used when making decisions on planning applications, therefore it is considered necessary to answer the following questions to determine further if a SEA is required.
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	N	The GNP policies prepared for town and country planning and land use and once adopted, will be part of the planning policy framework determining future development in Gurnard. Policies protect green spaces, improves cycle ways/bridleways/footpaths, protect heritage features, views, the landscape and the Gurnard settlement setting. It seeks to improve community facilities, health facilities and parking. It does not specifically address future consent of projects in Annexes I and II.
4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	N	See screening assessment for HRA in following section of this report. Any sites developed within the GNP policies will be limited in size and number.
5. Does the PP Determine the use of small areas at local level, OR is it a minor modification of a PP	Y	Once made the GNP will be part of the land use framework for the area and will help to determine the use of small areas at a local level. It does not allocate any sites for housing or anything else. Preservation of green

subject to Art. 3.2? (Art. 3.3)		spaces, habitat and the landscape character areas will help preserve the character of the village and maintain the popularity of the village as a place to live and visit. The policy has no negative impacts on the sustainability of the natural environment and will contribute to the long term economic and social sustainability of the village.
6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Y	Policies within the GNP will be used in the decision making process on planning applications within the Parish.
7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)	N	The GNP does not deal with these issues.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	N	No likely significant effects upon the environment have been identified

4.11 The Environment Agency, Natural England and English Heritage were consulted on the requirement for a SEA for GNP. Their responses are attached in Appendix 1 and key comments are summarised below which should be noted. They support the conclusion that the GNP will not result in any likely significant effects upon the environment therefore a SEA is not required.

Consultee	Comments
Environment Agency	<p><i>“Based on the proposed development and associated environmental constraints within the area, we have no detailed comments to make in relation to your Plan at this stage.”</i></p>
Historic England	<p><i>“In general, we do not have any concerns that the plan would have negative impacts for the historic environment.”</i></p>
Natural England	<p><i>“Natural England does not have any specific comments on this draft neighbourhood plan.”</i></p>

Screening Outcome

- 4.12 As a result of the assessment in the table and the responses received from the consultees, it is unlikely there will be any significant environmental effects arising from the GNP. The GNP policies are in conformity with the Isle of Wight Core Strategy (2012) which has been subject to a full Sustainability Appraisal, incorporating a SEA. Due to the nature of the GNP the assessment of the policies identifies no significant negative effects and as such, the GNP does not require a full SEA to be undertaken.

Section 5: HRA Screening

Introduction

- 5.1 The initial screening stage of the HRA process determines if there are any likely significant effects on Natura 2000 and Ramsar sites as a result of the implementation of the GNP.
- 5.2 Natura 2000 is the combined term for sites designated as Special Areas of Conservation (SAC) or Special Protection Areas (SPA).
- 5.3 A Ramsar site is one designated under the Ramsar Convention for the conservation and sustainable utilization of wetlands, recognising the fundamental ecological functions of wetlands and their economic, cultural, scientific, and recreational value.

Relevant Sites

- 5.4 We have identified 2 Natura 2000 or Ramsar sites close to Gurnard that might potentially be affected by development permitted by GNP policies.

1. Solent and Southampton Water SPA

The area covered extends from Hurst Spit to Gilkicker Point along the south coast of Hampshire and along the north coast of the Isle of Wight. The site comprises of estuaries and adjacent coastal habitats including intertidal flats, saline lagoons, shingle beaches, saltmarsh, reed-beds, damp woodland, and grazing marsh. The diversity of habitats support internationally important numbers of wintering waterfowl, important breeding gull and tern populations and an important assemblage of rare invertebrates and plants.

2. Solent Maritime SAC

The Solent is a complex site encompassing a major estuarine system on the south coast of England. The Solent and its inlets are unique in Britain and Europe for their hydrographic regime with double tides, as well as for the complexity of the marine and estuarine habitats present within the area. Sediment habitats within the estuaries include extensive areas of intertidal mudflats

- 5.5 Natural England has developed Site Improvement Plans (SIPs) for each Natura 2000 site in England. These plans identify pressures and threats to the sites from a variety of activities including development. We have undertaken the HRA screening exercise on the basis of the following pressures and threats which are judged to be capable of being affected by a development plan:
 - Public access and disturbance;
 - Water pollution;
 - Air pollution; and
 - Extraction (non-living resources).

