



# The Local Plan 2015 - 2030

The Local Plan Review: Scoping Report

**Have your say!**

(Regulation 18 consultation)

Summary of responses and the Local Planning

Authority response

Published February 2017



## 2015 Local Plan Review Scoping Report: Officer Responses | Publication Details

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## 1. Introduction

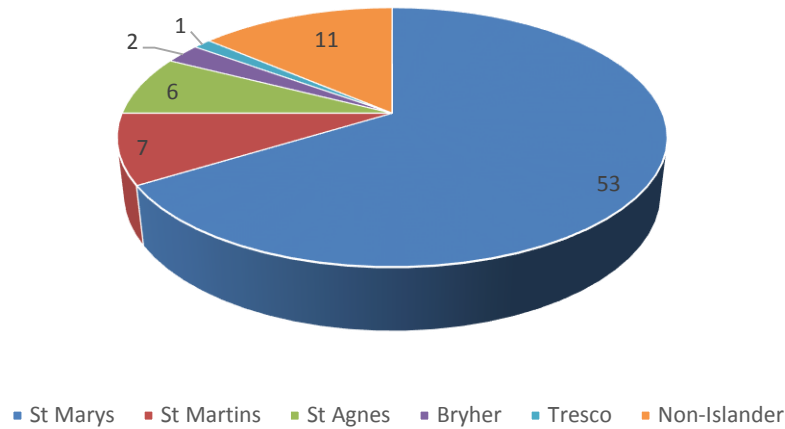
- 1.1 On 9th June 2015 the Local Planning Authority held a consultation about its intention to review the 2005 Isles of Scilly Local Plan. This consultation was the required Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulation 2012 where 18.—(1) A local planning authority must:
- a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and
  - b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.
- 1.2 The Local Plan Review Scoping Report (the Scoping Report) and accompanying appendices invited representations from the public and statutory consultees over a 7 week period from 8<sup>th</sup> June to 24<sup>th</sup> July 2015.
- 1.3 The scoping report set out a possible ‘vision’ for the islands as well as a number of issues it considered important for the Local Plan to address. These issues included Housing, Employment and the Economy, Physical and Social Infrastructure, Protection and enhancement of the Natural and Historic Environment and Sustainable Development.

## 2. Headline Indicators

- 2.1 A total of 80 consultation responses were received, including formal consultation responses from a number of organisations and Statutory Consultees:
- Historic England
  - Natural England
  - Environment Agency
  - Marine Management Organisation
  - RSPB
  - Isles of Scilly Healthwatch
  - Five Islands School – Student Council
  - National Farmers Union
  - Isles of Scilly Wildlife Trust
  - Cornwall Council
  - Cornwall and the Isles of Scilly Local Nature Partnership
  - Duchy of Cornwall
  - Islands Partnership
  - The Council of the Isles of Scilly Strategic Development
  - Tresco Estates
- 2.2 This included responses from 63 individuals of which all of the inhabited islands were represented. Figure 1 below shows the number and location of respondents and Figure 2 sets out the breakdown of respondents by type. This includes permanent residents, second homeowners or organisations.

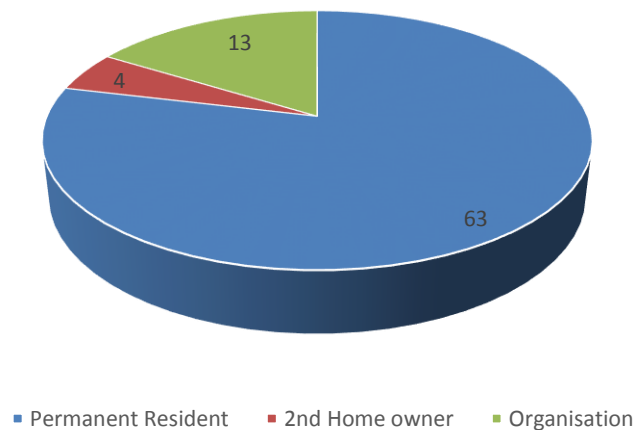


## Number of Respondents by Location



*Figure 1 Number of respondents by Location*

## Number of Respondents by Type



*Figure 2 Number of respondents by Type*

- 2.3 The consultation ended on 24<sup>th</sup> July 2015. Every household was written to directly inviting them to participate in the Local Plan consultation. This letter identified locations of where copies of the documents could be viewed and obtained. We did not send copies of the Scoping Report to all households. 1750 letters were sent out and Officers hosted drop-in sessions across all of the inhabited islands during the 2<sup>nd</sup> week of the 7 week consultation. This attracted 117 people to speak to us about the Local Plan review process.



Number of visitors attending Drop-In sessions

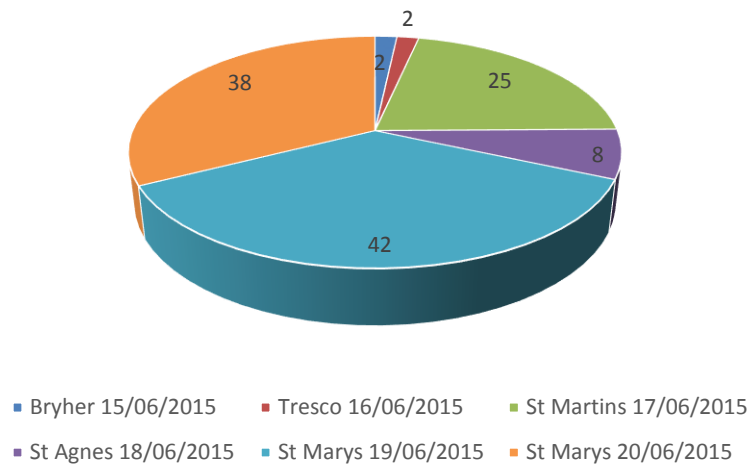


Figure 3 Number of visitors to island drop-in sessions

- 2.4 We have now considered all the responses. Sections 3-4 will provide a summary of responses received as well as the Local Planning Authorities response, whilst section 5 will outline the next steps regarding the next stage of the Local Plan Review process.
- 2.5 We are grateful to all the organisations across a range of sectors, as well as individuals for replying to this consultation.



Figure 4 Photographs taken during the Island Drop-In sessions (left to right: St Martins, St Agnes and St Mary's)

### 3. Summary of responses

- 3.1 The Consultation posed a number of questions for consideration. Whilst there was no obligation to answer these questions, it is useful to set out the general responses to these questions.

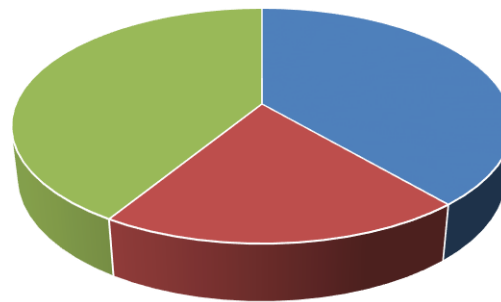
**1. Do you think the vision, aims and objectives of the Sustainable Economic Plan are appropriate? If not do you have any suggestions about what other objectives could be included?**



- 3.2 A total of **47** respondents answered question 1 and a number of people had comments to make but made no indication as to whether they agreed with this question.



### Question 1



- Percentage of respondents in Agreement
- Percentage of respondents in Disagreement
- Nil response

*Figure 5 Responses made to Question 1*

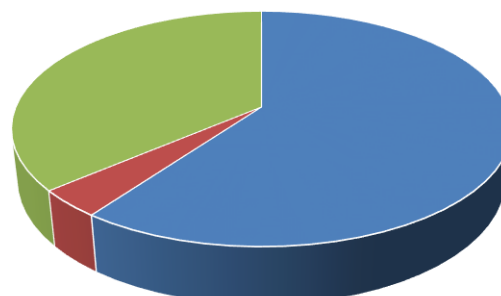
- 3.3 As you can see from figure 5 above the majority of respondents gave no indication either way as to whether they thought the 'vision, aims and objectives of the Sustainable Economic Plan were appropriate **41%**. Although a higher proportion (**39%**) of respondents agreed with the vision. **20%** disagreeing with the proposal to use the same vision, aims and objectives as the Sustainable Economic Plan.

**2. Do you consider housing is a key issue for the Isles of Scilly Local Plan to address and if so what do you think the main issue is/issues are?**



- 3.4 A total of **51** people responded to question 2 and a number of people had comments to make but made no indication as to whether or not they agreed.

### Question 2



- Percentage of respondents in Agreement
- Percentage of respondents in Disagreement
- Nil response



Figure 6 Responses made to question 2

- 3.5 As displayed in figure 6 above the overwhelming majority of people, who answered this question, agreed (**60%**) that housing is a key issue for the Local Plan moving forward. **36%** made no indication either way and **4%** disagreed that housing was not a key issue.

**3. Do you agree that new housing is required on the islands and if so do you have any suggestions as to how many, what type and where they should be located?**



- 3.6 A total of **40** people gave an answer to question 3 with a number of people giving no indication but did provide some comments.

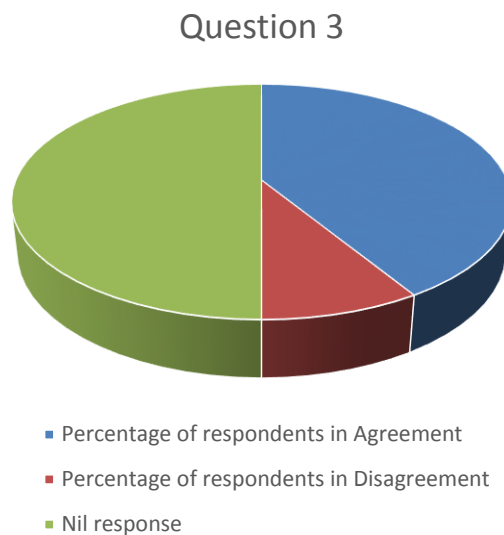


Figure 7 Responses to question 3.

- 3.7 The majority of respondents chose to give no answer to this question (40%). A significant proportion, however (**41%**) agreed that new housing is required on the islands. Only **9%** of respondents, who answered, disagreed that new housing is required on the islands.

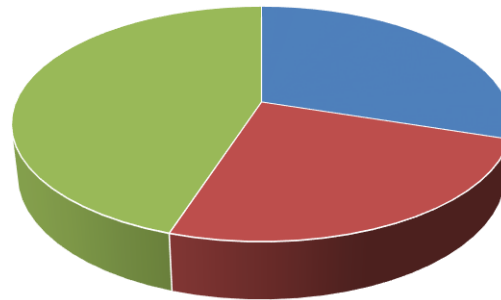
**4. Do you think the Council should be allowing some limited open market housing as a means of enabling housing development and to meet the wider demands of the islands?**



- 3.8 A total of **44** people provided an answer to question 4 and whilst a number of people made comments to this question, the majority declined to indicate positively or negatively.



#### Question 4



- Percentage of respondents in Agreement
- Percentage of respondents in Disagreement
- Nil response

*Figure 8 Responses to Question 4*

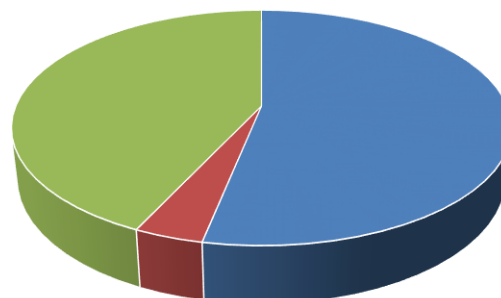
- 3.9 **30%** of the respondents were in agreement that the Local Plan should enable some limited 'open market' housing as a means of enabling housing development. Whilst **25%** disagreed that this was a suitable mechanism to deliver housing.

**5. Do you agree that there is the potential to grow the economic/employment sectors of food and agriculture?**



- 3.10 Question 5 provoked a response from **45** people on the issue as to whether there was potential to grow the economic sectors of food and agriculture.

#### Question 5



- Percentage of respondents in Agreement
- Percentage of respondents in Disagreement
- Nil response

*Figure 9 Responses to question 5*



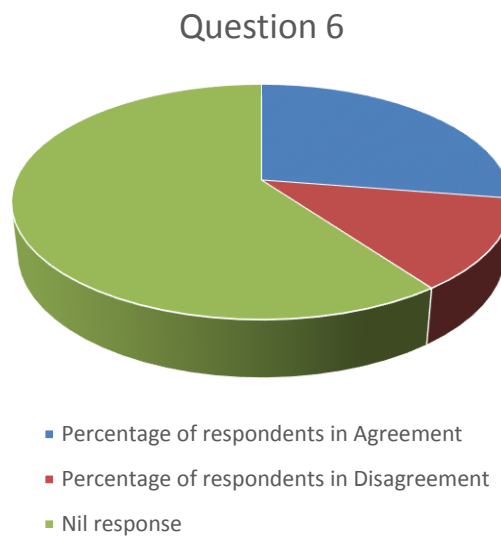


- 3.11 A significant proportion (**53%**) agreed that there is the potential to grow the economic sectors of agricultural and food of the island. Only **4%** of the respondents disagreed with this suggestion.

#### 6. Are you aware of any other specific business needs of the islands?



- 3.12 A total of **42** people provided a response to this question.



*Figure 10 Response to question 6*

- 3.13 Whilst 60% of the responses received declined to give a clear indication as to whether there were any other known business needs on the islands, **28%** did state that there were other specific business needs of the islands. **13%** stated that they did not know of any other business needs on the islands.

#### 7. Do you consider the plan should be encouraging the use of all types of renewable energy in all areas? Or are there restrictions on types or areas that should be considered?

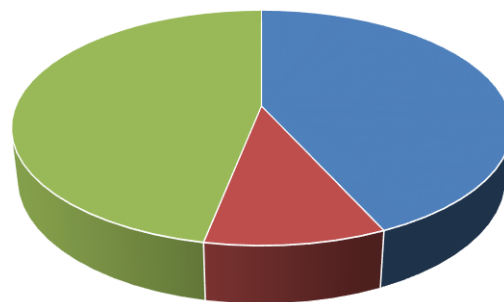


- 3.14 A total of **43** respondents provides a response to question 7.





### Question 7



- Percentage of respondents in Agreement
- Percentage of respondents in Disagreement
- Nil response

*Figure 11 Responses to question 7*

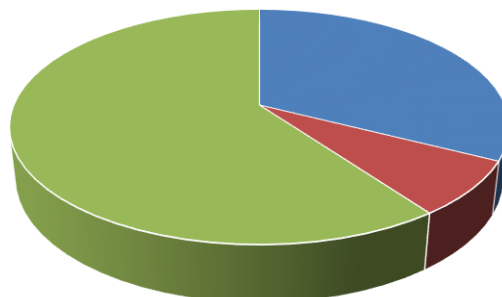
- 3.15 Of the 80 respondents, a significant proportion (**44%**) agreed that the plan should be encouraging all types of renewable energy in all areas. Only **10%** disagreed with this. The comments suggested that there may be exceptions to types and areas but overall the majority of respondents were in agreement with this position.

**8. Do you have any suggestions about how the Local Plan could address issues of waste, sewerage or water?**



- 3.16 Only **32** respondents had suggestions or comments as to how the Local Plan could address waste, sewerage or water. Although more people had general comments to make on this subject without specifically offering suggestions.

### Question 8



- Percentage of respondents have suggestions
- Percentage of respondents have no suggestions
- Nil response



Figure 12 Responses to question 8

- 3.17 Of those who responded to the questionnaire, **33%** offered suggestions as to how this could be addressed. **8%** had no suggestions as to how this could reasonably be addressed.

**9. Should specific areas (e.g. the town centre of Hugh Town) be protected or defined?**



- 3.18 Question 9 prompted **38** people to indicate whether they thought the Local Plan should seek to define or protect specific areas, such as the town centre of Hugh Town.

Question 9

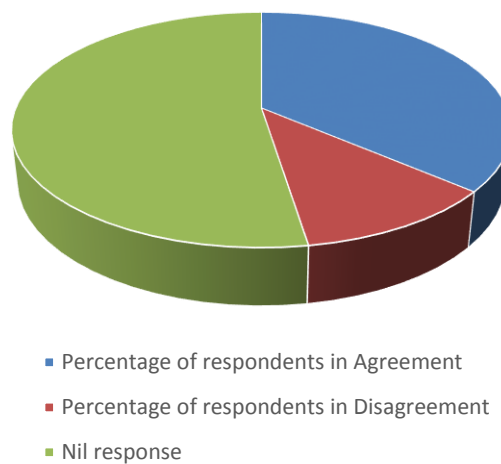


Figure 13 Responses to Question 9

- 3.19 Of the 38 respondents **36%** of people agreed that specific areas should defined or protected in the Local Plan. **11%** disagreed with the specific need to define or protect any areas of the islands.

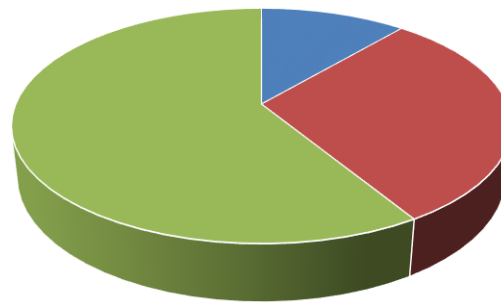
**10. Do you consider there are any areas that should not be included in the Conservation Area?**



- 3.20 Question 10 prompted **33** people to express a preference as to whether they agreed or disagreed with the suggestion to exclude areas from the current blanket conservation area designation.



### Question 10



- Percentage of respondents in Agreement
- Percentage of respondents in Disagreement
- Nil response

*Figure 14 Responses to Question 10*

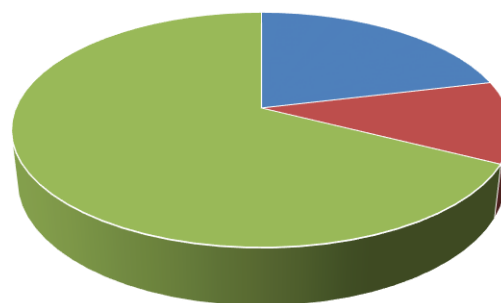
- 3.21 Only 9 of the 80 respondents (**11%**) agreed that there are areas on the island that should be excluded from the Conservation Area designation. **30%** did not consider there were areas that are not worthy of being retained as part of the conservation area.

**11. Do you consider there are any areas that may have declined and require further policies that seek to protect them from further deterioration?**



- 3.22 Question 11 prompted only **26** people to express a clear view as to whether they felt there were any parts of the islands that had declined and required further policies to protect them from further deterioration.

### Question 11



- Percentage of respondents in Agreement
- Percentage of respondents in Disagreement
- Nil response

*Figure 15 Responses to Question 11*

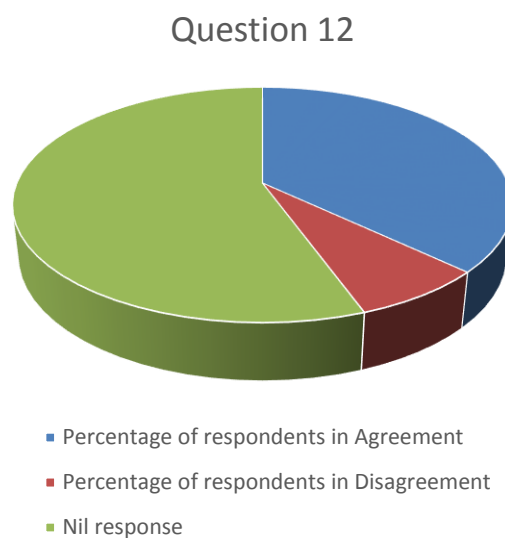


- 3.23 Overwhelmingly **68%** of respondents expressed no clear view of this question. **21%** agreed that there were areas that had declined and policies for further protection were required and only **11%** disagreed that there were such areas.

**12. Do you agree that settlement boundaries would provide a good basis to limit the spread of development on St Mary's?**



- 3.24 A total of **36** people expressed a view as to the proposal to defined settlement boundaries as means of limiting the spread of any future development.



*Figure 16 Responses to Question 12*

- 3.25 Whilst **56%** did not express a view either way, **38%** of respondents agreed that settlement boundaries would perhaps provide a way of limiting the spread of development, and protecting areas of open countryside. **8%** disagreed that this was a reasonable proposal.

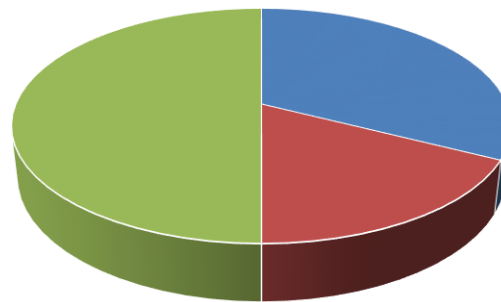
**13. Is there a need for new development or new types of development?**



- 3.26 **40** people expressed a clear response to the question as to whether they considered there was a need for any new development or new types of development.



### Question 13



- Percentage of respondents in Agreement
- Percentage of respondents in Disagreement
- Nil response

*Figure 17 Responses to Question 13*

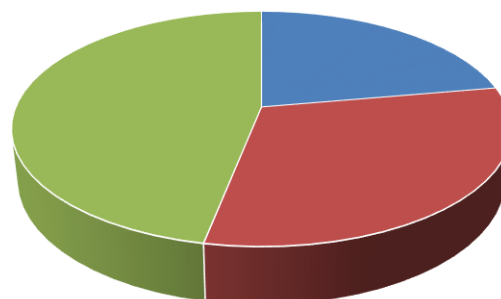
- 3.27 Whilst **50%** of respondents did not express a clear view most people did comment on this. **33%** did agree that there was a need for new types of development and **17%** disagreed.

**14. Do you agree that plastic windows and doors should be resisted because of the environmental harm?**



- 3.28 A total of **43** of the 80 respondents expressed a clear view in response to the proposal to resist uPVC windows on environmental grounds.

### Question 14



- Percentage of respondents in Agreement
- Percentage of respondents in Disagreement
- Nil response

*Figure 18 Responses to Question 14*



- 3.29 Whilst close, the majority of respondents (**31%**) who did express a view, did not consider it was appropriate or necessary to restrict the use of uPVC windows. **28%** of respondents were in agreement that it was a good idea to resist the use of uPVC windows. Many of the respondents expressed a view on this question.

## 4. Specific responses

- 4.1 The questionnaire asked for people's views about the islands. Specifically if the respondent lived on the Isles of Scilly they were asked what it is they liked about it. The table below provides peoples responses to this question.

Ref	If you live on the Isles of Scilly can you tell us what you like about where you live?
RE03	It's a beautiful place with easy access to everything my family needs without having to get in a car and it's a safe place to bring up my daughter.
RE06	Landscape – not just coastal, but also the inland rural areas. Little road traffic – therefore, safe and peaceful to walk or cycle about. Can commute to work by short walk – healthy, cheap, enjoyable and quick.
RE09	A Haven
RE011	Beautiful countryside and beaches on your doorstep. Lots of activities on offer. Mild year-round climate.
RE013	The peace, the lack of crime, the clear air, the fact that it is unspoilt (st Agnes)
RE015	Friendly people, safe, quiet, kind community
RE016	General feeling of safety and freedom, close-knit community, amazing beauty of the islands, Clean air, low crime, slower pace lifestyle
RE017	Key: a) female respondent and b) male respondent a) My birthplace. A beautiful place at the moment. Home, familiar and secure. Away from the mainland. B) Generally the fresh air, at present safety and security.
RE018	Most beautiful, friendly place.
RE019	I like: - Friendliness, safety, creativity, beautiful environment
RE020	The beautiful views, low pollution and ability to wander
RE021	I live in Buckinghamshire, but my parents have owned a property in Scilly since the 1970s which they use partly as their holiday home and partly for rental. I now part own one of these properties. I have been coming regularly to Scilly for the past 58 years because of its unique environment. I appreciate my views should not carry as much weight as those who live here permanently, but I hope that they will be perceived as relatively objective and as informed as it is possible to be a visitor who wishes only the best for Scilly.
RE022	The Environment, Safety
RE024	Peaceful, beautiful, no industry, light traffic, no noise, no pollution.
RE025	Natural Environment, Beautiful beaches/clean sea, close community/ lack of traffic on off-islands, Very safe
RE027	Just about everything. I enjoy walking my dog or night without fear of crime or predators! The scenery is beautiful and the air is so clean. It is easy to access a GP or Dentist. We are well off for restaurants and pubs given our size, due mostly to tourism. I also like the farm gate shops.
RE028	Quiet unspoiled beauty with great views, unhurried pace of life in a currently unique environment.





RE029	It has always been my home. There is nowhere else like it.(surely this questionnaire is only for people who live here)
RE032	That I live by the sea and can make a self-employed living here That I can walk everywhere (or catch a boat) That I live in an AONB with internationally important populations of seabirds on my doorstep That I live by the sea and can make a self-employed living here That I can walk everywhere (or catch a boat) That I live in an AONB with internationally important populations of seabirds on my doorstep
RE035	My wife and I came to live on St. Mary's in 1983. We sought a safe, peaceful lifestyle in a stunning natural environment in which to bring up our young daughter. We chose to live in a rural setting at McFarlands Down with minimal traffic close to Bar Beach with its beautiful sand dunes. There were numerous properties for sale in Hugh Town but we wanted to live in a country area and a rural setting with access to a beach. We considered Bar Point with its sand dunes to be the most beautiful beach on the island and still do. By 1984 we felt that we were under siege from the Council and Duchy businessmen. We have fought hard to preserve our area against quarrying of the beach and the coastal slope causing coastal erosion and proposals for waste disposal in this beautiful area by the Council and the Duchy operator. We feel that we have been thwarted by secrecy and misinformation from this Council at every step along the way and a denial of democratic rights. This 2015 Local Plan delivers yet another serious threat to our Rural Area status, our health, the structure of our house and our quality of life which have all been under attack since 1984.
RE036	Ease of access to Town, work and beach. Quite weekends when the planes aren't going overhead on approach / take off We're fortunate to live somewhere other people would pay £1000/ week to visit!
RE042	I do not live on the Scillies but have a house in St Mary's I stay in 2 months of the year. Since 25 years
RE045	Overall, beautiful, clean safe and friendly, I enjoy the things that entice visitors; low pollution, dark skies and a slower pace of life.
RE046	I love the natural landscape and biodiversity. I also love the high quality local services and facilities. I love that I don't need a car.
RE048	Good community feel with a good variety of community events.
RE049	The general ambiance and sense of community. The medical services and the way people look out for one another and care about society i.e. neighbours or friends.
RE051	The Community Spirit, the amazing scenery, the feeling of safety, the diversity of seasons, the business of summer, the peace and tranquillity of winter, the uniqueness - boating opportunities
RE052	It is still my home although it has changed so much over my lifetime some of it is still special.
RE054	Peace, tranquillity and beauty
RE056	Environment and Pace of Life
RE057	Environment and ambiance
RE060	The safety for children and the fact that they can live a carefree childhood. The beaches, the scenery. The community support
RE061	The environment, peace, tranquillity, being part of a community





<b>RE064</b>	Like my garden, my neighbours and the views from my house: all lovely and sum up St Agnes. The revamped Island hall, combining a restored Bible Christian church with an architecturally acclaimed extension containing half-a-dozen work units, is an impressive landmark that sums up community ambition on St Agnes. Impressive too was the Agnes team's achievement in taking over the associated road resurfacing project down to the Island Hall in double quick time and their effort earlier in the year in stabilising, reinforcing and re-building sea defences at Periglis. Impressive generally has been the way the Authority has backed major projects lately from the new school to new roads, from St Mary's quay improvements to hard runways, from Porthcressa regeneration (including Porthcressa flats) to the airport terminal building.
<b>RE065</b>	Living in Scilly has many benefits and amongst them are the tranquillity, the sense of belonging to a community with the potential for sustainable living and sharing a love for the islands with visitors in a special and unique natural environment.
<b>RE066</b>	Peace, tranquillity, amazing natural environment, open spaces, sea, sky, light
<b>RE070</b>	Safe, peaceful and healthy environment with good community spirit.
<b>RE074</b>	I like being remote, the lack of crowds and traffic, being self-sufficient in many ways and having a unique way of life.
<b>RE075</b>	The location, the people, the tranquillity, the feeling of safety and security, it's a long list.
<b>RE076</b>	<ul style="list-style-type: none"> <li>• Peace</li> <li>• Space</li> <li>• Natural Beauty</li> <li>• Close Community</li> <li>• Eccentric but friendly population</li> </ul>
<b>RE077</b>	How long have you got?! The tiny scale of the landscape of Bryher enables an intimate knowledge of one's surroundings. The character of some of the housing, barns and the Church maintain the historic essence of the island. Bryher has succeeded in moving forward while building on the foundations of its past.
<b>RE080</b>	Safe, Traditional values
<b>RE081</b>	Safe are, supportive, small community, beautiful, clear seas
<b>RE084</b>	Safe, beautiful, tranquil - when no major works being done

4.2 A simple text analysis of these responses reveals common values including 'Beautiful', 'Environment', 'Community', 'Safe', 'Natural', 'Safety' and 'Sea'. Out of the 80 respondents, 45 (56%) people chose to express views on what they liked about living on the Isles of Scilly. The Wordle<sup>1</sup> diagram, in figure 18 below, shows the most frequently used words, from the above responses, as larger, bolder words. This illustration provides an indication of the aspects of 'life on Scilly' appreciated by the respondents.

<sup>1</sup> Wordle.net is a free word analysis tool used to generate the image displayed.



Figure 19 A Wordle of common words used in response to what people like about living in Scilly

4.3 It is clear that most people appreciate the beauty of the natural environment and its safe community. When considering aspects of life of Scilly that were disliked then it is clear that people are not quite so in agreement on where the problems lie. The table below sets out peoples responses to this question.

Ref	If you live on the Isles of Scilly is there anything you dislike about where you live?
RE03	The lack of choice of affordable, good quality food. The cost of freight limits the use of mainland suppliers as it becomes very expensive very quickly.
RE06	Limited food/essentials shopping range in Hugh Town and generally on St Mary's. Everything seems too dependent/focussed on tourism.
RE09	Transport uncertainty
RE011	During the winter there is a lot less to do, shops close and it is extremely difficult to get back to the mainland. There is a lot of upvc in the heart of Hugh Town on guttering's and windows. There are lots of cars and pavements are very difficult if you are in a wheelchair or pushing a pushchair.
RE013	No!
RE016	Occasionally when I am stuck by the weather I have to remind myself that I choose to live on the island! My flat is tiny (rented dwelling) but although I am on the housing list, I am nowhere near eligible to be housed.
RE017	a) Ridiculous sign posts, and pointless signage on the roads. B) Recent changes, for the most part unnecessary - i.e. Airport. Industrial Estate
RE018	Lack of affordable housing for elderly people and young people.
RE019	I dislike: - supermarket- needs to be able to expand; lack of market stalls/lively competition/local produce; lack of good community space on St Mary's; lack of coherent housing strategy/policy which includes the Duchy of Cornwall which ensure the needs of all ages with different financial situations are taken into account.



<b>RE020</b>	Housing quality and availability. The acceptance of residents/need to accept poor standard accommodation and communal facilities. No one works together for the greater good of the residents and the business opportunities. Lack of understanding of what could be achieved and the attractiveness that the islands could have to visitors and 'migrants' who want to add to the welfare of these beautiful islands.
<b>RE022</b>	The unreliable transportation. The Duchy overcharging for food. Quality is very variable and overpriced on a like-for-like basis.
<b>RE024</b>	Plans to change all of the above by opening a waste processing site.
<b>RE025</b>	Transport problems - leaving/returning to islands in winter, lack of culture
<b>RE027</b>	Very little that I dislike but top of the list is transport to the mainland for me and for my family and friends. I hope the EGNOS system will improve matters but when I moved here the helicopter service existed and made trips particularly for medical purposes somewhat easier. Only other real frustration is the co-op or at least the way it is managed and the permitted order listed for the poor staff to cope with.
<b>RE028</b>	Not currently, but great apprehension about the council potentially allowing the disused Pendrenen Quarry to be used as a tip and building and other waste storage area, We note part of Moorwell's contaminated waste is still stored there.
<b>RE032</b>	Too many cars – encourage walking and cycling Unreliable and expensive transport to the mainland – I would support a year round boat That people don't appreciate what an amazing place we live in and how lucky we are The wastage of water – little appreciation of its true cost, especially when not metered Challenge of meeting infrastructure needs – water, sewage, energy Apathy sometimes encountered re the challenges of living in an island community
<b>RE035</b>	Our idyll was soon shattered when we had to fight the Council's Planning proposals for a long-term landfill site, including the excavation of the whole coastal slope from Pendrathen to Bar Point. The ensuing 5 years Public Inquiry was exhausting and badly affected our personal lives. At the same time we had to witness the accelerating destruction of the coastline at Bar Point by large-scale sand and stone extraction from the beach. More recently, despite our objections, since 2012 residents have had to witness the unlawful use of the quarry as a toxic refuse dump, without Planning consent. Hundreds of tonnes of waste contaminated with asbestos, heavy metals, tarmac etc. now remain in the quarry. Having fought a 5-year Public Inquiry 1987 to 1992 to stop waste dumping along the northern coastline, we feel that this Council has misled us, broken the law and we are back to square one without any planning rights whatsoever to object to new plans for waste dumping in the quarry. This is because we understand the operator is requesting 'legal use' from the Council rather than submitting a Planning Application whereby residents would have the right to object to the adverse effects of the dumping of waste where the origin and content of the waste could be unknown and could contain asbestos as well as other contaminants as has already happened and which hasn't yet been removed from Pendrathen back to Moorwell. There was a considerable increase in traffic, using our narrow residential road without paths, together with excessive noise, vibration and dust which we experienced in 2012 when the contaminated waste was deposited in the quarry on the claim by the Council and the EA that it was inert. Tests since then have proved that waste contains asbestos etc. No attempt by the Council or the operator was made to ameliorate these hazards so we have no confidence that any consideration will be given to residents in the future in terms of environmental health and pollution if waste is transferred from Moorwell. It may also be the case that under a 'legal use' permission, no conditions can be enforced in relation to heavy lorry danger to the public, noise, dust and inconvenience to local residents and tourists so is it therefore the case that we will have no right to object in any way whatsoever to the future operations at Pendrathen? In 2012 no testing even by sight seems to have been carried out. Nor was random chemical testing carried out by the Environment Agency on the waste being dumped at Pendrathen which was irresponsible and unlawful. Even if random chemical testing had taken place it would only have been hit and miss and unreliable and could not have guaranteed the discovery of all of the toxic pollutants in any batch of waste coming from builders, the Council or anyone else. The policy to



	<p>use sites other than Moorwell for processing what could be contaminated waste is unintelligent and ignores what will be the reality of spreading toxic contamination to new sites. Permission to use Pendrathen for builders' waste or any other wastes therefore must be refused by the Isles of Scilly Council. The result of the 1987 Public Inquiry must be complied with. A policy to use sites other than Moorwell to process waste is unsustainable. The promotion of local environmentally damaging businesses like that at Pendrathen must be rejected in order to protect residents and tourists and all of the designated areas of the natural environment from contamination by irresponsible business interests and Council Officers.</p> <p>Pendrathen is in an AONB, a Conservation Area and Heritage Coastline which has spectacular views admired by both residents and tourists alike. See IOS Conservation Area Character Statement 10.1 'there are significant views from all high points and numerous vantage points' and Fig. 17 map showing 'Significant Views &amp; Vistas on St. Mary's' in the vicinity of Pendrathen quarry. It is adjacent to extremely important Ancient Monuments. The 180° seascape vista from the higher path above Pendrathen quarry is spectacular because it looks across to the off-islands and the sun setting over the end of Tresco is magical and the best view in all the islands.</p> <p>The despoliation at Pendrathen Quarry can be viewed by tourists from both the higher and the lower coastal paths. It is essential that Pendrathen becomes part of an intelligent restoration programme including the possibility of it being transformed into an outdoor theatre. We find it outrageous that the Duchy and Council Officers are trying to turn this amazing area into a toxic waste tip as they tried to do in 1987. To highlight the beauty and attributes of this coastline in the Character Statement and at the same time plan the permanent ruination of this tourism asset defies belief! This is what makes local residents very angry which raises the question as to how Officers of the Council could have agreed to the abuse of Pendrathen knowing the national and international importance of this area containing many Ancient Monuments.</p> <p>Pendrathen despoliation is a blot on the landscape and in the circumstances of its present use, we believe that any Planning consent may have lapsed. However, if the quarry was transformed into an outdoor theatre similar to the Minack in Cornwall with its spectacular sunsets it would be admired by locals, residents and tourists. Other inspirational uses could be incorporated such as displaying poetry as part of the 'poetry trail' - Pendrathen could become an amazing tourist attraction along the coastal path that should be protected at all costs for the sake of tourism. To quote the Island Futures Sustainable Econ. Plan, 2.2 "To improve the quality of the tourism offer."</p>
RE036	<p>Plane over flight at the weekend when the wind is in the West or East.</p> <p>A bit of a "rat-run" for builders vans accessing stores at end of Close</p>
RE042	I love these islands because they are unique: landscapes/seascapes, isolation, animals, peace.
RE045	Unreliability of transport to/from the mainland (usually weather related). I worry about creeping changes that are gradually spoiling the things that make the islands different and special.
RE046	I don't like the number of cars on the roads. I don't like the number of low quality buildings and cheap building materials that are in use. I don't like the lack of focus on sustainable living.
RE048	Difficulties in transportation to and from the islands due to weather disruption which can sometimes create a sense of isolation from the mainland.
RE049	The lack of pride/cleanliness in the environment in general and particularly the streets around Hugh Town. People dumping their garden rubbish where ever it takes their fancy. Unnecessary exorbitant prices in some shops even allowing for additional transport costs
RE051	The increase in traffic, the cost of living. To take a holiday it's almost double compared to the mainland. Oh and an off island even more expensive. Sometimes lack of joined up thinking re boat services, especially freight movement.
RE052	Yes the change of emphasis on our way of life has changed so much because of top heavy bureaucracy which is mainly negative
RE054	No
RE056	Transport difficulties, cost of freight





<b>RE057</b>	No longer having transport competitions
<b>RE060</b>	The stinky seaweed on the beaches, especially Porthcressa and Old Town Bay- this attracts biting flies and smells. The lack of appropriate housing; however one must be careful where one builds. There are a large number of people in houses too big for them, but in order to tempt them to downsize and give up their family homes it is necessary to offer them a package - e.g. new decoration, carpets etc., plus help to move - they have a lifetime of possessions and in order to inspire them to move they probably need someone to help them clear their homes. There is a lack of places for teenagers to congregate.
<b>RE061</b>	Difficulties in travelling from any off-islands in the winter months and cost. Cost of living
<b>RE064</b>	To me it is not the Council's big projects that are a source of irritation and frustration. It's the little things associated with these schemes that the Authority does badly and then doesn't undo. Witness the 'Wall of Obscurity' up at the airport. Despite dozens of head-scratching queries and bemused complaints each week from visitors flying out the view from the Air Fare Cafe to the harbour remains blocked by this ridiculous wall. It needs to disappear immediately and be replaced either by fencing or glazed panels as used elsewhere all over the site and re-used to help mask the nearby oil (?) tanks.
<b>RE065</b>	Lack of renewable energy generation · Lack of local food production · Expensive and unconnected transport links · Lack of political leadership
<b>RE066</b>	Difficulties associated with travel to and from mainland, Traffic issues
<b>RE070</b>	My dislike is not of the islands, but of the prospect of possibly having to leave here as I get older and can no longer maintain a large house and garden because there is little or no suitable housing on the open market which is specifically designed for the elderly and infirm. My responses to Q1, Q2, Q3 and Q4 therefore reflect the concerns of the older generation on the islands of which I am part rather than the younger generation who will make their own representations about their concerns.
<b>RE074</b>	I have concerns regarding housing for young couples and families and securing compliant water supplies. I don't dislike anything about living here.
<b>RE075</b>	Wages are generally poor, rents are high and the quality of accommodation offered by the private sector is poor because demand outstrips supply. There is also a very negative section of the community who seem hell-bent on destroying the place with their constant criticisms of the Council, Steamship Co and Duchy. None of these organisations are perfect but I do believe they all do their best and with the best of intentions. It is not in the interest of the Council, Duchy or the Steamship Company for Scilly to fail because they too will fail.
<b>RE076</b>	Poor transport creates difficulty of access for health, business and cultural activities.
<b>RE077</b>	The cost and difficulties of transport, the cost of living.
<b>RE081</b>	We are behind in many areas, e.g. in terms of recycling and sustainability when we should be in front. The number and speed of cars over here I find deeply troubling and ever increasing. The expense of getting on an off but the benefits far outweigh the negative aspects.
<b>RE083</b>	Speeding Traffic, Dog Fouling
<b>RE084</b>	Loss of out of town store for grocery shopping - definitely needed. Community should have been more supportive



Figure 20 A Wordle of common words used in response to what people dislike about living in Scilly

- 4.4 What is clearly apparent from our existing residents is the problems and costs associated with transport and getting to and from the mainland. The costs associated with living here generally. The problems with getting rid of waste. Housing was cited by a number of residents as one of the main problems with Scilly and the lack of affordable housing in particular. A simple text analysis reveals words such as 'lack', 'transport' and 'cost' as appearing most often in the responses to this question.
- 4.5 It is clear that there are some common and important values that the Local Plan should seek to protect and that there are some problems the community would like to see addressed.

## Question 1

- 4.6 Question 1 sought to identify a 'vision' for the new Local Plan and set out the existing Local Plan vision as well as the 'vision', 'aims and 'objectives' of the 2014 Islands Futures Sustainable Economic Plan. The responses to this question, which specifically asked whether the Island Futures vision, aims and objectives were appropriate for a new Local Plan.



Ref	1. Do you think the vision, aims and objectives of the Sustainable Economic Plan are appropriate? <i>*Grammar and Spelling is unchanged from the original submission.</i>	LPA Response
RE03	The extra points in para 2.2 regarding safeguarding our infrastructure would be a useful addition.	Noted
RE04	I've got no idea as to what to call our vision, it makes no difference, just make something up that doesn't box us into a corner!	Noted
RE06	Particularly: diversification (would be great to develop marine tech & energy sources, as well as have more creative individuals/businesses (e.g. in design) based here); and self-sufficiency & resilience (especially in energy and water).	Partially Accept: The Vision, aims and objectives should not be too detailed. We need to balance a meaningful and realistic vision whilst reflecting all aspects of life on Scilly. It is considered that consideration could be given to including reference to 'diversification of economy'.
RE07	local transport	Partially Accept: The Vision, aims and objectives should not be too detailed. We need to balance a meaningful and realistic vision whilst reflecting all aspects of life on Scilly. It is considered that consideration could be given to including reference to 'local transport' provided it clearly relates to spatial planning matters consistent with the content and scope of a Local Plan.
RE08	Improving the quality of the tourism offer is a very vague aim. I suggest something like: 'Improving the breadth, quality and value of the tourism offer'. Diversification in the general sense is again very vague. Even with workspace, superfast broadband and housing, the prospect of relocating or starting a significant company in such a remote location with expensive and unreliable transport links to the rest of the UK, Europe and the world would rule our islands out. Entrepreneurs work with their heads not with their hearts! Diversification within tourism is the direction we should be moving in.	Partially Accept. It is noted that some of the terms are 'vague'. Some consideration could be given to incorporating the suggested changes where they clearly relates to spatial planning matters consistent with the content and scope of a Local Plan. The suggestion about attracting entrepreneurs is directly beyond the scope and remit of a Local Plan but provides an example to illustrate one way in which the Local Plan could seek to positively influence some diversification within the existing economy – for example by ensuring the provision of decent, suitable & affordable homes to attract and retain those with appropriate skills and experience and help to retain younger people on the islands supported by appropriate and sufficient business space to enable diversification from tourism.





RE09	You cannot have development and sites for housing local services <u>until</u> you have sustainable management of energy/fuel water sewage and waste. This has to be addressed first.	Noted. It is agreed that additional development will put pressure upon existing infrastructure. The value of any new development has to factor in necessary contributions towards infrastructure improvements. Current infrastructure problems have been exacerbated by piecemeal unplanned development being added on to existing infrastructure and a lack of investment to improve and upgrade. When development is planned then the necessary new or improved infrastructure provision can be accommodated. The LPA do not intend to allocate or permit any new development without a full consideration or mechanisms to ensure the necessary infrastructure requirements are met.
RE012	There is no specific mention of housing within the vision statement	Noted. The respondent is correct that reference to 'housing' is absent from the vision statement. The LPA believe this is implied by the terms 'thriving, vibrant community'. If the Local Plan does not provide the mechanisms and policies by which to deliver appropriate and necessary housing then our community is unlikely to be vibrant or thriving. Housing is the first 'issue' the Local Plan Review Scoping Report seeks to address in order to achieve the Vision, Aims and Objectives set out.
RE017	We agree with year round travel services. Diversifying the economy is not really a major issue. We are a small set of islands - not overly affected by mainland issues - let this remain.	Noted. The economy is driven by tourism which takes advantage of the natural environment in arguably an unsustainable way (attraction of large numbers of people during the summer when resources are stretched, loss of local housing to tourism and second homes and a need to attain quality standards within tourist accommodation that results in surplus waste). Unless the tourism offer changes significantly and is aimed at a 'green tourism' economy then this situation will not change. A community has been created that wholly relies on a delicate economy that is significantly affected by National and Global recession and climate change. The suggestions in the Local Plan to encourage a diversification of the economy are aimed at reducing the reliance on the economy and encouraging the development of skills for young people that will allow them to stay on the islands whilst enabling a more sustainable income this is not reliant on a predominantly seasonal and low wage economy.



RE019	Need to add "meet the needs and aspirations of a <u>diverse</u> population". Objectives need to talk about enabling creativity, quality of life for all, too focussed on business!!	Noted although the scope of the Local Plan is limited to addressing spatial planning issues.
RE021	The vision, aims and objectives are not consistent with one another. Scilly's environment is both precious and fragile. Perpetual change and growth are not necessarily compatible with preserving that environment. It seems self-evident to me that Scilly's primary source of income will remain tourist based (are there figures on the relative breakdown of different parts of Scilly's economy - and if not, why not?), particularly in a world where peace is going to become increasingly hard to enjoy. I would have thought that accepting this should be the priority, and thereafter considering what other appropriate growth in other sectors can follow in its wake, whilst protecting the reason why so many tourists not only flock to Scilly, but also come again and again. There will always be temporary blips in tourism but it will remain the anchor of Scilly's economy.	Noted. The vision, aims and objectives follow those set out in the Sustainable Economic Plan, which focusses on all aspects of the economy not just tourism. This work drew together a range of evidence, reports, strategies and plans of the islands. The evidence for this work focused on the different business sectors of the islands which is broken down in the Strategic Economic Plan.
RE022	I am in agreement with your vision on economic policy	Noted.
RE024	The emphasis has to be on infrastructure and improving local housing stock. Not building more houses. The population has been stable for decades.	Noted. The LPA will only plan for growth and more homes if the evidence indicates that there is a need, although given the acute housing difficulties on the islands there will inevitably be a requirement for new homes as concluded in the Housing Growth Plan. The actual number and type of homes required will need to be assessed and evidenced, particularly through the Strategic Housing Market Assessment (which will look at both demographic data and a local assessment of need through a survey of the current population. Any planned residential development will primarily provide the homes currently needed by its existing population and provide a better balance and match of housing need against supply. In addition, some provision will also be required to attract investment into the islands to ensure a more vibrant economy and a more demographically balanced population.



RE027	<p>I much prefer the original vision statement (2.1) on the last Local Plan. I am not sure that the community would recognise itself as 'excited about the future' which frankly sounds like frilly dressing agreed at a local government away day. It means nothing really. Maybe 'Optimistic about a Positive Future' might be easier to back up with what it means and how it will be achieved thus facilitating clear purpose and meaning for ordinary people? The objectives are OK but I would like to see ones like: - To ensure everyone has a good place to live (needs better wording I'm sure but you get the idea). - To set strict parameters to developers (local wherever possible) to ensure best possible value for ratepayers money (see my point at 15)</p>	<p>Partially Accept. It is accepted that the vision statement could be refined but needs to focus on spatial planning matters. Similarly the objectives need to focus on planning matters that are relevant to the islands and would, for example, be difficult to set strict parameters to developers that are unreasonable and beyond the legislative and regulatory controls and powers of the planning system.</p>
RE028	<p>Ok as far as it goes. However nothing can be developed residentially without solving the supply of additional safe water, secure and sanitary drainage and a permanent answer to safe waste disposal including recycling.</p>	<p>Partially Accept. It is acknowledged that the infrastructure on the islands needs to be improved. However, it should be recognised that new development can provide opportunities to improve infrastructure. When development is planned then the necessary new or improved infrastructure provision can be accommodated. The LPA do not intend to allocate or permit any new development without a full consideration or mechanisms to ensure the necessary infrastructure requirements are met.</p>
RE032	<p>Where is the nature? NPPF 2nd objective is to 'move from a net loss of bio-diversity to achieving net gains' and we talk about a vision of a thriving, vibrant community 'rooted in nature' but the Objectives do not address this – the plan is focused on growing the economy and resilience of the islands only. We need to be sure the plan does not just pay lip service but gives teeth to a key objective to 'Protect and enhance the natural and historic environment' Where conflicts of interest are encountered economic growth should not automatically win out. I am wary of the term Sustainable Development - the idea of continuous development, growth and rising population ad infinitum is inherently not sustainable. All systems have finite resources, ebb and flow.</p>	<p>Partially Accept. The Local Plan does need to ensure that its objectives, policies and proposals genuinely protect and enhance the outstanding environmental quality of the islands in accordance with statutory requirements. However, such an approach does not preclude additional growth on the islands where it is required to strengthen economic and social issues on the islands. In addition, every effort will be made to ensure that new development incorporates sustainable design features to reduce any impact on the natural resources and environment of the islands and contribute towards the principles of self-sufficiency and a circular economy.</p>
RE033	<p>The original vision statement did not address economic growth and development and the new version disregards everything else. The 'vision' seems quite odd. The objectives could include reference to:</p>	<p>Partially Accept. It is accepted that the vision statement could be refined but needs to focus on spatial planning matters. Similarly the objectives need to focus on planning matters that are relevant to the islands. Although the matters contained in the representation could be included in</p>



	<ol style="list-style-type: none"> <li>1. The health and wellbeing of the community and groups such as young people or older people; (delivered through access to services either provided by the Council or via resilient transport links).</li> <li>2. Making the environment safe for older people or members of the community with disabilities or health challenges; (delivered through appropriate housing and attention to lighting/ walkways/disability access in the public realm).</li> <li>3. Making Scilly a safe and supportive environment for children and young people to grow and prosper; (delivered through facilities for children and young people, road safety measures, cycle paths).</li> <li>4. Support for a skilled, home grown workforce; (delivered through job creation, support for training and employment in health and care services, affordable housing, key worker housing).</li> </ol>	the objectives, it is also important for this section of the Local Plan to be focused and succinct.
<b>RE034</b>	Environmental and social objectives must be included for the Local Plan to be sustainable	Accept. The Local Plan does need to ensure that its objectives, policies and proposals genuinely protect and enhance the outstanding environmental quality of the islands in accordance with statutory requirements as well as those that meet social issues.
<b>RE035</b>	<p>We agree that we must have a thriving, vibrant community but believe that those Officers, Councillors and businessmen pushing through one inappropriate and expensive project after another and incurring massive overspends, are not improving the bread and butter business of these islands – tourism and the basic infrastructure which supports both residents and tourists. We have to work from what we already have – a unique natural environment which is why tourists come here. We are in danger of losing our regular visitors because development is superseding the protection and enhancement of the natural environment. Inviting a few IT entrepreneurs to work on Scilly will not benefit the islands at all and when they experience the high cost of living and transport they are unlikely to stay. From all that has already happened and is now being proposed, we cannot feel anything other than deeply depressed – rather than excited - about the future. The priorities are inadequate and the results will damage the environment, public health and tourism.</p> <p>The rebuilding of the Airport was not necessary. What was necessary</p>	<p>Noted. The Local Plan needs to strike the right balance between facilitating new growth to meet the economic and social needs of the islands whilst protecting its outstanding environmental features in recognition that it underpins the economy. As part of this balance, it is important to enable a diversification of the economy to raise local incomes and ensure that the islands infrastructure is improved to comply with legislation.</p> <p>Airport refurbishment irrelevant to the Local Plan review and was required to ensure runways and terminal building compliant with the requirements of the CAA and largely funded through external grants.</p> <p>The Council is managing waste streams in accordance with the appropriate legislation and regulations but there has to be some acknowledgment of the logistical and financial challenges and there needs to be some responsibility from the business sector to more positively engage in finding more cost effective and sustainable solutions. In the context of the finite and limited land and the significant environmental constraints across the</p>



was to improve and refurbish what was already there. Many residents have expressed disquiet about the enormous expenditure involved. Despite its modern appearance it cannot in itself generate more passengers when the main drivers of tourism are the weather, care for the Scilly natural environment, good accommodation and good transport services. The provision for airport taxi transport has been made worse by allowing Skybus to monopolise all of the parking space in front of the building. The bays have proved to be physically dangerous and the slope of the road away from the building has perhaps created a situation of a serious accident waiting to happen if a hand brake disengages. The internal space at the Airport is not as attractive as it should have been for travellers. The cramped check-in area, the intrusive toilet block, the ridiculous walled area outside, the difficult parking bays and the sloping public parking areas. We feel that with the advent of every new 'project' emanating from the Econ. Development Dept. not enough account is being taken of the impact on the natural or the living environment which then impacts on both the tourist industry and the lives of residents. For example, toxic tarmac from the airport was deposited at Pendrathen, without planning permission, so was waste containing asbestos from Moorwell in 2012 and we now fear that toxic material containing asbestos from the demolition of the old secondary school will also end up in the quarry. Contrary to what the EA's Mr Mark Pilcher has advised, any waste containing asbestos is hazardous waste. Therefore practically all of the waste from Moorwell is hazardous and must be sent to the mainland for disposal.

Demolishing the very valuable 'not so old' Secondary school building at Carn Thomas would be irresponsible when it has so many potential uses that would support the advancement of the whole of this community if only we had the right Council with the right vision. These development schemes have damaged the natural environment and threatened the health of the public so the 'Vision' 2.2 of "A thriving, vibrant community rooted in nature" is in no way the reality given the 30 year-old business

entire islands, there are no easy solutions and limited opportunities for managing waste on the islands

The former secondary is considered to be both poorly designed and constructed and provides a valuable opportunity to redevelop a large site in a sustainable location.

Pendrethan Quarry has a certificate of lawful use as an inert and excavation waste recycling facility and an environmental permit for such activity. The facility provides a valuable resource as the option of transporting inert waste back to the mainland would be costly, environmentally unsustainable and result in the loss of a highly beneficial and valuable resource that should be recycled and reused in local construction projects so that the islands can become more viable and self-sufficient.





	<p>plans that are being progressed for waste dispersal to other areas instead of a strict policy of all waste containment at Moorwell and only mainland transportation of waste. This Council is failing tourism and this community.</p> <p>One glaring omission from the Objectives in 2.2 is 'To recognise the designations of AONB, Conservation Area and Heritage Coastline to protect and enhance the natural environment for posterity.'</p> <p>Also, 'To ensure all new business plans and applications that impact on the natural or the built environment are submitted to the Council and are rigorously examined to ensure they comply with the above designations.'</p> <p>The management of the Scilly environment requires that the Council plays a leading role in managing the natural and the built environment. There must be no more uncontrolled "Permitted Development" or what amounted to unlawful planning permissions and criminal waste dumping by the Council and the Environment Agency.</p> <p>All present activity at Pendrathen Quarry will always damage the area's designations and the lives of residents and tourists therefore it must be shut down as soon as possible before the present operator starts to grow a business that will further damage the coastline, damage the health and the lives of local residents the whole length of the island and damage tourism.</p> <p>Builders' rubble can be processed at Moorwell and could be stored and/or processed and stored at the noisy airport for use in the future for the lengthening of the runways or to raise the level of the area in front of the Airport building to improve safety, traffic flow and reduce the unhelpful and dangerous effects of the steeply sloping ground.</p>	
RE042	<p>The emphasis is here too much are guided by growth, ever if it is said to "sustainable". To me it has to be more specific in terms of limits to this growth,</p>	<p>Noted but the emphasis on any growth strategy is that it must be sustainable to meet economic and social needs.</p>



<b>RE046</b>	<p>I broadly agree with all of the aims and objectives. However, in my opinion, the most important are:</p> <p>"to diversify the economy"</p> <p>"to make the islands more self-sufficient and more resilient to future changes"</p> <p>It would benefit the islands to become less 'needy' and that the above two objectives work towards this goal.</p>	Noted and agreed.
<b>RE048</b>	Generally appropriate although regard should be given to the uniqueness of the geographical location and any potential changes in the future climate and how this may impact on issues such as sea defence, transport and tourism.	Accept. Geographical location and climate change are important factors to be taken into account in reviewing the Local Plan.
<b>RE049</b>	The vision is nothing more than waffle contrived by overpaid consultants who have never lived here. The 2005 statement is far more realistic and practical in approach but eradicate the "aspirations" but as some people's aspirations are neither practical nor affordable. We need to live in the real world.	Noted. The policies and proposals set out in the Local Plan will need to be deliverable.
<b>RE050</b>	The 'Vision statement' for 2005 is succinct, yet quite comprehensive and could hardly be disputed, we should think, by most residents. We question whether para 2.2, p6, is an improvement. Indeed it suffers from all the contemporary jargon and 'management speak' that characterizes so much documentation these days. It confuses rather than enhances one's understanding of the issues. Without wishing to be negative (or cynical!), phrases such as 'a thriving vibrant community, rooted in nature and excited about the future' hardly seem appropriate to a document that seeks to determine what are this community's down-to-earth priorities for the future at a time of huge financial constraint.	Partially Accept. It is accepted that the vision statement could be refined but needs to focus on spatial planning matters that are relevant to the islands.
<b>RE052</b>	It has little to do with normal sustainable off-island life	Noted





<b>RE053</b>	<p>The vision states the need for a thriving, vibrant community rooted in nature. However, none of the objectives relate to nature and how we will become “rooted” and there is no further mention of the natural environment in the document. The Isles of Scilly Wildlife Trust believes that the foundation of the tourism economy on Scilly is dependent on the natural environment. Visitors flock to Scilly to experience the landscapes, open spaces and natural beauty. Mention should be made in the economic plan that access to landscapes and management of them comes at a cost.</p> <p>Currently, any mention of the natural environment within the plan is of a static resource which will always be there and appears to be taken for granted. The local plan should serve to protect and enhance the islands’ natural assets on which the economy and the well-being of the community rely.</p>	<p>Partially Accept. The Local Plan needs to strike the right balance between facilitating new growth to meet the economic and social needs of the islands whilst protecting its outstanding environmental features in recognition that it underpins the economy. However, it is recognised that the Local Plan does need to ensure that its objectives, policies and proposals genuinely protect and enhance the outstanding environmental quality of the islands in accordance with statutory requirements as well as those that meet social issues.</p>
<b>RE056</b>	<p>We seem to have lost any mention of Transport. We cannot grow the economy until improvements are made.</p>	<p>Noted. The scope and remit of the Local Plan is limited as it needs to focus on spatial planning matters relevant to the islands and therefore has a limited influence in addressing wider transportation issues.</p>
<b>RE057</b>	<p>Given that the correct priorities are favoured.</p>	<p>Noted</p>
<b>RE058</b>	<p>I do not consider the aims and objectives sufficient. It does not mention inter-island transport which is essential to the wellbeing of off island communities and their economy as well as creating a better offering when the islands are viewed as a whole. Since 2013 the LA has been very much focused on St Mary's in particular Hugh Town. This causes dissatisfaction and mistrust. The vision is non-specific rather than inclusive. Tourism quality will grow of its own accord to facilitate changing markets and match whatever resources are available to us. So long as we have an open minded planning authority we will be able to adjust to the market. It would be best to leave this to those with experience in the business! Again it is not the Council's business to diversify the economy. ON the whole islanders are a fairly innovative lot and will make use of whatever opportunities come their way. Opportunities continued to be hindered by transport provision and cost. Collaboration again is hardly worthy of being an objective and is easily</p>	<p>Noted. The scope and remit of the Local Plan is limited as it needs to focus on spatial planning matters relevant to the islands and therefore has a limited influence in addressing wider transportation issues, including for example inter-island boating.</p> <p>The Local Plan needs to strike the right balance between facilitating new growth to meet the economic and social needs of the islands whilst protecting its outstanding environmental features in recognition that it underpins the economy. As part of this balance, it is important to provide a planning framework that enables the tourism sector to modernise and improve its quality whilst encouraging diversification of the economy to raise local incomes and ensure that the islands infrastructure is improved to comply with legislation.</p>



	<p>achieved by individuals to who the cause is mutually beneficial. I entirely agree that the islands should be more self-sufficient and resilient. This is best served by helping with things that it is impossible for the individual to organise and fund on their own. That is to create conditions where diversification can be achieved. My concern is that there is too much wriggle room for the LA. We have seen the much touted phrase 'not our responsibility' far too much. The previous administration, although a failing one at least recognised the importance of transport, in pursuing the rout scheme. Currently the LA seems pre-occupied with its own objectives and direct responsibilities to the exclusion and detriment of the private sector. It is a similar story with IP where the bulk of resources is directed at matters which can be easily and privately remedied rather than being a conduit for data regarding much needed work on transport and planning policy. My wish is not for people to be helped but to enable them through hard work and innovation to achieve their goals.</p>	
RE064	<p>Vision and aim slightly too messianic. So instead of 'ready to change' suggest 'prepared to adapt' and instead of 'excited about the future' go with 'ready and willing to face the future.'</p> <p>Suggest all seven bullet points on p7 be absorbed into the SEP objectives on p6.</p>	Partially Accept.
RE065	<p>Vision: Transition Scilly believe that the vision statement in the 2005 Local Plan represents a far more considered version than the one proposed in 2.2. We feel it needs to be rooted in pragmatism and needs to be more than a string of 'buzz' words without any mention of the real life issues currently facing the islands. One possible modification to the 2005 Local Plan version is to add the recognition of what drives the economy on Scilly – without tourism there will be precious little left of the resident community to provide for.</p> <p>Aim: There is a fundamental problem with any statement of aims that talks about growing economies without recognising the environmental and</p>	<p>Partially Accept. The Local Plan needs to strike the right balance between facilitating new growth to meet the economic and social needs of the islands whilst protecting its outstanding environmental features in recognition that it underpins the economy. However, it is recognised that the Local Plan does need to ensure that its objectives, policies and proposals genuinely protect and enhance the outstanding environmental quality of the islands in accordance with statutory requirements as well as those that meet social issues. In addition, any growth strategy will need to contribute to the future sustainability and viability of the islands with the aim of mitigating any impact on the natural resources and environment of the islands and contributing towards the principles of self-sufficiency and a circular economy. Accept that climate change needs to be addressed</p>



	<p>social limits to growth. Yes we can try to diversify, but more importantly we need to first identify the realistic economic, social and environmental limits of these islands and then work within them. We, as islanders, more than anyone else should recognise that there are limits to growth – our failing infrastructure should be giving us a clue here. How are we to appeal to the contemporary tourist while we continue to pump raw sewerage into the bathing water? Rather than just growing our economy we should also be making smarter use of the other resources (social, cultural and environmental) available to us.</p> <p>Objectives:</p> <p>Transition Scilly believe that the most important objective has been placed at the bottom of this list and that the need to be more self-sufficient and resilient in the future is the primary objective, only then will we be able to deliver on the other objectives. Of these five other objectives we feel that the stated ones of marketing, the tourism offer and transport to the mainland lie outside the primary scope of the local plan. We feel strongly that by concentrating on the issues of resilience through a process of diversification, collaboration and building on our strengths will we then be able to work towards developing a strong and vibrant community capable of taking on the challenge of Climate Change.</p> <p>We recommend the inclusion of an objective that recognises the challenge that Climate Change poses to the future of the Scilly community.</p>	<p>through the Local plan but consider that this is a cross-cutting issue rather than a standalone one meriting a separate objective.</p>
RE066	<p>The 2005 Vision reflects my views better. Especially preserving and enhancing the islands' outstanding natural beauty". I welcome change for the better not for its own sake. Aim to improve lives and a positive future. What is meant by 'rooted in nature'?</p>	<p>Noted although accept the vision needs to be reviewed and refined.</p>
RE069	<p>Comment:</p> <p>The outstanding quality of the natural environment and its importance to the economy needs to be more strongly set out. To be sustainable, the plan needs to consider and balance the economic, social and environmental strands that support sustainable development principles. The current information provided offers little information on the latter</p>	<p>Partially Accept. The Local Plan needs to strike the right balance between facilitating new growth to meet the economic and social needs of the islands whilst protecting its outstanding environmental features in recognition that it underpins the economy. However, it is recognised that the Local Plan does need to ensure that its objectives, policies and proposals genuinely protect and enhance the outstanding environmental</p>



	<p>two and is too strongly focused on economic growth. The RSPB believe that putting the delivery of a high quality natural landscape at the heart of the development of this area will bring significant benefits to the communities on the islands. We suggest including four objectives or principles that provide a framework for delivering sustainable development. These are as follows:</p> <ul style="list-style-type: none"> <li>• Deliver green infrastructure</li> <li>• Respect environmental capacity</li> <li>• Conserve natural resources</li> <li>• Protect and enhance biodiversity</li> </ul> <p>By incorporating these principles, the local plan can influence developments so they have protection and enhancement of the environment at their heart and will contribute to the achievement of sustainable development. A green environment offers many benefits including socially inclusive places, reduction in crime, economic investment, reduced health costs, as well as helping wildlife to thrive (see links to the RSPB's Healthy, Wealthy and Wise document).</p>	<p>quality of the islands in accordance with statutory requirements as well as those that meet social and economic issues in the framework that genuinely delivers sustainable development.</p>
<b>RE076</b>	<p>Agree with all 6 bullet points but would add an objective to attract/encourage inward investment. Improving the tourism offer may need new purpose built facilities and accommodation and should be encouraged.</p>	<p>Accept that new facilities and accommodation may be required to improve the quality of tourism on the islands.</p>
<b>RE077</b>	<p>The 2005 vision statement cannot be improved on for summing up adequately the objective of the Local Plan. I am sorry but I find the new statement ("A thriving, vibrant community rooted in nature, ready for change and excited about the future") pretentious and not based in the reality of times of austerity. The key issues (2.2) have not changed significantly during the past 30 years and progress has been made on nearly all issues. (A review of dozens of reports could provide evidence!) The Council would best serve the community by concentrating efforts and investment on their core functions: waste, water, sewerage, and act as an enabler only for more 'glamorous' things like 'smart grid technology'.</p>	<p>Partially Accept. It is recognised that the Local Plan does need to ensure that its objectives, policies and proposals genuinely protect and enhance the outstanding environmental quality of the islands in accordance with statutory requirements as well as those that meet social and economic issues in the framework that genuinely delivers sustainable development, including the provision of renewable energy. However the scope and remit of the Local Plan is limited to spatial planning issues although should include the appropriate framework to ensure the appropriate level of infrastructure is provided to support new development. In addition it will need to identify any committed and specific planned improvements to the islands infrastructure.</p>



	<p>The authority should continue in its role of encouraging recycling (remember the household composting scheme?) and in enabling small renewable energy schemes (PV cells, solar panels etc.)</p> <p>Little is made of protecting and enhancing the natural environment and where it is mentioned it comes last on the list (2.2) The environment is of vital importance for the economy, well-being and everything else!</p> <p>It will be interesting to see the response to this consultation from the Executive Committee of the AONB. Can it please be circulated? Likewise that from the Wildlife Trust?</p> <p>If the key issues are in order of priority, they should be listed differently (with the environment and transport higher).</p>	
<b>RE079</b>	<p>The Islands' Partnership is generally supportive of the scope of issues to be addressed by the Local Plan. Key will be striking a balance between providing a supportive framework to enable sustainable economic growth with the need to protect the unique environment on which the islands' depend.</p> <p>There should be a clear logic chain between the ambition and objectives set out in the Islands Futures report and the new Local Plan as a key policy framework that will help facilitate these. Taking into account the wider national context, it will also be important for new policies set out in the new Conservative government's Productivity Plan to be reflected in the Local Plan where appropriate.</p>	<p>Accept. The Local Plan needs to strike the right balance between facilitating new growth to meet the economic and social needs of the islands whilst protecting its outstanding environmental features in recognition that it underpins the economy. Where relevant to the Local Plan and circumstances of the islands, account will be taken of current Government policies.</p>
<b>RE081</b>	<p>In general yes, I concerns over new buildings and infrastructure being developed to broaden our employment opportunities if this has a negative effect on tourism as we cannot escape the fact that tourism current is the most important factor in our economy.</p>	<p>Noted. The Local Plan needs to strike the right balance between facilitating new growth to meet the economic and social needs of the islands whilst protecting its outstanding environmental features in recognition that it underpins the economy. As part of this balance, it is important to provide a planning framework that enables the tourism sector to modernise and improve its quality whilst encouraging diversification of the economy to raise local incomes and ensure that the islands infrastructure is improved to comply with legislation.</p>





RE082	1. I think the aims, vision and objectives are appropriate as long as we do not forget that this is dependent on the right housing mix, the right infrastructure, educational aspiration and social facilities and social cohesiveness.	Accept. The Local Plan needs to strike the right balance between facilitating new growth to meet the economic and social needs of the islands whilst protecting its outstanding environment and ensuring appropriate improvements to social and physical infrastructure to support any growth. A key element of the Local Plan will be to plan for the right mix of housing with the actual number and type of homes required properly assessed and evidenced, particularly through the Strategic Housing Market Assessment (which will look at both demographic data and a local assessment of need through a survey of the current population).
RE083	There is nothing new in this. We have always wanted these things	Noted

## Question 2

- 4.7 Question 2 sought to identify whether there was a consensus about the issue of housing and whether this should be addressed as a fundamental issue of the new Local Plan.

Ref	2. Do you consider housing is a key issue for the Isles of Scilly Local Plan to address and if so what do you think the main issue is? <i>*Grammar and Spelling is unchanged from the original submission.</i>	LPA Response
RE03	In order to secure the future of the islands, local young people need the opportunity to purchase affordable housing so they can stay here.	Accept.
RE04	Housing is a massive issue but the criteria for housing needs to be reviewed. There should be a formula whereby businesses that hire mainland-based workers should pay into the Housing Fund. If you're not careful then in 50 years' time the majority of islanders will be chefs, waitresses, chamber maids. How is that sustainable or healthy for the islands? More local people should be encouraged to stay and live here. It's an unfair system whereby you are born here, you grow up here, then you go to college and come back and then you're faced with nowhere to live because you can't afford anything here. So you either live in squalor on your low-income wage in a bedsit or a room of your parents house, or	Partially Accept. It is recognised that housing policies need to be reviewed and revised, including definitions of specific local need. However, it is crucial that the Local Plan provides a robust framework to deliver the appropriate number and type of homes required to sustain the islands population to meet both social and economic needs and ensure a more demographically balanced community.





	you move to the mainland, or you get someone pregnant here and see what happens with housing. That's totally ridiculous, but your/our system has those parameters built into it. The indigenous population of Scilly is dying, and I don't see much of a fuss being made about it, which is worrying.	
<b>RE06</b>	Clearly a need for additional housing made available for workers – job positions cannot be filled – and also for young families (ie for a couple plus 1-2 children)... therefore, 1/2/3-bedroom homes (which would also be useful units for elderly wishing to downsize and for independent living).	Partially Accept. The Local Plan must provide a robust framework to deliver the appropriate number and type of homes required to sustain the islands population to meet both social and economic needs. The actual number and type of homes required will need to be assessed and evidenced, particularly through the Strategic Housing Market Assessment (which will look at both demographic data and a local assessment of need through a survey of the current population. Any planned residential development will primarily provide the homes currently needed by its existing population and provide a better balance and match of housing need against supply (including opportunities for down-sizing).
<b>RE07</b>	Need to provide more 3-bedroom housing, also giving priority to people who have grown up on the islands	Noted. The actual number and type of homes required will need to be assessed and evidenced, particularly through the Strategic Housing Market Assessment (which will look at both demographic data and a local assessment of need through a survey of the current population. Any planned residential development will primarily provide the homes currently needed by its existing population and provide a better balance and match of housing need against supply and therefore a range of sizes will probably be required (and not primarily 3 bed room houses). Indeed, evidence would suggest that there is a growing requirement for smaller sized homes as households become smaller in part due to the aging population. In addition, some provision will also be required to attract investment into the islands to ensure a more vibrant economy and a more demographically balanced population.
<b>RE08</b>	Yes this is clearly an issue. The availability of affordable rental property with an option to purchase at a later date would provide an opportunity for younger people to have their own homes and to get on to the housing ladder when the time was rights, if that's what they want to do. They could move away from Scilly much more easily from a rented property should they wish to do this; we shouldn't assume that	Noted. The Local Plan must provide a robust framework to deliver the appropriate number and type of homes required to sustain the islands population to meet both social and economic needs. The actual number and type of homes required will need to be assessed and evidenced, particularly through the Strategic Housing Market Assessment (which will look at both demographic data and a local assessment of need through a



	<p>everyone borne here wants to stay for the rest of their lives. The Council could have first refusal if the occupier of a purchased property wanted to sell, as could other local residents for a limited time period. Working out a fair formula for pricing in a buyback situation would be difficult but not impossible. Limited open market housing would be a good idea if it helped to finance affordable rental housing. The islands have numerous disused barns, some of which are good conversion prospects. Incoming retirees should not be discriminated against; they contribute at least as much to the economy and community as anyone else. It would probably be illegal to discriminate against specific socio-economic groups anyway. Second home owners provide a high proportion of our essential holiday rental capacity. Many of these people have their primary homes here too. There might be a way on incentivising these owners to make the properties available for holiday or out of season rental if they do not already do so. Telegraph would be a good place for further development as proposed in the superseded local plan. There is already a significant housing base there, and provision could be made for a shop/restaurant/pub to add focus and reduce the need to travel into Hugh Town.</p>	<p>survey of the current population. Any planned residential development will primarily provide the homes currently needed by its existing population and provide a better balance and match of housing need against supply. In addition, some provision will also be required to attract investment into the islands to ensure a more vibrant economy and a more demographically balanced population.</p>
RE09	<p>but, see above. You can't have more houses etc. unless you have the infrastructure in place.</p>	<p>Noted. It is acknowledged that the infrastructure on the islands needs to be improved. However, it should be recognised that new development can provide opportunities to improve infrastructure. When development is planned then the necessary new or improved infrastructure provision can be accommodated. The LPA do not intend to allocate or permit any new development without a full consideration or mechanisms to ensure the necessary infrastructure requirements are met.</p>
RE011	<p>It seems like employers such as the Council, the School and the healthcare services struggle to find housing when potential employees are moving over from the mainland. House prices are far higher on the islands and getting building supplies, white goods or furniture generally costly.</p>	<p>Noted</p>



<b>RE012</b>	<p>Recognition that the islands cannot sustain development forever due mainly to the limited land and the need to balance growth with maintaining the natural environment that is vital to the islands. Need to look at other islands that have similar issues and the way they deal with inward and outward migration (need to accept that some have their own independent legislative government). The smaller homes should be a minimum of 2 bed 3 persons anything smaller would not necessarily provide for long terms needs especially for the young. The elderly also want 2 beds so they can have family etc. to stay. Demand does not necessarily equate to need. Allowing open market housing could provide cross-subsidy to provide social/affordable rent schemes to better value for money. This could be considered by most on the islands as a justifiable reason to allow open market rather than giving a better return for developers. Forms of open market, e.g. shared equity may take pressure off the demand for social rented, release existing social rented units and provide more housing options. Self-build should also be included. All the islands should be included although it must be noted that if it's hard to develop St Mary's it will be even harder on the off-islands. Getting the mix of tenures and properties and the sites right is vital.</p>	<p>Noted. The Local Plan needs to strike the right balance between facilitating new growth to meet the economic and social needs of the islands whilst protecting its outstanding environment. However, new homes will be required to meet the economic and social needs of the islands and include a range of sizes and tenures, including opportunities for self-build. The Local Plan (or indeed the Council) has no powers to influence in-migration.</p>
<b>RE015</b>	<p>We need homes that can be retained in the rental sector for young, local population. No free-market housing which will eventually be lost to locals.</p>	<p>Noted. The actual number and type of homes required will need to be assessed and evidenced, particularly through the Strategic Housing Market Assessment (which will look at both demographic data and a local assessment of need through a survey of the current population. However, some provision will also be required to attract investment into the islands to ensure a more vibrant economy and a more demographically balanced population, which may necessitate some form of open market housing.</p>
<b>RE016</b>	<p>It is actually more of a demand on small single dwellings than family homes. Also family size homes are being occupied by one older person in 3/4 bed homes</p>	<p>Noted. The actual number and type of homes required will need to be assessed and evidenced, particularly through the Strategic Housing Market Assessment (which will look at both demographic data and a local assessment of need through a survey of the current population). Evidence would suggest that there is a growing requirement for smaller sized homes as households become smaller in part due to the aging population. Furthermore, any planned residential development will primarily provide</p>



		the homes currently needed by its existing population and provide a better balance and match of housing need against supply.
RE017	Yes but affordable homes for locals only by adopting the regulations of the channel islands. I.e. Incomers may only purchase homes above a certain rateable value, thus retaining realistically priced homes for locals.	Noted. The Council has to work within the prevailing legislation applying to the UK and therefore cannot adopt policies applying to the Channel Islands.
RE019	What's happened to the idea of land trust? Why can't local people build houses - self-build should be encouraged! Key worker houses are needed but should be water-tight - really for Key workers not <u>council</u> workers!! No to open market housing and no to second homes - part shared ownership okay.	Noted. The Local Plan will consider opportunities for self-build and initiatives to facilitate housing through, for example, land trusts (although such a model may not be appropriate for the islands and will depend on the cooperation of the Duchy of Cornwall as the primary landowner).
RE020	Affordable to people who live and work on the islands all year. Spacious for families to enjoy. Built to enhance the natural environment, not some 'tenement' cramped estates - these are not good to live in or attractive for visitors to see (St Mary's) The off-island properties blend in very well and look in place to their setting. This encourages pride in the local environment.	Noted. A primary objective of the Local plan will be to ensure that there is a supply of affordable decent homes to meet the needs of the community. The design and siting of new homes is also important given the outstanding environmental quality of the islands and absolutely no intention of permitting 'tenement' cramped estates - although given the finite land higher density development that is well designed will be encouraged.
RE021	Housing is <u>a</u> key issue, but not in the way in which it is portrayed in the Scoping Document. Fining places to live for necessary key workers and local people has always been a problem, but I would have thought the solution lies in increasing the rental market, preferably council or housing association owned (although I appreciate the government's latest proposals on right to buy can make that problematic). Scilly should be arguing for exceptional status with respect to this legislation. And servicing the tourist industry is likely to be part locally done, and in part done by an itinerant work young force who equally need somewhere to sleep. So a flexible rental sector is critical. I am opposed to the development of 120 extra homes. Not only because of the obvious environmental impact such disproportionate development would entail, but also it is very important to consider all of the additional resources that will be needed to service the number of people living in 120 extra houses. A conservative estimate of 240 extra	Noted. The LPA will only plan for growth and more homes if the evidence indicates that there is a need, although given the acute housing difficulties on the islands there will inevitably be a requirement for new homes as concluded in the Housing Growth Plan. The actual number and type of homes required will need to be assessed and evidenced, particularly through the Strategic Housing Market Assessment (which will look at both demographic data and a local assessment of need through a survey of the current population. Any planned residential development will primarily provide the homes currently needed by its existing population and provide a better balance and match of housing need against supply. In addition, some provision will also be required to attract investment into the islands to ensure a more vibrant economy and a more demographically balanced population. Given that the scale of housing planned for the islands is unlikely to significantly increase the population (which has remained relatively static over a number of decades in spite of growth), the impacts on services and social and



	people on the islands year-round will require additional water, sewerage, schooling, medical facilities, cars etc.	physical infrastructure are not anticipated to be great. In any event, when development is planned then the necessary new or improved infrastructure provision can be accommodated. The Council will lobby government to ensure that any changes to extending the right to buy do not apply to the islands – although this issue is beyond the remit and scope of the local Plan.
<b>RE024</b>	Improve housing not more housing. If new housing is needed it has to be close to shops, services etc. Not in the middle of nowhere as planned. No elderly person wants to live far away from town. It would also mean more cars, traffic etc. Where are the jobs going to come from? Infrastructure? Especially in the outlying areas such as Telegraph.	<p>Noted. The LPA will only plan for growth and more homes if the evidence indicates that there is a need, although given the acute housing difficulties on the islands there will inevitably be a requirement for new homes as concluded in the Housing Growth Plan. The actual number and type of homes required will need to be assessed and evidenced, particularly through the Strategic Housing Market Assessment (which will look at both demographic data and a local assessment of need through a survey of the current population. Any planned residential development will primarily provide the homes currently needed by its existing population and provide a better balance and match of housing need against supply.</p> <p>Accept that new housing should be located in sustainable locations to reduce any unnecessary car trips and to support existing services and facilities.</p>
<b>RE025</b>	Agree with paragraph 3.2. Control 2nd homes on Off-Islands	Noted





**RE027**

I consider Housing to be a key issue for the Isles of Scilly Local Plan. In 2.4 definitions from National Policy there are definitions to rising population which is living longer. The reference to the need to avoid stagnation is also very relevant! My comments back up everything in 3.2, assuming those figures are correct. The main areas of need I would suggest are: Social Housing (and avoid selling any off), independent living accommodation for older people who do not need 24hr medical care, private retirement units and affordable homes possibly with a scheme for part purchase as happens elsewhere. - Social Housing stock is no doubt planning using a national formula which may or may not help here. Certainly there is a requirement by Government and presumably a waiting list. (If not then forget this category for now). I disagree with the right to buy policy completely. - A Park House extension may be needed but with a population which is living longer and in better health, independent living with a warden, emergency cords and other support needs to be planned for. - Retirement units for many older people who have either found themselves alone in a family sized home or who retired here and bought a larger property than they now need for whatever reason (bereavement, health, financial). These are the people who can afford to sell and buy and would not need to take up care home places or sheltered accommodation. However in many cases they might welcome a self-contained flat in a warden assisted complex/block. - Build on the affordable homes work already planned to ensure key workers such as nurses, doctors, teachers and of course local young people can afford to live here.

**RE028**

Main issues are as noted above, plus there has to be employment for those residents who require it.

Note. The Council will lobby government to ensure that any changes to extending the right to buy do not apply to the islands – although this issue is beyond the remit and scope of the local Plan. . Furthermore, the Council will also encourage independent living of the aged population although this is an issue beyond the scope and remit of the Local Plan.

None. Generally there is no unemployment on the islands - the key issue is underemployment and low wages.





<b>RE029</b>	<p>When deciding how many houses to build bear in mind that the Islands are a conservation area and heritage coast. Tourism is our main industry and visitors come to enjoy the beauty of the Islands, not to admire the housing. Also bear in mind that every new house usually means another vehicle, and of course more pressure on our limited water supply and more waste and sewage. What a pity the old secondary school is to be demolished, sure it could have been put to some good use. I suggest that two of three small cottages on the site would be in keeping with the area. Scilly should not be viewed as an idyllic place to spend your retirement unless you are a Scillonian/or you have spent all or most of your working life here. The provision of an abattoir should be addressed urgently. The main point for planners to bear in mind is that the islands are very small and the open area not already built on must be protected.</p>	<p>Noted. The Local Plan needs to strike the right balance between facilitating new growth to meet the economic and social needs of the islands whilst protecting its outstanding environment. However, new homes will be required to meet the economic and social needs of the islands. The former secondary is considered to be both poorly designed and constructed and provides a valuable opportunity to redevelop a large site in a sustainable location to provide new homes on the islands. The need for an abattoir is largely a commercial decision that will predicated on a sound business case.</p>
<b>RE032</b>	<p>I believe the biggest issues we have are transport and infrastructure As said our population is not actually rising very much, what is changing is household size. We need to make better use of the housing stock we have, tackle empty homes, underused social housing and where possible fight against 'right to buy' policies which are not appropriate.</p>	<p>Noted. Making better use of the housing stock will not address all the acute housing issues prevalent on the islands and is difficult to influence as determined by personal choices. Furthermore there are very few empty homes on the islands. Indeed providing a better mix of new homes could facilitate this movements in the housing market to provide a better match of need with demand. The Council will lobby government to ensure that any changes to extending the right to buy do not apply to the islands – although this issue is beyond the remit and scope of the local Plan.</p>
<b>RE033</b>	<p>Yes. Para 3.2 covers the key issues.</p>	<p>Noted</p>
<b>RE034</b>	<p>The key issue is how additional development could be accommodated given the poor infrastructure provision (waste, water and sewerage) and the need to increase its capacity to accommodation any development in order to conserve and enhance designated sites, especially European Sites.</p>	<p>Noted. It is acknowledged that the infrastructure on the islands needs to be improved. However, it should be recognised that new development can provide opportunities to improve infrastructure. When development is planned then the necessary new or improved infrastructure provision can be accommodated. The LPA do not intend to allocate or permit any new development without a full consideration or mechanisms to ensure the necessary infrastructure requirements are met.</p>



#### RE035

We accept that some housing is required for local need but it is a fact of life that however many homes are built, the need for even more housing development will grow and grow simply because you are continually increasing the number of houses and the size of the resident population. Devising schemes that would repatriate second homes and holiday lets by providing more compact properties like in town apartments for those owners could be constructive. We are in favour of providing for local need only under a strict set of criteria but feel that efforts must be made to provide homes for the islands' young people. Where this building takes place is of crucial importance to preserve the character of Scilly and keep the tourists coming back. We strongly object to estate-type, green field developments in country and coastal areas which we feel is a disaster for the countryside and tourism, e.g. Telegraph/McFarlands Down which would link both small settlements into one continuous built environment and destroy its rural status. We also object to building on 'green fields' next to the main bus route as happened at Normandy Farm and Old Town and which is being proposed for Telegraph/McFarlands Down which will destroy the concept of a rural community for both tourists and residents. We have not objected to the erection of a small number of single dwellings as 'infill' over a number of years within our vicinity. Suggestions for a pub and a shop to service one big 'estate' would severely downgrade the character of the area and horrifies us. It would not increase the existing level of business in any way - it would only reduce business for existing pubs, cafes and shops not far away and increase traffic congestion and pollution where there is none at present. A development at Telegraph/McFarlands Down would be contrary to 3.24 which says that if 'new development is directed to areas in and around these settlements (Hugh Town and Old Town) then this would reduce reliance on motorised transport.' As part of our philosophy to act responsibly towards the Scilly environment, we gave up our car and have mainly used cycles or bus transport for almost 30 years. We do not believe that the same would apply to most new householders who would probably be two or even

Noted. The LPA will only plan for growth and more homes if the evidence indicates that there is a need, although given the acute housing difficulties on the islands there will inevitably be a requirement for new homes as concluded in the Housing Growth Plan. The actual number and type of homes required will need to be assessed and evidenced, particularly through the Strategic Housing Market Assessment (which will look at both demographic data and a local assessment of need through a survey of the current population). Any planned residential development will primarily provide the homes currently needed by its existing population and provide a better balance and match of housing need against supply. Not convinced that schemes can be devised that would repatriate second homes and holiday lets by providing more compact properties like in town apartments. However, some provision will also be required to attract investment into the islands to ensure a more vibrant economy and a more demographically balanced population, which could assist in addressing this issue.

Accept that new housing should be located in sustainable locations to reduce any unnecessary car trips and to support existing services and facilities, which may preclude options such as McFarlands Down & Telegraph. Furthermore, every effort will be made to prioritise and maximise the opportunities to redevelop previously developed sites such as the former secondary school to minimise the need for greenfield land.



	<p>three-car families. Increasing traffic on narrow country roads will discourage cyclists. There are a number of cyclists that use our main roads for fitness and training purposes which carry minimal traffic. We can't see this continuing if the plans for house building at Telegraph/McFarlands Down and heavy vehicle waste processing at Pendrathen are adopted. In respect of the proposals for a large number of new houses and a very busy Pendrathen Quarry continuously receiving vehicles containing waste, all local roads would become rat runs that are hazardous for cyclists, walkers and horse riders and we would be forced to consider buying a car as the bus doesn't meet all of our needs. Why would anyone want to cycle that road when a big increase in traffic between Hugh Town and Telegraph makes cycling dangerous and no longer enjoyable?</p>	
<b>RE042</b>	<p>There are many houses of big family size, which are rented to tourists - many could become permanent dwellings for families</p>	<p>Noted. The Local Plan cannot influence such decisions.</p>
<b>RE045</b>	<p>Basically agree with para 3.2 although 90-120 sounds too high. Under-occupancy is an issue here (as elsewhere). More specialist smaller units would be most useful, i.e. starter homes, elderly flats and warden flats.</p>	<p>Noted. The actual number and type of homes required will need to be assessed and evidenced, particularly through the Strategic Housing Market Assessment (SHMA) which will look at both demographic data and a local assessment of need through a survey of the current population. Any planned residential development will primarily provide the homes currently needed by its existing population and provide a better balance and match of housing need against supply, and could include specialist housing if a need is established.</p>



**RE046**

Yes, it's very important. The quality of housing is generally poor in my experience, with many properties displaying little provision for the efficient use of energy. Furthermore, development appears piecemeal across the islands despite there being two clear areas of housing that development could be focussed on: Hugh Town and Old Town. Building outside of these areas perpetuates the reliance of large numbers of people on cars for transport. It also increases the number of septic tanks, when it would be more efficient to build around existing sewerage infrastructure and would support the economic case for future improvements to this infrastructure. This is to say nothing of the negative impact that distributed housing has on the overall character of the islands. Focusing on existing areas of development would mitigate any negative effects on the character and quality of the natural landscape. More sites at telegraph would be a mistake in my opinion as it is so far from the majority of existing services and infrastructure. The exception to the above is development on the off-islands. We are committed to supporting off-island living whether it is sustainable or not. This means concessionary boat journeys, desalination plants, sewerage solutions, etc. Consequently, there is potentially a benefit to be gained by encouraging a modest amount of additional development on each of the inhabited off-islands so that we benefit from the efficiencies that come from serving a larger population. This would also bring benefits to existing residents by making transport links to St Mary's more economically viable.