Policy ref.	Policy Theme	Policy summary	Likely significant effects ruled out
H1.1	Housing development – size	Limits size of any single development or sites A and C. Designed to meet local need.	Policy seeks to ensure that development coming forwards from individual planning applications to sites within settlement boundary or sites with least visual impact on the landscape. As such, the policy does not, itself, provide for a development and is therefore not capable of effects on European sites.
H1.2	Housing development – type	Development must meet local needs as defined by the housing needs assessment (HNA).	Policy seeks to ensure that development coming forwards from individual planning applications is of a type, design and tenure that addresses identified local needs and that individual developments do not exceed a certain size, to minimise their impacts. As such, the policy does not, itself, provide for a development and is therefore not capable of effects on European sites.
H1.3	Housing development - use	First occupiers must be residents of the Isle of Wight with a local connection.	The policy does not, itself, provide for a development and is therefore not capable of effects on European sites.
LE1.1	Business and retail – new build and conversion	Supports business and retail development within the settlement boundary. No harmful impacts on residents or neighbouring uses.	The policy is unlikely to contribute significantly to the threats stated in paragraph 5.5 as the business and retail development supported will be within the settlement boundary and therefore relatively remote from the European sites identified above. Further comfort can be taken from the fact that any large scale development coming forward would be subject to project level HRA, if appropriate.
LE1.2	Business and retail – change of use	Permitted if existing use is no longer viable.	The policy does not, itself, provide for a development. Whilst a change of use from business to residential could theoretically increase recreation pressure on the identified European sites if were to occur in close proximity to them, protection is afforded by Core Strategy policies which direct large scale development to within or adjacent the settlement boundary where it would be relatively remote from the European sites. Further comfort can be taken from the fact that

			any large scale development coming forward would be subject to project level HRA, if appropriate.
LE2.1	Visitor facilities	Development is supported within the settlement boundary; development in the wider rural area is restricted to protect the landscape and must demonstrate that a rural location is required.	Visitor numbers to the parish may increase as a consequence of this policy however our visitor survey shows that many visitors have an interest in landscape and habitat and we have no reason to believe they would do intentional or unintentional harm. Proposals in open countryside, outside the settlement boundary will need to demonstrate that the use needs to be located in the rural area and will not adversely affect the surrounding landscape or biodiversity, including the Solent and Southampton Water SPA and Solent Maritime SAC.
LE2.2	Loss of visitor facilities	Alternative use must provide equal or greater benefits.	The policy does not, itself, provide for a development and is therefore not capable of effects on European sites.
LE3	Gurnard Pines	Permits development to improve its leisure offer to visitors and local residents.	The policy is unlikely to contribute to the threats stated in paragraph 5.5 as permitted development is likely to be small scale and relatively remote from the identified European sites.
T1	Private parking	Adequate off-street provision.	The policy is unlikely to contribute to the threats stated in paragraph 5.5. Further comfort can be taken from the fact that any development proposals coming forward would be subject to project level HRA, if appropriate.
T2	Public Parking	Priorities for additional public parking.	The policy is unlikely to contribute to the threats stated in paragraph 5.5. Further comfort can be taken from the fact that any development proposals coming forward would be subject to project level HRA, if appropriate.
T3	Footpath and cycle ways	Priorities for establishing additional routes. Developments resulting in loss of such facilities will be resisted.	The policy is unlikely to contribute to the threats stated in paragraph 5.5. Further comfort can be taken from the fact that any development proposals coming forward would be subject to project level HRA, if appropriate.
CS1	New community facilities	Proposals for health facilities; sport and recreation will be supported.	The policy is unlikely to contribute to the threats stated in paragraph 5.5. Further comfort can be taken from the fact that any development proposals coming forward would

			be subject to project level HRA, if appropriate.
CS2	Local green space	Local designation to protect green spaces of community significance.	The policy does not, itself, provide for a development and is therefore not capable of effects on European sites.
CS3	Assets of Community Value	Support proposals to benefit community facilities and resist their loss unless proved to be not viable	The policy is unlikely to contribute to the threats stated in paragraph 5.5. Further comfort can be taken from the fact that any development proposals coming forward would be subject to project level HRA, if appropriate
E1	Landscape protection and green gaps	This policy is chiefly concerned with resisting development in locations which would harm the settlement setting of Gurnard Village, lead to coalescence with Cowes or harm the landscape character of Gurnard Parish.	The policy also identifies potential development locations which would be least harmful in relation to landscape, settlement setting and coalescence. In-combination with the amount and types of development provided for the Medina Valley by Island Plan Core Strategy Policy SP2, this policy could theoretically result in development coming forward in locations where it would adversely affect the Solent and Southampton Water SPA and Ramsar site by increased disturbance of its designated bird species from activities such as walking, dog walking and marine recreation. However, the potential development sites identified in the neighbourhood plan are at least 1.2km from the closest European sites (Solent & Southampton Water SPA and Solent & Southampton Water Ramsar site) as the crow flies and more distant via the road or footpath network. In addition, the scale of development likely to come forward on these sites is limited by Policy H1 of the neighbourhood plan and the small scale of need identified for the plan area. As such it is judged that the potential effects of neighbourhood plan Policy E1, in-combination with Policy SP2 of the Island Plan Core Strategy, are not likely to be significant.
E2	Protect and enhance biodiversity	All development proposals should conserve and enhance biodiversity.	The policy does not, itself, provide for a development and is therefore not capable of effects on European sites. Instead, the policy is likely to diminish threats identified in paragraph 5.5.