Noted. Accept that new housing should be located in sustainable locations to reduce any unnecessary car trips and to support existing services and facilities, which may preclude options such as McFarlands Down & Telegraph. Furthermore, every effort will be made to prioritise and maximise the opportunities to redevelop previously developed sites such as the former secondary school to minimise the need for greenfield land. Consideration will need to be made in relation the appropriate amount of new development that should be provided on each of the off islands.

**RE048**

From an Environmental Health perspective, an introduction of a housing, health and safety rating system (HHSRS) which is a risk based evaluation tool to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in a dwelling. The Housing Act 2004 gives local councils extensive powers to intervene where they consider housing conditions to be unacceptable on the basis of the impact of health and safety hazards on the most vulnerable potential occupier or visitor. In essence, this legislation gives local authorities powers to address poor housing conditions in the privately rented sector.

Noted. As specified in the response, this rating system is a valuable evaluation tool to undertake local authority EH and housing responsibilities that go beyond the scope and remit of a Local Plan. Similarly the powers contained in the Housing Act are not directly related to planning matters.



<b>RE049</b>	RE-allocation of council housing to allow families to live in the 3-bedroom places; construction of small 1-2 bed units to allow this to happen. Anyone who owns their own property on the island or mainland should not be allowed to live in a Council property.	Noted. Whilst this issue could influence the number and type of new homes identified in the Local Plan, this issue directly relates to the local authorities housing functions and raises challenges to the measures to incentivise such changes. However, the Local Plan can assist in this issue by identifying the requirement for new homes that better match the available stock with the needs of households, including the provision of good quality 1 & 2 bedroom properties.
<b>RE050</b>	Yes, housing is a key issue. a) Need for housing that young people can afford so that they are not forced to leave the Islands if they do not wish to. b) Sheltered housing, linked to a functioning integrated health/care system, for the increasing elderly population.	Accept. The Local Plan needs to identify a range of house types that meet the differing needs of the community, including decent affordable homes for the young and specialist housing for the elderly. Such a mix and number will be informed by the SHMA.
<b>RE051</b>	Sufficient housing needed to house those working/need to work (essential services e.g. midwife) Not for people who just fancy locating here.	Accept.
<b>RE052</b>	We have under occupancy of properties. Empty houses in winter, full use of houses, 12 months p.a. essential	Accept and this information will be captured in the SHMA and contribute to evaluating the overall housing target for the Local Plan.
<b>RE053</b>	Whilst the Isles of Scilly Wildlife Trust is not qualified to comment on issues which do not directly affect its core business, the lack of available housing on St Mary's has had a direct impact on the ability of the organisation to recruit skilled staff. It is difficult to see how the islands can get all of the key professional skills required to run a community without a change in housing provision.	Accept.
<b>RE054</b>	Lack of affordable property for renting or buying for young families on the off-islands. Plus smaller properties for the elderly to downsize. Lack of accommodation for key workers on St Mary's. Entrepreneurs can afford to buy on the open-market.	Partially accept although the Local Plan should consider an element of open market housing (with caveats to prevent more retired immigration and second home ownership) to stimulate and widen the housing market and encourage, for example, new entrepreneurs and cross subsidise affordable homes given the costs of building on the islands.
<b>RE056</b>	We need affordable housing for our Local Young People/Key workers. I would favour some restrictions on second homes.	Accept
<b>RE057</b>	One of the key issues. No more absentee landlords using up valuable housing stock. i.e. second homes	Noted but this issue is beyond the scope and remit of the Local Plan.





<b>RE058</b>	Housing is a key issue and the numbers would seem appropriate. Allowing the community designate sites ahead of development and then set them out in an efficient manner would ease the planning process. I think the plan should be very much aimed at getting people on the housing rather than the property ladder. We should be very careful of creating unfair imbalance in the market which already sees a vast disparity. Simply putting up expensive social housing and letting it cheap is unfair on those who must work much harder often for smaller, lower quality housing. Price should very much dictate size and quality in other words you get what you pay for.	Partially accept although the Local Plan should consider an element of open market housing (with caveats to prevent more retired immigration and second home ownership) to stimulate and widen the housing market and assist in the delivery of affordable homes through cross subsidy.
<b>RE060</b>	Maybe there is a need for sheltered accommodation and a more appropriate care home as the population is aging. In order to persuade people to downsize there need to be enticements	Accept that there could be a need for specialist housing for the elderly depending but downsizing does present challenges and requires some incentives. However, the Local Plan can assist in addressing this issue by identifying the requirement for new homes that better match the available stock with the needs of households, including the provision of good quality 1 & 2 bedroom properties.
<b>RE061</b>	Housing should be linked to jobs - e.g. teachers, health professionals etc. in the main, key workers. 90-120 seems a lot we sadly will never be able to house everyone. Housing should always be for local need and not market housing for sale to anyone.	Partially accept although the Local Plan should consider an element of open market housing (with caveats to prevent more retired immigration and second home ownership) to stimulate and widen the housing market and assist in the delivery of affordable homes through cross subsidy.
<b>RE062</b>	Before more building surely the infrastructure i.e. sewerage, water needs to be updated	Noted. It is acknowledged that the infrastructure on the islands needs to be improved. However, it should be recognised that new development can provide opportunities to improve infrastructure. When development is planned then the necessary new or improved infrastructure provision can be accommodated. The LPA do not intend to allocate or permit any new development without a full consideration or mechanisms to ensure the necessary infrastructure requirements are met.
<b>RE064</b>	It is one of the key issues. Visitors do not come to the islands to see them covered in houses. But new homes are needed, although their construction in any number has to be linked to the implementation of approved water and sewerage arrangements on all the inhabited islands. That needs to follow on from a detailed impact assessment from DEFRA and appropriate Drinking Water and Environment Agency	Partially Accept. The Local Plan will need to include mechanism to ensure the appropriate level of infrastructure is provided to support new development. The policy and proposals in the Local Plan will be subject to extensive consultation and scrutiny, including from statutory regulators such as the EA & DWI. The Local Plan will also provide opportunities for new homes on the off-islands.





	regulations applied to Scilly. Not all new homes need to be built on St Mary's.	
RE065	<p>Housing will always be a contentious issue here as everywhere else. Before embarking on a presumption for growth in housing stock the Council must first demonstrate that they are taking an evidenced based approach, rather than pulling figures from a report full of health warnings over the figures it contains as stated in the Housing Growth Plan 2014.</p> <p>"The estimates of demand are based on the best available data but the Council is urged to draw up more robust estimates (such as a Housing Market Assessment) before proceeding with any more plans for housing"</p> <p>The Local Plan must also delve deeper into the issue than simply numbers on waiting lists and given the low cost of Local Authority rent outlined in the Housing Growth report it might come as a surprise that there are not more names on the current list. Demographics are changing but so are the income streams for the islands. The reigning back of public sector finance (yet again under review) and European grant funding, combined with a less attractive aspect for retirees with rising retirement ages, less generous settlements and difficult transport links for medical care could well lead to a significant decline in demand for property over the coming years. The plan must show that these issues have been properly and openly considered before settling on a target for new build housing.</p> <p>Another vital consideration before looking into new housing, which we presume would be new buildings on brown or green field sites, is to audit the existing total stock (public and privately owned) to gain an accurate picture of under and over occupancy across the islands. This is an area where the Council could be truly innovative in terms of exploring and delivering programmes that support local authority tenants and private owners to open up any spare capacity to the community.</p> <p>So as well as auditing the existing housing stock we also feel that a proper and pragmatic review of non-residential assets is required. There</p>	<p>Accept. The housing policies and proposals set out in the Local Plan will be based on the SHMA to ensure a robust evidence based approach and include the issues raised in the representation and as recommended by the Government. Based on the SHMA a thorough assessment will also be undertaken of the sites required to meet the housing target and based on the principles of sustainability. The Local Plan cannot deal with the enforcement of housing issues governed by the Housing Act although the LPA does monitor occupancy restrictions where Planning Obligations apply.</p>



	<p>are viable opportunities out there if the Council is prepared to think laterally and move away from a 'if money was no object' grant led approach.</p> <p>While discussions for development of the old school site were conducted in a time of generous funding, it must be recognised that times have changed. Transition Scilly is supportive of the mixed accommodation proposed but we ask where is the current study for potential re-use of elements of the old school site? It'll be a shame to lose buildings that could have been repurposed with the knowledge that there is little chance of obtaining full funding for development of the whole site. A local example of such thinking was the refurbishment of the Police Housing and Station (a building of similar age and construction to the science block), which shows that a range of buildings can be bought up to modern standards for energy use, efficiency and comfort.</p> <p>Equally, still looking at the proposals for the old secondary school site ambitions must remain realistic and in line with national policy. It is our view that the application for sheltered housing would not have been helped by the addition of second bedrooms to the units, as it runs against the tried and tested model for such accommodation, limited the range and number of units that could be fitted on to the site and put the scheme in conflict with government policy with regard to benefit payments.</p> <p>We also consider that another 'elephant in the room' is the apparent lack of enforcement of the existing occupancy restrictions applied to properties. Anecdotally there are many stories of abuse with council tenants owning other property on the islands and mainland or people without key worker status occupying key worker housing. Without a robust and unbiased enforcement programme any restrictions are meaningless.</p>	
RE066	<p>Maintaining housing stock for the vulnerable. Not to overdevelop. To address traffic and parking associated with any development. And infrastructure.</p>	<p>Noted. In identifying any housing sites account will be taken of various impacts including environmental, infrastructure and traffic and parking.</p>



<p><b>RE069</b></p>	<p>Yes there is a need for housing on the islands, but they are internationally important for their seabirds (and associated habitats) and marine life and nationally important for their islands, heaths, dunes and inter-tidal and sub tidal habitats associated features. Designations cover 34.5% of the land area. The council will need to set out in the local plan how statutory and non-statutory sites designated for nature conservation and species or habitats protected through law will be considered and what requirements need to be in place (in terms of avoidance, mitigation and compensation) to ensure that biodiversity is enhanced during the plan period.</p> <p>The plan area includes:</p> <ul style="list-style-type: none"> <li>· Three sites designated for their global (Isles of Scilly RAMSAR) or European Importance (Isles of Scilly Complex SAC, Isles of Scilly SPA)</li> <li>· 26 nationally important sites (SSSIs)</li> <li>· locally important sites</li> <li>· protected species</li> </ul> <p>As this plan could potentially have an adverse effect on two European designated sites (SPAs/SACs) and their features we believe a Habitats Regulations Assessment (HRA) is required and you will need to consult Natural England.</p> <p>The HRA will need to consider a range of direct and indirect effects covering but not exclusively:</p> <ul style="list-style-type: none"> <li>- Loss/damage to habitats or species through destruction or displacement (e.g. through wind turbines, etc)</li> <li>- Bio-security (introduction of non-native invasive species)</li> <li>- Recreational Disturbance</li> <li>- pollution (through construction works or from post construction waste management issues)</li> </ul>	<p>Accept. Any housing sites identified through the Local Plan will be assessed and evaluated to mitigate any environmental impacts and will be influenced by the contents of the Sustainability Appraisal (SA).</p>
<p><b>RE070</b></p>	<p>New housing is required on the islands to meet the requirements of both the working population and those in retirement. The current definitions and criteria for eligibility of local need housing are outdated and make little, if any, provision for housing an increasingly aged population.</p>	<p>Accept. The Local Plan needs to provide a framework for delivering the appropriate number and types of homes required on the islands to meet the varying needs of the community based on the Strategic Housing Market Assessment (SHMA) and Objectively Assessed Need. As part of</p>



		this framework, the criteria and definitions of local need etc. also need to be reviewed.
<b>RE074</b>	More housing is needed in the off-islands as well as ST Mary's. It is vital that housing is provided at affordable rents so young couples can have families to keep communities viable.	Noted. A critical part of the evidence base of the local plan will be to identify the number of homes the local plan has to plan for as well as a supply of potential housing land. Any potential sites are identified in the Strategic Housing Land Availability Assessment (SHMAA). This will include off-island sites if the SHMA identifies the need for housing on the off-islands.
<b>RE075</b>	<p>I think housing is the biggest issue for the local plan and I would like to see, not just on Scilly but throughout the UK, a change to the allocation process where it is simply first come first served unless there is an extreme necessity for someone to jump the queue. Being pregnant is not a good enough reason in itself but a disability, for example, most certainly is.</p> <p>I also believe that where allocation is made on a needs basis then when those needs change the tenant should be contractually obliged to move. A contract between Council/Housing Association and tenant that adapts to the needs of the tenant will automatically start to free up 3 and 4 bedroom houses so these contracts should be drawn up at the outset of any tenancy arrangement.</p> <p>Also, the right to buy must be stopped on Scilly.</p>	Noted. The local plan will not include person specific allocation criteria. I would include a revision to the current Specific Local Need Criteria. The respondent's comments here are concerned with the allocation of Council Housing/Housing Association Housing. The Local Plan has to plan for future housing growth, which includes an assessment of the Objectively Assessed Needs of the Island and an identification of future potential housing land. The Local Plan cannot influence the National Government Acts to allow Right-to-Buy Council Housing Stock. The Local Planning Authority and the Council are in agreement that it is not a good thing for Scilly. The circumstances are such that allowing any person to buy Council housing stock does not solve the housing situation on the islands. Past evidence shows us that it only makes the housing situation worse not better.
<b>RE076</b>	New housing for permanent, economically active residents essential.	Noted



<b>RE077</b>	<p>Agree that it is a fundamental issue.</p> <p>There is evidence of a shortage of homes to meet different life-stage needs, for example:</p> <ul style="list-style-type: none"> <li>• Starter homes, to accommodate young adults (including singles) and to ease pressure on parental homes</li> <li>• Sheltered 'extra care' housing (some could be 'open market' to help finance units offered at affordable rents)</li> <li>• to enable downsizing for elderly/widowed/divorced. Thus releasing average sized homes (3 bed +) for growing families.</li> </ul> <p>The latter is particularly important not only for the elderly but for local families currently in cramped accommodation. One couple with very small children on St. Mary's described their housing situation as 'without hope'. And that family having to depart from Scilly would be a real loss to the islands. The solution to their situation would probably be housing association provision (as demonstrated on three off-islands and at Barnes Acre) or by self-build, if affordable.</p>	<p>Agreed. The replacement local plan will be based on the evidence of the current housing situation and future housing needs of the population.</p>
<b>RE079</b>	<p>The vision set out in the current Local Plan encompasses many of the key objectives that the future Local Plan must also tackle. Nevertheless, there could perhaps be a more overt acknowledgement and focus on place making and the quality of life of the community (which goes beyond just social infrastructure).</p>	<p>Noted. The vision set out in the scoping report is seeking to reflect a thriving vibrant community. The Local Plan however can only come in to play by creating a positive framework that seeks to enable development to take place, in some cases, and providing the parameters of what is acceptable, in others. It is through this process that the 'quality' of any changes of the public realm can be controlled.</p>
<b>RE080</b>	<p>Open market housing is too expensive. There are not enough smaller properties available (which are not flats) to either rent or buy.</p>	<p>Note. The Local Plan will be required to plan for an identified housing need as well as any future growth. The policies that permit future housing will have to be strictly controlling as to any 'open market' homes as well as the size and tenure of any new residential developments.</p>



<b>RE081</b>	Yes I think housing is a real issue. From my limited knowledge, one of the main issues is affordable housing for families as the house prices are so high few can afford to buy. However before building more I would feel happier if we looked in to what to do with existing empty buildings.	Noted. Where a property is empty but otherwise in good order (as opposed to falling into decline) then there is nothing the Council can do to force the owners to rent it or sell it. Unless the respondent is advocating compulsory purchase?
<b>RE082</b>	2. The key issue with housing is the lack of an active or affordable housing market, the poor choice of houses to rent or buy, restrictions that prevent mortgages but which do not properly squash prices, the wrong mix of housing stock, ability for young people to get on the housing market, nowhere attractive for social housing tenants to down size too, poor standard of housing in the private rented sector as made to feel you are privileged to be housed. This depresses business growth and formation as there is limited housing for staff, and it also makes business succession more challenging and the development of new industries.	Noted. The LPA cannot control the 'demand' for living on the islands. The current house prices are high because people are prepared to pay a lot more to live here because of the high quality environment. The current restrictions placed on newly constructed residential developments are required and necessary to ensure the market is limited to those people who live and work on the islands, rather than to any person anywhere (which is the case with unrestricted homes). This is in accordance with the current local plan. This is the only mechanism the LPA have to try and control the housing market. Section 106 legal agreements have been revised to ensure they do not prevent the lending of a mortgage. The criteria, however, by which a person is assessed to occupy a current or future unit of residential accommodation, will be revised as part of the Local Plan review process.
<b>RE083</b>	Makes better use of the existing housing stock	Noted. The problem has been revealed through the Strategic Housing Market Assessment, that there is an imbalance in the current housing stock. Homes that are privately owned tend to be the larger under-occupied housing stock whereas the social housing and council housing tends to be the smaller over-occupied homes. There is currently no leverage or powers to force home owners to down-size in to smaller properties. The Council's Housing Department are working on ways to encourage down-sizing of the properties the Council does control. This is not a process that can be addressed through the Local Plan review, other to ensure that any new residential development is only occupied appropriately.
<b>RE084</b>	Housing stock badly managed - e.g. teacher accommodation should have been ring-fenced.	Noted. The issues around managing specific accommodation for specific professions within the community, is you don't know the accommodation needs of the person applying for a job. Additionally the Council cannot control accommodation for employers such as the School, Doctors, and





		Hospital etc. Any company or organisation has to be responsible for the accommodation needs of its staff. The LPA cannot control this.
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### Question 3

- 4.8 Question 3 sought to establish whether there was a consensus on whether new housing was required on the islands. Where views were expressed that positively supported the need for additional homes then people were asked if they had any suggestions as to how many or where they should be ideally located.

Ref	3. Do you agree that new housing is required on the islands and if so do you have any suggestions as to how many, what type and where they should be located? <i>*Grammar and Spelling is unchanged from the original submission.</i>	LPA Response
RE03	A small number of houses on the off-islands and a development at the site at Telegraph of small family homes (3 bedroom).	Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan). In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan.
RE04	I don't know a formula for working out how much housing should be provided based on what population we have, but I'm sure such a formula exists. I think we should be building more two and three bedroom properties, and a block of flats in one or more locations. As for location, I really don't have a problem with them being built anywhere on the islands. I think Old Town needs to be left alone, it's already too developed and in need of a children's play area/grass field.	Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan). In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the



		<p>number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan.</p> <p>The plan also has to consider recreation and green space provision for the local community. It is anticipated that this will be to the standards required by Fields in Trust (formerly the National Playing Fields Association).</p>
<b>RE06</b>	<p>Primarily built on St Mary's (i.e. if 120 is the total for the Isles of Scilly, 100-110 of those should be on St Mary's) and on allocated sites &amp; within a Hugh Town development boundary. Potential for brownfield sites at Carn Thomas (old school site) and later at Normandy (the swimming pool); greenfield sites will be needed too though and the Telegraph area appears to continue to be a good location for these. A mixture of sizes and tenures, though with an emphasis on 1/2/3-bedroom homes that are available – by means of being sold or rented – to locals and key workers.</p>	<p>Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan).</p> <p>In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan.</p>
<b>RE07</b>	<p>Local need, self-build</p>	<p>Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan).</p> <p>In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan.</p> <p>The Housing Survey, which formed part of the SHMA, did identify interest in self-build from 11 respondents. Under the draft Housing and Planning Bill 2015 there is an amendment proposed to the Custom Housebuilding Act 2015 which requires local authorities to keep a register of people seeking to acquire land to build or commission their own home. The LPA</p>



		is setting up a register of Self-Build interest on its website to ensure people who want to register such an interest can do so.
<b>RE08</b>	Same as 3 above [you cannot have more housing and development sites until you have sustainable management of energy/fuel/water/sewerage and waste which has to be addressed first]	Noted. The Council is pursuing sources of funding to implement schemes that seek to resolve current water and sewage issues on the islands as part of the wider 'Smart Island' work. This work will be running parallel with the local plan process.
<b>RE09</b>	See No. 1 and 2	Noted
<b>RE011</b>	The number of houses needed depends on population changes and the desire to grow the economy and ultimately how successful this can be. Tourism as the dominant economic base is extremely dependent on economic prosperity, the climate and climate change (weather) and the ability of the islands to retain its special characteristics. Ultimately the lack of housing is a barrier so if we don't build any it is likely the islands will be unable to effectively diversify the economy and thus increase wages for local people.	Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan). In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan.
<b>RE012</b>	Mostly covered in 2 above	Noted
<b>RE013</b>	Not too many new houses - only for Local people. There's not enough water for many more.	Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. The Council is pursuing sources of funding to implement schemes that seek to resolve current water issues on the islands'.
<b>RE015</b>	Located within existing developments, rental, as few as possible.	Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan). In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does



		identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan. It is intended that sites within or on the edge of existing built-up areas or brownfield sites will be developed where possible.
<b>RE016</b>	Small flat dwellings maybe. Extend small village community at Barnes Acre/Old Town? Land when the old school is demolished.	<p>Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan).</p> <p>In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan.</p>
<b>RE017</b>	The islands are only so big. So very careful consideration must be made as to numbers and location. Houses at Telegraph would increase more traffic, and then would come a demand for shops in the area. A big No!	<p>Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan).</p> <p>In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan. This does include a number of sites at Telegraph.</p>
<b>RE018</b>	Small cheap flats to rent or buy	<p>Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan) and they size and type of tenure required.</p> <p>In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the</p>



		Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan.
<b>RE019</b>	Homes for older people and handicapped (i.e. Visual impaired) Homes for young families and extended families. Businesses (including the Council) should provide accommodation for their workers and workers only allowed to work for limited period. Too many stay on and claim council houses! No second homes. They should be located at Telegraph/brownfield sites (swimming pool)/Old secondary school) - unused farm buildings. Extend existing homes for extended families.	<p>Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan) and the size and type of tenure required.</p> <p>In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan.</p>
<b>RE020</b>	How many people need housing and who are we losing by it not being available? Eco-houses that do not strip the natural resources - solar and heat sync heating and water systems - carbon neutral. Take a look at the lost picturesque houses on the off-islands, how do they blend in - use natural materials - are breeze blocks the way? Lots of natural light, big windows and roof lights. Covenants in the sale/rent that the gardens have to be maintained by the owners/tenants.	<p>Noted. The SHMA, which includes a Housing Survey of all current residents as well as an assessment of household and population projections and found there was an existing housing need, without planning for growth. The new local plan will have to essentially plan to provide new residential development to meet this objectively assessed need. The type of housing will have to have a minimal impact upon the wider character of the delicate environment both visually as well as environmentally. It is anticipated that new housing will have to be capable of adaptation to ensure it can connect to any renewable forms of energy. A review of the occupancy criteria for new housing will be required which will ensure that any new residential development that come forward are not lost to the second home market but are genuinely for the purpose of meeting local needs of a sustainable community.</p>





**RE021**

Before this question can be answered sensibly I would need more empirical evidence of from where the demand for housing comes. What is the length of the Council's housing waiting list; what is its nature; how many older people are wishing to downsize; is there evidence that people have not come to Scilly to live brining viable businesses with them because of the unavailability of housing etc., etc.? What is needed is not just anecdotal evidence. Have you interviewed the local estate agents? Casual inspection of the rate of turnover of properties here would not suggest that there real pressure on the properties available.

Agreed. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan) and the size and type of tenure required.

In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan.

The Council has a waiting list of:

Bedsits: 21 individuals

1 Bedroom: 19 Couples

2 Bedroom: 12 Families

3 Bedroom: 5 Families

That is a total need of 46 units of residential accommodation required for the existing local residents waiting for appropriate accommodation on the island. The criteria for people to apply for Council Housing includes a pre-requisite of a minimum of 3 years living on the islands. The above current need for accommodation is therefore an existing need. The SHMA also drew out a number of concealed households who require accommodation but cannot afford to move. The demand therefore is an existing population, not from people wanting to move here.

**RE024**

A small amount of accommodation near facilities (15 houses) i.e. Hugh Town. Porth Loo. You cannot situate people on Green fields at the far end of the Island.

Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan) and the size and type of tenure required.

In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the





		number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan.
<b>RE025</b>	On off-islands - affordable, social housing has been a success. A few more in appropriate locations.	Agreed.
<b>RE027</b>	As above. New housing is needed but let's plan carefully to meet need which seems to be more for rented accommodation and starter homes - not more mansions!	Noted.
<b>RE028</b>	To keep costs down, would the imaginative conversion of existing buildings (rather than demolition) make sense? For e.g. The Old School and unused farm buildings.	Agreed. The Local Plan could include specific policies that would allow for 'windfall' residential developments particularly where these are conversions of existing buildings and are worthy of retention.
<b>RE032</b>	I agree that some smaller local need dwellings and sheltered housing could be helpful but I do not agree that mixing this with new open market housing makes any sense whilst we cannot support our current population with the infrastructure we have. If open market housing is built I am sceptical that we will be able to avoid more second or holiday homes and retired in-migration. Do we publish the numbers of local people currently on the housing list/ poorly housed and the size of dwelling they are looking for? Is this used to inform the 'need to house a rising population'?	Disagree. There is a fundamental barrier to delivering housing on the islands due to the significant uplift in costs associated with building here. There are no longer pots of grants available to part fund social housing schemes which is why house building of affordable accommodation is not currently taking place (previously the only way recent social housing has been delivered). There needs to be a degree of cross-subsidy to provide the profit margin to encourage any developer or other investor to build local need housing on the islands. The problem is that on top of 50% higher build costs there are also fundamental investments required to connect to an electricity supply and improve foul drainage and to ensure appropriate supplies of clean water. Any open market housing would have to be strictly controlled to ensure it is only permitted as a means to enable development to take place and deliver much needed local housing.
<b>RE033</b>	Yes. It is important that housing should be adaptable to meet changing needs (homes for life).	Agreed.
<b>RE034</b>	Housing numbers should be based on a robust evidence base to determine Objectively Assessed Need (OAN) and not solely on the results of a consultation exercise. The evidence base is unclear for the range 90-120 additional houses derived from the Housing Growth Plan	Agreed. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan) and the size and type of tenure required.



	and needs to be robust. We note that the Housing Growth Plan itself recommends more detailed analysis.	In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan.
RE035	<p>See 2. above</p> <p>120 new houses over ten years is far too many and would in itself be a major disaster for Scilly tourism. Whatever the local need a reasonable number could probably be 60 new houses over the next 10 years. We have not objected to the 6 new houses and one shortly to be built in the Pungies Lane/McFarlands Down area over the past decades but now feel that enough is enough for this area for at least the next ten years. Regarding the siting of new housing for local need, we would only want to see multiple housing units built around existing large settlements like Hugh Town and Old Town. However, there are a large number of small and very small settlements around St. Mary's (and probably the off-islands) which have had no additional housing built for many years or even many decades that are hidden from the road and the sight of tourists and locals. Building a very small number of houses (e.g. one or two) in each of those rural areas should be acceptable. Such a scheme would not jeopardise the rural nature of each area, nor would it create significant extra traffic or put undue strain on water or sewerage services in those areas. The wider the distribution of those new properties then the more chance there would be of public acceptance.</p> <p>With this kind of development we could encourage more self-build properties by young couples which would avoid the need for large capital expenditure by mainland developers, our Council or the Duchy. The Local Housing Association, however, could be used to help in any way they can to deliver the bulk of those 60 properties for local need. The Council should not be looking to private 'developers' at all (3.4) whose only interests are in making large profits on private sales or</p>	<p>Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan) and the size and type of tenure required.</p> <p>In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan</p>



	high rents on new properties which would not serve this community in any way whatsoever. Private developers like the Duchy who charge high rents should be prevented from building houses that locals in low paid jobs can't afford.	
RE036	I think we need to be able to create the capacity and range of housing necessary for people to move on from family homes to homes for couples once the children have moved on. More Duchy bungalow type builds would be good.	Agreed.
RE045	Out of town (McFarlands, Telegraph etc) will generate more traffic. Currently there is quite a lot of unoccupied/under-occupied property. How about new flats in Thorofare, above the co-op shed.	Noted. The main issue with developing in most parts of Hugh Town, is that it is low lying land. It is not good practice to plan to develop vulnerable uses, such as residential development, at or so close to sea level. Out of town sites as noted are further away from essential services but they are already relatively built-up parts of the island and any new development here would increase the demand for local provisions such as a community facility such as a children's recreation, a shop or pub or other community building, thus reducing the need to require householders to own their own car
RE046	<p>Yes. If Scilly is to support an aspirational youth it must be able to accommodate talented people who want to bring training, experience and energy to the islands. It would also benefit residents because additional housing would go some way to increasing the ratio of resident homeowners versus second homeowners and private/Council rented. In my experience the inability to house workers is one of the chief impediments to improving services and opportunities across the islands.</p> <p>We do a poor job currently of housing transient workers as well as those whose housing needs are modest (single people including young adults and elderly).</p> <p>Please see answer to question 2 above for suggestions on the location of new developments.</p>	Agreed.



RE048	This issue is of prime importance as it may discourage persons from applying for employment on the Isles of Scilly as there could be difficulties in sourcing affordable and suitable accommodation.	Agreed.
RE049	Small units for older people to release existing properties (both Council and private). Small units for young people wanting to leave home but do not earn enough to do so. Former school site as planned but don't mix the two ages.	Agreed. This would be appropriate development that would seek to free up larger properties and create much needed movement in the existing housing market. It is however not necessarily possible to control, through the planning process, who eventually would live where and it is not necessarily a bad thing to have a mix of housing, although it is appreciated that younger families can be noisier and that older people may prefer a quieter environment and any community needs to work.
RE050	This has been partly answered in Q2. Without knowing the numbers of people in these categories we do not feel that we can comment sensibly on numbers. As to location, we agree with previously discussed concepts that new housing development should be confined to well-defined 'development areas' such as Telegraph-MacFarland's Down. Sheltered housing for the elderly seems better placed in Hugh Town and we understand that the site of the old school at Carn Thomas was under serious consideration. What has happened to this plan? We have heard little of it recently. Likewise, the development at Telegraph has gone quiet. We understand that there have been business/financial reasons for this but all the issues discussed in the Scoping Report have their costs and if we cannot pay for them, we cannot have them.	<p>Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan) and the size and type of tenure required.</p> <p>In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan.</p> <p>The former secondary school site at Carn Thomas is still intended to be re-used for residential development, once demolished. The type, number and size of any residential developments created would be subject to a formal planning application. A development brief would need to be prepared to ensure that re-development was the most appropriate for the islands community. The timing of this project is set to avoid the main tourist season and as such the LPA are aware that demolition is set to take place in Winter 2016/17. The current Local Plan did include housing allocations at two sites in Telegraph. It is not clear why development at these sites has not come forward during the plan period. It is likely however that even a small scale housing development would not be viable under the current local plan where occupancy restrictions required</p>



		for any new housing. This reduces the profit margin for any developer/investor but the development costs remain high.
<b>RE051</b>	Am not qualified to say how many - but suggest affordable and only on brownfield sites. There is a problems of how to house skilled workers.	Noted and Agreed. In order to answer this question and to create a 'sound' local plan the LPA are required to demonstrate an appropriate evidence base to support any new policies or proposals in a new local plan. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan) and the size and type of tenure required. In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan.
<b>RE052</b>	ON St Martin's during my life time (70 years approximately) 25 new dwellings, yet population slightly lower	Noted. The SHMA report has identified that the population of St Martin's population has increased in the last 35 years from 71 people in 1981 to 113 people in 1991 to 141 people in 2001 and 136 people in 2011. During that period there has been an increase of 65 people. The development of 25 new homes of 70 years would not seem to suggest a problem in the supply and demand of housing on St Martins. The change you may have witnessed over the last 70 years may be due to the general changes in terms of people living longer, household sizes smaller but homes being larger and families splitting up or just people choosing to live alone. There is also likely to be more homes given over to the holiday market reflecting a lower permanent population but more houses.



<b>RE053</b>	Any new housing development should be serviced with the correct infrastructure such as water, waste, sewerage and other facilities such as adequate health, education and social care provision. The location of any new housing development should be clearly thought through and an environmental impact assessment carried out where there is a risk to any protected species. Any new housing development should have adequate green space provided within it (i.e. gardens) and sustainable drainage, water capture and usage and energy generation should all be included within the design and subsequent planning application. Where any loss of quality of the natural environment occurs, the local plan and supporting policies should have the power to impose suitable and appropriate mitigation.	Agreed. The development of the Local Plan has been Sustainability Appraised to ensure the environmental impact of future policies or proposals are acceptable. This is a statutory requirement. This process runs in parallel with the Local Plan process. Additionally this is carried out in consultation with Statutory Consultees such as the Environment Agency, Natural England, RSPB, Historic England etc. to ensure it is sound and does not result in unnecessary harm to the natural environment. The LPA is in agreement that housing developments should include sustainable means of energy provision, water usage and sustainable drainage
<b>RE054</b>	On St Martins 6 ASAP, 3 for young families i.e. 3 bedroom property, 3 for elderly i.e. 1 or 2 bedroom and Duchy and Council approach the elderly to move into smaller premises and re-letting their larger houses. On St Mary's 50 of a mix.	Noted.
<b>RE056</b>	I need more information regarding type and tenure before deciding.	Noted
<b>RE057</b>	Subject to above. Should be demand LED	Noted. The proposed housing figure will need to be 'demand' led. In order for any new Local Plan to be found sound at Public Examination by an independent planning inspector, it will need to have the appropriate and proportionate evidence base to support any residential development policies or proposals.





#### RE058

There is a complete lack of starter accommodation on St Martins which means home leavers have no choice to leave for the mainland, leaving the island short of the labour and energy it desperately needs. I think that business should be encouraged to sponsor low cost accommodation similar to that on Tresco which will be very much in their interest to do and improve the labour market as well as the social diversity. I think further sites should be earmarked for self-build local needs, 106 development. It should be made very clear that these3 are for islanders of at least 10 years standing and only used as necessary in the even to of no suitable Duchy properties becoming available. I think there is scope for tied housing for services such as transport and to ease hospital staff recruitment. This should prevent recurring problems in accommodation. ON off payments to build such property could then provide many years of incentive to what is often poorer than national standard wages. As regards location I am anxious that building on agricultural land should be avoided if at all possible. This is the embodiment of the sustainability enshrinement. Agriculture is currently worthless but should not be removed as an option from future gen3erations as well as affecting our self-sufficiency. I think there is adequate marginal/common land which would not affect this.

Noted. It may be that some of the issues are caused by the fact that some of the existing accommodation is of a starter accommodation size, but unfortunately this has been lost to the local need market. Any new residential development would need to be strictly controlled and would need to meet the needs of local people in terms of size.

It is unclear how the local plan can require local business sponsorship of low-cost accommodation. The example of Tresco is not directly comparable to the other off-islands. Tresco is controlled by Tresco Estates and the only people permitted to live on that island are the workforce of Tresco Estate.

In relation to self-build, the Council have a duty to keep a register of people interested in self-build and the LPA considers it is important to make provision within the new local plan that enables the self-build demand to be met.

As part of the local plan review process the LPA will be reviewing the criteria for any occupancy restricted properties. It is unlikely that this will include an increase in the length of time a person has to live here for before they qualify.

I think there is scope for tied housing for services such as transport and to ease hospital staff recruitment. This should prevent recurring problems in accommodation.

The LPA would not disagree that local businesses have a responsibility to provide their own accommodation, particularly for key worker posts. There are no legal mechanisms, however to require local businesses to purchase or build new residential accommodation. The Council is working with partner organisations on the islands to ensure the delivery of any future housing meets the needs of the community and local businesses.



		<p>The location of housing sites will be assessed through a technical study called a Strategic Housing Land Availability Study SHLAA, this assesses any sites put forward, by landowners, as to their appropriateness or suitability for housing. The preference is to develop brownfield sites before greenfield sites. So sites such as the former secondary school at Carn Thomas on St Mary's would be developed as a priority to meet the housing needs of the islands. Other sites within built-up area or on the edge of settlements would be preferable to isolated sites. The LPA are, however, required to have an identified 5 year supply of housing land to meet the housing needs of the island over the life of the local plan. One of the problems is that there are few previously developed areas and to demonstrate a supply of housing land, as we are required to do to have a 'sound' local plan, may require the identification of agricultural land. We have to balance the retention of green open spaces and recreation sites within built-up areas.</p>
RE061	Near to existing housing Max 50 over all islands. Some flats/smaller dwelling. Residents for older people/Single Persons	<p>Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan) and the size and type of tenure required.</p> <p>In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan.</p>



#### RE064

Not sure I agree with putting precise numbers on the number of new homes, not least because of my thoughts expressed in 2. But given what development is already in the pipeline and left over from the current Local Plan it should not be considered excessive to be contemplating 80-90 new builds on St Mary's and 10-20 on the off islands.

On St Mary's, the Carn Thomas site should be mainly devoted to two - with someone - bed S106 rental accommodation geared to adaption for older residents but alongside a modest number catering for key workers and a handful for strictly-covenanted open market purchase. Both Telegraph sites from the 2005 Local Plan should be expedited via an island-based Community Land Trust which could permit shared ownership and self-build under strict conditions. Elsewhere on St Mary's small numbers of dwellings could be permitted on brownfield sites or where infilling within existing settlements is deemed suitable. Not all necessarily S106 but heavily covenanted if for sale.

On the off islands any new units should ideally be contained within or located adjacent to existing settlements and be purely for social housing.

The majority of new properties on Scilly should typically be two bed bearing in mind the demographic on the waiting list. Again any significant development will need to await key infrastructure improvements on the water and sewerage front.

Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan) and the size and type of tenure required.

In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period. The 2016 SHLAA does identify sites that have to be assessed to ensure they are viable, available, suitable and achievable over the life of the plan. The sites already allocated for housing under the current local plan, at Telegraph, are included in the SHLAA. These sites are in the land ownership of the Duchy of Cornwall. There are no mechanisms within the planning system, to force a land owner to pass over land to a Community Land Trust. The Council would have Compulsory Purchase powers, but these would only be used in exceptional circumstances with the ownership of land or buildings was holding up significant infrastructure developments. The Duchy of Cornwall do not appear to be 'blocking' any development at the Telegraph sites. In relation to self-build, the Council have a duty to keep a register of people interested in self-build and the LPA considers it is important to make provision within the new local plan that enables any self-build demand to be met. With the exception of some enabling development, which could be in the form of 'open market' accommodation (which we would seek to ensure did not become lost to the 'second home' or 'holiday let' market) any new residential development would be controlled to meet local needs only.



<b>RE065</b>	<p>Until there is a clear methodology to assess demand and need in place, with a robust application and enforcement of current occupancy restrictions, together with evidence that best use is being made of existing stock it remains to be seen if there is an immediate need for allocations of new housing developments.</p> <p>While Transition Scilly advocates the use of the full planning process to judge the merits of numbers and locations of any new build housing we would expect that where new houses are needed they should be exemplars of high quality in terms of design, efficiency and in their utilisation of appropriate construction methods.</p> <p>What should be born in mind for any location is the services required for these houses. The questions that arise about their impact on the water supply, the electricity network together with consideration of any increase in traffic and noise levels must be fully addressed. For the houses themselves, they must be highly energy efficient, have renewable energy generation built in, be made of low carbon materials and designed to be warm, light and comfortable together without being high cost.</p>	<p>Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan) and the size and type of tenure required.</p> <p>In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period.</p> <p>The local plan process is running parallel to the Smart Islands work to ensure than any 'smart technology' to generate or reduce energy and waste will be compatible with any future developments on the island.</p>
<b>RE066</b>	<p>Traffic system and infrastructure cannot support further country development. Small development similar to Normandy "Barnes Acre" may work on Fringes of Old Town. School and amenities. Redevelopment where possible. Former secondary school.</p>	<p>Any future development, particularly residential, will need to ensure that it does not require or encourage private car ownership. Unfortunately, as with the rest of mainland Britain, we cannot restrict car ownership. So even if development is planned to be as conveniently located to shops and services as possible that will not ensure people do not still retain a vehicle. The local plan process will need to both understand and plan for residential development that meets local needs and supports a sustainable community, but it will also have to identified sufficient land to ensure the most appropriate and sustainable sites can be used for any housing requirements. Previously development sites would be used in preference to greenfield sites, and sites within or on the edge of existing settlements would have preference over isolated sites.</p>



**RE069**

The assessment of housing need is a matter the RSPB is not able to comment on. However, in addressing this need the plan should protect or enhance existing biodiversity by shaping the size, location, density, and design of settlements to avoid protected wildlife sites and important habitats or species. This should be determined by an appropriate evidence baseline which includes:

- A mapped and written biodiversity audit identifying important sites (Special Area of Conservation, Special Protection Areas, Sites of Special Scientific Interest (SSSI's), County Wildlife Sites (CWS), Priority habitats and species and should include potential areas of enhancement or creation.
- As this plan could potentially have an adverse effect on two European designated sites (SPAs/SACs) and their features we believe a Habitats Regulations Assessment (HRA) is required and you will need to consult Natural England. (See answer to question 2).

Noted. The local plan process will be Sustainability Appraised and the LPA are working on the baseline scoping report to identify the sustainability objectives that the local plan should work within.

**RE070**

**TYPE** - A revision of planning policy to permit elderly people in larger properties to downsize to new purpose built properties equipped and designed to meet their needs in old age (with a prior residency period criteria needed to eliminate in-migration of retirees) could then release housing for local working families/incoming entrepreneurs. Provision of such housing could be achieved by a combination of local authority or housing association developments, private developers and individuals. One could argue that elderly residents in private dwellings should downsize to properties on the open market. However, few of the current open market properties on the islands are suitable for the elderly (either too large, non-ground floor or with access not suited to the disabled).

**WHERE** - Such developments would need to be within reasonable distance of the town's amenities and using infill wherever possible rather than green field sites.

**HOW MANY** - This is very difficult to assess. The LA may have information on the number of its tenants in this category but expressions of interest should perhaps be sought from Duchy tenants

Noted. The LPA welcomes constructive suggestions as to how some of the islands housing issues could be resolved. The LPA agree that the creation of appropriately controlled properties, of an appropriate size and design could assist the downsizing of under-occupied properties and allow them to be occupied by families in over-crowded properties. This would assist in creating movement within the housing market. This is certainly something the LPA would like to achieve within any new residential development. Not only would it require less new housing to be built but it would ensure best use is made of the existing stock. One of the main issues to achieving this ideal situation is that where a person is encouraged to downsize from a privately-owned property, it is out of the Council's control as to who would then be allowed to purchase or occupy their property. The SHMA has found that there is a significant imbalance in the housing market and that most of the larger family properties that are under-occupied are in the private housing market and most of the smaller over-occupied housing is socially rented accommodation or council accommodation. There are no mechanisms that could force owners of private houses to sell their property to islanders at a lower market value than if it was wholly open markets and unrestricted. The





	and private property owners to see whether numerical limits are necessary for the plan.	<p>issue is compounded by the right to buy of council housing stock, which results in fewer properties available to meet an affordable housing need. Previously development sites would be used in preference to greenfield sites, and sites within or on the edge of existing settlements would have preference over isolated sites.</p> <p>Any future residential development would need to ensure there are appropriate mechanisms in place to ensure homes are not lost to the holiday let or second home owner market and are retained at a price that local people can afford.</p>
<b>RE074</b>	Encouragement could be given to self-build projects on tenants land appropriately sited.	<p>The Housing Survey, which formed part of the SHMA, did identify interest in self-build from 11 respondents. Under the draft Housing and Planning Bill 2015 there is an amendment proposed to the Custom Housebuilding Act 2015 which requires local authorities to keep a register of people seeking to acquire land to build or commission their own home. The LPA is setting up a register of Self-Build interest on its website to ensure people who want to register such an interest can do so. The LPA considers it is important to make provision within the new local plan that enables the self-build demand to be met.</p>
<b>RE075</b>	<p>I would build several three story two-bedroom flats at the batching plant at Parting Carn, surrounded by an attractive shelter belt of trees to make them obscured from the road.</p> <p>I would also consider utilising a field next to Barnes Acre to extend the current development and create more parking for the residents of Normandy House and the users of the swimming pool.</p> <p>I would not build any one bedroom homes on Scilly. Too many people are moved too frequently because they are expecting their first child. If more people could be given a two bedroom from the word go then it would allow them to settle longer and not panic when that first born is on the way.</p> <p>A second bedroom would also provide many people with the opportunity to rent a room to help boost their income and in turn this helps the local economy.</p>	<p>Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan) and the size and type of tenure required.</p> <p>In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period.</p>





<b>RE076</b>	All sizes and types both freehold and rental. Would favour clusters of units to enable green energy systems to be efficient.	Noted
<b>RE077</b>	Agree that a 'range of new homes' is desirable. Although the suggested number of houses is not out of line with the recent history of house building, it should be recognised that the pattern cannot continue indefinitely without threat to provision of services (particularly water and sewerage, education capacity, energy supplies, transport capacity, health facilities, etc.), and without damaging the quality of life. The recent increase in traffic and waste quantity is evidence of the speed at which things can become unsustainable. In any case, it is not a good idea to put a prescriptive number of proposed houses. When this happened previously (at least on Bryher with four proposed dwellings to meet local need) it resulted in a scramble to obtain one of the few allocations and now, only one of those four fulfils its original purpose.	Agreed. The new local plan, however will have to critically address and plan to build sufficient housing to meet an objectively assessed need. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan) and the size and type of tenure required. In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period.
<b>RE079</b>	The Islands' Partnership is supportive of the need to focus on housing as part of the new Local Plan. The housing shortage on Scilly is a critical barrier to economic growth and the Local Plan should provide a framework that supports and enables appropriate solutions.	Agreed
<b>RE080</b>	Smaller bungalows/retirement homes with a small garden to sit in/hang out washing etc. Also small bungalows/houses for singles/couples. NOT MORE FLATS. Some should be available on the open market. Possible locations, next to Old Town Inn and back to the end of Trench Lane, infill on seaward side of Launceston Close across to Vets surgery, on edge of Hugh Town, at Telegraph on site already earmarked.	Noted. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan) and the size and type of tenure required. In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period.
<b>RE081</b>	As above.	Noted



RE082	<p>3. New housing is definitely required, over 100 but this should be properly assessed and a needs assessment undertaken, there needs to be as much development as possible on brownfield land (both Carn Thomas sites and any infill sites) and adjacent to other developed areas preferably with amenities, we should not encouraged large one off developments in fields or unattractive ribbon development as is happening on St Mary's and some of the Off Islands. Density is really important.</p>	<p>Agreed. The Council has carried out a Strategic Housing Market Assessment (SHMA), to assess the objectively assessed needs of the islands. This will inform how many homes the new local plan will have to plan for over the period (life of the plan) and the size and type of tenure required.</p> <p>In addition to the SHMA the LPA are required to identify potential future housing sites and have carried out a technical study known as the Strategic Housing Land Availability (SHLAA). This seeks to ensure the Council have a 5 year supply of potential housing land, based on the number of homes required over the plan period.</p>
RE083	<p>No more houses are needed. There are currently 48 residential properties for sale on St Mary's and 5 on the off-islands, Many have been for sale for years</p>	<p>Disagree. The problems is the valuation of unrestricted/uncontrolled properties on Scilly. These are often priced beyond the affordability of most islanders. If these long-standing properties sell, they are likely to be sold to people who do not currently live on the islands and are likely to become second homes or holiday letting properties.</p>
RE084	<p>Smaller estate opposite Ennor House? Major concern/problem - all the extra cars.</p>	<p>Noted. Any future development, particularly residential, will need to ensure that it does not require or encourage private car ownership. Unfortunately, as with the rest of mainland Britain, we cannot restrict car ownership. So even if development is planned to be as conveniently located to shops and services as possible that will not ensure people do not still retain a vehicle. The local plan process will need to both understand and plan for residential development that meets local needs and supports a sustainable community, but it will also have to identified sufficient land to ensure the most appropriate and sustainable sites can be used for any housing requirements. Previously development sites would be used in preference to greenfield sites, and sites within or on the edge of existing settlements would have preference over isolated sites.</p>

## Question 4

- 4.8 Question 4 sought to establish what people thought about allowing some form of 'open-market' housing as a means of enabling housing development and the creation of 'affordable housing' to meet the wider housing needs of the island.



Ref	4. Do you think the Council should be allowing some limited open market housing as a means of enabling housing development and to meet the wider demands of the islands? <i>*Grammar and Spelling is unchanged from the original submission.</i>	LPA Response
RE03	So that it is not quite so hard to get a mortgage. From experience, if your house has a restriction it is almost impossible to find a lender willing to take on the property. However, if you are doing this then the restrictions should be lifted from other affordable housing with housing and planning restrictions imposed so that prospective buyers are actually able to buy them. Surely there is another way of controlling the sale so it would benefit the local population and not people wishing to move over to retire/ purchase a second home.	Noted. Whilst it can be difficult to obtain a 'favourable' rate mortgage, the imposition of a Section 106 Legal Agreement does not prevent a person from securing a mortgage. In 2012 the Section 106 agreement was modified and updated to allow a mortgage lender, who may take possession of a property, to sell the property to any person regardless of the occupancy restriction. That future owner would then be required to sell it on to a qualifying person. The LPA are in the process of reviewing the criteria by which a person can qualify to occupy/own a S106 restricted property, whilst this will still be aimed at a local market restriction, it is hoped that it would simplify the process. Any proposed changes will be subject to public consultation.
RE04	That's a conversation you should have once you've found a way forward for social housing. There's already far too many second homes on the islands, it leads to a terrible situation in the winter where, on balance, if all houses were filled with families then you could make a real go at winter services for people. As it is, the islands 'shut down' because there isn't the trade to keep things open. That's a direct result of 'x' amount of properties on the islands being left vacant between October and April.	Noted. Partially Agree. The LPA has to consider mechanisms to ensure the delivery of future housing to meet the needs of a sustainable community, is viable. There are factors that make the delivery of any future housing extremely difficult in an island location. Some form of controlled open market accommodation is being considered as means of enabling some affordable housing only. The LPA would not consider permitting general open market housing but only in circumstances where it can be justified as necessary to achieve the delivery of residential development. The LPA agree that it is the existing unrestricted residential accommodation, which is lost to the local housing markets, as a result of its higher value, that has caused the current housing situation on the islands. We would not wish to compound the situation. There is an acknowledgement however that holiday let accommodation does have an important role for the islands and the tourism industry.
RE06	...but only in some instances (e.g. at Telegraph) and even then a low percentage of the total.	Noted
RE07	Limit to only those coming to work on the islands.	Noted.
RE08	same as 3 above	Noted



<b>RE09</b>	The Council should have property for key workers is next - No key workers, no sustainability of the islands well-being.	Noted. The Council does retain some residential accommodation for Key workers.
<b>RE011</b>	If this is what it will take to attract developers to build houses then it should be permitted on a strictly controlled basis. If we get 3 affordable or locally available houses, for example, for every 1 dwelling that is open market then it may be worth considering.	Agree.
<b>RE012</b>	Mostly covered in 2 above	Noted
<b>RE015</b>	There are plenty of houses for sale no need for new build except to meet specific local need.	Noted. The LPA has to consider mechanisms to ensure the delivery of future housing to meet the needs of a sustainable community, is viable. There are factors that make the delivery of any future housing extremely difficult in an island location. Some form of controlled open market accommodation is being considered as means of enabling some affordable housing only. The LPA would not consider permitting general open market housing but only in circumstances where it can be justified as necessary to achieve the delivery of residential development. The LPA agree that it is the existing unrestricted residential accommodation, which is lost to the local housing markets, as a result of its higher value, that has caused the current housing situation on the islands. We would not wish to compound the situation. There is an acknowledgement however that holiday let accommodation does have an important role for the islands and the tourism industry.
<b>RE016</b>	Do we need to review the clauses on market housing if a home owner wishes to sell and move on? (i.e. To a bigger property on the islands)	Noted. There are no mechanisms within the planning system that can place clauses on private residential properties.
<b>RE017</b>	We do not need any more entrepreneurs buying up houses only to be let out during a few months of the year.	Noted. The use of the term entrepreneurs is possibly misleading. The Council would like to create some housing that is attractive and priced accordingly to allow people with appropriate skills to relocate to the islands that would permit the passing on of a range of additional skills to school leavers to widen the career path of children on and from Scilly. Currently unless you have very specific skills and can be employed as a teacher, doctor, dentist, and a handful of other professions or a person is prepared and happy to work in the hospitality/tourism/agriculture industry which are usually the lower paid forms of employment, then



		there are few career paths open for the next generation, without leaving the islands.
<b>RE019</b>	No open market housing. Not needed if local people helped to build own homes which return to the community under a housing trust. Also more housing association houses - but not under council control - too rigid/restrictive.	Disagree. It is unclear what help you imagine would be available to local people to assist in building their own home? It is precisely because there is no assistance that some form of enabling development would be required, that then delivers the financial incentive for a developer to build affordable housing. The reason more Housing Associations are not building local need housing on Scilly is because there are no longer any financial incentives to do so. The Government's plan to allow the right to buy Council Housing does not deliver any money back to the local economy. The money from the sale of Council housing stock would go back to the government to assist other tenants in buying the social rented properties of Housing Associations. The Isles of Scilly are not excluded from these proposals. The Isles of Scilly are treated the same as mainland UK and local people on the mainland are not helped to build their own homes from government money.
<b>RE020</b>	Yes with some stringent design principles and for family use not B&B and rental. Run a design competition from the architect colleges, use the big companies to build experimental properties. No rabbit hutches, build for living in not rooms for rent.	Noted. You have some interesting suggestions. It is difficult under the current limited resources to envisage how such a proposal would be managed? Would welcome practical suggestions as to how this could be put in to practice. The Council has to procure any services under strict Procurement rules which means any potential contractor commissioned to do any work, as an experiment or otherwise, would have to be tendered appropriately to ensure best value for money.
<b>RE021</b>	Again a cursory glance at the properties available in Scilly indicates there are properties for sale on the open market - there are just not buyers for them. Why was it that the property we bought last September had been on the market for many months with little interest being shown in it? Similarly more affordable and smaller flats do not sell readily. This is not a community where there is pressure from the open market. There may well be significant pressure from local people for affordable and social housing. That is what is required. I might add, and this may seem a maverick suggestion, that Scilly has always welcomed people from overseas into its community,	Partially agree. There is a demand for people to own their own home, without restrictions. The results of the SHMA and Housing Survey will provide important information on the amount and type of demand of local people. The fact that open market properties are slow to sell is because the high market value of unrestricted properties, compared to average local earnings, rather than a lack of local demand. The potential open market residential developments, put forward in the scoping report, is a suggestion aimed at encouraging people to move here with different skills to support economic diversity, which will have benefits for future generations of islanders. The LPA does not disagree that car ownership in





	strengthening the community in a variety of ways. We are all painfully aware of the need for all communities to accept migrants: these are people with a demonstrated entrepreneurial spirit who will need somewhere to live. So if you insist on building, why not set aside a proportion of your accommodation for economic migrants? And, if you insist on building, why not make it a provision that the use of cars in Scilly is a major threat to your primary source of income (see 1 above). Every year there appear to be more and more parked cars - has a proper survey been conducted of car usage and need in Scilly? All your surveys show that the car is the number one problem for the tourist.	Scilly, particularly on St Mary's, is a problem. As with mainland UK the LPA can only create opportunities for development that do not rely on car ownership. Even where development is provided in the most convenient places that would not prevent car ownership. Part of the problem is the lack of a public transport system but the current level of population and seasonal nature of the economy does lend itself to providing this service at the public expense.
RE024	But only if that private housing is not for second homes.	Agree
RE025	Not sure - would need to see more detailed plans for this.	Noted
RE027	I am concerned about this question as it seems to imply the council has experienced a reluctance from developers to build only social and affordable housing. However given how long private dwellings stay on the market I say beware of building a lot more.	Noted. The Council has not itself built housing on the islands since the 1960s. Housing Associations have built social housing on the islands more recently but this is only possible where there are grants available to overcome the significant additional build costs of an island location like Scilly. Strategic Housing is not being built on the islands, to allow appropriate and improved infrastructure to be put in place, because of the lack of financial assistance. There is also the issue that some existing properties require significant modernisation, which may be one of the reasons why a property stays on the market for a long time, which together with 'London' house prices can result in a reluctance to purchase property. Some carefully controlled open market residential development could be attractive and would provide the financial incentives to provide the much needed affordable properties.
RE028	Per your statements in para 3.4	Noted
RE029	There is just not the room.	Noted
RE032	This does not constitute 'Sustainable Development' We cannot support developers at the cost of our community	Noted. If the LPA do not progress with the adoption of a local plan, it will still have to be done (potentially by an external organisation appointed by the Government) to ensure the housing needs of the island are provided.





		<p>The SHMA has identified an objectively assessed housing need to meet local needs. The current housing situation will not be resolved by the much needed investments in the island, without a profit margin. No developer or investor, including Housing Associations can afford to invest in development on Scilly. If the LPA does not plan for the homes needed on the islands, as part of a local plan, there is the risk that it will happen anyway and we will not be able to control where development takes places or require any controls over occupation of any residential development built. New housing has to be done in a sustainable way and if the existing housing stock is not occupied more efficiently then there is no choice but to build new, where the controls over who can occupy it can be put in place, in accordance with a new local plan.</p>
RE033	Yes, if this is a means to delivering affordable local housing and is subject to controls.	Agreed
RE034	No Comment	Noted
RE035	<p>Absolutely not. What is the point in allowing housing development that doesn't address local housing need? We already have 'open market housing' run by estate agents. What evidence is there that allowing developers to build and sell homes on the open market would meet the needs of any islanders? And more importantly, where is the evidence that local first-time buyers would be able to afford to buy a house from a developer? Due to the extra costs of building in these islands they would probably cost far in excess of what most young couples residing in Scilly could afford. Nor would business entrepreneurs with expertise be attracted to buy these pricey houses in Scilly except to then rent out at higher rents when they could buy the same property on the mainland much cheaper. The "pie in the sky" wish for private entrepreneurs to settle and do business in Scilly and not just grab any cheap house-buying opportunity they are given and then leave having made a considerable profit on the sale of their subsidised property would be almost impossible and be a waste of the chance to house more locals.</p>	<p>Noted. If the LPA do not progress with the adoption of a new up-to-date local plan, it will still have to be done (potentially by an external organisation appointed by the Government) to ensure the housing needs of the island are provided. The SHMA has identified an objectively assessed housing need to meet local needs. The current housing situation will not be resolved by the much needed investments in the island, without a profit margin. No developer or investor, including Housing Associations can afford to invest in development on Scilly. If the LPA does not plan for the homes needed on the islands, as part of a local plan, there is the risk that we will not be able to control where development takes places or require any controls over occupation of any residential development built. New housing has to be done in a sustainable way and if the existing housing stock is not occupied more efficiently then there is no choice but to build new, where the controls over who can occupy it can be put in place, in accordance with a new local plan. Any new residential development will have to meet the needs of a sustainable community and any open market housing required to enable that to take place would have to be justified in exceptional circumstances in the interests of achieving affordable and decent homes for the community. It</p>



		would not be acceptable for any new residential development to be lost to the second home or holiday let market. Some controls over 'open market' would still be required.
<b>RE036</b>	Given that increased supply will be totally absorbed by external purchasers and downsizers from the South East, I think open market development would only benefit the developers and exclude local purchasers who given the very low median wages could never afford the deposit or mortgage multiples of open market developments.	Noted. If the LPA do not progress with the adoption of a new up-to-date local plan, it will still have to be done (potentially by an external organisation appointed by the Government) to ensure the housing needs of the island are provided. The SHMA has identified an objectively assessed housing need to meet local needs. The current housing situation will not be resolved by the much needed investments in the island, without a profit margin. No developer or investor, including Housing Associations, can afford to invest in development on Scilly. If the LPA does not plan for the homes needed on the islands, as part of a local plan, and put in the mechanisms to reasonably enable it to come forward, there is the risk that it will happen anyway, but we will not be able to control where development takes places or require any controls over occupation of any residential development built. New housing has to be done in a sustainable way and if the existing housing stock is not occupied more efficiently then there is no choice but to build new, where the controls over who can occupy it can be put in place, in accordance with a new local plan. Any new residential development will have to meet the needs of a sustainable community and any open market housing required to enable that to take place would have to be justified in exceptional circumstances in the interests of achieving affordable and decent homes for the community. It would not be acceptable for any new residential development to be lost to the second home or holiday let market. Some controls over 'open market' would still be required.
<b>RE042</b>	Open market housing is a trap to uncontrolled growth. Imagine the investors from the mainland in their starting blocks	Disagree. Having an out-of-date Local Plan and not addressing an Objectively Assessed Need for a sustainable community is a risk that could lead to uncontrolled growth. Without the strict controls over new residential developments, that an up-to-date Local Plan should contain, any developer or investor could look to build open market housing on Scilly. It would be extremely difficult for the Council to resist new homes, whilst acknowledging a shortage of housing, if the new developments were otherwise sustainable.



RE045	Not overly against but it sounds complicated,	Noted.
RE046	Yes. If the Council is uncomfortable with the economic risk of taking on debt to build Council housing, then the housing need (which I believe is considerable) should be addressed privately and funded with the incentive of some open market allocation.	Agreed.
RE049	With planned changes in government policy it could be difficult/impossible for the Council to apply these "strictly controlled" measures, and the last thing we need is an allocation of land for homes which it then transpires end up as holiday homes. Homes for locals are what is needed.	Disagree. Having an out-of-date Local Plan and not addressing an Objectively Assessed Need for a sustainable community is a risk that could lead to uncontrolled growth without any measures. Without the strict controls over new residential developments, that an up-to-date Local Plan should contain, any developer or investor could look to build open market housing on Scilly. It would be extremely difficult for the Council to resist new homes, whilst acknowledging a shortage of housing, if the new developments were otherwise sustainable.
RE050	This depends on how we interpret 'open-market housing'. We think that there is scope here for open-market housing but only for existing residents or incomers intending to be resident here. It should NOT be for second-home owners. Without knowing the legal restraints about curbing second-home ownership, every legal strategy to prevent or discourage second homes should be employed. Probably this will mean hitting their pockets hard.	Agreed
RE051	I think Councils should be able to build houses - say in co-operation with housing associations and should be allowed/made to keep such stock for its key workers.	Agreed.
RE054	There would have to be tight restrictions on use and resale. A minefield!	Agreed.
RE056	Not sure - would need to see plans and suggestions re tenure	Noted
RE057	See 2 above	Noted
RE058	I emphatically do not think the Council should be allowed open market development. Space is way too precious a commodity to be exploited in this way. I would largely depend on the Duchy allowing the sale of leases which it would naturally require a large chunk of. This would	Disagree. Having an out-of-date Local Plan and not addressing an Objectively Assessed Need for a sustainable community is a risk that could lead to uncontrolled growth without any control measures. Without the strict controls over new residential developments, that an



	<p>only attract wealthy or retired individuals who will contribute little or nothing to our community and further create democratic imbalance with those committed to island life rather than a house in nice surroundings! This is defiantly not sustainable. There are properties for sale already, just far beyond the reach of a working islander. The property market already has much to answer for in creating uneconomic business opportunities previously based on the earning potential of the business and not the lifestyle property market. This has allowed a generation to retire comfortably and created an economic time bomb for the next. I think there is danger of this imply being an opportunity for relatively well-paid council staff to acquire desirable property a below market rates. By sorting a freight subsidy, opportunities would become affordable in their own right and not expensive houses let cheap! It has to be connected to the actual cost of the property. Self-build cost as little as 10% of what it would cost the Duchy or Council. If sites are earmarked and import costs lowered with sustainability protected with 106 agreements, then I think it will happen of its own accord.</p>	<p>up-to-date Local Plan should contain, any developer or investor could look to build open market housing on Scilly. It would be extremely difficult for the Council to resist new homes, whilst acknowledging a shortage of housing, if the new developments were otherwise sustainable.</p> <p>The Duchy does have an important role to play in terms of the land of the islands. The Council would need to work closely with the Duchy to ensure any land identified as suitable for housing could come forward without significantly damaging the sustainability of the islands. The Housing Survey, which formed part of the SHMA, did identify interest in self-build from 11 respondents. Under the draft Housing and Planning Bill 2015 there is an amendment proposed to the Custom Housebuilding Act 2015 which requires local authorities to keep a register of people seeking to acquire land to build or commission their own home. The LPA is setting up a register of Self-Build interest on its website to ensure people who want to register such an interest can do so. The LPA considers it is important to make provision within the new local plan that enables the self-build demand to be met.</p>
RE060	<p>There is a real problem with affordable housing for locals. Is there some way there would be a two-tier sale price?</p>	<p>Noted. The LPA is aware of such a system existing in the Channel Islands. The constitutional position of the island has allowed a low-tax environment to flourish. It is a dependency of the UK Crown, but has the right to legislate independently on domestic matters such as taxation. Internationally, it is not technically part of the UK or European Union, though it has a special trading status within the EU.</p> <p>Houses on the island Guernsey for example are either “local market” or “open market”. Local-market homes are restricted to Guernsey natives and those with specific housing licences, but anyone can buy one of the remaining 7 per cent of properties deemed open market. It is possible for the Channel Islands to put this system in place as they have a separate Government and Legal system to that of mainland UK. The Isles of Scilly are controlled by mainland central government and legal and tax systems of the UK. Unless the islands sought to become a Crown Dependency and set its own Government, Legal and Tax systems then it is unlikely that a two-tier house price system would be created.</p>



		The mechanisms of the planning system currently used by the LPA for any newly created residential property do in effect create a two-tier system. The S106 seeks to reduce the price of a property by restricting who can occupy it. It is not attractive for an in-retiree, for example, to purchase a property they have no right to occupy and as such they would have to look only at the unrestricted market, which are of a higher market value.
<b>RE061</b>	Most local people would be unable to purchase properties so it should be in the rental sector.	Noted
<b>RE064</b>	Yes. But with emphasis on the limited. None on the off islands and say 10-15 of new builds on St Mary's, all heavily covenanted. The proposed Housing Assessment, however, should not overlook the fact that compared to 10 or 20 years ago the number of properties up for sale on Scilly is very high while the market appears to be fairly sluggish.	Agreed
<b>RE065</b>	Transition Scilly understands that the use of open market housing can be seen as a means of tackling building costs through its potential to cross subsidise local needs housing, however we know there are building techniques and construction methods as well as funding options that are capable of overcoming many of the cost barriers to building on Scilly. We recommend that there is a thorough discussion involving all stakeholders to look at these techniques and options before using open market housing to subsidise local needs housing.	Noted. The Council has established a Housing Partnership Board with its partner organisations to explore all potential sources of subsidising affordable housing. These will not be overlooked for an 'easy' solution of allowing open market housing. Any new residential development will have to meet the needs of a sustainable community and any open market housing required to enable that to take place would have to be justified in exceptional circumstances in the interests of achieving affordable and decent homes for the community. It would not be acceptable for any new residential development to be lost to the second home or holiday let market. Some controls over 'open market' would still be required.
<b>RE066</b>	Para 3.4 (checked your definition to avoid ambiguity) I do not think the council should relax restrictions or allow "open market housing". Controls on original permissions and 106 clauses should be maintained to allow future re-uptake. I would leave council vulnerable to property developer's demands.	Noted



<b>RE070</b>	Some open market housing may have to be allowed to help offset the high cost of building on the islands by housing associations or other developers. However, following on from my points outlined in (3), development by resident private individuals would be self-funding and help limit in-migration as a consequence.	Noted
<b>RE074</b>	I agree strict controls need to be in place to prevent second homes etc. However immigration of skilled workers particularly those brought up in Scilly but who has gained work experience away. Should be encouraged.	Agreed
<b>RE075</b>	I would also like to see shared home ownership options that allow working people, such as single people or couples on low incomes, who cannot afford a mortgage to be able to acquire an asset.	Agreed
<b>RE076</b>	It will be necessary to allow some open market houses to help fund local affordable housing and rental units. If owners wish to use as second homes they must agree to holiday letting for minimum number of weeks.	Partially Agreed. It is considered that there is sufficient accommodation on the islands already given over the holiday let market, any new residential development created, even open market, should be for permanent occupation only.





#### RE077

To supply open-market executive style housing, to introduce new blood of entrepreneurship, while young(ish) people, committed to forging their future in Scilly, are denied the opportunity of decent affordable housing, and could lead to resentment and division in the community. Many local people in this age group are highly educated and with potential to further the islands' economic success. There is a dichotomy resulting from the local need criteria precluding young islanders who have worked on the mainland from qualifying for housing. Does the new local plan propose a change in criteria? The Scoping Plan (3.2) distinguishes between local younger people and entrepreneurs, whereas they may well be the same people.

The current threat to the future of Housing Associations is a retrograde step in provision of affordable, good quality housing for local people. In terms of design, empathy with the environment, supporting sustainability of community, Housing Association provision has many advantages, including the possibility of joint ownership schemes (not implemented in IOS as elsewhere). The proposed 'right to buy' of HA housing is counterproductive of a long term supply of local needs housing. But joint ownership does provide an opportunity of investment, provides a step on the housing ladder, while providing affordable rented housing in perpetuity. The Council should be acting politically to protect the HA role in Scilly. Every endeavour should be continued to encourage flexibility in the existing housing stock and equally every endeavour should be made to prevent further second-home and non-resident ownership. There could be scope to consider planning applications on their own merits rather than blind adherence to policy. The off-islands could each form a small community group, rather than individual Councillors, to consider applications and provide a view on the impact of any development on their island. It is widely noted that Tresco applications are not usually subjected to the same level of scrutiny as those on the other islands.

- Single occupants in large social housing units should be motivated to

Noted. The review of the local plan will include a review of the specific local need land key worker criteria to ensure it is easier for local people to qualify to occupy local housing, especially where they have gained education, training, experience and skill that they can bring back to the islands. We would also like to seek to encouragement in the diversity of the economy to ensure a variety of employment opportunities can be gained on the islands by local people without need to leave.

The Governments proposed changes to right to buy of both Housing Association properties and Council Housing is considered significantly harmful to the unique circumstances on the islands, where there is no travel-to-work area for employment purposes. The Council is lobbying Central Government and Ministers to seek to exclude the Islands from this legislation, or at least to put us on the same starting point as London Council housing (which has a higher threshold to buy compared to the rest of the UK).

It is agreed that all possible restriction are used, within the remit of the planning system, to ensure any new residential development is not lost to the second home or holiday let market and is retained to genuinely meet the needs of a sustainable community.

The LPA is aware of the efforts of the Council Housing Officer to encourage residents of larger under-occupied council housing stock to downsize. This can only go so far. The SHMA has revealed an imbalance in the housing market with the majority of larger under-occupied homes being within the private ownership market and the smaller over-occupied properties being within the social rented and Council housing stock. This results in difficulties in encouraging downsizing.



	<p>downsize. (Aware that the Housing Officer is to be commended for his work in arranging transfers in this respect: one of the advantages of a small community where individual needs are recognised).</p> <ul style="list-style-type: none"> <li>• Small work-shop annexes could be combined with living accommodation (like the old-style 'craft cottages'.)</li> <li>• In co-joined housing or accommodation units for the elderly, shared facilities could be incorporated, even within non-corporate developments.</li> </ul>	
<b>RE079</b>	One such solution may be the allowance for open market housing, which the Islands' Partnership would be supportive of in principle.	Noted.
<b>RE081</b>	I'm not sure I fully understand the term 'open market housing' but I agree there should be restrictions and measures to prevent second homes empty for so much of the year when they are desperately required.	Noted. The LPA have not fully formulated mechanisms or definitions of this aspect of potential future homes on the islands. It is becoming increasingly apparent that delivery of housing, to meet an affordable need for local people, will require some incentives. The allowance of any such 'open market' developments will require both careful justification and careful management to ensure they are not lost to the second home/holiday let market.
<b>RE082</b>	4. Yes we do not more broadly open market housing to subsidise schemes but we should look at covenants which prevent them being used as holiday or second homes but which are linked to living and working here but are not as restrictive as key worker or other definitions.	Noted. The LPA have not fully formulated mechanisms or definitions of this aspect of potential future homes on the islands. It is becoming increasingly apparent that delivery of housing, to meet an affordable need for local people, will require some incentives. The allowance of any such 'open market' developments will require both careful justification



		and careful management to ensure they are not lost to the second home/holiday let market.
RE083	As above. There is a substantial choice already available	Noted. There is an issue that some existing properties require significant modernisation, which may be one of the reasons why a property stays on the market for a long time, which together with 'London' house prices can result in a reluctance to purchase property. Some carefully controlled open market residential development could be attractive and would provide the financial incentives to provide the much needed affordable properties.
RE084	Why? Plenty for sale on the open market	Noted. There is an issue that some existing properties require significant modernisation, which may be one of the reasons why a property stays on the market for a long time, which together with 'London' house prices can result in a reluctance to purchase property. Some carefully controlled open market residential development could be attractive and would provide the financial incentives to provide the much needed affordable properties.

## Question 5

4.9 Question 5 related to the issue of employment and the economy and sought to establish whether people thought there is the potential to grow the economy specifically in the sectors of food and agriculture.

Ref	5. Do you agree that there is the potential to grow the economic/employment sectors of food and agriculture? <i>*Grammar and Spelling is unchanged from the original submission.</i>	LPA Response
RE03	Absolutely. Local producers should be encouraged and supported to provide islanders with affordable good quality food.	Agree
RE04	There's always potential, of course. I think the transport infrastructure is not there to facilitate these industries at present. Flowers could wait days in the winter before getting to the mainland. More local food could be grown but there needs to be help from the Council, or Duchy, or whomever, to give a platform on which to sell	Noted. The Council is the Local Authority and has significant statutory responsibilities. Whilst the responder's comments provide a constructive suggestions to allow the use of the Town Hall as a local produce market, this would require the use of its scarce resources to manage. It is also a suggestion that lies outside the scope of the local plan.



	local produce. Perhaps the Town Hall could open every Saturday to sell local produce.	<p>The LPA is in agreement that the transport infrastructure is a limiting factor as to what can take place on the islands. The improvement of the operation of transport to and from the islands is not within the control of the Council of the Isles of Scilly. Whilst the LPA can seek to encourage improvements in connections to and from the mainland we have no mechanisms to require this.</p> <p>The Local Plan could seek to create a positive framework in which economic diversity is positively encouraged and the same approach could be sought for transport connections. The Local Plan could not require either of these.</p>
RE06	...though it will always be limited due to the size of the islands (and therefore the scale of farmland available) and the transport costs & time to the mainland.	Agreed.
RE08	Local production for local consumption is clearly a good idea, but given the size of the population, not very easy or profitable. Any food produced here for consumption elsewhere would have to be top quality in order to command the premium price needed to make this a viable option.	Agreed
RE09	So many fields under-utilised	Noted
RE011	This will ultimately depend on whether there is a desire locally. There seems to be a very limited fishing industry but there seems to be potential for this to increase without the need for vast amounts of infrastructure. Producing local meat will be dependent on the ability of the islands to deliver an abattoir. Ultimately the cost of importing goods increases the cost of producing food and goods locally. I think the 'Made in Scilly' brand has the potential to be very valuable and successful for the local economy.	Agreed. Market forces will dictate whether there is a sustainable demand locally for 'Scilly-grown' produce. The LPA through the Local Plan consider is necessary to create a positive framework for the delivery of such food processing facilities.
RE012	This is basically getting back to what the islands did until tourism took over and when holiday chalets were allowed on farms which in turn made it easy money compared with farming the land. The increase in this sector will cut the need to import produce and with the climate could become like the channel islands (tomatoes/potatoes)	Agreed



RE015	Help needs to be given to vegetable and fruit growers - problems with rabbits, birds and need for irrigation.	Noted. Other than creating a positive framework to ensure sustainable economic diversification can take place, the local plan cannot provide physical assistance to land owners to assist in growing or pest control.
RE016	Many of the tenants of agricultural land are Duchy tenants - rents are reasonable but could the Duchy invest more into this Sector of the economy?	Noted
RE017	Food production could be significantly increased. There are many many acres of good farmland going to waste. Encouragement to get the purposeful use of the land, would be good.	Agreed. Market forces will dictate whether there is a sustainable demand locally for 'Scilly-grown' produce. The LPA through the Local Plan consider is necessary to create a positive framework for the delivery of such food processing facilities.
RE019	Yes but not at the expense of the environment.	Noted. Agriculture can take place without any planning permission. Where other infrastructure is required then it will be necessary to ensure it does not have any harmful impacts upon issues of acknowledged importance.
RE020	Yes. Many tourists are surprised that we are not more self-sufficient, especially considering our climate. Why don't we grow more food, including our local meat and slaughter facilities. Catch and sell local fish at the quay too?	Noted. The principal reason for no meat being slaughtered locally is due to the fact there is no abattoir on the island. The current local plan is positively in support of such facilities and it is anticipated this will follow through in to the new local plan.
RE021	Scilly, insofar as possible, needs to be self-sustaining.	Agreed
RE024	It is already happening in the shape of honesty boxes. A venue for a cooperative for local produce would be good.	Noted
RE027	Yes definitely. Explore more ideas and help small producers. There is a trend on the mainland as well as here for people to demand to know where their food is coming from. I have mentioned the coop above where they are told to supply foreign lettuces, mushrooms, apples etc. when, at the very least, we should be able to buy English. I would prefer to see Scilly being self-sufficient wherever possible, much more than is currently being achieved. I applaud Salakee farm's initiative as visiting management from the coop told me duck was considered too 'high end' for Scilly. This is a very good example of the hopeless policies of the coop and the scope for local entrepreneurs. I would like	Agree



	to see every possible encouragement, promotion and support for initiatives like this.	
<b>RE028</b>	There needs to be a focal point for the advertisement of what local produce is available and an outlet or delivery system to distribute it. Tourism office to promote local produce. For example note the advertisement we include for fresh produce in Guernsey which looks as if it is centrally sponsored.	Noted. Whilst the LPA welcome the constructive suggestions, it is not within the scope of the local plan. The Islands Partnership would be better place to make these arrangements.
<b>RE032</b>	Potentially yes with the development of high quality low carbon 'Scilly Brand' products.	Agreed.
<b>RE034</b>	Any growth in this sector e.g. Development of an abattoir, will need to be carefully planned to ensure that there are no effects on designated sites. The site improvement plan lists agricultural activity and effects on hydrology and run-off as a threat to the conservation objectives of European sites.	Agree. The Local Plan process will be sustainability appraised against appropriate sustainability objectives to ensure that policies and proposal of local plan are not harmful to the environment or any harm is acceptability mitigated.
<b>RE035</b>	Food, Farming and Fishing have always been practiced in Scilly but have never received the support they needed to take off in a commercial way. As stated, there are many excellent food producers on the islands but high transport costs to and from the mainland and the off-islands is probably the most important factor in restricting growth in all sectors. We understand from the Chairman of TEDI that some universities are very interested in studying the economic/social aspects of the islands and therefore they may be prepared to undertake an in depth transport study into freight transport costs and the problems the	Noted. A local plan is a plan to cover any environmental, social, design and economic objectives which are relevant to the fulfilment of the development and use of land in the Isles of Scilly over the life of the plan. In this case 2015 – 2030. There can be no business, person or organisation targeted positively or negatively in the plan and the driver of whether development is successful in the islands has to be left to market forces. The plan can positively create a framework by which to assess whether development is appropriate but it cannot provide any incentives. In the case of transport costs the Local Plan cannot require the Isles of Scilly Steamship company to carry out an in-depth study into freight





	<p>IOSSCo transport creates for all island activities including tourism and our costly Moorwell waste transportation operation to the mainland. This would be with a view to minimising freight costs so that we could maximise the amount of waste that could be sent to the mainland for either recycling or disposal. Other aspects of the financing of waste and produce transfer could be to ask the Gov't to cancel the Landfill Tax on a one - off transfer of historical contaminated waste from Moorwell to Cornwall and perhaps introduce a permanent freight subsidy for all exports and imports in support of all Council and island businesses.</p> <p>We feel the Council could do much more in encouraging small producers to sell their produce locally, especially when residents express their support for such ventures. In a recent case, a local producer whose produce in our view was superior to that of the mainland supplier was discouraged from doing so.</p>	<p>transport costs, unless it was relevant to the submission of a planning application for development. Similarly the local plan cannot control the Governments position in relation to landfill tax for the Isles of Scilly. Whilst the LPA welcome constructive suggestions there are limitations has to how far these can be taken within the local plan process.</p>
RE036	<p>Only if the main retailer is able to stock and re-sell local produce. Its bizarre to walk into the Co-Op and find Cornish potatoes and Narcissi!</p>	<p>Partially Agree. The Local Plan can create a positive framework that allows economic diversification and would not necessarily rely on existing businesses to be achieved.</p>
RE042	<p>There is a huge demand in the tourist season for island-grown products.</p>	<p>Noted. Market forces will dictate however whether there is a sustainable demand locally for 'Scilly-grown' produce. The LPA through the Local Plan consider it is necessary to create a positive framework for the delivery of such food processing facilities.</p>
RE045	<p>There is some very good food production here but there must be scope for more. Head towards self-sufficiency and grow it for island consumption, not export. Could a growers' co-operative give the produce a strong island branding? Maybe utilising our flag. Localism is currently all the rage with consumers.</p>	<p>Agreed. Market forces will dictate whether there is a sustainable demand locally for 'Scilly-grown' produce. The LPA through the Local Plan consider is necessary to create a positive framework for the delivery of such food processing facilities.</p>
RE046	<p>Yes. There are very few food crops on the islands when the UK as a whole is seeing an increasing demand for locally grown produce. There are some encouraging signs in the form of the fish and chip shop on St Martin's (local potatoes; local fish) and the vineyards.</p> <p>A major constraint here is the lack of an abattoir. Whilst many people would prefer to eat locally sourced meat, it is disappointing that this</p>	<p>Agreed. Market forces will dictate whether there is a sustainable demand locally for 'Scilly-grown' produce. The LPA through the Local Plan consider is necessary to create a positive framework for the delivery of such food processing facilities.</p> <p>The lack of a food processing facility such as an abattoir is a problem to increasing self-sufficiency. The current local plan is positively in support</p>



	must be first shipped to the mainland for slaughter - clearly inefficient and distressing to the animals.	of such facilities and it is anticipated this will follow through in to the new local plan.
<b>RE048</b>	A full assessment would be required to establish if this was feasible.	Noted.
<b>RE049</b>	The potential is there but who will do the work? Bringing outside workers to islands (similar to the tourist industry) creates its own shortage of accommodation problems. Self-sufficiency is to be applauded but there is a dearth of available willing workers.	Noted
<b>RE050</b>	Potential to grow the economy in food/agriculture? Yes, there is scope to encourage horticulture to increase self-sufficiency in the Islands, particularly in regard to vegetables and herbs (culinary herbs and essential oils for flavourings, colourings and medicinal uses). Some farmers/horticulturalists are already in this business but the scale could be increased, possibly with the aid of an organization such as employed by Mainland Marketing for the Narcissus industry.	Agreed. Market forces will dictate whether there is a sustainable demand locally for 'Scilly-grown' produce. The LPA through the Local Plan consider is necessary to create a positive framework for the delivery of such food processing facilities
<b>RE051</b>	Processing primary products such as soft fruits, juices, potatoes grow well - chips?! Fish processing	Noted
<b>RE053</b>	Isles of Scilly Wildlife Trust would like to see the livestock (mainly beef) sector expand to allow local farmers to assist with grazing on our leased land. However, this expansion relies on the development of an abattoir/cutting room to promote best practice in animal welfare and to create a premium end product. Due to the islands reliance on the natural environment, opportunities to encourage good environmental practice with all farmers and land managers should be developed whether through a re-vamped Farmer's & Growers Initiative or something similar.	Agreed. The lack of a food processing facility such as an abattoir is a problem to increasing self-sufficiency. The current local plan is positively in support of such facilities and it is anticipated this will follow through in to the new local plan.
<b>RE054</b>	Would require irrigation as most land is of poor quality, lower transport costs. Abattoir for killing and processing increased meat production	Noted. There are sustainable solutions to improving soil quality but this would be beyond the scope of the local plan and in the hands of landowners/tenant farmers. It is noted that there is only so much improvements such interventions could achieve if the soil not the best and most versatile graded land. The lack of a food processing facility such as an abattoir is a problem to increasing self-sufficiency. The current local



		plan is positively in support of such facilities and it is anticipated this will follow through in to the new local plan.
<b>RE056</b>	Cost of transport and freight will be pivotal	Noted
<b>RE057</b>	Not at present with such High Transportation costs	Noted
<b>RE058</b>	<p>There is absolutely potential to grow earnings from Agriculture etc., with a freight subsidy &amp; efficient transport it could potentially reach the earnings of lower value tourism related activities such as catering. Speaking as someone with direct experience in both! Currently the only truly successful example owes its success entirely to the Subsidised Royal Mail universal service obligation and a VAT exempt status worth 20% in revenue on its own. On this basis pretty much any industry can be successful! Other are heavily subsidised with considerable tourism letting opportunities. What the Council has to remember is that whilst dependence on tourism is inadvisable, it none the less forms 80% of the backbone of the economy with the ancillary businesses providing supporting roles in a marketable produce. What is increasingly lacking is a link between the relative wealth from providing accommodation and the lower earning supporting industries. A tourist first has to reach the islands and then find accommodation thus establishing the pecking order for a share of the spend. We hear of "high end" offerings etc. which are all very well in conjunction with the economy as a whole but could not stand in isolation, we need to maintain and improve a truly varied offering or our market will become (as it has~), too small to support a choice of transport options etc. Pushing high earning jobs in the so called "knowledge based industries" is all well and good if equal attention is given to existing industries. The people employed in these sectors may earn more but will still require the services of the lowest paid in the islands. The other problem is that these options tend to centre on St Mary's, leaving the already poorer off island communities yet further disadvantaged. I think that the LA overestimates the attractiveness of the islands as a location for budding entrepreneurs -</p>	<p>The respondent's comments on subsidisation of transport/delivery costs is noted and understood. Royal Mail postal subsistence to the economy has become a necessity.</p> <p>The support of ancillary holiday letting accommodation has become an invaluable source of income for many of the islands agricultural businesses and the current local plan has made a positive provision for this to support existing farms. The discrepancy between the wealth generated by the tourism industry and the low earning potential of a large proportion of the islands community is understood. The Council have been seeking to support training and provide the necessary infrastructure to create an environment that provides the right opportunities to diversify the economy allowing people to earn more money without it having a detrimental impact upon the environment or our natural resources. Both agriculture and tourism are important aspects of the economy and there is no suggestion that we should move wholly away from this, but the LPA can start to provide a positive framework to allow appropriate economic diversification. This will not happen if there is no appetite from the community to make this change. The Local Plan can only seek to provide a positive framework for assessing applications that are submitted. It is accepted that this will not happen if the community are happy with the economic situation and the existing 'home grown' businesses of the islands as it currently is. The LPA would concur that the majority of infrastructure and service provision is centred on St Mary's but this is primarily because around 70% of the population of the islands live on St Marys. The Off-Islands have to be provided with necessary services and modern island halls including the connection to super-fast fibre optic broadband have been provided on each of the off-islands. The respondent has to acknowledge however the</p>



they still require good transport links, attend face to face meetings and exchange hard copies etc. with a degree of efficiency, which immediately puts us at a disadvantage. Realistically, if it were going to happen then it would be happening in Cornwall which it isn't. We should concentrate on improving our home grown-industries which we are good at and providing incentives for the younger generation to stay and drive the economy. I feel that the idea of not seeking to advantage or disadvantage anyone with planning or licensing options needs further work within the Council and in the past has created a glass ceiling which stifles a truly competitive economy and stagnates any drive and enthusiasm for improvement. Most innovations takes years in gaining planning and a struggle for relatively wealthy individuals which just puts it out of reach of those with few resources and little time. We need easily understood formats in clearly defined areas which are upheld by officers of the LA in a uniform manner which sets precedence which can be followed.

trade-off a person makes when they chose to live or continue to live on a small island. The quality of the natural environment, the low-stress, low-pollution lifestyle, crime-free and safe environment compared to many of the mainland towns and cities has its benefits. Whilst many of the mainland advantages will never be provided to the off-islands of the Isles of Scilly this is not because there is a general consensus to disadvantage these small island communities it is because it is often prohibitively expensive, requires significant grant funding and can often lead to a compromise in what makes that island special.

It is agreed that transport to and from the islands is problematic but the issues and potential resolutions lie beyond the scope of the local plan. The Council of the Isles of Scilly is not a transport provider and the provision of public transport, due to the significant costs, is not provided by the Council. The significant costs of providing transport links to the island versus the limited market and returns this will always have is likely to remain the limiting factor in providing choice to the existing transport links to the Isles of Scilly. At the present the LPA can offer no comments. The respondent's comments on planning and licensing are not clear. The Planning system is a level playing field and assesses all planning applications submitted based on the information provided, in accordance with the adopted local plan and national guidance. We would require specific examples to comments on what has taken 'years', what is perceived as a glass ceiling? It is agreed that those people with the greater resources will be in a position to put more investment in the projects they want to see come forward. This is not a barrier with the planning system. The process of assessment of planning applications is applied consistently. Different outcomes are because each application is determined on its own merits and as such the use of 'precedent situation' cannot apply without the two sites and circumstances being identical, which they never are. What will always be clear, however, is how the different outcomes have been reached. You may not agree with the decision, but the process is transparent and open to public inspection and scrutiny.