The Island Plan Core Strategy

- 5.6 A HRA of the Island Plan Core Strategy was been carried out in parallel with the SA/SEA. As a result of the assessment, the Core Strategy includes safeguards to ensure protection of Natura 2000 sites. Any subsequent Island Plan documents will also be subject to an HRA. The Core Strategy has been subject to assessment in relation to Regulation 85 of the Habitats Regulations to ensure that the proposals it contains will not lead to an adverse effect on the integrity of any Natura 2000 or Ramsar sites.

Screening outcome

- 5.7 The analysis suggests that likely significant effects can be ruled out for the GNP, either alone or in-combination with other plans and projects, and therefore a more detailed Appropriate Assessment under the Habitats Regulations is not required.

Appendix 1

Full response of the statutory agencies to the pre-submission draft of the Gurnard Neighbourhood Development Plan.

Statutory consultees and the Isle of Wight Council

1. The statutory consultees consulted were

- The Environment Agency
- Historic England
- Natural England

2. The Environment Agency told us that:

"Based on the proposed development and associated environmental constraints within the area, we have no detailed comments to make in relation to your Plan at this stage.

We are pleased to see that the protection and enhancement of the local environment is a key theme within your aims. We would recommend that flood risk is also added to these themes to ensure the avoidance of development in inappropriate areas such as the flood plain of the Gurnard Luck. This theme could be incorporated in to Policy H1 New Housing Development - here you could require any new development to be located within Flood Zone 1 of the Environment Agency Flood Maps – land which has the lowest risk of flooding. This approach would be in line with both national and local planning policy.

Your draft plan and associated Landscape Assessment allocates 4 sites for new development that are deemed to be the areas that would have the least negative impact on the landscape character areas of the parish. We are pleased that all of the sites (A,B,C or D) are located in areas designated as Flood Zone 1 – land defined as having the lowest risk of flooding. Should this change and any of the allocations propose to deliver housing in areas at risk of flooding (Flood Zones 2 & 3), these areas will be required to undertake the sequential test, that is, it must consider whether the applicant has demonstrated and sufficiently justified that no alternative sites are available in a lower flood risk zone.

Please note that within allocation site C there are some tributaries of the Gurnard Luck. These are classified as Ordinary Watercourses. The prior written consent of the relevant Lead Local Flood Authority (LLFA) is required for the erection of any flow control structures, culverting or diversion of ordinary watercourses, including streams, land drains and ditches. In this instance, the LLFA is the Isle of Wight Council.

Please be aware that the Lead Local Flood Authority has up to two months to determine applications for consent made under Section 23 of the Land Drainage Act 1991.

We support the inclusion of policy E2 – Protect and Enhance Biodiversity.”

3. Natural England told us that:

“Natural England does not have any specific comments on this draft neighbourhood plan.”

4. Historic England told us that:

“In general, we do not have any concerns that the plan would have negative impacts for the historic environment. We note that the plan area has only limited recorded potential for archaeological remains to be present, although this does include a reference to a Roman villa at Gurnard. We recommend consulting with the Isle of Wight Council archaeological advisors to ensure that proposed site allocations would not affect any sites considered to have a raised archaeological potential without including suitable policy wording to ensure that development proposals are informed by suitable archaeological investigation.

We note the use of landscape character assessment as a tool to inform the plan and provide robust evidence for its policies and in particular the identification of the Jordan Valley as an area of landscape that plays an important role in the plan area for its distinctive landscape character of small-scale landscape and attractive views. It may help to identify whether this landscape has a historic interest possibly as an area of ancient woodland (Debourne Copse recorded on the 1865 Ordnance Survey map) or orchards, reflecting historic land management. This could help to support the identification of the area as unsuitable for built development.

Neighbourhood Planning is an opportunity for the community to identify heritage assets (features of the environment that merit consideration planning for their heritage interest) that have local significance and that contribute to local distinctiveness and sense of identity. Given that the parish contains relatively few designated heritage assets (mainly relating to the farmsteads that formed the focus of settlement in the parish before the development of Gurnard Village in the mid and later 19th century. Local heritage assets need not be restricted to buildings and archaeological remains but could also include areas and places that the community values. The value of these locations as heritage might include their appearance in views from the sea – we note the use of the view of the area of Gurnard Cliff (Princes Esplanade) on the cover of the neighbourhood plan as emblematic of Gurnard as a whole. Suitably worded policy can help to ensure the need to conserve the locally distinctive character of such locations’ receives a high level of attention in decision-making. Further information on the role of both designated and non-designated heritage assets in the decision making process can be found in the National Planning Policy Framework at paragraphs 126-141. If you would like more information on identifying non-designated heritage assets or incorporating policy wording into the plan to help manage decisions affecting them I would be pleased to discuss this further.”