RE061	An abattoir would be a huge benefit to farmers and could make the islands self-sufficient in meat production and sale.	Agreed. The lack of a food processing facility such as an abattoir is a problem to increasing self-sufficiency. The current local plan is positively in support of such facilities and it is anticipated this will follow through in to the new local plan.
RE064	Yes: it has been proved on St Agnes despite its comparative remoteness and limited acreage that micro businesses can be created and flourish: Westward and Troy Town farms and the Little Island Chocolate company are good examples, while Lower Town Farm continues to fly a lone flag for traditional but adaptable flower farming.	Agreed
RE065	<p>Yes, to an extent and while the challenge will be to stem the decline in these sectors against external competition, a move to increase local food production will play an important part in supporting Scilly's future viability. However this is not necessarily a simple matter and there are various issues that need consideration including land tenure, availability of water, financial capital, soil fertility and the commitment of local retailers and caterers that must be included in any move to increase food production.</p> <p>The Local Plan should recognise the importance of local food and provide opportunities for the development of more agriculture, horticulture and fishing businesses. Such business, when practised in a sustainable manner, are to be considered vital both for the food security of the Islands along with their offer of a quality experience to visitors and tourists.</p> <p>Careful thought needs to be given to what the " Scilly Brand" actually stands for and it should not be devalued by its use on processed products containing few or no local ingredients, but instead stand for high quality food and produce with a low environmental impact together with a solid provenance of local materials and inputs.</p>	<p>Agreed. Market forces will dictate whether there is a sustainable demand locally for 'Scilly-grown' produce. The LPA would also agree that the issues and situation requires agreement from multiple sectors and a balance of many delicate aspects and issues to make it work both in the long term and on a sufficiently sustainable scale. The solution is not simple and no ultimate resolution from this will come out of the local plan. We can however create a positive framework that encourages collaboration and control between the competing issues to ensure that anything that does come forward meets appropriate tests.</p> <p>It is agreed that a 'Scilly Brand' could be devalued if not appropriately used. It would seem appropriate for this to be used only to products that are sourced, grown or made in the Isles of Scilly to ensure it stands for something truly sustainable and unique to the islands</p>
RE066	Most desirable economic option - but challenging climate/soil types/scale/water etc. Sure there are new opportunities/ideas. Great to keep land productive - but clear. Bird/wildlife habitats.	Agreed





RE074	Yes, there is scope for a local abattoir if linked with proper butchery facilities. Also potential for other food manufacturing e.g. cheese making, larger pasty making facilities etc.	Agreed. The lack of a food processing facility such as an abattoir is a problem to increasing self-sufficiency. The current local plan is positively in support of such facilities and it is anticipated this will follow through in to the new local plan.
RE075	Most certainly. Visitors come to Scilly expecting to see lots of farming and fishing and we should be able to meet this expectation. Further to that, Scilly should have its own Dairy herd, bake all its own bread, have an abattoir of some sort and grow the vast majority of its own vegetables. Much of what comes off that ship on an almost daily basis is unnecessary and indulgent. A more self-sustainable Scilly would also be a more attractive holiday destination.	Noted
RE076	Agricultural/horticultural business will always be a niche market. The Local Plan should support investment needed to add value to local products for local consumption.	Agreed
RE077	Yes, there is definitely potential for improved marketing of local food and the Council/Islands Partnership could play a part in promoting 'added value' to existing produce (e.g. smoked fish, processed shellfish etc.) and promotion of high value/low volume goods for export and an identifiable Scilly brand. Could encourage efficient co-ordination of transport (e.g. work is already underway to provide overnight rail transport to London markets for perishable goods to achieve premium prices). (Not relevant, I know, but I can remember tinned Tresco cream in Fortnum and Mason's!)	Noted
RE079	Where possible the Local Plan should also allow greater flexibility for the local community to benefit more directly from new housing development including schemes that could see a proportion of the new build sale re-invested into the community or greater flexibility for locals to raise finance against these assets for other business investment in the islands. The Islands' Partnership welcomes the commissioning of an independent and objective housing needs assessment in order to inform the levels of new housing required – including additional rental opportunities for staff, particularly during the summer season. Nevertheless, any large scale housing	Noted





	development in the short term (as opposed to small scale, incremental development over a number of years) must consider the long-term impact this creates in terms of additional housing requirements for the next generation.	
RE080	More people would keep animals for mean if we had a slaughter house. One has been absent for too long giving rise to cost and animal welfare issues for farmers.	Agreed. The lack of a food processing facility such as an abattoir is a problem to increasing self-sufficiency. The current local plan is positively in support of such facilities and it is anticipated this will follow through in to the new local plan.
RE081	Yes I would love to see more locally produced food and us becoming more sustainable and less dependent on the co-op! An abattoir would be great.	Agreed. The lack of a food processing facility such as an abattoir is a problem to increasing self-sufficiency. The current local plan is positively in support of such facilities and it is anticipated this will follow through in to the new local plan.
RE082	5. I think we should be adding more value to produce on island which requires small scale processing facilities etc.	Agreed. The lack of a food processing facility such as an abattoir is a problem to increasing self-sufficiency. The current local plan is positively in support of such facilities and it is anticipated this will follow through in to the new local plan.
RE083	Economically unlikely with costs of transportation	Noted
RE084	Yes - must be grants available! If money can be obtained for totally unnecessary quay extension, surely food and agriculture	Noted

## Question 6

4.10 Also in relation to employment and the economy question 6 sought to identify whether there were any other known business needs on the islands.

Ref	6. Are you aware of any other specific business needs of the islands? <i>*Grammar and Spelling is unchanged from the original submission.</i>	LPA Response
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<b>RE03</b>	The education sector could be encouraged in some way – if we had access to more courses and educational opportunities surely other people would like the opportunity to study over here and contribute directly to the local economy. For example the health centre and hospital could set up a partnership with colleges in Cornwall to provide courses for healthcare/ nursing/ medicine that are supported by the network of colleges and universities in Cornwall.	Noted. The delivery of the education services specifically is beyond the scope of the local plan. The local plan could provide policies and proposal to create a positive framework for the delivery of new facilities. The last local plan did create the positive framework that has resulted in the delivery of a new school combining junior and secondary education.
<b>RE04</b>	If you want to encourage productivity then you need to invest in space for people to produce things. The industrial estate should feature affordable areas where people, not businesses, can hire spaces to produce things, if even on a short-term basis. Again, all businesses fail if the transport fails, this needs to be primary concern for the Council, to make the IOSSCO improve their service to the islands or to make a case to government that the IOSSCO are not providing a sufficient service in terms of price, reliability, and access.	Noted. The Council has delivered serviced business facilities on St Mary's and assisted in the delivery of Super-fast fibre-optic broadband on all of the islands. Each island has also had a new island hall and quay improvements. The delivery of transport services and the operation of the Steamship Company is beyond the scope of the local plan. It is acknowledged that transport is a critical aspect to life and business on the islands.
<b>RE06</b>	Further 'employment land' could be allocated (with flexibility as to use classes, including A), possibly in the Porth Mellon and Telegraph areas. The availability (and also retention) of employees is an issue – ie there is limited (even non-existent) homes for them at the moment.	Noted. More work on the evidence base is required to determine what precisely is required in terms of industrial and employment land. The local plan will need to cater for the findings of this evidence.
<b>RE011</b>	Improved transport links to the mainland would be of benefit for all businesses. Could the Islands become independent in the same way as the Channel Islands and thereby set their own laws and levels of taxation? I don't know if this is a business need per se? But could be a way to diversify the economy and stimulate investment. The ability to generate energy and move away from a reliance of mainland generated fossil fuel electricity.	Noted and partially agree. The move to being fully independent in the same way as the Channel Islands is beyond the scope of the local plan. The respondent's suggestions are noted and the local plan would seek to diversify the economy thus stimulate investment through a positive policy framework. Similarly the local plan would seek to create policies that assisted in the sustainable use of energy and resource to become self-sufficient and sustainable place to live.
<b>RE012</b>	Storage and better economic transport. Reduce freight and similar costs.	Noted



<b>RE017</b>	Not necessary. Re: 3.10 We do not need development technologies here. Leave it on the mainland.	Noted
<b>RE019</b>	Need coherent business development plans which supports new businesses and encourages young entrepreneurs. To develop creative arts/online innovation/leisure/marine industries, environmental tourism, environmental research/test-bed focus for islands.	Agree.
<b>RE020</b>	IT get some good people in to set up IT companies. Attract large companies to invest in - say eco-projects (great R&D environment). Add a conference centre, especially useful for the winter lull. Go green - make it a magnet for green living enthusiasts. Encourage the school to network and provide online training opportunities to our young generation in more than boating and hospitality. There are some good initiatives that already deliver global business training. Contact ***@outlook.com for some pointers.	Noted. The respondent's suggestions are positive and offer some useful suggestions to assist in the diversification of the economy. The local plan will need to create a positive policy framework to encourage economic diversification and sustainable development.
<b>RE021</b>	Why does transport not appear to be a specific item?! Scilly is absolutely reliant on a viable transport system. You NEED a year round subsidised boat-service. And a boat that will run in all weathers and in the dark. Reducing or eliminating the use of cars for all but essential journeys (we have all witnessed the profligate use of cars in Scilly to the detriment of pedestrians and cyclists - this should be an area which promotes green and healthy transport alternatives, to say nothing of a healthy lifestyle). Businesses would be harmed in no way whatsoever if Scilly introduced 20mph throughout the islands. It would be a beacon to other communities and a magnet for tourists.	Noted. The delivery of transport services and the operation of external operators is beyond the scope of the local plan, which is why transport is not a specific 'issue' in the scoping report. It is acknowledged that transport is a critical aspect to life and business on the islands. The local plan would need to ensure that improvements in transport services is not prevented and it will be necessary to create a positive framework that ensure the delivery of alternatives could come forward. The Local Plan cannot in itself force this to happen. The respondent's comments of reducing the reliance of the private motor car are noted. It is agreed that car ownership is not necessary but the local plan cannot prevent car ownership in itself but it can seek to ensure any new development is not reliant on people owning cars. The introduction of speed restrictions is beyond the scope of the local plan.
<b>RE027</b>	Not really. You won't get IT firms relocating here as it is too expensive to live here. However there is no doubt scope for local people to set up their own IT based businesses and there needs to be every encouragement in this. Probably training courses and set up assistance needed here.	Noted.



RE028	More development of sports and the arts. E.g. Adventure centres, arts courses for visitors. E.g. Could Carreg Dhu be developed into a horticultural and arts centre?	Noted
RE032	3.7 assumes that money is the most important thing and ignores lifestyle and job satisfaction. We have some of the highest rates of self-employment and entrepreneurship in the country – the joy of being your own boss should not be underestimated. Many people chose under-employment in order to live in such a wonderful place, free from the stresses of corporate culture and commuting. Superfast broadband and the new work spaces at the Porthmellon, Porthcressa and the St Agnes Island Hall have all been great steps forward.	Agreed
RE033	Yes. Training and recruitment in health and care services.	Noted
RE034	No Comment	Noted
RE035	As far as we know there has been no attempt to consult with the Community on the question of what should be done with the old Secondary School or where the recovered materials would end up, some of which could be contaminated with asbestos. Importing expertise at the highest level is 'hit and miss' but planning to develop a wide variety of local expertise by developing a technology centre in the old Secondary School, with minimal refurbishment, could deliver higher educational success for those who wish to live in Scilly long-term. Higher educational qualifications could promote better on island decision making. The demolition of such a large, modern and valuable school building as the old Secondary School instead of taking the opportunity to adapt it for a wide range of local uses would be irresponsible. Housing for the elderly could be built elsewhere - perhaps close to the Health Centre with its beautiful views and served by doctors who are close by and with the Community or Buzza Bus for shopping etc. Over the past 30 years this Council has lacked management	<p>The respondents comments are noted, they are however multi-faceted and appear to focus on the inadequacies of the Council and the use of the former Secondary School at Carn Thomas.</p> <p>The issue of the potential re-use of the Carn Thomas Secondary School has been considered by the Council given that it is their asset. Furthermore, the Local Plan process also provides the community with an opportunity to be consulted on the future proposals for the former secondary school. Any planning permission for the secondary school will be subject to a construction &amp; demolition management plan to ensure that any demolition materials are appropriately reused and recycled where possible or disposed of appropriately in accordance with waste regulations and legislation, including any hazardous materials such as asbestos.</p> <p>Given that the main development pressure on the islands is for housing, it is considered that the reuse for this previously developed site for housing should be considered the preferred option. The demand for a technology centre of this</p>



expertise with higher educational qualifications which is obvious in the many poor policy decisions of the past. Scilly is unique and so it's not good enough to use the argument that it is done this way on the mainland without doing the research as to whether it is the best option for Scilly. In our view nothing has changed much from the past. There is still a considerable lack of vision, expertise and research that is sending our Council in the wrong direction on many policy decisions where care for the environment is almost non-existent.

Importing highly educated and experienced business entrepreneurs to a small struggling economy like this would be in our view impossible but planning to develop a wide variety of local expertise by developing a technology centre in the old Secondary School, with minimal refurbishment, could deliver long term success and growth for the whole community. It is true that there are limited career opportunities for our young people leaving school. Perhaps more could be done to encourage existing businesses, e.g. in catering, engineering and IT to take on more apprenticeships or training in conjunction with mainland colleges with a view to enabling our young people to obtain the qualifications necessary to work as chefs, engineers or in IT etc. on the islands or ultimately to run their own businesses. It is important we try to lift the average wage and the skills base of our young people if they wish to live and work on the islands or start a career or a business here. Judging the overall results of the completed schemes at the Airport, Porthcressa and the questionable progress on the waste issue there is a need for improved skills including architectural design within the community and the Council. The need of this Scilly community to develop higher management skills and new ideas is great. Decision-making in Scilly has not therefore improved over the decades despite all of the changes in staff the same mistakes and out-of-date policies are happening today because the old undemocratic influences that have dominated the past

size is unlikely particularly given the recent development of the Porthcressa Enterprise Centre, which performs a similar function. Due to the structural integrity and poor architectural quality of the former secondary school building, the redevelopment of the site provides an opportunity to maximise its use with a much better designed and more sustainable building with wider benefits to the environment (including making a significant contribution to meeting the requirements for new homes identified through the SHMA and a 5 year housing land supply and thereby reducing the amount of greenfield land that needs to be identified).

The identification of new sites for residential development will need to be thoroughly analysed and assessed against a range of constraints and requirements as part of the Strategic Housing Land Availability Assessment, including the visual impact on the environment (which would be a consideration in such a visually prominent location).

The respondents comments on Council management expertise then it is noted that these opinions are not related to the scope and remit of a Local Plan.

The demand for a technology centre of this size is unlikely particularly given the recent development of the Porthcressa Enterprise Centre, which performs a similar function. Due to the structural integrity and poor architectural quality of the former secondary school building, the redevelopment of the site provides an opportunity to maximise its use with a much better designed and more sustainable building with wider benefits to the environment.

In relation to the respondents comments on limited career opportunities for school leavers then it is considered these issues are outside of the scope and remit of the Local Plan.

In relation to the respondents comments on average wages and skills base then these issues are outside of the scope and remit of the Local Plan.





are still in control. Returning after 30 years to enforce waste processing and dumping at Pendrathen is proof that nothing has changed and bad planning decisions are still being made. We need to break with the past and start making decisions in a completely different way on the basis of what is best for the whole community - not what is best for local business. The old Secondary School could provide a great opportunity to address this need. It could serve The Five Islands School, local business and our Council by becoming our own FE type Technical College housing a number of trades and research facilities in a multiple classroom setting which would be able to provide and promote education, design, research, innovation, and winter conference facilities that the whole community could benefit from. Demolishing that very valuable building could therefore be a massive mistake and a missed opportunity to kickstart a new future for Scilly based upon Higher Education and the research of new ideas by a new generation of free-thinking individuals. The Council has indicated the beginning of a process of catapulting Scilly into the new technological age but without the means to deliver that future in practical terms it will fail or even worse open up Scilly to high powered and dominant commercial exploitation. Other countries have completely different education pathways to producing more expert workers and planners. No plan exists to raise the performance levels of local management in Scilly. Scilly has always had problems in this area of educational expertise and skills. Scilly's business sector is years behind the times as is the IOSSCo. This community has so many problems that need resolving that unless a new way forward is found to improve expertise and decision - making in the face of vested interests and a lack of local democratic rights and accountability then Scilly will be stuck in the same old rut for ever more making one mistake after another and wasting millions of pounds worth of grants. The old Secondary School is

In relation to the respondents comments on Council decision-making then it is noted that these opinions are not related or relevant to the scope and remit of a Local Plan.

In relation to options for re-using the Carn Thomas secondary school site, although for the reasons stated previously, it is not considered likely that there would be a demand for such a facility and that it could not be delivered without significant funding that is also unlikely. Furthermore, the former secondary school building could not easily be adapted for such a use and should be demolished due to its structural integrity and poor design, particularly in the context of a Conservation Area and AONB. The infrastructure and building blocks to develop a new technological age are in place (e.g. super-fast broadband & the Enterprise Centre) and will develop through the implementation of initiatives such as the Smart Islands project.

In relation to the respondents comments of education pathways, then these opinions are not related or relevant to the scope and remit of a Local Plan.

The respondents comments on the re-use of the Carn Thomas Secondary School site are noted although for the reasons stated previously, it is not considered likely that there would be a demand for such a facility and that it could not be delivered without significant funding that is also unlikely. Furthermore, the former secondary school building could not easily be adapted for such a use and should be demolished due to its structural integrity and poor design, particularly in the context of a Conservation Area and AONB

Noted. The challenge for the Local Plan is to facilitate the developments requirements for the islands to ensure its economic and social well-being balanced against protecting its most important natural assets so as to protect the exceptional environment. This approach can be achieved by ensuring that development is well designed and directed to the most appropriate sites, including maximising the reuse of previously developed sites such as the former secondary school which currently detracts from the environmental quality of the islands. Given the seasonal nature of the economy which is dominated by



	<p>vital to the development of various educational and research skill sets in the future and must not be demolished. Its uses are many and its classroom structure equivalent to an FE College and Technology Centre cannot be provided by any other building on St.Mary's. The fact that the decision has been made to demolish this vital building without proper consideration also proves this Council's inability to develop or manage a forward-looking vision for this community.</p> <p>The Local Plan Scoping Report emphasises the need to balance the protection of the environment with the diversification of the economy but it is our view that the natural environment cannot be compromised in any way to accommodate business interests because this will lead to a deterioration of the landscape on which tourism depends. This is a policy of diminishing returns. There is no consideration in the report as to the reasons why visitors come to Scilly and how important it is to protect and enhance the environment to ensure tourism continues to be the leading sector in our economy. Where is the evidence that diversifying our economy into untried and untested fanciful business ventures would be successful and benefit islanders, especially our young people?</p>	<p>tourism, it is considered vital that the economy diversifies to open up more opportunities for decent jobs that are better paid and more professionally fulfilling – whilst the Local Plan is limited in achieving such an objective, it is important that it contains an appropriate framework of policies and proposals to facilitate new business developments.</p>
<b>RE042</b>	<p>The needs of other businesses, than tourism (and related) and agriculture comes from outside the islands. It is an imported need.</p>	<p>Noted</p>
<b>RE045</b>	<p>The re-provision of the abattoir (talked about for the 8 years I've been here) would make a fundamentally difference. A small mobile unit, to fit on the Lyonesse Lady, should be quite sufficient.</p>	<p>Noted. The lack of a food processing facility such as an abattoir is a problem to increasing self-sufficiency. The current local plan is positively in support of such facilities and it is anticipated this will follow through in to the new local plan.</p>
<b>RE046</b>	<p>Given the high dependence on tourism, the lack of a mobile data network is a major disadvantage to the islands' businesses versus mainland and continental competitors. The islands are expensive to get to and therefore compete with destinations within a huge European catchment. We must therefore promote the islands effectively and a mobile data network</p>	<p>Agreed. The Local Plan could create the positive framework for the delivery of the appropriate infrastructure. The Local Plan could not force mobile phone network providers to install the necessary equipment on Scilly. The requirement to provide sufficient mobile phone coverage across the Country is driven by Central Government.</p>



	<p>allows for organic promotion by visitors (Instagram photos, Facebook updates, blogging etc).</p> <p>The competition for renting retail outlets in the centre of Hugh Town against holiday lets is clearly not supportive of the long-term viability of St Mary's as an attractive visitor destination. Tourists have certain expectations of a holiday destination, with a vibrant town centre featuring cafes and shops being among them. The centre of Hugh Town including the stretch from the quay through Hugh Street to the Strand ought to be protected for retail and food use.</p>	<p>The respondent's comments on the viability of the Town Centre of Hugh Town are noted. It is agreed that a vibrant town centre is attractive for tourists and residents alike but market forces will dictate whether there is a demand or sufficient profit for retailers in establishing a business in Scilly. The Local Plan will need to understand fully the existing retail offer in Scilly and determine whether protectionist policies need to be developed to ensure retail units are retained for retail purposes and not lost without the right justification. It is beyond the scope of the local plan however to ensure retail units are occupied</p>
<b>RE049</b>	<p>Another supermarket or a bigger co-op. The improvements in technology etc for the islands are great which means more people can work from home or internets. The balance between new business and more housing only exasperates the existing problems. Over-development of the islands with homes/buildings will detract from the reason why visitors enjoy the natural environment and come here for peace and quiet in the first place.</p>	<p>Noted. Market forces will dictate whether the islands could support a new bigger or second supermarket and the local plan could not require this. It is agreed that supply of land on the islands is finite and this should be protected from unnecessary development.</p>
<b>RE050</b>	<p>Yes:</p> <ul style="list-style-type: none"> <li>• Plumbers</li> <li>• Electricians</li> <li>• Gardeners</li> <li>• Builders</li> <li>• IT support</li> </ul> <p>Although there are, of course, people on the Islands with these skills, it is nevertheless, in our experience, difficult to get jobs done satisfactorily for several reasons:</p> <ul style="list-style-type: none"> <li>• Many are engaged in large contracts (for the Council, Duchy, on large grant-funded schemes) and cannot always supply a personal service when needed, or have to terminate a job before completed.</li> <li>• Some seem not wholly to have their heart in a job and either do it poorly or do not turn up at all.</li> </ul>	<p>Noted. It is difficult for skilled professionals to relocate to Scilly because of the shortage of affordable housing. The Local Plan could not seek to require people specifically to relocate to Scilly.</p>



• IT support is an area in which many people, who use computer-based systems but are not themselves particularly 'computer literate', would welcome more support. The service provided at the Library can be quite helpful but is limited to one day in the week and the people involved, although knowledgeable, are not always well enough versed to tackle the most difficult problems. There are several people with professional knowledge who undertake freelance advice but who have other employment that always takes priority. There is, therefore, room for young enthusiastic, capable, IT consultants to take it on full-time. We are sure they could make a living, especially given the ever increasing reliance on IT systems!

We can illustrate the difficulties listed above from our own experiences:

- We needed to install a new septic tank and employed a local builder. The job was 90% completed when the builder had to devote full time to a major contract and, having been paid, promised to complete the job 'in due course'. After nearly 2 years, the job is incomplete and urging from us has been ineffectual. There are safety issues here too.
- We have several gas appliances but cannot get jobs done now by anyone in Scilly. Safety issues again!
- We need IT help frequently but rarely can get assistance when most needed.
- Recently, we needed help with a specific job in the garden. A person who advertised his gardening services locally was approached and agreed to come on a specified day. He has still not come despite messages to and fro! We later discovered from others that he was 'unreliable'.

There is thus scope for employment in everyday jobs by people who want to work.

Physical and Social Infrastructure (3.12-3.17 pp10-11)

3.13 We are not well versed in 'smart grid technology' but it



	seems to us that, in a situation where money is tight, that this is a refinement that could go well down the priority list, when quite simple, relatively cheap methods of energy saving are being neglected (see later comments).	
<b>RE051</b>	Many small island businesses could grow if they could employ. Thus the need for small housing units, freight is a major cost and especially on the off-islands - should be monitored.	Noted. The Local Plan will need to make provision to deliver the appropriate level of growth and housing needed to support a sustainable community.
<b>RE053</b>	As an SME, with 7 full time staff, the Isles of Scilly Wildlife Trust requires specialist administrative functions such as finance and IT, the skills for which cannot always be found on the islands. Add to this the housing issues when trying to employ staff from the mainland, and small businesses can struggle to operate effectively. Opportunities should be sought for bringing specialist skills to the islands (whether resident or remote) and then sharing of these functions which are similar no matter what the outputs of the organisation.	Noted. The Local Plan will need to make provision to deliver the appropriate level of growth and housing needed to support a sustainable community.
<b>RE054</b>	Privately operated residential care home would provide year-round employment, bring business from mainland, use locally produced food.	Noted. The provision of a privately operated care home is a constructive suggestion. This would however require the recruitment of specialist staff, which if not already on the islands would require potentially the creation of additional affordable housing or staff accommodation. It would, however create year-round employment and create a demand for food. There would be no guarantee or requirement however that the business would have to employ local or existing residents, or buy-in local produce.
<b>RE056</b>	Transport, affordability and reliability again.	Noted
<b>RE057</b>	Tourism is our prime source of finance being damaged by high transport costs	Noted
<b>RE058</b>	I think there is a demand and space for tourism letting opportunities in the form of the increasingly popular shepherds huts, yurts and pods which are far more attractive than the traditionally static caravan and easily concealed. It offers a non-permanent form of development within the financial reach of the less wealthy and attracts a new kind of young traveller	Noted. The creation of additional units of tourism accommodation will create the demand for staff accommodation. There is already a shortage of suitable and affordable units of accommodation for staff purposes to run existing businesses. The development of such units of tourism accommodation would not diversify the economy in a sustainable way or provide any skills or training to





	<p>type which is increasingly common now. It is a slightly more weather resistant and upmarket option to traditional camping. I also think that consideration should be given to workshops storage sheds and processing facilities in suitable convenient locations. There seems to be a Council preoccupation with providing for what is seen as "nice clean industries" in nice new glass fronted workshops. The dirty smelly stuff has to happen somewhere! I think that the LA needs to take the roll of an enabler rather than a provider. Public building projects are inherently expensive, inefficient and their benefits unfairly distributed. This also goes for social affordable housing which is in effect expensive housing let cheap. Efficient and affordable transport of materials is key to allowing self-help to those showing initiative and commitment. I think the LA should keep an open mind to larger community developments such as tidal energy but should ensure that the local population get maximum advantage.</p>	<p>attract the next generation of young people to remain on the islands, if they have ambitions to work outside the tourism industry. The provision of ancillary storage sheds and processing facilities is noted. The local plan recognises and will need to create a policy framework that allows the needs of all businesses in the community to thrive and continue, in whatever form this takes, providing it does not have a detrimental impact upon the natural and historic environment.</p>
RE064	<p>Provided the Environment Agency and Drinking Water issues can be overcome then the projected construction of a small abattoir at Parting Carn should be pursued in the interests of stimulating animal husbandry.</p> <p>The Duchy Tenants Association's agricultural sub-committee concluded an agreement with Hugh House a few years ago which overturned traditional Duchy opposition to sub-letting of holdings on the islands. The agreement did not imply the loss of all land or accommodation for those tenants either retiring or not actively farming. But it did potentially allow those farmers anxious to expand some extra acreage to work with.</p> <p>A Field Centre linked to universities in the SW or further afield that specialise, for example, in ecology, meteorology, rural tourism or the marine environment is still very much needed. Such an enterprise could be developed not where previously envisaged at Longstone but out of season say on Tresco and on</p>	<p>Noted.</p>



	other off islands around community halls and campsites at shoulder periods.	
<b>RE065</b>	A persistent and unresolved need of the business community is the need for reliable, affordable and connected transport links, both inter island and to the mainland (local and upcountry). Here the Local Plan needs to be absolutely honest about what it can and cannot deliver. If it has no real influence over our sole current transport and freight provider it needs to say so. The cost of freight for bought in goods from the mainland is an enormous cost for businesses. This has a very serious impact on island businesses but cannot currently be effectively challenged due to the lack of competition.	It is agreed that transport to and from the islands is problematic but the issues and potential resolutions lie beyond the scope of the local plan. The Council of the Isles of Scilly is not a transport provider and the provision of public transport, due to the significant costs, is not provided by the Council. The significant costs of providing transport links to the island versus the limited market and returns this will always have is likely to remain the limiting factor in providing choice to the existing transport links to the Isles of Scilly. At the present the LPA can offer no comments.
<b>RE066</b>	Assume greatest challenges are freight costs. Reliability of transport/weather limitations. Totnes in a local currency - maybe worth exploring - keeping money in the community.	Noted
<b>RE074</b>	The refrigerator engineer is nearing retirement and commutes regularly from Newquay. There could be potential for someone with these skills and abilities to service electrical goods (washing machine etc.) to be resident in Scilly.	Noted
<b>RE075</b>	The greatest business need on the islands is a reduction in business rates, particularly for seasonal businesses. There will also always be a demand for bed and breakfast accommodation and far too much of it is now going over to self-catering. This is good for the Co-op but bad for the pubs, and restaurants. The problem is that property prices are now so high and I fear that those who are able to purchase a B&B business will not wish to purchase the work that goes along with running one. For those who need to borrow heavily to obtain a B&B it will be incredibly difficult to operate profitably. I would like to see the community, through the Council and the Duchy, collectively purchasing B&B's and leasing them to local people at a decent rate that allows them to run a viable	Noted. A reduction in business rates for seasonal businesses may impact upon the provision of year-round services, as some year-round businesses may choose to close during the winter, leaving the permanent residents with little or no services. The respondent's suggestions lie outside the scope of the local plan.



	business and protects this vital sector within our overall tourist offer.	
<b>RE076</b>	<p>Any business that improves the economy and leads to a reduction in seasonality should be welcomed. Strengthen existing economy by permitting new tourism accommodation and facilities to broaden the market. The emphasis should be on quality in all categories and flexibility in order to promote a more even spread of passengers through the airport.</p> <p>In terms of new industries we should encourage the growth of the knowledge economy and build on initiatives such as “Smart Islands” where the “Living laboratory” qualities of Scilly can be the basis of a broader economy.</p> <p>Staff accommodation should be permitted and encouraged to support existing businesses and new projects that may need a transient workforce.</p>	<p>Partially agree. The local plan could create a positive framework seeking to encourage a year-round economy, which includes the growth of a diverse economy that does not compromise the attractive and important natural and historic environment. The creation of new units of tourism accommodation, however would add to the housing problems of the islands. The local plan process has revealed that that there is no shortage of employment but there is a shortage of housing to attract an appropriately skilled workforce to the islands. Staff accommodation is and will continued to be permitted where it is necessary to support existing business and to support a sustainable community.</p>
<b>RE077</b>	<p>The specific business needs of the islands must include: electricians, plumbers, builders; the practical skills for which there is always a demand. There is also a need for technical and advisory skills in IT. Lifelong Learning and apprenticeship schemes have a role to play, and there could also be potential in selling training and education courses. Scilly has opportunities and facilities as a location for companies seeking training. (Improvements to transport would be a prerequisite, likewise for the conference business which could be vulnerable to transport malfunction, although Scilly has the advantage of trapping delegates for periods of time! Physical and Social Infrastructure</p> <p>3.12 Nobody disputes the importance of infrastructure but the basics are the most important and the needs of the tourism industry should be recognised as de facto. The next few years should witness consolidation of good quality and quantity of drinking water; responsible management of waste water and disposal of waste generally. Conservation of our water supplies</p>	<p>Noted. Whilst the local plan cannot seek to require or only permit certain skilled people to the islands, it does seek to ensure that there is sufficient accommodation to meet the staff accommodation needs of the island and to support a sustainable community without harming environment. It is agreed that transport can often be a limiting factor for any business or industry on the islands. The creation of additional transport services however are beyond the scope of the local plan.</p> <p>The respondent’s comments on infrastructure are noted. The local plan will need to ensure that any development does put pressure upon the existing infrastructure and should result in overall reductions and improvements to both water usage and disposal.</p>



	should be a priority, plus the promotion of water saving measures, and use of rainwater harvesting for toilets and horticulture/gardening activities.	
<b>RE079</b>	The Islands' Partnership agrees that the Local Plan should play a central role in encouraging, supporting and providing the conditions for economic growth across the islands. It is important that any future funding and investment decisions that may result or benefit from these policies take a needs-based approach in the first instance with clear evidence of economic need and opportunity to ensure outcomes are sustainable. In addition to diversification, it should also be recognised that another way of addressing the seasonal nature of the tourism industry on Scilly is to extend the season, grow the market and create the conditions for businesses to profitably trade over a longer period. It is also worth noting that the range of services and facilities that would serve to attract new industry and investment (shops, restaurants, leisure facilities and cultural activities etc.) can ultimately only be sustained by a buoyant tourism market.	Noted
<b>RE081</b>	My main concern over diversifying business would be transport as we cannot escape the fact that we live on an isolated island. I believe transport could be more reliable and considerably cheaper but we would still be separated by a stretch of water.	Noted. . It is agreed that transport can often be a limiting factor for any business or industry on the islands. The creation of additional transport services however are beyond the scope of the local plan.
<b>RE082</b>	6. Housing is one of the biggest issues for business as are other infrastructure weaknesses such as water and sewerage and lack of aspirational schooling with a focus on STEM sciences	Noted.
<b>RE084</b>	Dog-grooming and behaviour management classes	Noted.

## Question 7

- 4.11 In relation to physical and social infrastructure question 7 sought views on whether the local plan should be encouraging all types of renewable energy generation in all areas or whether there should be any restrictions on this issue.



Ref	7. Do you consider the plan should be encouraging the use of all types of renewable energy in all areas? Or area there restrictions on types or areas that should be considered? <i>*Grammar and Spelling is unchanged from the original submission.</i>	LPA Response
RE03	Renewable energy should be actively encouraged, however there would be specific considerations to take into account such as the issue of shadow flicker produced by wind turbines.	Noted. The local plan will need to ensure it delivers sustainable development. This will include the positive policy provision for a variety of forms of renewable energy. Any policy will need to ensure appropriate assessment of the impact upon both landscape character and the amenity of nearby residents.
RE04	I don't think the plan should write-off, at this stage, any suggestions in terms of renewable energy sources. The islands are special, but not as to prohibit anything as long as it's done in a way that is environmentally friendly.	Agreed.
RE06	Instead of allocating specific sites, there should be a policy on ground-based solar, which would allow such development depending on circumstances/meeting certain criteria (e.g. visibility/impact on natural and historic heritage, and what land is currently being used for – e.g. not taking up essential land such as a school sports field).	Noted.
RE07	All including energy from waste.	Agreed
RE08	It is very sad to see the proliferation of roof-top PVA's here; they are extremely unsightly. Turbines would be equally detrimental. Wave power will be a good option one day, but the technology is insufficiently developed at the moment. There are a number of geothermal installations here; are these cost effective? Is there scope for bigger/centralised geothermal energy recovery? Simpler energy saving initiatives will be more cost effective. Smart meters will make consumers more aware of their energy use profiles, but the most cost effective approach would be to encourage the use of better insulation and energy conservation. Contractors involved in providing loft and cavity insulation under the current government scheme seem to be able to exclude Scilly from their operations. Can the Council work to put this right?	Noted. Most rooftop solar energy generating equipment does not require planning permission.
RE09	Nothing unsightly please.	Noted and agreed





<b>RE011</b>	With longer hours of sunlight, on a year-round basis there must be a way to more efficiently become self-sufficient as an island and be less reliant on the mainland. I would encourage all new buildings to incorporate ways of utilising this.	Noted and agreed
<b>RE012</b>	Careful consideration of the natural environment what is to be considered?	Agreed
<b>RE015</b>	Solar panels are unsightly, other renewables should be considered.	The respondent's comments on the appearance of solar panels are noted. It is agreed that some traditional solar panels, bolted on to roofs can appear unsympathetic and even harmful to the wider character of the environment. There are modern solutions which can have a sympathetic appearance, such as solar slates, for example. Where planning permission is required then the LPA will require solutions that seek to minimise the visual impact upon the wider public realm. Where the use of renewable energy installations are permitted development, then we have no control over the specific products chosen. There is a general requirement that the installation of such equipment is, as far as possible, visually sympathetic to the wider environment. Generally the LPA welcomes all types of renewable energy installations but not at any cost and any installation should minimise the wider visual impact upon the environment.
<b>RE016</b>	I think wind turbines would be good - but people challenge their aesthetic appearance.	Noted. Traditionally the islands and islanders have made use of natural wind energy and there is evidence of 'windmills' particularly on the garrison.
<b>RE017</b>	Possibly solar panels on housing but no in fields.	Noted. Disagree. Whilst large areas of fields on the scales seen on the mainland would not be appropriate on the islands. There may be scope to utilise smaller sites to create 'solar gardens' rather than 'solar farms'.
<b>RE018</b>	Solar, water conservation, i.e. Water butts etc.	Noted. In relation to water butts, then the LPA have required new developments to incorporate water saving measures
<b>RE019</b>	The islands should be totally self-sufficient. All types should be considered.	Noted and agreed.
<b>RE021</b>	Please explore wave power judiciously. Although this is a self-evident area for high tech development it is in its very early stages and may	Noted. The LPA is aware that through the Smart Islands Infrastructure project work, this is being considered carefully.



	prove both costly and damaging. But it is worth exploring on a small development scale.	
<b>RE025</b>	Wind turbines would not be appropriate	Noted. Traditionally the islands and islanders have made use of natural wind energy and there is evidence of 'windmills' particularly on the garrison.
<b>RE027</b>	On reading para 3.13, I leave the basics to the experts as I am out of my depth here. I do however feel strongly that we should all be looking at ways to reduce energy wastage and aim for lower bills. In this I would like to see as little light pollution as possible. Scilly should be a dark sky site wherever possible and the quay should only lighting in areas when they are in use. I have received a very positive letter from the Duchy about this but cannot monitor the situation with all the current work taking place. Could you review all street lighting times and other private lighting levels? I know of one light on the side of a building which has been on day and night for the last 8 years that I know of!	Noted and partially agree. The monitoring of dark skies and street lighting is beyond the scope of the Local Plan.
<b>RE028</b>	Although renewable energy must surely have its place, we should avoid anything which detracts from the beauty and timeless peaceful quality of the islands and in so doing would thus harm the main industry of the islands which is Tourism. Perhaps tidal electricity generators have a place, but at what cost.	Noted. Partially Agree. If people are to live on the islands then it makes sense that it should be as sustainably as possible and not wholly reliant on electricity supplied from the mainland. Renewable energy infrastructure where it is as unobtrusive as possible will be considered
<b>RE029</b>	Consider it by all means but do nothing that would spoil or change the environment.	Noted
<b>RE032</b>	Yes – this is a no-brainer. Of course the Local Plan should be creating policies to positively promote the use of renewable energy. How can we try to talk about Sustainable Development if we don't? The 'smart grid technology' sounds very exciting. The comment in 3.25 that 'the actions of islanders will have little impact upon the global implications of climate change' is wrong. We absolutely do have an impact – everyone does and unless we recognise this and begin the move to carbon free we are part of the problem.	Noted and agreed. The LPA would seek to ensure that any type of renewable energy is not restricted and encouraged particularly where it is supported by the community and when it does not give rise to any other harm to the environment



RE034	<p>All renewable energy should consider impacts on designations. AONB does not rule out solar or wind but must be acceptable in landscape terms. The SPA should be considered in respect of Wind turbines, Marine SAC must be taken into account if considering wave power.</p>	<p>Noted and agreed. The LPA would seek to ensure that any type of renewable energy is not restricted and encouraged particularly where it is supported by the community and when it does not give rise to any other harm to the environment.</p>
RE035	<p>Whilst we are very much in favour of renewable energy, we believe that the Scilly environment cannot tolerate all forms of renewables. Therefore we are not in favour of on-shore wind turbines which are inefficient, noisy, expensive and visually unacceptable in low-lying islands. We are in favour of all new and existing buildings having photo-voltaic on their roofs as long as it makes economic sense, e.g. under a Gov't initiative. Fields full of P.V. panels would ruin the quality of the landscape of Scilly.</p> <p>Wave and tidal power may well be the most environmentally acceptable forms of renewable energy in the future and we sincerely hope that the trials being conducted in Cornwall and elsewhere will prove the worth of this new technology but we believe that it is unrealistic for the IOS Council to be contemplating investment at this present time - in the absence of energy storage and whilst there could be a question mark over the capacity of the cable to take large amounts of electricity from Scilly back to the mainland grid. Our Council is already hugely in debt due to their latest 'projects' therefore the cost of investing in new renewable energy could be prohibitive – especially when we are not yet investing enough in basic infrastructure. There would have to be absolute proof that any renewable energy plant would have the ability to make a profit for the Council and not be taken over by the private business sector such as we have in Scilly which is just waiting for any kind of business opportunity no matter what damage they do to our environment or the lives of our residents.</p>	<p>Noted. The LPA would seek to ensure that any type of renewable energy is not restricted and encouraged particularly where it is supported by the community and when it does not give rise to any other harm to the environment.</p>
RE036	<p>There should be some restriction on placement of wind turbines etc. But solar fields are fine and marine renewable would not be obtrusive.</p>	<p>Noted. The LPA would seek to ensure that any type of renewable energy is not restricted and encouraged particularly where it is supported by the community and when it does not give rise to any other harm to the environment.</p>



RE038	<p>Question 7 relating to encouragement of all types of renewable energy is very important. The NFU is supportive of all types of renewable energy but recognises that there will be restrictions to their development according to issues such as location and climate and also community visions. However, any policy must have a consideration of scale. Many farms will look to develop small-scale projects that meet their farm energy requirements. In addition larger scale projects can provide an excellent diversification for some farms and community benefits.</p> <p>The NFU does not have any particular views on which areas should or should not be part of Conservation Area. However, we do recognise that within Conservation Areas farm will need to develop their businesses in line with policy, regulations and markets and as such planning must reflect this need.</p>	<p>Noted. In relation to individual farmers seeking to introduce small-scale projects that meet their farming requirements. This would not be particularly resisted where it is demonstrated that the project is not otherwise harmful. What would be encouraged in the first instance however, is a collective Island solution that met the needs of the wider community in addition to the small farmers and growers on the islands. The respondent's comments are noted in relation to the conservation area.</p>
RE042	<p>Of course wind-power plants have to be located in not to conspicuous spots inside the islands, not along the shoreline.</p>	<p>Noted. Aerodynamics of wind may prove impossible to overcome. Wind turbines have to be located in areas that generate sufficient volumes of wind. So either close to the shore or on higher ground. Such areas would conflict with the respondent's views.</p> <p>The LPA would seek to ensure that any type of renewable energy is not restricted and encouraged particularly where it is supported by the community and when it does not give rise to any other harm to the environment.</p>
RE045	<p>Definitely No to large wind turbines but small scale solar seems okay. Most logical, though expensive, would be wave energy, possibly off the western rocks.</p>	<p>Noted.</p>
RE046	<p>Yes. Absolutely. If this is to become a more sustainable, self-sufficient and less needy population it is essential to encourage renewable energy production, energy storage, energy efficient homes, electric cars and smart grid technology. Islanders should be proud of this and not seek to hide it. I would support mixed renewables: wind, solar, wave and biomass. The installation of battery storage could also be encouraged to support the local grid.</p>	<p>Noted and agreed. The LPA would seek to ensure that any type of renewable energy is not restricted and encouraged particularly where it is supported by the community and when it does not give rise to any other harm to the environment.</p>



	<p>Aside from the obvious economic, sustainability and security benefits of a diverse local energy grid, there is a moral obligation to do what we can to decrease the islands' carbon footprint. It is not reasonable to expect the mainland UK and continental Europe to make changes to their energy infrastructure whilst the islands continue to waste energy through poorly constructed homes, car journeys of less than 2 miles, cheap distributed storage heating and use of fossil fuel derived electricity. A large part of Scilly's population lives on the sand bar and will suffer the consequences of rising sea levels over the coming decades. It is ridiculous to continue to waste energy and expect other people to solve this problem.</p>	
RE049	<p>The beauty of the islands should not be despoiled in any way. Reference 3.13 'smart grid technology' and its benefits should fine without an explanation to the methods of obtaining such energy. But how and what cost to our AONB status? Sounds as if we could destroy the goose that laid the golden egg. No windmills nor large areas of solar panels in fields should be allowed for example.</p>	<p>Noted. The LPA would seek to ensure that any type of renewable energy is not restricted and encouraged particularly where it is supported by the community and when it does not give rise to any other harm to the environment.</p>
RE050	<p>No, not in all. We cannot afford all and must prioritize. Although Scilly is 'blessed' with wind for a great part of the year, this should not be a preferred option. Scilly is far too small for the costly infrastructure needed. Our top priority would be to extend the use of solar power for domestic and business premises. Scilly is blessed with ample sunlight and the wherewithal to exploit it is available; set-up costs are decreasing. Several years ago 'Transition Scilly' held a series of meetings in which different energy-saving measures were discussed with experts. This then gave rise of an initiative by a group of enthusiastic local people who researched solar power. As a result we, and a small number of others, installed first solar panels and, later, photovoltaic panels for generating electricity. Since then, prices have come down significantly.</p> <p>Our experience is that on sunny days we have ample hot water (and save by not using the immersion heater) and on all days except the very darkest, we produce a significant amount of electricity that can be fed into the grid, for which we receive a substantial payment every</p>	<p>Noted. The LPA would seek to ensure that any type of renewable energy is not restricted and encouraged particularly where it is supported by the community and when it does not give rise to any other harm to the environment.</p>





	<p>quarter. The photovoltaic cells do not need a cloudless day and work well in Scilly, even in winter. We are surprised that not more people have taken this up. 'Transition Scilly' has gone quiet and the group of enthusiasts who raised interest in the first place has dispersed either to the mainland or found other interests. Since we came here 25 years ago, we have found that initiatives are most successful when driven by enthusiastic individuals. Grand schemes proposed by local authorities and backed up by impressive 'vision statements' and contemporary management jargon are not enough. Perhaps an important role of local authorities is not necessarily to provide ready-made services in all areas but to encourage and support individual initiatives. The most constant sources of power in Scilly must surely be wave power and/or tidal currents. This is an expensive enterprise but the Council should give all the support it can to organizations that wish to pursue its possibilities.</p>	
RE051	<p>It would be ideal if we could be self-sufficient in energy - but with some restrictions. Large wind turbines - not appropriate - wave hubs and photo voltaic would be .</p>	<p>Noted. The LPA would seek to ensure that any type of renewable energy is not restricted and encouraged particularly where it is supported by the community and when it does not give rise to any other harm to the environment.</p>
RE053	<p>Energy security in the future is likely to be a major issue and any action which helps to secure energy supplies for the community should be considered.</p>	<p>Noted and Agreed.</p>
RE054	<p>No solar voltaic, production is environmentally poor and use rare earth metals - Need replacing every 25 years after date of manufacture. 2% loss of functioning capacity every year. No wind power - unsightly and unreliable. Yes to solar thermal - most electricity on the islands is used to heat homes and water. Yes to geothermal. Then none for smart technology - who pays for the meters?</p>	<p>Noted. The respondent's comments are not all relevant to the local plan review process. It is envisaged that any renewable energy supported will be sustainable in terms of the 'energy' it generates as well as being environmentally sustainable in terms of its production. It would seem that production 'standards' need to be adopted nationally or locally as to the type of photo voltaic panels being accepted.</p>
RE056	<p>Wave energy sounds interesting? Mini wind turbines on new housing, good insulation/ground source heat pumps</p>	<p>Noted. The LPA would seek to ensure that any type of renewable energy is not restricted and encouraged particularly where it is supported by the community and when it does not give rise to any other harm to the environment.</p>



RE057	Subject to presentation of our wonderful natural environment	Noted. The LPA would seek to ensure that any type of renewable energy is not restricted and encouraged particularly where it is supported by the community and when it does not give rise to any other harm to the environment.
RE058	Yes I think that all forms of renewable energy should be encouraged in defined areas where there are already buildings and structures. I wonder if the Council should look at powering the desalination plant with solar for example with peak usage occurring in the sunny summer months. If successful it could be rolled out on a larger scale across the islands and become a leading example! Its small scale and achievable. I wonder if the Karma Hotel on St Martins would be an appropriate place to test a small tidal turbine in Tean Sound immediately adjacent and requiring no long and expensive cables. Likewise Tresco channel could provide for a small generation station on Bryher - providing that island with a possible job, attraction and emphasis? Solar gardens such as the one planned on St Martins could provide small local opportunities if adequate grid upgrades were in place. Housing schemes could be encouraged to provide leading examples of sustainability with solar water heaters which are more efficient than PV, PV to reduce the other electric costs and rainwater harvesting for toilet flushing etc.	Noted. Some of the respondent's comments are beyond the scope of the local plan review process. The operational process of the desalination plan is not something the local plan could seek to control. The LPA is aware that the scale of solar panels required to power the desalination plant meant that this option is not viable. It is intended that policies would seek to ensure that any type of renewable energy is encouraged particularly where it is supported by the community and when it does not give rise to any other harm to the environment. Policies will be supportive of any new development incorporating water/energy reduction measures and energy generation measures and where possible connecting in to any future 'smart island grid'.
RE061	Solar as long as it's on existing buildings. Wave as long as it doesn't hamper fisherman's activities. Could sewerage/refuse be used to generate power?	Noted. Part of the 'smart island' work is looking into the wider energy infrastructure capacity of the islands which includes possible solutions to sewage and refuse (including green waste) to generate on-island power. The new local plan will ensure that such proposals can come forward and are not restricted.



**RE064**

Scilly should not play host to wind farms as such. But small projects serving individual farms or hamlets such as Trenoweth, for instance, should not be dismissed out of hand.

Elsewhere, I remain in favour of wave and/or tidal power development, provided offshore devices are not of the Fred Olsen oil derrick variety but rather of the wave buoy type. Also provided sites are sensitively selected and do not damage the marine environment or local commercial fishing interests then such devices can be contemplated reasonably close inshore.

Small solar farms/gardens can be contemplated within suitably screened field boundaries on land unfit for conventional agricultural use. Such developments, provided appropriate storage facilities can prove themselves within appropriate timescales, could also help safeguard sustainable drinking water supplies on the islands.

All this pre-supposes that the existing capacity for transmitting electricity around the islands as well as to and from the mainland and upcountry can be not just maintained but upgraded.

Noted. In relation to individual farmers seeking to introduce small-scale projects that meet their farming requirements. This would not be particularly resisted where it is demonstrated that the project is not otherwise harmful. What would be encouraged in the first instance however, is a collective Island solution that met the needs of the wider community in addition to the small farmers and growers on the islands. The respondent's comments in relation capacity for transmitting energy around the islands and to the mainland are noted.

**RE065**

This appears to be a poorly worded / somewhat loaded question. Yes we should be encouraging the use of all types of renewable energy and yes there will have to be location and aesthetic considerations applied through the normal planning process.

One would hope that the local plan will both identify preferred areas for renewables such as ground mount solar PV and take a positive (but measured) view on sites that come forward outside of the areas identified. The plan needs to identify and prepare for the evolving technologies – design and efficiencies of renewable energy technology (generation and storage) will change, the plan must ensure that it does not close the door on any technology (including wind).

The other thing that needs consideration is the consenting process for such technology. Currently the planning process can be seen as a hurdle to individuals delivering property level technology within a Conservation Area and consideration should be given to streamlining this process for technologies such as:

- Roof mount solar thermal.

The respondent's comments are noted. The question was not intentionally 'loaded' but genuinely seeking the views of islanders' on this subject. The variety and polar nature of the responses is testament to the way the question has been interpreted. The LPA would seek to ensure that any type of renewable energy is not restricted and encouraged particularly where it is supported by the community and when it does not give rise to any other harm to the environment. If the local plan does identify sites for specific types of energy then we will ensure the community has the opportunity to express any views about specific allocations. The draft local plan is the next stage of the local plan process. If preferred renewable energy types or locations are proposed, then they will be included as part of the draft local plan.

Part of the 'smart island' work is looking into the wider energy infrastructure capacity of the islands which includes possible solutions to sewage and refuse (including green waste) to generate on-island power. The new local plan will ensure that such proposals can come forward and are not restricted.



- Roof mount PV
- Air source heat pump

With the decline in funding incentives (FIT's etc.) the cost of a full application and associated drawings may well make small scale projects unviable. However a permitted development/ pre application consultation type approach would make delivery of such projects more achievable.

The plan also needs to set out the Councils 'vision' and responsibilities for renewable generation across the islands:

- It needs to identify the distribution network, its shortcomings and who is responsible for addressing these
- The Council needs to define its role in generating renewable energy – is it there to support and facilitate individuals and existing community based providers (e.g. Isles of Scilly Renewable Energy Co-operative (ISREC)) or is it aiming to become an energy provider in its own right?
- The plan needs to identify and share current and projected energy demand, transmission losses associated with the supply from the mainland and land area required to meet the current level of demand using proven technology (solar PV and small scale wind) If the community was fully aware of inefficiencies and vulnerability involved with our link to the mainland, the attitude to renewables could well see a dramatic change – no one wants to see the lights go out. Furthermore, the opportunities for collective community investment in renewable energy projects could result in more low carbon electricity, a return for investors and financial rewards for the community.

Wave and tidal generation are to be welcomed; however the very large investment in marine construction projects necessitates development by organisations with access to significant capital and specialist skills and equipment. Therefore the Council would be well advised not to pin all hopes on renewable energy solutions from marine sources.

There are not currently any restrictions to certain types/sizes of micro-generation installations on domestic properties (excluding listed buildings). In such a sensitive environment, where both the natural and historic environment are highly valued and protected, it is important that an assessment is carried out through the planning process to ensure that installations are appropriate.

It is not the job of the Isles of Scilly Local Plan process to streamline the national consent process, as this is controlled by the General Permitted Development Order (GPDO), where rights are permitted for this type of development. The Isles of Scilly do not remove any of the rights for micro-renewables on domestic properties as set out in the national GPDO.

It is not the role of the local plan review process to establish the Council's role on RE generation. The LPA is aware that as part of the Smart Island Partnership the Council is supportive of any Energy Enterprise created to control the energy created as part of the smart island projects.



RE066	<p>Do not think wind farms on or off shore would be desirable for Scilly. Wave power may have potential but how much infrastructure/sub stations required? How much control given to industry partners?! May be scope for some bio-mass (research into pelleted fuel from gorse/heather) Still open to some renewables -but green technology not so green in production/distribution/disposal i.e. PV panels.</p>	<p>Noted. Some of the respondent's comments are beyond the scope of the local plan review process.</p>
RE069	<p>The RSPB believe that climate change is one of the greatest threats to biodiversity. The deployment of new renewable energy sources can help contribute towards the urgent greenhouse emission cuts that we need to make. However, it is essential that new renewable energy sources are situated in the right locations and avoid harm to existing feature. To be sound the plan will need to have policies that set out what is appropriate to ensure the right development happens in the right place, so that the benefits do not outweigh the losses. The provision of renewable energy should follow principles which support the reduction in greenhouse gases. These should include:</p> <ul style="list-style-type: none"> <li>· The first principle of the plan document in tackling the impacts of climate change should be to reduce consumption of natural resources.</li> <li>· The second principle of the plan document in tackling climate change needs to protect or enhance existing biodiversity by shaping the size, location, density, and design of settlements to avoid protected wildlife/sites and important habitats or species.</li> </ul> <p>Because of the presence of European sites (SPAs/SACs) with potentially sensitive features (seabirds) at risk from certain renewable developments the RSPB believe a Habitat Regulation Assessment (HRA) is required. Please consult with Natural England (see answer to question 2).</p> <p>The RSPB have helped Cornwall Council in the development of planning guidance for small turbine developments and we would be happy to support the Isles of Scilly Council in similar renewable documents.</p> <p>It is important that plan document does not just promote energy generation but also helps reduce consumption. Design policies need to set out the standards to be adopted for developments that reduce</p>	<p>Noted and agreed. The LPA is not seeking to locate any developments within sensitive natural environment designations. The Local Plan and its policies will be Sustainability Appraised which will include assessment against the Habitat Regulations.</p> <p>The LPA have and will be consulting with our statutory consultees including Natural England on the local plan review process and would welcome input and guidance on ensuring future policies are appropriate, fit for purpose and suitably protect the quality of the natural environment.</p> <p>The assistance with the development of guidance on small scale turbine developments would be welcome. There has not been much demand in recent years on the islands for this type of development.</p> <p>Officers have sought to ensure all developments seek to reduce energy consumption, through the use of conditions. It is envisaged that this will be reflected in future policies to ensure development reduces consumption of energy and water. Detailed design policies may have to be adopted as supplementary planning guidance to ensure expectations of policies are realised as well as being anticipated by developers.</p> <p>There are not currently any plans to adopt a Community Infrastructure Levy.</p>





	energy consumption and move the islands towards a low carbon economy. The CIL could provide a mechanism to support energy conservation measures from new developments to support improvements, especially on old social housing, etc.	
<b>RE070</b>	Careful consideration should be given to the siting and proliferation of solar panels other than on buildings.	Noted and agreed.
<b>RE074</b>	I wouldn't want to see fields of Solar Panels, but solar panels on roofs are to be encouraged and ground and air source heat pumps should be part of new build projects	Noted and agreed.
<b>RE075</b>	I would always encourage renewable energy use at all times and to restrict it on an aesthetic or even economic grounds is something I would consider unethical.	Noted.
<b>RE076</b>	Small scale use of all types of renewables should be encouraged – facilities to enable an increase in the infrastructure to support renewables should be permitted.	Noted.
<b>RE077</b>	Individual households should be encouraged in the use of solar panels and PV tiles, possibly even small wind turbines. Large scale projects such as tidal or wave power could be encouraged but only to the extent that the Duchy and Council could approve commercial companies to use our natural resources to a wider benefit and specifically to the advantage of local energy users.	Noted.
<b>RE079</b>	Clearly the islands face a number of challenges over the short to medium term in terms of the management of both water and waste. Again, the Local Plan must provide a framework within which the most appropriate solutions for these issues can be developed and implemented.	Noted and agreed.
<b>RE080</b>	The islands have great potential to be energy self-sufficient and all forms of renewable energy sources should be encouraged.	Noted and agreed.



RE081	Yes, I love this idea. The idea that we could become much more self-reliant is very attractive. This would of course have to be done delicately so that it did not threaten our local landscape but it would be fantastic to see our renewable energy potential exploited.	Noted and agreed.
RE082	7. Yes all RE should be encouraged but scale and location will be a factor in such a heavily designated and protected landscape.	Noted and agreed.
RE083	Get people to use less. No unnecessary lighting. No Christmas Lights	Noted.
RE084	Wave energy	Noted.

## Question 8

4.12 Question 8 sought to establish people's views in relation to the issue of waste, sewerage and water and to establish whether there were any suggestions about how these issues could be addressed.

Ref	8. Do you have any suggestions about how the Local Plan could address issues of waste? (Paragraph 3.15). Could you provide some comment on this? <i>*Grammar and Spelling is unchanged from the original submission.</i>	LPA Response
RE04	I think the Local Plan should bow to the input of DEFRA, for example. I think there is far too much weight placed on tourism on the islands, to the point that tourism will kill the islands as they will oppose anything that 'stands out' in the locality. People wealthy enough to own a property on Scilly, and/or a tourism business, should not be considered to be 'friends' of the long-term future of the islands. They are too invested, literally, in keeping the scenery free from obstruction. That's not fair to the hundreds of families on the islands who are not wealthy enough to be 'in the game', but want to earn a living and remain on Scilly. Tourism has a place on Scilly, it always will, but Scilly should not be defined by being attractive to outsiders as a place to visit. It's not a museum or a fairground, it should be a place to live and work. Otherwise being born on Scilly would be a very tragic	Noted. The LPA would agree that the Local Plan should balance the needs of the tourism with the needs of the permanent residential population who live and work on the islands without involvement in the tourism industry.



	<p>affair where you know that you will have to move away if you want to earn proper money, otherwise you're born into a future that hinges on you being a chef, waiter or chambermaid for people much wealthier than you.</p>	
<b>RE06</b>	<p>For green waste (i.e. compostable material) a number of sites could be established (e.g. 1 or 2 per off-island, plus several for St Mary's) and the compost material then re-used locally.</p> <p>A site allocation should be made for a possibly needed sewerage treatment plant on St Mary's, for dealing with waste water from all Hugh Town and possibly also Old Town. (Possibly sited in the Porth Mellon area, or near Old Town.)</p>	<p>Noted. Whilst it may not specifically identify or allocate sites on each island for the purposes of green waste, the local plan will certainly ensure policies are positive in relation to such proposals coming forward in the future.</p>
<b>RE07</b>	<p>Limit the population by only bringing in workers when local people cannot be sourced or trained.</p>	<p>Noted.</p>
<b>RE08</b>	<p>Please continue to work closely with DEFRA, the EA and the water inspectorate re these subjects. I was very impressed with the apparent co-operation between the Council and these bodies when attending the public meeting earlier this year. It is nice to see progress with waste management and it looks as though we will catch up with the mainland in this area before too long.</p>	<p>Noted and agreed.</p>
<b>RE09</b>	<p>It is too technical for me to comment but it needs to be addressed professionally.</p>	<p>Noted</p>
<b>RE011</b>	<p>Provide recycling facilities for more types of materials. Innovative approaches to re-using non-recyclable materials should definitely be encouraged. The composting of food and green waste to generate energy such as biomass or anaerobic digestion.</p>	<p>Noted. The LPA consider that it will be important to create a positive framework for enabling innovative approaching to disposal of waste particularly where this is for recycling. It will be important that future proposals for anaerobic digestion and biomass energy generation can come forward without barrier under the new local plan.</p>
<b>RE012</b>	<p>Consideration of transferring the Council's responsibilities to another organisation e.g. A Water Company as the infrastructure costs are too great for this Council and in the current climate the Government.</p>	<p>Noted.</p>
<b>RE015</b>	<p>Much more recycling. Shipment to the mainland</p>	<p>Noted.</p>
<b>RE016</b>	<p>Waste paper recycling. Plastics? (not sure if this is a low cost exercise)</p>	<p>Noted.</p>



RE017	<b><u>DO NOT DUMP IT AT PENDRATHEN QUARRY. Make Moorwell viable, as was planned</u></b>	Noted. There are no plans to move the Council's household waste collection to Pendrathen. Progress is well underway to transform the Moorwell Waste site and former incinerator in to a Household Waste and Recycling Centre.
RE019	Needs to get much more focussed on recycling and re-using as much as possible due to small living spaces need to help to set up spaces and collect recycled materials regularly.	Noted.
RE020	Reduce, reuse. Add more recycle bins around islands and fine those who do not comply - look at other islands and German system. Tax tourists additional cost of waste disposal.	Noted. The respondents comments in relation to taxing tourists is beyond the scope of the local plan review process
RE021	Why does Scilly not recycle and compost like the rest of the nation? I see very few of the Council's waste food composting bins around. Is this worth another push? Is there a central cardboard recycling site form all the goods delivered by Amazon etc.? Perhaps the simplest solution (as happens in my home area) is that all recyclables get collected together and are then directly shipped back to the mainland on the returning Gry.	Noted.
RE022	Bring up to mainland standards	Noted.
RE024	Water - households could use roof drain water for toilets, gardens, hosepipes etc. Sewage - needs treatment before disposing in sea. Waste - one waste site as far as possible away from habitation not like now in the middle of Pilots Retreat, Jacksons Hill and MacFarlands Down.	Noted. Water reuse and water reduction measures are required currently with all new development. The LPA have no powers to insist on retro-fitting on existing properties as there are no mechanisms to require householders to install this type of infrastructure. It is envisaged that policies of the new local plan will require all developments to incorporate not only water reduction measures but energy reduction measures. The treatment of sewage on all new developments will be required to provide modern standards for the treatment of waste. The strategic planning of sites for housing will ensure that suitable sewerage infrastructure can be incorporated and link in to any future waste/energy site.



<b>RE027</b>	<p>At public meetings we have been told that the whole water issue is potentially difficult and expensive. I hope the experts are looking out for us! There is one way I would use more water though and that is to establish one more set of public toilets on St Mary's. I would suggest telegraph where there has been talk of new commercial outlet. Could this have a condition of a public toilet like Speros? On the mainland where public toilets are being closed down, schemes have started up to get all pubs and cafes etc. to allow people to use their toilets even if they are not customers. I know some cafe owners get quite indignant about this but it really is friendlier if we cannot increase provision. A voluntary list always look good! Having said that there is a big gap in provision for walkers. Possibly Trenowith is an alternative. Recycling is an area being looked at already but I am aware some in the community are less than excited about this! It would be great to have recycling areas where people can take cardboard, plastic etc. as there is with glass. Can we try that first and hope to avoid complicated refuse collection. ON the mainland everyone ends up with too many bins and subsequent health issues around less frequent collections of decomposing waste.</p>	<p>Noted. Key stakeholders, including the Council, are working closely with Defra and the statutory regulators to ensure an affordable and viable solution to meeting the requirements set out in water and sewerage legislation prior to their application to the islands. Cost implications for new public toilets although this issue is beyond the control of the Local Plan although could be a requirement for any new development where customer toilet facilities are being provided. Future recycling is likely to be a mix of kerbside collection and bring sites as suggested, although actual provision needs to be subject to further analysis.</p>
<b>RE028</b>	<p>In conjunction with major manufacturers develop a household product refill centre on the Industrial Estate to reduce plastic bottle waste (enlarging on the ecover refill service provided by Home Hardware) Charge for plastic bags in shops, with money going into a central recycling fund. More publicity on 'saving water'; and collecting rainwater for garden use. Serious consideration to household water meters if the installation and maintenance costs can be justified.</p>	<p>Noted. Issues generally beyond the scope of the Local Plan although policies should include opportunities for new developments promoted through the commercial sector to reuse and recycle waste.</p>
<b>RE029</b>	<p>Do no throw good items away. Have recycling areas.</p>	<p>Agree. The Council committed to recycling once the waste management site at Porthmellon is completed and a long term solution to manage and dispose of waste streams has been agreed.</p>





<p><b>RE032</b></p>	<p>This is a key issue for the Local Plan. [In my printed copy from the meeting and 3.15 this question included sewerage and water – why have they been removed – these are Key issues?]</p> <p>For Waste - Start with Reduce. Can we tackle the amount of packaging/ pallets etc. that everything arrives in? What about relaxing accommodation needs to replace mattresses so frequently? Re-use can we have a free-cycle shed for stuff taken to the dump that still has life? Recycle – I am excited to see the planned new recycling facilities at Moorwell. Are we doing the best we can with food waste from hotels and restaurants?</p> <p>3.16 suggests that the Local Plan ‘could’ create a positive framework for water, water treatment and waste disposal (possibly related to the smart grid) – of course it should, why would it not when these are our biggest issues?</p>	<p>Noted. Issues of reducing waste largely beyond the scope of the Local Plan and relate to commercial decision making. The Local Plan will set out a spatial framework to assist in the implementation of the smart islands project, including the potential identification of a site to manage waste water and create energy/heat.</p>
<p><b>RE033</b></p>	<p>Just a comment on the sentence: ‘Providing sufficient quality drinking water can be both expensive and problematic and on St Mary’s is primarily obtained through a desalination plant.’ We understood that desalinated water must be mixed with well water in a controlled ratio, therefore there is a limit on capacity, and water usage must still be considered when considering future development. Is this correct and if so it should be made clear?</p>	<p>Accept. Water usage must be a consideration is planning for new growth on the islands. Key stakeholders, including the Council, are working closely with Defra and the statutory regulators to ensure an affordable and viable solution to meeting the requirements set out in water and sewerage legislation prior to their application to the islands. Policies should ensure that Sustainable water measures should be incorporated into new developments.</p>
<p><b>RE034</b></p>	<p>Additional development will have a direct impact on the capacity of key infrastructure. This infrastructure is itself is considered in the Economic plan to be a breaking point and not capable of accommodating additional growth without significant improvement. Failure to address this key issue is likely to have a direct effect on designated features of the European Sites. A plan which has an adverse effect on the Conservation Objectives of a European Site which are not mitigated against is unlikely to be able to be found sound and will not comply with the legal requirements necessary.</p>	<p>Accept. New development will need to ensure adequate infrastructure provision and ensure that any potential impact on the environment, including on European sites, is mitigated against. Key stakeholders, including the Council, are working closely with Defra and the statutory regulators to ensure an affordable and viable solution to meeting the requirements set out in water and sewerage legislation prior to their application to the islands. The Smart Islands project is also identifying sustainable and innovative solutions to improve the islands infrastructure.</p>
<p><b>RE035</b></p>	<p>Having spent much time and energy over 30 years in finding a new way other than incineration to deal with our waste, I am finally gratified that the toxic polluting incinerator has closed down and my representations to the Gov’t and their consultant has proved</p>	<p>Noted. Waste management practices are beyond the scope of the Local Plan although if there is a requirement it can contain policies and proposals for new facilities. Pendrethan Quarry is subject to appropriate</p>



successful. My suggestion to the Govt. was to close the incinerator and transport a very large percentage of separated waste as recyclables and the remaining residue waste to the mainland for landfill. My aim was to keep all waste at the Moorwell site so that no other sites would be needed which would despoil the Scilly environment for both tourists and residents. However, efforts by the Council and local business to use Pendrathen for various types of waste processing and all the problems referred to above, could destroy my original plan to preserve the natural environment of the rest of St. Mary's by restricting all waste processing to Moorwell. We believe the Council is totally disregarding the problems associated with the use of Pendrathen for waste processing and the disruption and threat to the health of tourists and the residents living nearby. All local residents are being deprived of any say in the planning of waste services before long term decisions are being made. Even those on the Waste Forum that was set up specifically for that purpose are not having any say whatsoever in what is being planned and are just being informed of decisions. Also residents are being given no rights in Law to object to any aspect of these waste management plans. If residents are being given no rights in law to object then Officers should not expect residents to have any responsibility to support the plans. If current proposals are agreed by the Council, there could be no limit to the volume of traffic coming from all parts of the island. Will private builders/decorators also be able to dump their industrial waste in Pendrathen? This is totally unacceptable in what is normally a quiet residential area and a beautiful coastal environment. Councillors must close down Pendrathen for good. The only processing that would be acceptable away from Moorwell would be composting and treatment of green waste - well away from the public on an isolated farm where the quality of the final product would be of a high enough standard to be used as a growing medium. Proposals to build housing on two green fields at Telegraph/McFarlands Down when there are serious problems of drainage and flooding in the whole area are not sustainable and with

planning and environmental consents for the processing and management of inert waste streams.



	<p>the possibility of explosives being used at the Pendrathen Quarry then the stability of the whole hillside could be called into question and a landslide involving around twenty houses becomes a serious possibility. At present all the properties in the Telegraph/McFarlands Down area rely on septic tanks which at times of heavy rain often present problems. If plans similar to the 2005 proposals to build a large number of homes on either side of Pungies Lane are accepted, there will be a major problem with flooding and sewerage. The existing main sewerage systems are virtually at the state of collapse and the vast sums of money required to install an adequate system for Hugh Town and Old Town would prohibit any possibility of linking Telegraph/McFarlands Down with the main sewerage system. Any significant increase in the number of septic tanks could become a major problem.</p> <p>In torrential rain, the green fields either side of Pungies Lane absorb much of the surface water but if they were built on there would be a considerable increase in the amount of water flowing down the lane at McFarlands Down. Heavy rain already causes major problems for properties at the lower end of the road and massive erosion of the road surface. The Council must take on board the numerous problems associated with large-scale development in this area and not simply view the proposals as an easy option to finding a location for a large number of housing units.</p>	<p>Any drainage, flooding and infrastructural issues (including the provision for adequate sewerage treatment) arising as a result of new development would need to be addressed through the planning application process.</p>
RE036	I'd propose that waste recycling and maximising value from re-cycled materials be adopted.	Noted. The Council are committed to increasing recycling rates in the future.
RE042	Use EU Money for this (waste, sewage, water) rather than for more road-surfacing and airport extensions.	Reject. Such projects are not eligible for EU funding.
RE045	Reference Water Supply: Procrastinate! If the referendum result goes the right way you won't have to worry about Brussels dictats	Noted but UK legislation would still need to be applied.



<b>RE046</b>	<p>As stated in the answer to question 2, the best solution to these problems is to increase the density of housing in existing built up areas, specifically Hugh Town and Old Town. By doing so, we make better use of existing infrastructure, decrease the need to build and maintain extra infrastructure and improve our case when making applications for grants to modernise existing infrastructure. The same argument applies to off-islands too because of the requirement to support these communities regardless of population size so an increase in housing and population in these places would potentially be a benefit.</p>	<p>Noted. The Local Plan will ensure that all available and appropriate sites identified for new development are effectively and efficiently developed with a focus on Hugh Town and Old Town in the interests of sustainability and to make strategic improvements to infrastructure. Some provision will also be made for the off islands.</p>
<b>RE049</b>	<p>The public meetings held earlier in the year produced various responses to the problem but I see no alternative to having comply with National and European Regulations. Grants in the relatively recent past were obtained but here they spend appropriately if the infrastructure is in the state it is? Further grants are needed and contributions from business increased. Energy from waste is a possibility.</p>	<p>Accept. Key stakeholders, including the Council, are working closely with Defra and the statutory regulators to ensure an affordable and viable solution to meeting the requirements set out in water and sewerage legislation prior to their application to the islands. The Local Plan will set out a spatial framework to assist in the implementation of the smart islands project, including the potential identification of a site to manage waste water and create energy/heat from waste.</p>
<b>RE050</b>	<p>These need significant capital expenditure. Where is this to come from? Hugh Town sewerage must be a priority (a) because it is a legal requirement; (b) because the present system allows untreated sewage to be released into the sea at Morning Point. Tests have shown that currents can take this around into the harbour. This is a scandal and must be rectified on health &amp; safety as well as environmental grounds –effects on marine biology.</p> <p>A good clean water supply is a necessity for local residents and for sustaining the tourism industry, so must be a priority. Much more stress must be placed on the need to conserve water directed at residents and visitors. Much more use should be made of rainwater management when so much ‘free water’ is available from the sky. It could be harvested from roofs for use in flushing toilets and other domestic uses that do not require ultra-pure water. From personal experience, our relatively small roof area at Maypole is able to catch enough water to keep our water butts full for use in the garden. If schemes were available to support householders (and businesses) in</p>	<p>Accept. Key stakeholders, including the Council, are working closely with Defra and the statutory regulators to ensure an affordable and viable solution to meeting the requirements set out in water and sewerage legislation prior to their application to the islands. Policies should ensure that sustainable water measures should be incorporated into new developments. The Local Plan will set out a spatial framework to assist in the implementation of the smart islands project, including the use of organic waste to produce heat/energy. The Council are committed to increasing recycling rates in the future although opportunities also exist for the private sector to be involved, including composting.</p>



	<p>installing rainwater harvesting and utilization systems (as was done for solar panels, albeit short-lived) much water could be saved and re-used relatively cheaply.</p> <p>Waste management/recycling is already beginning at Porthmellon and the scheme looks promising. In such a small community, we should be able to operate an efficient scheme but it needs to be simple and easy to use and people need to be encouraged and supported. Some years ago the Council set up schemes to encourage composting and issued composters such as the 'Green Johanna'. This system provides excellent compost and, in conjunction with cheap conventional compost bins, our household produces no excess compostable waste. Yet the original scheme has 'gone quiet' and no effort now seems to be made to encourage and support.</p>	
<b>RE051</b>	<p>We should aim to recycle more - can crushed glass be used again, say in concrete? Packaging is a major problem. Can cardboard be recycled?</p>	<p>Noted. Glass is currently being processed and re-used in construction schemes. Packaging issues beyond the remit and control of the Local Plan.</p>
<b>RE053</b>	<p>Waste management on the islands will always be a problem and until waste is tackled at source – i.e. with the producer then this is always going to be a problem. Reduce, Reuse &amp; Recycle is the popular phrase used to explain how waste should be tackled and therefore more emphasis needs to be placed on reducing the amount of "one use" packaging and then reuse of packaging associated with freight. More emphasis should be placed on personal responsibility in the local plan. The current "black bag" mentality must be dealt with and therefore the local plan should outline a framework for education of the public.</p>	<p>Noted. Waste management issues are largely beyond the remit of the Local Plan but the Council is committed to implementing the waste hierarchy and increasing the reuse and recycling of waste in the future.</p>
<b>RE054</b>	<p>I think the Council are trying hard to catch up on a problem that should have been tackled years ago. Until DEFRA produces their legislation and plans for water, especially on the off-islands, it's a case of treading water.</p>	<p>Accept. Key stakeholders, including the Council, are working closely with Defra and the statutory regulators to ensure an affordable and viable solution to meeting the requirements set out in water and sewerage legislation prior to their application to the islands</p>
<b>RE056</b>	<p>Keep liaising with DEFRA &amp; DWI and EA</p>	<p>Accept. Key stakeholders, including the Council, are working closely with Defra and the statutory regulators to ensure an affordable and viable solution to meeting the requirements set out in water and sewerage legislation prior to their application to the islands</p>





<b>RE057</b>	Promote continued discussion with DEFRA, EA and DWI stressing need for grant funding.	Accept. Key stakeholders, including the Council, are working closely with Defra and the statutory regulators to ensure an affordable and viable solution to meeting the requirements set out in water and sewerage legislation prior to their application to the islands
<b>RE058</b>	I don't think the water and sewage issues are as bad as the Council makes out. The trouble it has is convincing the freehold property public of Hugh Town to put adequate resources into their system comparable at least to the other rental and leasehold properties around the islands. To put the burden of this on the Taxpayer and other lower earning islanders is unfair! The luxury of freehold only became affordable because of its location which meant the Duchy could not afford the sea defences and infrastructure. Maintaining the market value of these properties should not fall on the taxpayer! In fact I feel a lot more needs to be done to address the imbalance of public spending and opportunity (which centre on St Marys) so that Scilly can speak with a unified voice from experience equal opportunity. We have seen migration to St Mary's, especially from Bryher. With too many younger working age people finding the economic and social situation on the off islands poor, it makes the situation even worse for those who remain and leaves the islands poor, it makes the situation even worse for those who remain and leaves the islands lacking in vitality and sustainable population with a healthy and democratic social cross-section.	Noted. Key stakeholders, including the Council, are working closely with Defra and the statutory regulators to ensure an affordable and viable solution to meeting the requirements set out in water and sewerage legislation prior to their application to the islands
<b>RE061</b>	Whatever is put in place requires funding from government so all residents are compliant not just St Mary's	Noted. Key stakeholders, including the Council, are working closely with Defra and the statutory regulators to ensure an affordable and viable solution to meeting the requirements set out in water and sewerage legislation prior to their application to the islands
<b>RE064</b>	Key moves are being made here at last and I'm in general agreement with them. On St Mary's community composting at the new waste management site would be a bonus as ideally would the ability to generate energy from waste.	Noted. The Local Plan will set out a spatial framework to assist in the implementation of the smart islands project, including the use of organic waste to produce heat/energy. The Council are committed to increasing recycling rates in the future although opportunities also exist for the private sector to be involved, including composting.



<p><b>RE065</b></p>	<p><b>Solid Waste</b></p> <ul style="list-style-type: none"> <li>· Identify a suitable site on St Mary's for anaerobic digestion (AD) of waste (human and green)</li> <li>· Identify land and other resources required for composting the green waste that is unsuitable for AD</li> <li>· Implement kerbside recycling of items that can be economically recycled.</li> <li>· Supporting local retailers in taking responsibility for their packaging</li> <li>· Work with the English Tourist Board and other agencies involved in the tourist industry to try and reduce any unnecessary turnover of furnishings and other goods.</li> </ul> <p><b>Water Waste</b></p> <p>Transition Scilly sees the situation where we continue to discharge raw sewerage in to our environment and flush potable water down the drain as unsustainable in a community that relies on a fragile and seasonal water supply.</p> <p>The use of water on Scilly is unsustainably high, and before any increases in supply are sought, reducing consumption must be made a priority. There are many opportunities to recycle waste water and reduce throughput of a finite water supply. Use of grey and rainwater must increase substantially and mandatory water meters would help ensure people are more aware of their consumption and also potentially contribute to reduced household costs.</p> <p>Waste water is currently given no sensible treatment either in the mains systems or off-mains septic tanks. It is a valuable resource that could be treated in very different and more sustainable ways, including grey water recycling, reed bed systems, composting toilets, etc. Granted these are not overnight solutions but a change in infrastructure would pay huge dividends in the long run.</p>	<p>Accept. The Local Plan will set out a spatial framework to assist in the implementation of the smart islands project, including the potential provision of an AD plant. Waste management measures are largely beyond the scope of the Local Plan but the Council are committed to increasing recycling rates in the future. Policies should ensure that sustainable water and waste disposal measures should be incorporated into new developments.</p>
<p><b>RE066</b></p>	<p>Find a way of complying with DEFRA's requirements ASAP for most residents and visitors this is the most important issue to tackle and for all life forms/land scheme until it is solved.</p>	<p>Noted. Key stakeholders, including the Council, are working closely with Defra and the statutory regulators to ensure an affordable and viable solution to meeting the requirements set out in water and sewerage legislation prior to their application to the islands</p>



<b>RE069</b>	<p>The issues highlighted above are major constraints to further development. A clear plan of how the current demand will be met needs to be included in any plan for the provision of extra capacity for future housing. There are a range of design features which will help address the issues highlighted above and the environment agency have developed a range of policy documents which should be incorporated in the plan document. Some of these may form part of design policies for the plan. The CIL could be used as a mechanism to support retro-fitting for suitable properties. Policies should consider</p> <ul style="list-style-type: none"> <li>· Avoid floodplains</li> <li>· Make Sustainable Urban drainage (SUDs) mandatory for all developments</li> <li>· Require grey water re-cycling as mandatory for all new dwellings</li> <li>· Include rainwater harvesting techniques within new developments</li> <li>· Require provision of green waste recycling facilities mandatory for all development units</li> <li>· Use CIL to support provision of these facilities at older developments</li> </ul>	<p>Partially accept. New development will need to ensure adequate infrastructure provision. The Smart Islands project is also identifying sustainable and innovative solutions to improve the islands infrastructure. Policies should ensure that sustainable design measures as identified measures should be incorporated into new developments. However, the nature and scale of developments mean that it is unlikely that use of a Community Infrastructure levy would be appropriate and propionate.</p>
<b>RE074</b>	<p>Meeting European legislation for water and waste is a huge problem which has only just begun to be addressed and on St Agnes. Desalination may well be needed to meet demands for the volume of water at the new required standards.</p>	<p>Noted. Key stakeholders, including the Council, are working closely with Defra and the statutory regulators to ensure an affordable and viable solution to meeting the requirements set out in water and sewerage legislation prior to their application to the islands</p>



RE075	<p>Lots of builders want granite and rubble but have nowhere to store it. I would invite builders to drop off rubble and granite into unique piles at £x per ton and then allow them to remove rubble from those same piles at £y per ton.</p> <p>I would build a large barn style shed and store wood – just wood. Someone would separate the wood between treated and untreated as well as remove any metal. The untreated wood would then be used to make kindling and firewood to be sold locally.</p> <p>Paper and cardboard would be crushed to make fire bricks to be sold locally.</p> <p>The waste site needs to be open at all times to both businesses and residents. Also, there is a requirement for a Saturday morning too. I'm getting to the point where I am tempted to fly-tip my garden waste because I can't get to the dump during the week.</p> <p>The permit idea needs to be looked at again. I wanted to dispose of a chair from my office which meant obtaining a permit for 1 month. You could simply introduce a one-off charge to pay as you go on site or invite people to open an account and utilise the waste centre as frequently or indeed infrequently as they wish, but at a cost of course.</p>	<p>Noted. Waste management issues are largely beyond the remit of the Local Plan but the Council is committed to implementing the waste hierarchy and increasing the reuse and recycling of waste in the future, including the opportunities identified which could be provided by the private sector.</p>
RE076	<p>Current direction of travel regarding waste management is best available. Local Plan should encourage, support and permit investment that improves waste management processes.</p>	<p>Noted. Waste management issues are largely beyond the remit of the Local Plan although policies should ensure waste management plans are provided where appropriate to ensure good practice as suggested is implemented.</p>
RE077	<p>Discharging raw sewage into the sea anywhere in the islands is not acceptable. The sewers in Hugh Town must be a priority. And support and advice to households with private sewerage systems should be available from the authority.</p>	<p>Noted. Key stakeholders, including the Council, are working closely with Defra and the statutory regulators to ensure an affordable and viable solution to meeting the requirements set out in water and sewerage legislation prior to their application to the islands</p>
RE079	<p>The Islands' Partnership would welcome a greater recognition of the importance of the viability and vitality of Hugh Town as a 'town centre' and the key role it plays in providing services and facilities for visitors and locals alike – as well as in creating a distinctive and attractive sense of place and positive first impression for arriving visitors.</p>	<p>Accept. The Local Plan will consider a policy framework that promotes and protects the viability and vitality of Hugh Town as a 'town centre'.</p>



<b>RE080</b>	Have an incinerator which produces electricity?	Reject. Unlikely to be cost effective and no available funding. However, the Local Plan will set out a spatial framework to assist in the implementation of the smart islands project, including the potential provision of an AD/gasifier plant which would utilise organic waste streams.
<b>RE081</b>	This is slightly alternative but could new houses be built in a 'green' way so waste is composted and rainwater collected etc.? I like the idea of generating energy through the disposal of waste. I would really like to be able to recycle and perhaps we could have community composting areas for plant waste?	Partially accept. The Local Plan should encourage new developments to be as sustainable as possible and incorporate such measures. The Council is committed to implementing the waste hierarchy and increasing the reuse and recycling of waste in the future. The Local Plan will set out a spatial framework to assist in the implementation of the smart islands project, including the potential provision of an AD/gasifier plant which would utilise organic waste streams.
<b>RE082</b>	8. Build green sustainable homes from the start insist on all types of water saving, reuse, but also look at shared facilities like the St Agnes Hall Bio-bubble for remoter areas	Partially accept. The Local Plan should encourage new developments to be as sustainable as possible and incorporate such measures as well as sharing infrastructure where possible.
<b>RE083</b>	Install water meters, consumers will use less	Noted. Beyond the remit of the Local Plan as a management decision of the water supplier. Currently no resources to provide and read such meters for all properties.
<b>RE084</b>	Proper recycling facilities, especially furniture. Modern generator - heat generated to be used as energy	Noted. Waste management issues are largely beyond the remit of the Local Plan but the Council is committed to implementing the waste hierarchy and increasing the reuse and recycling of waste in the future. The Local Plan will set out a spatial framework to assist in the implementation of the smart islands project, including the potential provision of an AD/gasifier plant which would utilise organic waste streams.

## Question 9

- 4.13 In relation to Social Infrastructure the scoping report suggested that areas of St Mary's could be defined to provide a further degree of protection from inappropriate development. One example was given which was to define a 'town centre' in Hugh Town, in which protection policies could be used to protect the loss of retail uses and to focus future retail uses within this defined area. Question 9 sought people's views on whether this was necessary.





Ref	9. Should specific areas (e.g. town centres) be protected or defined? <i>*Grammar and Spelling is unchanged from the original submission.</i>	LPA Response
RE03	Hugh Town's shops could have planning restrictions to stop a change of use from a shop to housing.	Accept. Consideration should be given to protecting shops where they contribute to the vitality and viability of the town centre.
RE04	I think that care should be taken with the off-islands, and certain areas of St Marys, but I think that there is much development to be done on St Marys yet in order to do right by the people who live here.	Noted.
RE06	Small retail units in older buildings are perhaps not as viable in the present day and if so they should be allowed to convert to other uses, including residential, and this would be better than having empty units which would only be detrimental to the street scene. The development of new retail space should be encouraged/allowed within any Hugh Town development boundary, in order to facilitate more modern/larger retail units.	Noted. Need to ensure a policy framework that balances the requirement to protect shops where they contribute to the vitality and viability of the community and those where a change of use would be acceptable and prevent vacant spaces. New retail developments will be encouraged in appropriate locations subject to demand.
RE07	It is good to keep the shops close together for business, but part of island charm is our mixed high street.	Noted.
RE08	No, I don't think this would be helpful	Noted.
RE09	It should be left alone.	Noted.
RE011	If we can create a year-round economy to enable shops to become viable to open on a year round basis then it will only enhance the main season. I definitely think shops and businesses should be encouraged to stay in Hugh Town. Perhaps if there was a reduction in business rates for those shops that stayed open on a year-round basis or retained a Hugh Town presence?	Noted although beyond the scope of the Local Plan to contain policies on business rates.
RE012	This is a yes and no answer. The defining of areas such as Old Town and Hugh Town and concentration of development here may deter entrepreneurs etc. from moving here as they probably want to live 'in the country'. Other areas of natural importance should be protected or at least the development restricted.	Noted.
RE016	Definitely define Hugh Town as the 'town centre' of Scilly	Noted.



<b>RE017</b>	It is obvious if you want more homes you want more waste and more food shops will be needed. Sounds as if our home will become overcrowded.	Noted although the provision of new homes will not necessarily create sufficient additional demand to necessitate the need for new food shops.
<b>RE019</b>	Hugh Town needs to be protected from uncontrolled business usage, shop fronts are very variable (Silver Street looks good for example - quaint but good for tourism)	Noted.
<b>RE021</b>	Car ownership (apart from trades people and disabled) in Hugh Town should be restricted to all but the most urgently in need. There is no justification for internal Hugh Town traffic! For those who need to get up country on an occasional basis there should be a decent bus service, a pooled car scheme, and disability transport.	Noted. Although traffic management measures are beyond the scope and remit of the Local Plan, this issue is being considered by the Council.
<b>RE025</b>	Agree with 3.16. Would like to see outdoor cafe areas and an improved general environment - difficult when cars have to use the main street.	Noted.
<b>RE027</b>	Not sure about this. I think caution is needed especially if there is a declining need for restaurants and shops. Certainly on the mainland they strive for a healthy mix to ensure property is not wasted (e.g. Living above shops) and the streets are not deserted at night. The lack of crime here makes that less important but I think it is still worth considering. As to challenging the types of retail, street trading within limits should be encouraged for small operators with farms but no outlets.	Noted. Street trading beyond the scope and remit of the Local Plan, although an activity that is encouraged by the Council in appropriate locations.
<b>RE028</b>	Until waste, sewerage and drainage problems are addressed and solved, there should be no residential development in Hugh Town	Noted. Limited sites within Hugh Town as densely developed although any new development would need to ensure that any infrastructure impacts are adequately addressed.
<b>RE032</b>	Possibly? I can only think of a couple of changes from retail to residential in 'town'?	Noted.
<b>RE034</b>	Paragraph 3.18 - 3.21 whilst entitled "Protection and Enhancement of the Natural and Historic Environment" is heavily weighted towards the historic environment and not the natural environment. If this section is solely about the protection of cultural aspects this should be made clear. However, the whole does not consider the natural environment adequately. This should be remedied in the next version of the plan.	Partially accept and the draft Local Plan will reflect the importance of both the natural and historic environment (although the historic context of Hugh Town is clearly important).



<b>RE035</b>	It could be beneficial to define a 'town centre' but do not see how this would protect retail businesses etc. It maybe that high rents are a disincentive but competition between businesses offering similar services or products could also be a problem, especially during winter months when the spending power of mostly local residents is spread more thinly. The impact of on-line shopping is also a factor in reducing demand in our retail sector.	Noted and acknowledge that the Local Plan has a limited role in protecting retail businesses.
<b>RE042</b>	But cannot be used as justification to building elsewhere, more housing for immigrants (from war-lands)	Noted.
<b>RE046</b>	Hugh Town should definitely be protected as a defined town centre to preserve the occupancy of premises by retailers and those selling food or providing entertainment. This is essential to maintain the offer for visitors to the islands (also see answer to question 6).	Accept. Need to consider a defined area with a policy framework to protecting commercial premises that contribute to the vitality and viability of the town centre.
<b>RE049</b>	Once buildings are "lost" to housing, they will never be regained. Buildings currently used as business premises or shops should be retained for the benefit of the wider community to provide services, choice etc.	Partially accept. Need to ensure a policy framework that balances the requirement to protect shops where they contribute to the vitality and viability of the community and those where a change of use would be acceptable and prevent vacant spaces.
<b>RE050</b>	Yes. This would be a good idea if it means that useful shops, such as butchers, food stores as alternatives to the Coop, decent clothiers etc. were prevented from being converted into private residences or yet another shop selling T-shirts and tourist trinkets.	Partially accept. Need to ensure a policy framework that balances the requirement to protect shops where they contribute to the vitality and viability of the community and those where a change of use would be acceptable and prevent vacant spaces.
<b>RE054</b>	If businesses aren't viable they will close. Perhaps business rates could be addressed.	Noted although beyond the scope of the Local Plan to contain policies on business rates.
<b>RE056</b>	We need to protect a certain degree of retail/business space	Noted.
<b>RE057</b>	Generally yes. If we ensure that balanced market forces prevail. (Too few winter customer - empty houses) + transport costs.	Partially accept. Need to ensure a policy framework that balances the requirement to protect shops where they contribute to the vitality and viability of the community and those where a change of use would be acceptable and prevent vacant spaces



<b>RE058</b>	I don't think there is any point in the Council defining areas as "town centre". The sad truth is that most private sector industries are suffering and simply cannot afford property prices driven by the retirement home market! Business property costs needs to be very much linked to earning potential in which the Duchy must plan an important role. The Council planning should cater for innovation and opportunity, the economy needs to be driven with healthy competition rather than protecting monopolies! Property not in the town centre should be cheaper to compensate for lower earning potential; it is up to individuals to take the various risks, without the option, private rents would have to fall to affordable levels.	Noted although these issues are generally beyond the scope and remit of the Local Plan.
<b>RE061</b>	To keep shops etc. for tourist and locals to use.	Noted.
<b>RE064</b>	Decline in numbers of retail outlets and scope of retail offer needs to be reversed where possible. Protection within a defined area of Hugh Town could be helpful. Would not want to see individual retail units being converted into residences. But prepared to see space above shops continue to be used and maybe used more as local needs accommodation.	Partially accept. Need to ensure a policy framework that balances the requirement to protect shops where they contribute to the vitality and viability of the community and those where a change of use would be acceptable and prevent vacant spaces. Limited control over use of space above shops.
<b>RE065</b>	This needs to be undertaken/ facilitated by a professional community architect – current routes and methods to engage with the local community are not delivering sufficient levels of engagement or participation in the decision making process.	Noted.
<b>RE066</b>	Not sure. Believe decline in shops due in large part ot lack of support. Online shopping major contributing factor - I appreciate it may be necessary for those on low incomes.	Noted.
<b>RE074</b>	Generating energy for waste seems an excellent idea.	Noted and will be supported through the Local plan.
<b>RE075</b>	I agree to a point but this generation must not make irreversible rules for future generations and protected status of any description must not be immune from adaptation to meet the future demands of what will ultimately be a different society.	Noted.
<b>RE076</b>	Engineering of use classes full of danger as market conditions change and cannot be influenced by Isles of Scilly Council i.e. internet shopping.	Noted.



<b>RE077</b>	Specific areas of Hugh Town should be protected and defined. It should not be possible to convert useful shops into homes, and it should be possible to encourage suitable retailers (e.g. an alternative food outlet to the Co-op); greengrocery; butchers, etc.) The Local Plan could identify areas in retail which are lacking in order to encourage small businesses to fill the gaps. Again, each application should be judged on its own merits: it would be counter-productive to have empty or boarded up buildings as a result of Local Plan restrictions.	Partially accept. Need to ensure a policy framework that balances the requirement to protect shops where they contribute to the vitality and viability of the community and those where a change of use would be acceptable and prevent vacant spaces. Limited control over use of space above shops.
<b>RE079</b>	see 7 and 8	Noted
<b>RE080</b>	There is already a mix of housing, retail and service industries in the Town. Shops and services can only exist if people use them. Fewer locals are using our shops because of online shopping and fewer visitors spend money on gifts than 10 years ago. If this trend continues and a business is not making money it cannot stay open. Would people rather have empty shops or useful, badly needed housing. If a premises was once a house, however long ago, then it should be able to be one again.	Noted.
<b>RE081</b>	Yes I would like to see certain areas such as Hugh Town protected so that retail spaces etc. are not all converted to housing.	Partially accept. Need to ensure a policy framework that balances the requirement to protect shops where they contribute to the vitality and viability of the community and those where a change of use would be acceptable and prevent vacant spaces.
<b>RE082</b>	9. Yes we cannot lose more retail to holiday accommodation	Partially accept. Need to ensure a policy framework that balances the requirement to protect shops where they contribute to the vitality and viability of the community and those where a change of use would be acceptable and prevent vacant spaces.
<b>RE083</b>	Businesses should not be restricted	Noted
<b>RE084</b>	Yes we have lovely shops - more educating to shop local	Noted





## Question 10

- 4.14 In relation to the protection and enhancement of the natural and built environment question 10 sought views on whether there were areas that should not be included in the conservation area.

Ref	10. Do you consider there are any areas that should not be included in the Conservation Area? <i>*Grammar and Spelling is unchanged from the original submission.</i>	LPA Response
RE04	Most of St Marys. Comes a time when you have to look around and see what's already happened vs what needs to happen. There's already an airport, new roads, construction sites every year, new school, demolition of Carn Thomas to happen, a very busy harbour, the place is already beyond the realms of 'conservation', and what little is done is rather flimsy. The burning of headland at the Garrison for example, it just annoyed people. Grazing cows around the place, it's just annoying. I think we all accept that St Mary's is a little slice of the mainland, and I think people enjoy it being so. Even visitors appreciate this, which is why you see so many places with public Wi-Fi and you see so many golf buggies around. If people want to experience tranquillity and natural beauty then they can visit any one of the hundred satellite islands. But those satellite islands don't exist, don't get visited, without one island being sacrificed in order to facilitate a working community for the islands.	Noted. The challenge for the islands is to accommodate the entire development needs to ensure a viable community and economy, which is not entirely compatible with its Conservation area status. Many of the issues addressed are land or traffic management beyond the scope of the Local Plan.
RE06	One conservation area (as now) with several character areas within (including a number for St Mary's alone) – some would be more sensitive than others with regard to particular development and this would then be reflected in any analysis of proposed development.	Noted and accept.
RE08	The islands must remain as a full conservation area in order to prevent the sort of mistakes that were made in the past.	Noted.
RE09	see above	Noted.



<b>RE011</b>	This is difficult but I definitely think the conservation area should at the very least be split into smaller and easier to define character areas, such as by island. This would then allow for a more detailed assessment of each island to consider whether any part should be taken out of the designation. The AONB is protecting the landscape the Conservation Area should be used to protect the historic built environment only.	Noted although any review of the Conservation Area boundary would need to be subject to a separate and more detailed study outside the preparation of the Local Plan.
<b>RE012</b>	The suggestion in the scoping report are an example.	Noted.
<b>RE016</b>	I think in an area such as Scilly there should be conservation restrictions - but not really pretty ones.	Noted
<b>RE017</b>	The Town. Do not replace our town houses that have existing for year and years with shops etc.; you will ruin Scilly	Noted.
<b>RE019</b>	No all areas must be included.	Noted.
<b>RE021</b>	Reduce it at your peril.	Noted.
<b>RE024</b>	Deep Point	Noted although any review of the Conservation Area boundary would need to be subject to a separate and more detailed study outside the preparation of the Local Plan.
<b>RE027</b>	Choosing sites for new build is controversial here as on the mainland and of course anywhere involving Conservation Area and AONBs. I think keep the requirements with a relaxed approach. Look at each case on its merits but even with modern buildings there is a need to restrict sheds, annexes etc. which can affect others or be misused. Has an audit been carried out on all existing buildings to find any which could be made over such as barns, flower shed, shops etc? Nationally I think a bit of new thinking by planners may just have to challenge protecting older buildings where the need is great. I know the Council wishes to look at housing provision for the old secondary school site which I applaud. I feel that dismantling and saving materials is the best option too.	Noted. The identification of any sites for new development will be selected on a range of criteria including impacts on the environment. A survey has been undertaken of all rural buildings and the Local Plan should include a policy framework to facilitate their appropriate conversion as suggested.



<b>RE032</b>	Is there any information as to what proposed development has been blocked as a result of the restrictions and what could potentially sneak in if they are relaxed? I would generally support restrictions to cutting trees and concreting gardens.	Noted. There are numerous planning applications that have either been approved or refused on the basis of their impacts on the character and appearance of the conservation area.
<b>RE034</b>	No Comment	Noted.
<b>RE035</b>	It is only by retaining the designations of AONB, Conservation Area and Heritage Coastline for the whole of the islands that we have any hope of protecting this special, unique environment and tourism for posterity. Despite the fact that they currently apply to all the islands, in planning the designations are often disregarded which is a travesty so weakening still further their protection of the environment would be disastrous.	Noted.
<b>RE046</b>	The conservation area designation is clearly too broad. The idea that the waste site and industrial estate constitute a conservation area is obviously not a reasonable one. To be credible when making decisions on the pruning of trees and minor aesthetic alterations to buildings within a conservation area, it must be clear why we are doing so. It is emphatically not clear when such rules apply to sheds and industrial units next to a waste site. It also increases the enforcement burden on the local authority such that enforcement effort might not be directed to genuine areas of conservation concern such as the garrison.	Noted although any review of the Conservation Area boundary would need to be subject to a separate and more detailed study outside the preparation of the Local Plan.
<b>RE048</b>	The consultation report states that there are restrictions on IOS which are enjoyed by mainland householders. It would require further identification of the restrictions and a determination made on which of these can be appropriately relaxed.	Noted. The Council will review its article 4 directions as a separate exercise to the preparation of the Local Plan.
<b>RE049</b>	It matters not what mainlanders are permitted to do the Isles of Scilly are our concern. Re: 3.19 - are Article 4 Directions strictly adhered to? I suspect not. Re 3.12 - I trust this won't involve another mainland (so called) consultant who knows nothing the islanders don't already know. Believe it or not there are intelligent and experienced people living on the islands.	Noted.



#### RE050

No!!! Scilly has many special environmental designations because of its many outstanding natural qualities and it is questionable whether a local authority has the power easily to take areas out. Even if it were possible, it should be resisted. Tourism is likely to remain our predominant source of income and we should not destroy what most visitors come to see.

Other than a brief mention that Scilly is an Area of Outstanding Natural Beauty (AONB), there is nothing in the document that discusses the importance of the AONB and the Wildlife Trust in protecting the natural environment. There should be more cross-talk between the Council and the AONB/WT as well as with other environmental organizations (e.g. Bird Group and Bat Group) and also with individual local naturalists who may have a wealth of experience of local flora and fauna but not necessarily direct connexions with the IOSWT/AONB. The Bat Group has built up a good relationship with the Planning Department in regard to ensuring that the law on protected species is upheld when planning applications for development are considered and we are pleased that this has resulted in wider appreciation among the public of the importance of wildlife protection. (Bat Walks are appreciated by visitors and also contribute to tourism!) Sometimes, however, the Council appears to take actions that seem to preclude discussion with these bodies. Often it uses outside consultants with little knowledge of Scilly when local experts could provide better advice and for no cost. Recently we took great pains to protect a flowering plant that grows only in two small areas in Scilly. Imagine our dismay when this plant was almost completely destroyed by the activities of a Council worker with a brush-cutter 'keeping Scilly tidy'. Liaison with those with local botanical knowledge before such work is conducted would avoid these problems. As a result of a recent meeting organized by the Bird and Bat Groups, a group of local biological recorders (covering a wide range of species) is to be formed and will be a focal point for advice on such matters.

Noted. Due to the plethora of designations the LPA is required to consult a range of environmental organisations to ensure that it makes appropriate and balanced decisions and has a duty to protect flora and fauna that is statutorily protected. However, the LPA has no control over activities that are beyond the scope and remit of the planning system.



<b>RE053</b>	The conservation area is a building/urban designation and this should be made clearer. There is current confusion between that and the AONB, which is a landscape designation.	Noted although any review of the Conservation Area boundary would need to be subject to a separate and more detailed study outside the preparation of the Local Plan.
<b>RE054</b>	We import sand and aggregate at vast expense. There are sand pits or sea sand and gravels available and we intend to build a lot of houses. Is it worth investigating?	Noted although unlikely to be environmentally acceptable in the context of the significant designations applying to the islands.
<b>RE056</b>	Keep Scilly special!	Noted
<b>RE057</b>	Preserve the environment - our principal asset.	Noted
<b>RE058</b>	I think many planning restrictions amount to nit picking bureaucracy administered inappropriately and not relative to the situation. Conditions are hard enough on an island without creating artificial ones! If we must have AONB status and Conservation Areas then they should be mitigated with clearly defined development areas in which conditions are straightforward. Small businesses simply don't have the time, labour or resources to commit to lengthy planning procedures which limit developments to those who are least needy!	Noted
<b>RE064</b>	Still feel there is virtue in Scilly retaining its current status as a single all-embracing Conservation Area, AONB and independent Local Authority.	Noted
<b>RE065</b>	It is right to keep the Conservation Area, however there does need to be a more pragmatic approach to some issues – expecting full planning applications for small greenhouses on allotments or to repaint a house is just the thing to dent confidence in the Council. There needs to be a clearly signposted pre-application consultation route so that de minimus items can be dealt with outside of the formal (and expensive) planning application process.	Noted although these issues are covered by national legislation that also applies to the Isles of Scilly and therefore there is little or no scope for discretion.
<b>RE066</b>	3.18 Restrictions on rights to develop should be upheld if character to be kept.	Noted.





<b>RE070</b>	I think, within reason, some aspects of permitted development (as allowed on the mainland) should be relaxed. Extensions to existing homes (within limits) should be permitted to help ease the housing situation and sub division of larger properties should be allowed for the same reason provided the division is for the housing current residents.	Noted although these issues are covered by national legislation that also applies to the Isles of Scilly and therefore there is little or no scope for discretion. However, the Council will review its article 4 directions as a separate exercise to the preparation of the Local Plan.
<b>RE074</b>	Housing should be allowed over shops, but business rates should be reasonable to encourage small enterprise.	Noted. Houses are permitted above shops under current legislation although business rates are beyond the scope of the Local Plan.
<b>RE075</b>	All of Scilly should be one big conservation area in terms of the environment, sustainability and the tourism offer.	Noted.
<b>RE076</b>	Desirable but a local listing process would be cumbersome and expensive.	Noted.
<b>RE077</b>	No areas should not be included in the Conservation Area. If areas start being removed from the designation, the importance attached to the whole environment of Scilly will be diminished. As it is, there is little mention of the AONB designation nor the role played by the Wildlife Trust in protecting the natural environment of Scilly.	Noted. The work of the WT is fully appreciated but as land management measures are beyond the remit of the Local Plan, there is limited scope to make specific references to the important work of the WT. These issues are better placed in the AONB Management Plan.
<b>RE079</b>	The Islands' Partnership's view is that the entire Isles of Scilly should remain as a designated conservation area.  There are some areas around which the new Local Plan should be used to strengthen these controls, particularly where there is a clear impact on the quality of the natural environment, streetscape or public realm. There are several areas where, due to poor architecture and building design, an inconsistent approach to public realm, general clutter and/or waste and a lack of coherent signage and interpretation, additional interventions are clearly needed.	Noted and acknowledge the need to improve parts of the public realm as recognised in various documents, including the Design Guide.
<b>RE082</b>	10. No apart from the Industrial estate	Noted although any review of the Conservation Area boundary would need to be subject to a separate and more detailed study outside the preparation of the Local Plan.
<b>RE083</b>	Market forces will be pivotal	Noted.



## Question 11

4.15 Question 11 asked people to consider whether there were any areas that have declined and would benefit from further policies that would seek to protect them from further deterioration.

Ref	11. Do you consider there are any areas that may have declined and require further policies that seek to protect them from further deterioration? <i>*Grammar and Spelling is unchanged from the original submission.</i>	LPA Response
RE04	I don't think so, I think the main threats are to the sea-life, but also seem well-managed. Actually, I think that Old Town needs protection from further development. Families need to be treated with a bit of respect and you need to stop building on green fields, as you've done before in that area. I think the Council was remiss to do so, and could and should be held accountable on grounds of the developments being detrimental to the health and wellbeing of children there, as you forced children to play in the roads once you removed their playing fields.	Noted. Need to ensure that any new developments respect the residential amenities of neighbouring properties in accordance with good standards of planning and that there is adequate open space provision for children.
RE06	Although the Garrison area should be protected from further development, by not including it in any development boundary.	Noted and accept.
RE07	Porthloo green, it is a disgrace, badly thought out and left in a mess. Just hope when the quay is finished, it will be green again!	Noted but consider more of a land management issue than a planning issue.
RE08	No need for new policies.	Noted.
RE09	see above	Noted.
RE011	The use of plastic windows and doors is eroding traditional character, as I see it. Similarly poor pointing and the use of cement is causing traditional buildings and structures to deteriorate. There are not many shops within Hugh Town and so it is disappointing to see poorly maintained or vacant shops. Similarly guttering is not cleared as frequently as it should be so whilst succulents and plants growing out of guttering is pleasing this is likely to be causing significant damage to the building.	Noted. Current policies and guidelines seek to prevent the use of plastic windows where it would be detrimental to the character and appearance of traditional buildings and street scenes. Cleaning of gutters is beyond the remit of the Local Plan.



<b>RE015</b>	Area around the refuse tip is awful and the industrial estate is unsightly.	Noted. The waste management site is being redeveloped and will therefore improve its appearance. The Local Plan has limited scope to improve the visual improvement of the industrial estate.
<b>RE016</b>	There seems to have been so much development recently.	Noted.
<b>RE017</b>	Pendrather Quarry. Return it to an Area of Outstanding Natural Beauty by replacing it with clean soil and fresh plantings. The most beautiful view on the islands the quarry is destroyed by ramshackle boundary fencing, heaps of rubbish from Moorwell and other building sites. It is an utter disgrace to our islands.	Reject. Unrealistic proposition as Pendrethan Quarry has a legitimate and viable use as an inert waste recycling facility to the benefit of the islands.
<b>RE019</b>	Hugh Town! Development too intensive - many grotty back alleys! Unkempt areas need to be cleared up by residents. Recycling area very unsightly (back of Town Hall - main tourist area).	Noted. New development can be controlled to prevent further intensification of development where justified on planning grounds. Acknowledge more work required to improve the quality of the public realm, including the recycling area to the rear of the Town Hall.
<b>RE021</b>	The community bus service needs enhancing. Light pollution needs to be addressed urgently if Scilly is to protect its dark skies. Everyone should be issued with a torch and all private security lights should be seriously restricted.	Noted. The community bus service is a commercial business and outside the scope and remit of the planning system. Light pollution is a matter for the planning system and is a factor that is taken into account. Need to strike the right balance between the key objective of protecting the quality of our night skies whilst taking an appropriate and proportionate approach to health & safety requirements.
<b>RE022</b>	Transportation to/from islands	Noted although beyond the scope and remit of the Local Plan.
<b>RE024</b>	Some Council Housing	Noted. The Council has a programme for improving its housing stock and has undertaken work to improve the appearance of some of its stock.
<b>RE025</b>	Sea defences - top priority	Noted.
<b>RE027</b>	I am not informed enough to comment on this.	Noted.
<b>RE028</b>	Pendrather Quarry in an AONB on a Heritage Coastline adjacent to Ancient Monuments. The Council should be protecting this beautiful area not encouraging the use of a disused quarry as a tip.	Reject. Pendrethan Quarry has a legitimate and viable use as an inert waste recycling facility to the benefit of the islands. It should be noted that the entire islands are designated an AONB & Heritage Coast and has the highest concentration of scheduled ancient monuments in the UK.
<b>RE032</b>	Is this a reference to natural areas or I suspect built up? We have seen a large decline in our seabird populations in the last 25 years. The current MCZ and Climate Change mitigation and use of renewable energy could help tackle this.	Accept.



<b>RE034</b>	As well as European Sites, some of which lie on the inhabited islands therefore being particularly vulnerable, the Isles of Scilly also has numerous Sites of Special Scientific Interest. Not all of these are in favourable condition and while none are in the unfavourable declining category, many continue to be vulnerable. Such impacts such as coastal change, invasive species, recreational pressures, water derogation and grazing management all contribute to the existing situation. Plan proposals should avoid effects leading to a deteriorating condition of the SSSI or supporting habitat on the features for which they are designated.	Accept. The policies and proposals in the Local Plan will be required to have regard to the statutory duty of protecting SSSI's.
<b>RE035</b>	See comments above 1. '.... is there anything you dislike about where you live.'	Noted.
<b>RE042</b>	The beaches: the water in Porthcressa and Town Beach is polluted over EU water-purity regulations.	Noted. To comply with the legislation that will be applied on the islands, the Council are working with Defra & the EA for a viable and effective solution for its sewerage provision in Hugh Town & Old Town.
<b>RE045</b>	Nothing specific here, but see comments on Page 18 (put in order question 15)	Noted.
<b>RE046</b>	I don't know.	Noted.
<b>RE049</b>	I should have thought that the Local Council is already overwhelmed by designations, policies and regulations and doesn't need any more. By the time all these are studies and followed 'tis a wonder anybody finds time to work.	Noted.
<b>RE050</b>	We are not sure what is meant by this. Certainly some areas are unsightly, such as the Pendrathen quarry, which does not even seem to be used for anything now. This are could be cleaned up and made attractive and useful but the costs might put it low on the priority list unless the benefits gained were considerable financially and/or socially.	Noted. Pendrethan Quarry has a legitimate and viable use as an inert waste recycling facility to the benefit of the islands.
<b>RE051</b>	Public toilets on St martins are a disgrace - many of our open spaces are such as the bank adjacent to Par Beach are mis-used and are an eyesore. Car parks full of junk. Need to retain close links with the Duchy land owners.	Noted. The Council has limited powers on the off islands and although joint working with the Duchy could deliver environmental benefits where areas are in need of improvement. The Council is committed to improving the public toilets but has a limited budget.



RE056	Public realm looks very tatty? Volunteer involvement	Noted. Generally the quality of the public realm is considered to be good although acknowledge that improvements are required for specific areas and in relation to street furniture. Attempts to engage volunteers in the past has not always proved effective (e.g. beach cleans).
RE058	I think there is too much exploitation of agricultural land simply because appropriate sites are unavailable. More work needs to be done with the Duchy and existing tenants to secure appropriate sites set out to gain maximum potential. Each property doesn't need to be a mansion set in its own grounds!	Noted. Sites for new development will be selected against a range of sustainability criteria to minimise for example any environmental impacts although inevitably some agricultural land will need to be developed. One of the aims of the plan will be to ensure that any land is used effectively and efficiently to minimise the amount of land that needs to be developed.
RE064	Working islands can and do get cluttered. Bagged rather than binned waste in streets encourages gulls to scavenge and settle in urban areas rather than their natural maritime environment Outside the main settlement areas even where storage barns are in situ on farm tenancies the Conservation Area's appearance can deteriorate if equipment and materials are not tidied away whenever feasible	Noted. It is acknowledged that there is a general lack of indoor storage which does have a negative impact on the environment.
RE065	Although the public realm is more of a maintenance and revenue issue than a Planning issue it would be good if the local plan could identify the areas of public realm that are considered as needing attention – for example the path network around the Porthcressa allotments area is suffering from poor path surface, vegetation encroachment and heavy levels of dog fouling. As these paths are heavily used by visitors (day trippers and cruise ship passengers in particular) we at least need to identify the deficiencies.	Noted. As indicated in the representation, the Local Plan has limited scope to improve the public realm.
RE066	Conservation and character statement addresses issues comprehensively.	Noted.



<b>RE069</b>	The natural environment provides a range of goods and services, and policies should be included in the plan for these to be retained or incorporated into developments to ensure they are sustainable. In particular homes for wildlife are often lost through development but with appropriate policies nest sites for birds and bats can be included and the use of local provenance plantings will provide suitable habitat for a range of species associated with the islands. The Exeter City Design guide has a very good policy covering this issue.	Partially accept. The Local Plan could contain policies and proposals that ensure appropriate mitigation and compensation measures to off-set any impacts on habitats as well as those relating to landscaping. However, these issues could also be covered by supplementary planning documents as indicated in the representation.
<b>RE075</b>	I believe there are too many listed properties on St Mary's that do not deserve preserving. It's vital we keep examples of how we used to live as museum pieces within the public realm but only the best examples. Age alone is not a basis for preservation.	Noted. Historic England and not the Council does have responsibility in relation to listing buildings.
<b>RE077</b>	The obvious area which has declined are the Porthmellon Industrial Estate including the Moorwell site. On Bryher, the area between 'the town' and Church Quay requires special attention, being the first point of entry to the island. Screening is required to mask the semi-industrial activities from view from the harbour. Also, the island's waste site in the area between the cross roads and the hotel denigrates that walk westward towards an otherwise iconic view of the western seascape and northwards across the Pool to Shipman Head Down.	Noted. The Local Plan has limited scope to improve such areas as these are land management issues, although it is acknowledged that all of these areas are in need of improvement.
<b>RE079</b>	As set out in the Blue Sail Report of 2011 and accompanying Green Framework, levels of acceptable change should be established across the islands, with clear measures and controls to ensure a balance is reached between essential development and the protection of the environment and the community it supports. The Local Plan and supporting policies should have powers to curb and impose mitigating steps to address and reverse any negative impacts	Partially accept. The Local Plan needs to provide an appropriate balance between facilitating development required to meet its economic and social needs and protecting the environment. However, mitigating measures can only be delivered where new development is being proposed or permitted.
<b>RE082</b>	11. The 60 and 70 s developments public and private in Hugh town are particularly ugly and should be where possible be improved one planning application at a time – more enforcement or adherence to the design guide	Accept and any planning decisions do have regard to the Design Guide as a material planning consideration.





<b>RE084</b>	Education and teacher housing. Dental services going backwards - Truro call centre to make local appointments!!	Partially accept. The new Local Plan will need to include an appropriate framework to address the housing issues on the islands. However, services such as dentistry are beyond the scope and remit of the Local Plan.
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## Question 12

4.15 In relation to the issue of sustainable development, question 12 sought views on whether the use of defined settlement boundaries would be a good mechanism to limit the spread of development.

Ref	12. Do you agree that settlement boundaries would provide a good basis to limit the spread of development on St Mary's? <i>*Grammar and Spelling is unchanged from the original submission.</i>	LPA Response
<b>RE04</b>	Absolutely not, it's totally unfair on families. Young people in Birmingham probably get more access to grass fields next to their houses than on St Marys. You can't build a community spirit without building communal areas for them to mingle on. At some point the Council needs to make a choice about housing, and who they want to live on the islands, because at this point I can't see much development in the favour of enhancing family life. You want to cram families into small houses, with little or no gardens, and no green fields to play on, and you want to take away their car? It's not the Victorian ages! Families do need cars. People who don't need cars are the wealthy people whose children have left home, who live in small pockets of developments in prime locations. But these are the people usually with two or more vehicles, and bigger vehicles than most. The Council needs to rally around families, these are the people paying rent to the Council and using their services. The wealthy, who own their houses, pay no rent and don't often utilise council services because they can afford not to. So why base the Local Plan around keeping their areas free from development and keeping their house price sky-high?	The suggestion to define a settlement boundary would be to limit the spread of development by drawing a line on a map which would define the built-up area of a place as distinct to the countryside area of place. This would relate to a policy that would seek to encourage developments within the settlement area and not in the countryside. This would not prevent access to the countryside or open spaces. This would be to protect open spaces outside settlements and encourage any new development to sustainable and already built-up areas such as previously developed land, before greenfield sites. This would not require developments to only be built to higher densities but just encourage developments to make the best use of available sites, well located or within existing built-up areas.
<b>RE06</b>	Only for Hugh Town (which should include the Porthmellon Industrial Estate and Pilots Retreat, but exclude the Garrison and the Moorwell	The respondent's comments are noted and agreed.



	waste site). The purpose of any such development boundary should be to allow development (of new housing, retail space, etc) within the boundary – ie not be subject to all the restrictions found elsewhere.	
<b>RE07</b>	Lessen the need for cars	The respondent's comments are noted and agreed.
<b>RE08</b>	This subject touches on transport and the use of cars. People use cars/motorbikes for one or more of three reasons. A) They are in a hurry. B) They have heavy things to carry. C) They have mobility problems (or are lazy) in that order. Settlement boundary implementation would have a miniscule effect on the use of motorised transport, and would preclude the use of barn conversions in the countryside (either for residential or holiday let use). This is how the car congestion problem could be solved: - Designate Hugh Town vehicle free 0900 to 1800 hours, except for essential users and residents. - Create a car park on the industrial estate with an electric shuttle bus in use during the periods of town closure. - Pay for it by a 'town permit' analogous to the quay permit and by a seasonal charge for using the car park.	The respondent's comments are noted and partially agreed. The islands are small and it is unlikely that the establishment of a settlement boundary would make much difference in relation to the use of vehicles. The respondent's comments on suggestions to minimise car use are noted but these go beyond the scope of the local plan.
<b>RE09</b>	See No. 1 and 2. Please do not put the cart before the horse	Noted.
<b>RE012</b>	See comments in 9 above	Noted.
<b>RE016</b>	Extend the existing settlement where possible.	The respondent's comments are noted.
<b>RE017</b>	Yes we agree, as was pointed out by us in 3, of this document.	The respondent's comments are noted.
<b>RE018</b>	More little hamlets i.e. Holy Vale, McFarlands Down, Watermill and Normandy	The respondent's comments are noted.
<b>RE019</b>	I think that there needs to be a limit on uncontrolled spread of development but defined hamlets like Holy Vale could be developed i.e. Normandy?	The respondent's comments are noted.
<b>RE021</b>	I still need to be convinced of the need for development.	The respondent's comments are noted.



RE027	Reducing reliance on motorised transport would be a good issue to concentrate on. Is there anyway households, wherever they are be restricted to just one vehicle (plus farm specific plant where applicable)? I am not convinced settlement boundaries will help as I know of people living in Hugh Town who use their car to go shopping and take advantage of the free parking at the airport when they go away. Improved pavements so people can use shopping trolleys might stem the arguments for those elderly or less mobile customers.	The respondent's comments are noted however there are no mechanisms available to restrict the private ownership and use of motor vehicles.
RE028	But no <u>residential</u> development should take place without solving the previously mentioned priorities of waste, water and sewerage.	The respondent's comments are noted.
RE032	I agree with the sense behind directing settlement to areas with existing facilities (i.e. not Telegraph) but fear that wherever people live they want cars. Until we tackle public transport/ parking etc this will not change.	The respondent's comments are noted
RE033	It is important that new housing suitable for families and older people should be sited near existing services and facilities in order to reduce reliance on transport.	The respondent's comments are noted and agreed.
RE034	If settlement boundaries are designated as a mechanism to control development and limit the spread of development, they should avoid affecting designated sites. For example water management at Lower Moors SSSI which lies close to Hugh Town, remains difficult to continue to have a difficult effect on SSSI features. Additional development in the vicinity of the SSSI could have an additional detrimental effect without mitigation.	The respondent's comments are noted and agreed.
RE035	We completely agree that development should be restricted to the main centres of Hugh Town and Old Town where the majority of the population lives and where shops, services and facilities are located. Although this would reduce reliance on motorised transport, we and many visitors are concerned at the continual increase in traffic on the country roads. If rural areas are built up, we will see even more traffic to and from town which is contrary to protecting the environment and tourism.	The respondent's comments are noted and agreed.



RE042	If these settlement boundaries are not too expensive, too wide, they should not extend the building areas as it is existing today for more than 1/2 a kilometre!	The suggestion to define a settlement boundary would be to limit the spread of development by drawing a line on a map which would define the built-up area of a place as distinct to the countryside area of a place. This would relate to a policy that would seek to encourage developments within the settlement area and not in the countryside
RE045	Anything that may help to reduce the use of motorised vehicular traffic is worth considering.	The respondent's comments are noted and agreed.
RE046	Definitely. Restricting the spread of development (and piecemeal development across the island) would be an excellent way of preserving the character of the island and increasing the efficiency, sustainability and viability of the island's population.	The respondent's comments are noted and agreed.
RE048	Due to the localised nature of the island community, a settlement boundary should be flexible to facilitate spread if required.	The respondent's comments are noted and agreed.
RE049	This is about <u>what is best for the people of the island</u> not about the reduction in the reliance on motorised transport. Distance are so short they are almost irrelevant.	The respondent's comments are noted.
RE053	Existing settlements, as long as the infrastructure is there to support them and an adequate environmental impact assessment is carried out on any un-developed land, would provide a good basis to limit the spread of development on St Mary's. The Isles of Scilly Wildlife Trust would welcome the opportunity to work with officers of the CloS to ensure that knowledge of designated land i.e. SSSI's and land within the Isles of Scilly Wildlife Trust lease is up to date. Finally, we applaud the creation of a new local plan and look forward to the opportunity to work with the CloS on its development in the future.	The respondent's comments are noted and agreed.
RE056	Possibly but using redundant buildings could be useful	The respondent's comments are noted and agreed.
RE057	Consider priorities derelict but renewable and brown-fill sites for affordable housing	The respondent's comments are noted and agreed.
RE058	I don't live on St Mary's!	Noted.



<b>RE064</b>	As a principle, best to confine spread of any housing development to (or adjacent to) main settlements both on St Mary's and the off islands. This principle would not necessarily apply to other forms of development.	The respondent's comments are noted and agreed.
<b>RE065</b>	Unfortunately the Scoping Report does not appear to provide a map or representation of the current settlement boundaries and therefore Transition Scilly is unable to comment on this question.	The suggestion to define a settlement boundary would be to limit the spread of development by drawing a line on a map which would define the built-up area of a place as distinct to the countryside area of a place. This would relate to a policy that would seek to encourage developments within the settlement area and not in the countryside. No settlement boundaries have ever been defined but it would be aimed at restricting development to those areas already built-up such as Hugh Town and Old Town and drawing a boundary beyond which new development would be limited to those uses appropriate to a countryside location.
<b>RE066</b>	Essential to preserve rural distinction and continued safety.	The respondent's comments are noted and agreed.
<b>RE070</b>	Infill or refurbishment of unused or derelict properties in existing settlements should take precedence over new, so called 'green field' sites.	The respondent's comments are noted and agreed.
<b>RE074</b>	Some developments may be needed on farmland in the countryside.	The respondent's comments are noted and agreed.
<b>RE075</b>	I think we need to be wary about a policy of limiting the spread of development on St Mary's because there is a danger we limit our ambitions as an island and as part of a holiday resort that has much scope for expansion and improvement. We certainly don't make the most of our sea views on St Mary's and this would require more ambitious development.	The respondent's comments are noted.
<b>RE076</b>	Isolated houses probably not a good idea. However, new housing clusters should ideally be near or adjacent to existing settlements in order to reduce traffic and share facilities.	The respondent's comments are noted and agreed.
<b>RE077</b>	Wherever feasible, development should relate to existing built-up areas. Large dwellings (e.g. Peninnis Farmhouse) in isolation to be avoided. The Telegraph housing proposal to be encouraged, echoing the success of 'Barnes Acre'. Small clusters of buildings, rather than the ribbon development as has occurred on some off-islands, is preferable.	The respondent's comments are noted and agreed.



RE079	The revised Local Plan must also ensure a greater level of consistency in both the design and the location and siting of permitted development – e.g. the installation of solar panels on roofs which, whilst addressing greener energy generation, can look particularly unsightly.	The respondent's comments are noted. Permitted Development (PD) is limited on the islands due to it being defined as Article 2(3) Land (both a Conservation Area and AONB) in addition to the use of Article 4 Directions (which are 4 blanket designations that apply only to the Isles of Scilly). Permitted Development Rights that do exist here are therefore limited but there is no control over the development that does fall within the limited PD available. We cannot therefore control the consistency of the design or location of such development.
RE081	I definitely like the idea that this could reduce the need for motorised transport but I'm not sure this would happen in reality. I would argue that motorised transport is barely required on a small island and yet most people have a car.	The respondent's comments are noted and agreed.
RE082	I think there will be some adjacent areas which would be good but in principle yes	The respondent's comments are noted and agreed.
RE083	St Marys is already too cluttered The building of properties should have been spread out with individual distances like is soon in Norway	The respondent's comments are noted.

## Question 13

4.16 Also in relation to Sustainable Development, question 13 sought views on whether there is a need for any new types of development on the islands.

Ref	13. Is there a need for new development or new types of development (healthcare, fitness, education, leisure facilities for example)? <i>*Grammar and Spelling is unchanged from the original submission.</i>	LPA Response
RE03	As mentioned early, education would be an excellent sector to develop.	Noted





<b>RE06</b>	<p>A site should be reserved/allocated for a replacement swimming pool in case a decision is made within the plan period for it to be relocated from Normandy. The site for the new pool would ideally be at or adjacent to the Five Islands School/Wellbeing Centre near Old Town.</p> <p>Also, a site could be reserved/allocated for a research facility or further/higher education base.</p>	<p>In relation to the issues of a replacement swimming pool and potential sites for research or higher education, then these could be delivered if appropriate sites are identified and it does not result in significant harm to issues of acknowledged importance. The respondent's comments on potential sites are noted.</p>
<b>RE07</b>	Local training for local jobs for local people.	Noted
<b>RE08</b>	A marina or extended facilities in the harbour would encourage more waterborne visitors.	Significant work has been carried out on St Mary's Quay including the redevelopment for a hotel within the harbourside building.
<b>RE011</b>	<p>Improved waste and recycling facilities, 4g mobile data connections. Winter facilities such as an observatory which would take advantage of the 'dark sky' that is very apparent on Scilly particularly in winter. Facilities to attract students, children or academic groups and conferences or study tours would be good.</p>	<p>Significant improvements are being carried out at the former Moorwell Incinerator and waste site. This site is in the process of being transformed in to a Household Waste and Recycling Centre. 4g mobile phone data has been rolled out on the islands during 2016. A recent permission has been granted for a community observatory facility on St Martin's. Similarly the site at Longstone Heritage Centre has recently obtained planning permission to be converted to a hostel which could attract the groups mentioned in the respondent's comments.</p>
<b>RE012</b>	The provision of community facilities is vital with any future development to encourage social and community interaction. It could, for example at Telegraph enable a third community and perhaps an opportunity for a business/employment (shop)	The respondent's comments are noted. The islands have had European Investments into community facilities which have included the development of community and business spaces. A former building at Porthmellon Industrial Estate has been converted to deliver start-up business spaces.
<b>RE016</b>	Swimming pool in the town or at the Sports Hall. I think the sports facilities we have are excellent.	The respondent's comments are noted. Out of the responses received to this question it is the need for a formalised and larger swimming pool, located with the existing leisure centre which has come out as a desire for many of our islanders for both residents and visitor use. Whilst the Local Plan could look to create a positive framework to deliver such a development it is unlikely to be in a position to ensure such a proposal is delivered.



<b>RE019</b>	The Swimming Pool needs to be relocated to next to sports hall. Need new skate park, space to support academic research and development need to be created.	The respondent's comments are noted. Out of the responses received to this question it is the need for a formalised and larger swimming pool, located with the existing leisure centre which has come out as a desire for many of our islanders for both residents and visitor use. Whilst the Local Plan could look to create a positive framework to deliver such a development it is unlikely to be in a position to ensure such a proposal is delivered.
<b>RE020</b>	Locate them together and in a central area. Hospital and doctors are already co-located, improve the hospital and reduce the use of the helicopter. Make the 'well-being' centre more attractive, with colour and a lot less clinical. Offer the facilities to more groups and add and indoor/outdoor pool. Package gym and facilities in with hotels. Hotels pay a fee for their guests to use facilities freely.	The respondent's comments are noted.
<b>RE021</b>	Better use of existing facilities should be encouraged e.g. Sports centre, the pool, the playing fields etc. Scilly is resource-rich community-wise by comparison with many places on the mainland but does not utilise the numerous existing facilities efficiently.	The respondent's comments are noted.
<b>RE022</b>	Already in place	Noted
<b>RE024</b>	Tourist Facilities for winter months	The respondent's comments are noted.
<b>RE025</b>	Would be better to locate a swimming pool with existing other fitness, leisure facilities	The respondent's comments are noted. Out of the responses received to this question it is the need for a formalised and larger swimming pool, located with the existing leisure centre which has come out as a desire for many of our islanders for both residents and visitor use. Whilst the Local Plan could look to create a positive framework to deliver such a development it is unlikely to be in a position to ensure such a proposal is delivered.
<b>RE027</b>	Let's hold back on more new development, People are fed up with all the disruption caused by major development work. To say nothing of overspending.	The respondent's comments are noted.
<b>RE028</b>	More encouragement of outdoor adventure activities, e.g. Like the very successful inter island swim. I.e. Market the islands as a centre for this form of activity, like the Welsh do of their outdoor environment.	The respondent's comments are noted.



<b>RE032</b>	I think we've had our share of European money for Massive new Schools, Sports Halls and Island Halls now. We could support the leisure facilities we have, as well as the good old Outdoors. Possibly facilities/ support for tertiary study/ conferences/ field trips?	The respondent's comments are noted.
<b>RE033</b>	Not sure how this relates to para 3.25. We recognise that there have been many improvements in fitness, education and leisure facilities and maintaining and further improving these should be a priority. There is a need for new accommodation/facilities for the elderly: supported living homes; day centre facilities; suitable care home accommodation and nursing home provision.	The respondent's comments are noted.
<b>RE034</b>	Paragraph 3.25 is concerned with uPVC windows and not new development. If additional new types of development are proposed, Natural England would welcome early discussion with the Authority to ensure all effects are mitigated.	The respondent's comments are noted.
<b>RE035</b>	A new swimming pool should be built near to The Five Islands School. This was proposed when a comprehensive proposal for the new school was submitted to the Labour Gov't. The Heath Robinson poly-tunnel at Normandy is an insult to our school children, our resident community and our tourists and is a monument to an out-of-date and incompetent Council administration of the past.	The respondent's comments are noted. Out of the responses received to this question it is the need for a formalised and larger swimming pool, located with the existing leisure centre which has come out as a desire for many of our islanders for both residents and visitor use. Whilst the Local Plan could look to create a positive framework to deliver such a development it is unlikely to be in a position to ensure such a proposal is delivered.
<b>RE036</b>	It would be good to see a swimming pool co-located with other sports facilities for ease of supervision and pooling of resource	The respondent's comments are noted. Out of the responses received to this question it is the need for a formalised and larger swimming pool, located with the existing leisure centre which has come out as a desire for many of our islanders for both residents and visitor use. Whilst the Local Plan could look to create a positive framework to deliver such a development it is unlikely to be in a position to ensure such a proposal is delivered.
<b>RE042</b>	There could/would be a need (but one can live without it) for a 'bath-aquatic' place (sea water/algae/massage and the like.	The respondent's comments are noted.
<b>RE045</b>	I think we have plenty (there's no money!)	The respondent's comments are noted.



<b>RE046</b>	Yes. More high density, high quality housing in areas that encourage walking and the use of bikes. Mixed accommodation size would also help to house the segments of the population with different housing demands (especially single people).	The respondent's comments are noted. The new local plan will ensure it seeks to enable the appropriate amount of development in the most appropriate locations.
<b>RE048</b>	With regard to fitness, leisure facilities, there is a good availability of leisure amenity (sports hall, gym), however, perhaps there is a need to promote and encourage the usage of these services and make them more accessible. Barriers may be an over inflated charging system in place when considering the relatively low workplace earnings.	The respondent's comments are noted.
<b>RE049</b>	When healthcare employees (e.g. nurses and midwives, are unable to take up appointments through lack of housing, something is very wrong with the implementation of policies.	The respondent's comments are noted.
<b>RE050</b>	Yes: Housing as discussed under Q2 & 3. We think there seems to be adequate provision for businesses at this time.	The respondent's comments are noted.
<b>RE051</b>	Care for the elderly who cannot support themselves in the own homes.	The respondent's comments are noted.
<b>RE056</b>	Possibly, marine study centre, Better TIC (GP DOC centres in New Zealand)	The respondent's comments are noted.
<b>RE058</b>	There is definitely a need for small accommodations for young workers in low paid industries that they may save to build their own property or move up the ladder. Rental costs of private property prohibits this with its short supply and high demand. The returns on such developments are low compared with the holiday trade accommodation. I think that the majority of this could come from private sector business and if on a large enough scale would increase availability and lower rentals. By building staff accommodation businesses can ensure staff availability of workers who could not otherwise live here. This is the missing link on all the islands except Tresco. There needs to be financial incentive to work here if we are to improve standards.	The respondent's comments are noted. It is agreed that there are barriers to delivering effective businesses and services on the islands that stem from issues with accommodation and housing. The new local plan will ensure it seeks to enable the appropriate amount of development in the most appropriate locations.
<b>RE060</b>	Better appointed care home for the elderly. More facilities available at the hospital. A larger swimming pool, closer to town/Old Town.	The respondent's comments are noted. Out of the responses received to this question it is the need for a formalised and larger swimming pool, located with the existing leisure centre which has come out as a desire for many of our islanders for both residents and visitor use. Whilst the Local



		Plan could look to create a positive framework to deliver such a development it is unlikely to be in a position to ensure such a proposal is delivered.
<b>RE064</b>	<p>There have been huge strides made in the past five years under these headings. More information could be circulated so that visitors are made better aware of what we provide on the islands, not least now in terms of wet weather facilities.</p> <p>Provision of a somewhat larger swimming pool adjacent to the Sports Hall would be a bonus the Council should push for and which would then allow the Normandy site to be potentially developed for extra social housing.</p> <p>On the health care front there should be an opportunity to create a larger residential home than Park House up by the Health Centre and hospital and one with a wider remit in terms of clients and therefore more capable of catering for Scilly's growing elderly population.</p>	<p>The Council of the Isles of Scilly as a unitary authority have a responsibility to provide services to the community and protect the environment. The new local plan has to balance the protection of the environment whilst providing is functions and services to the community. The local plan can seek to positively enable developments that are of benefit to the economy. Out of the responses received to this question it is the need for a formalised and larger swimming pool, located with the existing leisure centre which has come out as a desire for many of our islanders for both residents and visitor use. Whilst the Local Plan could look to create a positive framework to deliver such a development it is unlikely to be in a position to ensure such a proposal is delivered.</p>
<b>RE065</b>	For the size of community and levels of use of existing facilities it is clear that any more developments of the type indicated above may well be considered a luxury and therefore priority should be given to initiatives and developments that ensure we have adequate housing stock and sustainable supplies of energy, water and food.	The respondents comments and partially agree.
<b>RE066</b>	For the size of the community facilities are good. Parking and funding limit use of Normandy pool. But it is a fine facility for good health.	The respondent's comments are noted.
<b>RE069</b>	<p>To ensure the local plan provides enhancement of biodiversity the council will require a mechanism in place to deliver this objective. This could be through the production of a Green Infrastructure Strategy. This will need to be linked to a legally binding mechanism e.g. CIL or S106 to be deliverable. The RSPB would be happy to work with the council to produce this strategy.</p> <p>In addition, a priority for provision of grey infrastructure will be to address the issues highlighted in question 8.</p>	The respondent's comments are noted. At present there are no plans to establish a Community Infrastructure Levy. The production of a Green Infrastructure Strategy seems a disproportionate approach given the small-scale nature of the islands and accessible nature of most of the islands landscapes. As there are no formal rights of way to 'connect' through a green infrastructure strategy it is considered that this would not add any benefits to enhancing biodiversity.
<b>RE070</b>	If provided they should be as near as possible to related existing buildings.	The respondent's comments are noted.





<b>RE074</b>	New leisure facilities to cater for islanders and visitors, particularly wet weather activities.	The respondent's comments are noted.
<b>RE075</b>	I have always believed these islands need a proper 25m swimming pool, close to the school. We lack good quality wet weather facilities.	The respondent's comments are noted. Out of the responses received to this question it is the need for a formalised and larger swimming pool, located with the existing leisure centre which has come out as a desire for many of our islanders for both residents and visitor use. Whilst the Local Plan could look to create a positive framework to deliver such a development it is unlikely to be in a position to ensure such a proposal is delivered.
<b>RE076</b>	Most definitely – all such facilities should be available to islanders and visitors to maximise community and economic benefits.	The respondent's comments are noted and currently all leisure and healthcare facilities are available to all islanders and visitors
<b>RE077</b>	Housing, as stated earlier. Particularly extra-care housing on St. Mary's on the site of the former secondary school. Also, a field centre for groups such as volunteer workers, research students, etc.	The respondent's comments are noted. Currently there is no approved scheme to replace the now demolished secondary school at Carn Thomas. It is likely that this will be used to deliver residential development. In relation to the suggestion of a field centre then planning permission was approved in 2016 for the establishment of a hostel at the former Longstone Heritage Centre on St Mary's. This intention is that this would be a suitable location for such groups.
<b>RE079</b>	Regarding settlement boundaries and future development, this is unlikely to be a one-size-fits-all solution. Whilst certain boundaries should be protected, the Islands' Partnership is not opposed to development in principle providing this is appropriate to the location.	The respondent's comments are noted.
<b>RE081</b>	There is already a gym that is barely used - do we really need another fitness facility.	The respondent's comments are noted.
<b>RE082</b>	13. Housing largely	The respondent's comments are noted.
<b>RE083</b>	Plastic window do not harm the environment	The respondent's comments are noted.
<b>RE084</b>	Dog grooming and behaviour management classes	The respondent's comments are noted.





## Question 14

- 4.17 Finally in relation to sustainable development the scoping document, question 14 sought views on whether it was appropriate to resist the use of upvc on the grounds of its environmental harm, rather than on just its aesthetic harm to the character of the conservation area.

Ref	14. Do you agree that plastic windows and doors should be resisted because of the environmental harm? <i>*Grammar and Spelling is unchanged from the original submission.</i>	LPA Response
RE04	I think people that have strong arguments against plastic windows are exactly the sort of people who you should be ignoring. Too much time on their hands, too invested in how Scilly 'looks' to visitors. I think 99% of visitors probably have plastic windows at home. They don't visit the islands to see our wooden windows. This is a nothing argument, it's a parish argument and we're a unitary authority and should be bigger than this. People should be able to pick and choose whatever window they want. Or, the council should put a fund aside and pay the difference for people who want plastic windows but are denied them.	The respondent's comments are noted. As the Islands' have been designated as a Conservation Area for over 40 years because of the quality of the historic built environment and the high number of listed building and scheduled monuments it is important that any development does not result in harm to the significance of this historic environment. The use of upvc windows is strongly resisted on historic buildings because of erosion of character and the detrimental impact they have on the appearance of such traditional buildings. Additionally the use of such windows can have a detrimental impact by causing harm to the fabric of historic buildings as they remove the building's ability to 'breathe' and cause damp to the structure through the loss of circulation.
RE06	There is the potential, by enforcing such a policy, for local skilled craftspeople to be employed in the repair and installation of traditional windows and doors.	The respondent's comments are noted and agreed.
RE08	The environmental impact of using plastic for doors and windows is very low. The Council should encourage the use of modern materials with the proviso that their appearance is comparable with traditionally constructed equivalents. Early plastic windows in particular looked terrible, especially in older buildings. Nowadays good quality plastic windows are practically indistinguishable from wooden ones, including sash types. Where a building is listed though, clearly the original building materials should be used in any work undertaken.	The respondent's comments are noted.



<b>RE09</b>	Ideally wood would be sweet but maintenance is ongoing and expensive and in most cases (on higher windows) would be left to look unsightly and would not - sea winds etc. In a listed building wood is appropriate but otherwise I think there are far more important issues in front of the council than worrying about plastic windows! Once in situ, where is the environmental harm? In an ideal would then okay but the economics don't add up and sadly it is the here and now that matters.	The respondent's comments are noted. It should be pointed out that timber windows, whilst requiring regular maintenance can be repaired and are from a renewable source. Upvc windows however are an environmentally harmful man-made product that also requires regular maintenance, becomes pitted, stained and brittle in areas of high sunshine but unlike timber cannot be repaired or recycled. The historic environment of the islands is one of its main economic assets that should be protected and the small erosion of traditional details degrades the historic environment.
<b>RE011</b>	Plastic windows cannot be repaired, plastic windows have to be maintained, plastic windows have a limited life expectancy. The Scilly climate reduces the life expectancy as it becomes brittle with higher levels of uv rays. The production and disposal of upvc is really bad for the environment because the heavy metals and dioxins get into the food chain and do not reduce over time. Yes it is easier to wipe down a plastic window compared to sanding and repainting timber but timber windows look better, are a much more environmentally friendly product which can be produced from sustainable sources, repaired and recycled. You cannot do this with a plastic window once it is broken.	The respondent's comments are noted and agreed.
<b>RE012</b>	There always needs to be a balance of costs against the environment. Not everyone can afford the alternative	The respondent's comments are noted.
<b>RE015</b>	Plastic windows can be made to be identical to wooden. They have enormous practical benefits to householders and should be allowed wherever request them provided they replicate those replaced.	The respondent's comments are noted.
<b>RE017</b>	Longer life, less maintenance, greater security and more cost effective, conserving energy costs.	The respondent's comments are noted.
<b>RE019</b>	No more plastic windows	The respondent's comments are noted.
<b>RE021</b>	Again this is impossible to answer. I understand the arguments that sustainable wood is far preferable to upvc (see greenpeace analysis). However, on-one seems to have addressed the special needs of a salt-exposed community. Does upvc deal better with this, so is more sustainable in the long run? Data please.	The respondent's comments are noted. The LPA does not have access to the resources required to investigate whether timber or plastic is better in a coastal environment. Some building materials are not considered appropriate in sensitive areas such as the Isles of Scilly, which is a designated Conservation Area and AONB for aesthetic



		reasons, meaning that they can appear incongruous when used in traditional buildings or historic settings and can erode the character and appearance of the building, local area or street scene. The isolated nature of the island and the difficulty of disposing of waste would suggest materials should be as sustainable as possible. The question about environmental impact was a means of seeking out community views on this issue.
<b>RE022</b>	Transportation to/from islands	The respondent's comments are noted.
<b>RE025</b>	Depends on location and type of building. Maintenance has to be taken into account. Good quality plastic windows have their place but perhaps not in very visible areas.	The respondent's comments are noted.
<b>RE027</b>	No I think plastic windows can be justified but again keep it so each case is considered on its merits.	The respondent's comments are noted.
<b>RE028</b>	Agree they are inappropriate on traditional buildings, but there are architecturally appropriate exceptions.	The respondent's comments are noted and agree.
<b>RE029</b>	If you say no,	The respondent's comments are noted.
<b>RE032</b>	Seriously, plastic windows are our biggest environmental concern? The Conservation Area Character Statement rightly focuses on our important mature elms. Yet we have no restrictions on the import of wood with bark on which could any day introduce Dutch Elm's disease to the islands with devastating consequences.	The Local Plan focuses on the management of development and engineering operations where planning permission is required. The protection of natural flora and fauna is part of this consideration but often many of the operations that result in importation of wood are beyond the control of the Local Planning Authority. It should be pointed out that timber windows, whilst requiring regular maintenance can be repaired and are from a renewable source. Upvc windows however are an environmentally harmful man-made product that also requires regular maintenance, becomes pitted, stained and brittle in areas of high sunshine but unlike timber cannot be repaired or recycled. The historic environment of the islands is one of its main economic assets that should be protected and the small erosion of traditional details degrades the historic environment.
<b>RE034</b>	No Comment	The respondent's comments are noted.



RE035	What environmental harm? What about the environmental harm from the many toxic coatings on wooden windows and the problems of early decay and disposal? We need to find a mainland company that can recycle these plastic windows. Not a local company that could end up polluting the Scilly environment.	Timber windows, whilst requiring regular maintenance can be repaired and are from a renewable source. Upvc windows have traditionally been an environmentally harmful man-made product that also requires regular maintenance, becomes pitted, stained and brittle in areas of high sunshine but unlike timber cannot be repaired or recycled. The historic environment of the islands is one of its main economic assets that should be protected and the small erosion of traditional details degrades the historic environment. The isolated nature of the island and the difficulty of disposing of waste would suggest materials should be as sustainable as possible.
RE045	Environmentally I think the Jury is still out. Aesthetically I would like to see all timber in all of the traditional stone buildings. For new rendered buildings in less sensitive areas I think upvc is fine.	The respondent's comments are noted.
RE046	Yes. A cursory glance at the evidence shows that wooden and metal window frames and doors are a better option from an environmental perspective. Plastics are harmful during production and are harder to fix and maintain over their lifespan than wooden and metal alternatives. They are also less attractive in my opinion.	The respondent's comments are noted and agreed.
RE049	For a designated Area of Outstanding Natural Beauty there is a horrendous amount of extensions and additions to properties which lack conformity of any sort. Manufacture of plastic windows has improved enormously since first introduced and look no different to wooden ones. Paint is toxic as well as plastic.	The respondent's comments are noted.



<b>RE050</b>	No. We definitely do NOT agree. It is said that plastic windows/doors (a) cause environmental harm; (b) are 'inappropriate' and spoil the appearance of 'traditional buildings'. We have had these windows at Vale View for 24 years. They replaced badly fitting wooden sash windows that either could not be properly shut or opened, were draughty and unsightly. The plastic replacements fit perfectly, are easy to open/close and their double glazing reduces heat loss, thus saving on fuel. Moreover, we cannot agree that they look in any way out of place on such buildings; if anything they enhance the appearance. I'm not sure why we should cow-tow to the 'heritage lobby'. We are also unsure why they should be considered harmful to the environment, any more than a whole host of plastic, wood or metal objects that are regularly deposited at the dump. Our windows have provided good service for 24 years, whereas many refrigerators, freezers, electric kettles, bread makers, etc. have been and gone in that time. We should strongly resist the abandonment of these useful modern accessories.	The respondent's comments are noted.
<b>RE051</b>	As long as timber is seasoned properly. Our wooden sash windows don't open in the winter and rattle in the summer.	The respondent's comments are noted.
<b>RE054</b>	Plastic windows are draught proof, double glazed and require little maintenance. Most of the housing stock is cold. Damp requires a lot of heating. Aesthetically they have improved with the finishes and types available. Regarding environmental harm, apply the same criteria to solar voltaic panels.	The respondent's comments are noted.
<b>RE056</b>	In sensitive buildings always not sure on a blanket ban.	The respondent's comments are noted. There will always be circumstances, such as non-traditional buildings, where upvc windows can and have been permitted in recognition of the benefits to older housing stock when weighed with the long-term harm, especially in areas where they are not going to give rise to harm to the historic built environment.
<b>RE057</b>	They are practical in our weather-beaten environment. But consideration has to be given to the traditional character of the host building.	The respondent's comments are noted.



<b>RE058</b>	I think that modern materials are updating at such a speed as this proposal would soon be outdated. In properties separate to conservation areas, I think that appropriate and affordable modern materials should be permitted to aid affordability and durability. Naturally we should preserve the character of existing buildings of historical, architectural importance etc. The LA should be careful to uphold its principals in its own projects!	The respondent's comments are noted.
<b>RE060</b>	Within reason - it does sometimes appear that some houses are permitted to change their windows/doors, while others in the same street aren't.	The islands are covered by an Article 4 Direction which essentially removes Permitted Development Rights to change windows (style, materials, position or dimensions) on properties where these front a road or waterway. So planning permission is always required in these cases. Unless a building is a listed building (in which case consent is required anyway) then a property can change windows on the side or rear (if they don't also front a road or waterway) without any permission. The difficulty is not everyone knows that they need planning permission to change their windows. Some have therefore been done without consent and others may have been changed before the article 4 direction was designated and therefore any subsequent change of windows to upvc (if the style was the same) would not have required permission. This may give the impression that decision making is inconsistent.
<b>RE061</b>	Because of the environment plastic doors and windows are more resilient and today look very similar to wood ones and do not deteriorate like wood ones do. People should be able to have a choice.	Timber windows, whilst requiring regular maintenance can be repaired and are from a renewable source. Upvc windows have traditionally been an environmentally harmful man-made product that also requires regular maintenance, becomes pitted, stained and brittle in areas of high sunshine but unlike timber cannot be repaired or recycled. The historic environment of the islands is one of its main economic assets that should be protected and the small erosion of traditional details degrades the historic environment. The isolated nature of the island and the difficulty of disposing of waste would suggest materials should be as sustainable as possible.
<b>RE064</b>	Plastic windows should continue to be resisted on listed buildings and on properties where they have not been previously installed. On new builds modern plastic treatments can be quite appropriate.	The respondent's comments are noted.





<p><b>RE065</b></p>	<p>Nowhere in the Scoping Report is a coherent case made against the use of plastic windows or evidence provided of any environmental harm.</p> <p>The council has been inconsistent in application of the policy in the past – we feel that this is creating a damaging ‘side show’ to the real issue of trying to bring up our existing building stock to higher levels of sustainability in terms of resource use.</p> <p>With the increasing requirements of Part L of Building Regulations we are now coming close to the zero carbon ambition for new stock. Given the slow replacement rate of housing stock, elevated building costs and the decline in grant funding, the challenge to the Council and the local plan is to work out how to retrofit these improvements / standards to the existing housing stock. Picking on plastic windows alone will not achieve this. Until there is a clear and comprehensive policy on how to bring up the Islands' existing housing stock to better standards of overall sustainability (water, energy and waste) it is wrong to single out a single item for persecution.</p> <p>Of course the Council also needs to be seen to be leading by example – much of the Council housing stock has plastic windows but may also perform badly in other areas in terms of energy performance.</p> <p>We recommend</p> <ul style="list-style-type: none"> <li>· That the Council works with other stakeholders and the private sector to undertake and publish Energy Performance Certificate audits and improvement plans for all its properties.</li> <li>· The Council works to encourage this process amongst other social landlords and private households on the islands.</li> </ul>	<p>Timber windows, whilst requiring regular maintenance can be repaired and are from a renewable source. Upvc windows have traditionally been an environmentally harmful man-made product that also requires regular maintenance, becomes pitted, stained and brittle in areas of high sunshine but unlike timber cannot be repaired and are difficult to recycle. The historic environment of the islands is one of its main economic assets that should be protected and the small erosion of traditional details degrades the historic environment. The isolated nature of the island and the difficulty of disposing of waste would suggest materials should be as sustainable as possible.</p> <p>The islands are covered by an Article 4 Direction which essentially removes Permitted Development Rights to change windows (style, materials, position or dimensions) on properties where these front a road or waterway. So planning permission is always required in these cases. Unless a building is a listed building then a property can change windows on the side or rear (if they don't also front a road or waterway) without any permission. The difficulty is not everyone knows that they need planning permission to change their windows. Some have therefore been done without consent and others may have been changed before the article 4 direction was designated and therefore any subsequent change of windows to upvc (if the style was the same) would not have required permission. This may give the impression that decision making is inconsistent. The energy efficiency of older housing stock where these are of a non-traditional design then the LPA accept that the use of such materials have benefits that can outweigh the harm.</p>
<p><b>RE066</b></p>	<p>A well maintained wooden window especial in period property aesthetically more pleasing, But a good quality plastic window has its place and preferable to rotting wood. Enhance internal living quality and require less maintenance. Environmental harm also associated with paints/treatments etc.</p>	<p>The respondent's comments are noted.</p>
<p><b>RE069</b></p>	<p>Please refer to the AONB</p>	<p>The respondent's comments are noted.</p>



<b>RE070</b>	Definitely not. Provided they are in keeping with the design of a building they should be allowed. Wooden windows in my experience are not good insulators and are high maintenance (requiring frequent use of environmentally unfriendly paint). Not much use installing renewable energy provision on a property if it is losing heat through the windows!	The respondent's comments are noted.
<b>RE074</b>	In certain locations plastic windows may be better to resist weather and stay smarter looking than conventional windows which constantly need repainting.	The respondent's comments are noted.
<b>RE075</b>	I believe that plastic doors and windows also save a lot of energy. I certainly don't think it's a big issue but maybe my view would change with more information.	The respondent's comments are noted.
<b>RE076</b>	Does not deserve a place in Local Plan. Horseshoe for courses.	The respondent's comments are noted.
<b>RE077</b>	Plastic windows can be unsympathetic but some of the newer ones are high quality and do not detract from the traditional design of island buildings, and indeed are almost indistinguishable from the hardwood variety. When refurbishment and repair of island housing is very costly, good UPVC windows should be permitted.	The respondent's comments are noted.
<b>RE079</b>	In terms of renewable energy on the islands, the Islands' Partnership would welcome further exploration and potential use of tidal turbines. There is also merit in the introduction of small-scale, individual wind turbines and solar panels providing these are discreet and unobtrusive to views and vistas.	The respondent's comments are noted.
<b>RE080</b>	Plastic windows look okay and they don't swell, warp, peel or warp. It is far preferable to see plastic windows than paint-peeling rotten wooden ones. As someone who has over 30 windows and doors to paint at home and work I would love to have plastic windows. I am too busy to paint them as often as necessary and it is too expensive to pay someone else to do it. Consequently they don't always look at their best. In our busy lives we have to make some concessions and I think plastic windows should be one of them. Plastic is the material of the moment. In 100 years' time it will be something else	The respondent's comments are noted.



RE081	Yes I think this is a great idea. It would be great to be fully sustainable, environmentally aware and lead by example	The respondent's comments are noted.
RE082	14. The embedded carbon in PVC windows is a real issue and there are better timber and aluminium products on the market which have longer design lives, better efficiency, better looking although more expensive. A cost benefit for each development needs to be undertaken.	The respondent's comments are noted.
RE083	I have been refused plastic windows in a property I own in Lower Strand Yet a property next door has plastic, and many other in the location also have plastic Modern plastic windows can now look like timber	The islands are covered by an Article 4 Direction which essentially removes Permitted Development Rights to change windows (style, materials, position or dimensions) on properties where these front a road or waterway. So planning permission is always required in these cases. Unless a building is a listed building (in which case consent is required anyway) then a property can change windows on the side or rear (if they don't also front a road or waterway) without any permission. The difficulty is not everyone knows that they need planning permission to change their windows. Some have therefore been done without consent and others may have been changed before the article 4 direction was designated and therefore any subsequent change of windows to upvc (if the style was the same) would not have required permission. This may give the impression that decision making is inconsistent.
RE084	No had to wait 2 years to get guttering replaced as original. If plastic had been used initially that would have been used then	The respondent's comments are noted.

## Any Other Issues

4.18 Finally we asked for people to give us their views on any other issues they thought the local plan could address.

Ref	Are there any issues that you feel have been missed in this document that you would like to see covered by the emerging Local Plan? <i>*Grammar and Spelling is unchanged from the original submission.</i>	LPA Response
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RE03	This is quite a long form, maybe it could be reduced slightly to encourage more responses?	The respondent's comments are noted.
RE04	As a closing statement, I'll say this. Every plan the Council has ever designed and owned in recent times, has failed. Think about it: Past economic plans, Housing Strategy, Community Strategy, Strategic Transport Framework, Airport Improvement Project, Sustainable Energy Strategy, Waste Management, they've all failed to produce the marked improvement they said they would. Don't make another plan that you have no intention of following-through on. Don't promise anything you don't mean, don't scale down for fear of failure. Just be honest and do the best thing for the community, as a whole, for the families of Scilly and the future families of Scilly. Do that and you'll make a good plan?	The respondent's comments are noted. The Local Plan is a statutory document that sets out general policies and proposals to help set expectations about the planning decision making for the future of the islands. The current Local Plan was adopted in 2005 and is still used for making planning decisions. It contains 6 general policies about development, 5 detailed policies and 5 proposals for future development. We are statutorily required to update this document to reflect national planning policy. It is therefore necessary to go through all statutory requirement to ensure public consensus and due processes are followed to get a sound local plan that works for the benefit of the island and is residents and visitors.
RE06	<ol style="list-style-type: none"> <li>1. A policy on boatyards/facilities/marinas etc., extending to some of the islands.</li> <li>2. Existing employment land (B use classes) should be identified and protected and new employment land should be identified and allocated. (An extension to the Porthmellon Industrial Estate, or perhaps a small site at Telegraph, as possible examples.) These sites could also allow for any new research centre or new sewerage treatment works.</li> <li>3. A policy (and this reflected when allocating sites too) addressing the long-term issue of rising sea levels/inundation by the sea... potentially quite a strict policy such as no development being allowed on land below, say, 3m above the present high tide level. And where development is allowed near the coast, long-term arrangements for/contributions to sea defences should be made.</li> </ol>	<p>The respondent's comments are noted. Whilst there may not be sufficient information to be precise over the specific types of developments stated in this response, there would be no reason why such development proposals could not be supported if it is demonstrated that they are necessary and otherwise give rise to no significant harm to either the natural or historic environment or the amenity of the local communities.</p> <p>The relevant stages of the Local Plan are informed by Sustainability Appraisal process which seeks to ensure that policies and proposal within the plan are sustainable in terms of the environment, economy and socially.</p>
RE07	Number and size of cars on St Mary's	The respondent's comments are noted. It however does not require planning permission to own a car. The Local Plan cannot remove the rights of islanders to own vehicles.
RE015	Decent food supermarket essential for self-catering tourists and locals.	The respondent's comments are noted. The provision of local shops is largely dictated by market forces. If there is an increase in demand then this will be filled by businesses in a position to provide the necessary service. We cannot force businesses to locate to or to open up on the



		islands. There will of course be a positive framework that should support any economic enterprise on the islands where there is a proven need and there are otherwise no significant impacts.
<b>RE018</b>	The Normandy swimming Pool could be moved nearer to the Sports Hall. It would enable far more use. Coastal erosion.	The respondent's comments are noted. Out of the responses received to question 13 it is the need for a formalised and larger swimming pool, located with the existing leisure centre which has come out as a desire for many of our islanders for both residents and visitor use. Whilst the Local Plan could look to create a positive framework to deliver such a development it is unlikely to be in a position to ensure such a proposal is delivered.
<b>RE019</b>	Very little about environmental preservation and coastal defences. No mention of keeping beaches clean and accessible. Many areas on St Mary's have no toilet facilities and no dog poo bins/ rubbish bins! The environment needs to be the most important factor otherwise we will lose tourists.	The relevant stages of the Local Plan are informed by Sustainability Appraisal process which will ensure that policies and proposals within the plan are sustainable in terms of the environment, economy and socially. The Shoreline Management Plan will inform any policies and proposals. The respondent's comments are noted.
<b>RE021</b>	See my comments above on local transport, and transport to the mainland. There should be a property community bus which is fully accessible with specifications to meet basic disability standards and properly accommodation shopping and luggage. The route, timetable and marketing are a leftover of 1960s Scilly and have not been appropriate for many years. The timetable needs revamping to meet the needs of the community, tourists and offer a real alternative to the car. The route even misses is main markets by not running along Hugh Street (for the main Shops, pubs) to the chemist (for the quay) etc. The timings have not changed in decades to cater for market change. The timetable should offer an island school journey (no need for separate school bus) and with greater frequency incorporating anti circular journeys would provide a direct Hugh Town - Old Town service for those who simply want to get home rather than go on a tour of the island. Likewise getting to hospital/surgery. Sunday and evening services with a fare subsidy would further discourage car use. Safety and comfort need to be of a much higher standard. If there is no entrepreneur able to achieve such a basic service then the myriad of grants available should be sourced to assist.	The respondent's comments are noted. The provision of local transport is largely dictated by market forces. The operation of vehicles on island roads does not however require planning permission and there is nothing to stop the establishment of community transport. If there is an increase in demand then this will be filled by businesses in a position to provide the necessary service. The Local Planning Authority cannot force businesses to locate to or to open up on the islands. There will of course be a positive framework that should support any economic enterprise on the islands where there is a proven need and there are otherwise no significant impacts.





<b>RE022</b>	There are plastic windows and plastic window use should be restricted to approve suppliers i.e. Those used in high profile conservation projects.	The respondent's comments are noted. In response to question 14 many negative comments were received in relation to the suggestion about restricting the use of upvc windows. It is clearly an issue that is particularly sensitive. It is likely to remain restricted in sensitive historic buildings and areas but potentially continued to be permitted in other non-traditional buildings in less sensitive parts of the islands. We are unable to require people to obtain a particular supplier or brand of product.
<b>RE025</b>	I would like to see more emphasis on promoting the natural environment and more information to tourists on the AONB and Marine Conservation Zones. I would even go further and suggest that tourists should pay something towards the maintenance of a pristine environment. This is probably controversial!	The respondent's comments are noted. The relevant stages of the Local Plan are informed by Sustainability Appraisal process which will ensure that policies and proposal within the plan are sustainable in terms of the environment, economy and socially. The introduction of a visitor levy has been suggested in the past but has never been implemented because of the potential barrier it may create in attracting visitors the islands. The Local Plan would not be in a position to implement such a proposal as it does not relate to the management of land or buildings.
<b>RE028</b>	There is no mention of the enormous contribution to tourism of the World Pilot Gig Championships. The huge success of this event is testament to the Islands' "Can do" attitude. More events in sport and the arts should be encouraged. An arts festival in Art, Dance and Drama for all ages; Adventure races e.g. swims, kayaking, running, sailing, windsurfing; are so perfect in this environment and would bring a wider cross section of visitors. There must be a complete rethink of how allowable waste the islands produce. Why do we have "new retail" outlets being built when older ones are lying empty? Reuse, Refurbish, Recycle. Encourage more "joined up" thinking local growers by advertising to visitors all that's available. Fish, fruit, veg, flowers, meats. Make Scilly produce more desirable commodity (see example from Guernsey produce advert included as part of our answer to Q5)	The WPGC are held here annually but this is an event and not a form of development that requires policies in order for it to take place. Again the establishment of 'events' is not controlled by the planning system. The plan will have an underlying theme of sustainable development which should create a positive framework for development proposals to come forward where they are otherwise sustainable.
<b>RE029</b>	What sort of planning policy - if there is one - allows a small bungalow to be developed into a large house to the detriment and aggravation of the neighbours	Planning permission is required to replace an existing dwelling with a 'different' dwelling. This is assessed in exactly the same way as any other planning permission. If the proposal is not otherwise harmful to the natural or historic environment and does not give rise to issues of





		amenity for neighbouring properties and it is otherwise in keeping with the character of the area then there would be insufficient grounds on which to refuse the development. All applications are assessed on their merits and individual circumstances.
<b>RE032</b>	<p>Yes Water &amp; Sewage.</p> <p>All properties should be fitted with water meters and all homes and businesses charged the actual cost of the water used. Bring back the Town Hall board which documented when ground water was low and usage too high – the idea now that desalinated water is free and unlimited is crazy.</p> <p>Instead of trying to build more homes, let's tackle the issues of sewage treatment from the ones we have. That we still pump raw sewage into the sea is an embarrassing disgrace for an AONB, SAC, SPA, SSSI, MCZ and RAMSAR.</p> <p>3.28 talks about projects that 'promote environmental growth' can we be more specific about what this actually means?</p>	<p>The Local Plan will not be in a position to require modifications to existing properties. Only where development proposals increase the pressure on infrastructure can modifications to that property be required as part of the development proposed. The Council of the Isles of Scilly operates as the Water Authority and does monitor the water level closely. This is regularly published as public information. The issue of sewerage treatment would be tackled as part of any new residential development, where there is a lack of such provision to support the development proposed. This is due to the financial inputs required. It is anticipated that as part of the Smart Islands project the waste streams of the islands including sewerage waste will be used to provide energy for the islands. This is a long-term project that would be supported by the local plan. Environmental growth is about allowing the islands to grow, promoting sustainable growth and allowing the islands to prosper economically without harming its natural resources and assets.</p>
<b>RE033</b>	<p>Yes.</p> <p>All planning and housing decisions should consider the health and wellbeing of the population; for example, relaxing restrictions that may keep people in cold, damp, expensive to maintain, too big, too small or otherwise inappropriate homes.</p>	<p>The respondent's comments are unclear. There are no planning restrictions that keep people in cold, damp and expensive to maintain properties. There are issues of under-occupation and over-occupation of housing. These issues are difficult to tackle as many of the smaller more affordable homes are in council ownership but without larger housing being vacated it is not possible to create movement in the Council-Housing stock without acquiring more property. Many of the larger under-occupied properties are in private ownership.</p>



<p><b>RE035</b></p>	<p>There are specific problems with the way transport is organised which cannot be changed simply because a private company refuses to co-operate with this community's needs and wishes. We believe the Council has the right to insist on transport company's fulfilling a duty to serve this community in the way they wish to be served. Scilly will not be able to make progress on beneficial change in the future unless all companies active in Scilly open up their operations to scrutiny and public accountability. Running the Council on a shoestring with limited reserves whilst private companies are making large profits puts our community at a disadvantage in the provision of services. Equitable returns for the taxpayer on for example Airport fees would allow the Council to deliver more and better services at a profit.</p>	<p>The Local Planning Authority does not have any power to insist on any private company fulfilling a duty to serve the communities transport needs. There will of course be a positive policy framework that should support any economic enterprise on the islands where there is a proven need and there are otherwise no significant impacts. The respondent's comments are noted.</p>
<p><b>RE040</b></p>	<p>I believe that food security should, for any community, be one of the key issues a local plan should focus on and I am really surprised that this topic is not mentioned at all.</p> <p>Going into the Co-op on St Mary's when the Gry has missed one or more sailings in the winter opens your eyes to the Islands' vulnerability to food insecurity. The Co-op and the independent off-island shops all only or mostly sell fruit, veg, dairy and meat that has been brought in from the mainland: the quality is often poor, it creates huge waste material through all the plastic packaging that is involved, does not pay one local farmer and does not connect its residents to the land. I am experiencing myself how extremely difficult it is to make a living from farming yet food security and sustainability just has to become centre of attention in my opinion. Creating or promoting jobs in horticulture and agriculture shouldn't just be another way of increasing economic growth but it should also be about growth in wellbeing and thus be part of the vision of a "thriving, vibrant community rooted in nature" (a great vision!).</p> <p>In my opinion, on a very basic level, people with ideas in growing and farming need to have access to land. On St Martin's, where I live, a huge proportion of the land is leased to very few people and many fields are often unused, or sometimes completely overgrown and covered with brambles and bracken with hedges that aren't being cut.</p>	<p>The respondent's comments are noted. The Local Plan cannot provide any land for community or private enterprise, where that land is in private ownership. The use of land for 'growing' produce does not require planning permission. Where planning permission is required for developments associated with the delivery of food security then these would be supported through a positive policy framework, if there are no other adverse impacts as a result, in terms of the natural and historic environment designations.</p>



	<p>Many visitors comment on this fact. Also, younger generations that have ideas and visions often cannot fulfil them because they don't have access any land.</p> <p>How about promoting and creating allotments? Community orchards? Proper fruit and veg gardens for the school children? Being rooted in nature to me means to take care of it, to plant trees, to tend a garden, to grow the food we eat every day and to make sure that when the freight boat misses a sailing or two, we don't have to start worrying about what will be left to eat. Relying on online shopping cannot be the answer in the long run- we need to promote a sustainable community that can feed itself and not rely as much on outside sources for survival. The same is true for our sources of energy but food security in particular is, in my opinion, just not highlighted enough.</p> <p>To give an example, the Bristol Local Plan states under "Green Infrastructure":</p> <ul style="list-style-type: none"> <li>• "Space for local food production within the city: Allotments, grazing land, city farms and informal areas of green space create potential for local food production and community use. These types of green infrastructure can contribute to people's health and well-being, provide education opportunities and can also be valuable for wildlife."</li> </ul>	
RE042	<p>Yes - the control of the level of noise pollution. The concerns: the airport and flight paths of the leaving planes - helicopter service, power boats.</p>	<p>The respondent's comments are noted. The Planning Authority are not aware of a particular noise pollution problem. The noise of the airport and helicopters are an essential part of the transport infrastructure. Similarly the use of motorised boats is an essential part of linking the islands for supplies and medical support. There is no intention to impose restrictions through the Local Plan on these particular aspects of the community. The records of noise complaints to the Council relate to domestic nuisances and places of entertainment. Where development proposals come forward that are likely to give rise to significant noise impacts then these proposals should be supported by acoustic surveys to demonstrate the 'noise levels'. Where these are found to be significantly harmful then such proposals could be resisted by the Local Plan.</p>



<p><b>RE045</b></p>	<p>"To improve the quality of the tourism offer" Scoping Report Page 6. People were attracted here by the islands' unique features. These were largely unchanging; peace and quiet with a gentle pace of life, safe and atmospheric. Now we seem to be living on a large and permanent construction site with noise, disruption and mess becoming endemic. PLEASE STOP! No more strategic development or grand projects, which we don't need and can't afford anyway.</p>	<p>The respondent's comments are noted. Regeneration of the islands infrastructure and buildings in an inevitable part of life. It is likely that there has been a flurry of larger scale products in recent years following the Objective One funding of the European Union. The Objective One and Convergence programmes helped the economy of Cornwall and the Isles of Scilly to grow with a vision to achieve a high-value knowledge based green economy with opportunities for all. The intentions therefore were to assist the islands in 'sustainable growth'. There are unfortunate implications of any development which are of a short-term nature but have a long-term benefit for the community.</p>
<p><b>RE050</b></p>	<ul style="list-style-type: none"> <li>• Assess the costs/benefits of your 'key issues' and prioritize</li> <li>• Focus on those that have legal constraints if they are not put in place or will really adversely affect the natural or built environment.</li> <li>• Focus on practical, relatively low cost schemes, such as solar panels, rainwater management, recycling schemes with support and encouragement for local people, as individuals or small enthusiastic groups, to follow up.</li> </ul> <p>Our own priorities list, for what it is worth, is:</p> <ul style="list-style-type: none"> <li>• Hugh Town sewerage</li> <li>• Protection of the natural environment</li> <li>• Housing for young active people and elderly people (in conjunction with an integrated health/care system).</li> <li>• Energy-saving systems that currently exist, are proven and relatively inexpensive, plus support/encouragement from the Council for go-ahead individuals to install and use them.</li> <li>• Water-management systems, such as rainwater harvesting, again with appropriate systems of support and encouragement.</li> <li>• Provision of opportunities for enterprising people to supply services (plumbers, electricians, IT specialists, gardeners) that are not constrained by their necessity to work for large public schemes.</li> <li>• Encouragement for people to diversify horticulture/agriculture to produce a range of vegetables and herbs that will aid self-sufficiency in the Isles.</li> <li>• More reliable all-year-round transport facilities.</li> </ul>	<p>The respondent's comments are noted. The process of local plan preparation is subject to public consultation, sustainability appraisal and independent public examination to be found 'sound' before it can be adopted by the Council. The Local Plan is a document that cannot require anything to take place but it can create a positive policy framework, consistent with national requirements but locally distinctive, that would ensure both protection of the environment but encourage the right types of development in the right places. Above all any development supported by the policies of the local plan has to be sustainable. Development would not be permitted if it was deemed to have significant adverse impacts that resulted in harm that could not be balanced with significant wider public benefits.</p>



RE051	To particularly support the off-island communities who are integral to the success of tourism on St Mary's e.g. to retain concessionary boat fares. To continue to improve communication with us. To subsidise waste unemployment, one freight charge to all the Islands.	The Local Planning Authority does not have any power to insist on any private company fulfilling a duty to serve the communities transport needs (which would include concessionary boat fares). There will of course be a positive policy framework that should support any economic enterprise on the islands where there is a proven need and there are otherwise no significant impacts. The respondent's comments are noted.
RE052	Build new houses? Water supply? Sewage disposal? Extra waste created? Schooling for potential off-springs? Motor vehicles? Parking?	The respondent's comments are noted. The evidence base so far including the Strategic Housing Market Assessment suggests there is a local 'housing need' which will need to be addressed within the Local Plan, as far as possible, without harming the natural or historic environment. As part of any new development is it critical that there is no additional burden to infrastructure such as water and sewerage and waste disposal. Any development will need to address these issues. There are no known issues with the numbers of school places and with the size of the community it is likely that any modest increase would not pose long-term capacity issues. The creation of new housing is not intended to enable large-scale growth in population but to deliver housing solutions for existing needs and workplace recruitments for many of our essential services and businesses. The increase in motor vehicles therefore is not considered to be an issue. There are no restrictions that the Local Plan could require through policies that would restrict private individuals from owning vehicles. Locating development sensibly would ensure any household did not have to own a private vehicle to be able to live on the islands.
RE054	Re-opening the quarry - provides year round employment for a number of people, granite for building or the facing of new houses. To maintain the ambience of Scilly. Cheaper than importing. An export to the mainland so providing income to the island.	The respondent's comments are noted. As a Unitary Authority the Local Plan will have to address Minerals and Waste Plan aspect. There are no specific plans at the present time to seek to re-establish quarrying as an industry on the islands. Mineral extraction is not a major aspect of the economy on Scilly either presently or historically. The sensitive nature of the natural and historic environment together with the small-scale nature of the islands would suggest that any re-introduction of mineral extraction activities would have potentially significant impacts upon the environment. It is unlikely therefore that policies will encourage the re-opening of quarries. In certain circumstances it may be appropriate to





		allow limited and small-scale quarrying of sites but this would need to be supported by a clear case of need and supported by evidence that it is not otherwise harmful to the environment.
<b>RE056</b>	Cost of transport and freight. It was mentioned in 20:20 vision. I recognise CIOs can do little in some areas but it is key to development with water and sewage improvements	The respondent's comments are noted. The Local Plan cannot impose any requirements on local businesses in terms of setting costs of transport and freight.
<b>RE057</b>	Greater emphasis and priority should be given to transportation costs. High costs are deterring potential visitors and losing traditional visitors. 92% of our income is at stake!!	The respondent's comments are noted. The Local Plan cannot impose any requirements on local businesses in terms of setting costs of transport and freight.
<b>RE058</b>	Further to the above comments I would like to see the LA embark on an efficiency drive, by this I mean make their so called services quick and easy to access online. For example Temporary Event Notices should be submitted online. Payments made online, application forms should be filled online and information to help people reach information options about the LA promoted in an easily understood manner to the layman e.g. accounts. In the working private sector we simply don't have the time to go to St Mary's and investigate! We have access to good broadband now so we should use it to save time and Money!	The respondent's comments are noted and agreed. The issues raised are beyond the scope of the Local Plan. Planning Applications can be submitted online and payments to the Authority can be made on the telephone.
<b>RE064</b>	<p>One considerable omission unless I have overlooked it is mention of sea defences. There is a note in Appendix B referring to the Shoreline Management Plan but the Local Plan itself needs to commit the Council alongside the Environment Agency to maintaining existing sea defences and 'managing retreat' only where there is no significant environmental impact or properties or essential infrastructure are not put at risk</p> <p>Would also like to see opportunities for more opportunities for modest street and beachfront cafes to flourish. Perhaps the Kavorna, for instance, could be encouraged to put two or three tables outside its premises and existing outlets like Dibble and Grub be allowed a little more licence on Porthcressa seafront.</p> <p>Finally, there ought to be a mechanism other than relying on public opprobrium whereby ludicrous excrescences like the Wall of</p>	<p>The respondent's comments are noted. Work on understanding flood risks and coastal erosion is informed by the Shoreline management plan and work is underway to understand flood risks more generally, which will inform the local plan. All of the local plan is subject to sustainability appraisal and any policy or proposal will be assessed in terms of sustainability impacts.</p> <p>The issue of outside seating for café's. The use of the highway, which includes the pavements would require permission from the Council (where the road or pavement is maintained by them) and would require planning permission for a change of use. There is nothing to stop businesses from applying for such a change of use. Any application would be assessed as to impacts upon the amenity of the area and highway</p>





	Obscurity associated with building projects can be disposed of with the minimum of fuss and replaced by appropriate structures.	safety. If there is no identified harm then such an application could be supported.
RE065	<ul style="list-style-type: none"> <li>· Transport – there seems to be little consideration of the relative carbon emissions of modes of transport options, both on and off island and how these may be reduced in the future. This will be critical in a future with reduced fossil fuel availability and a necessity to curb carbon emissions.</li> <li>· Sea level rises – it has been mentioned, but nothing has been suggested about how to adapt to these impacts. Within the next 30-50 years this could be a very serious issue for all the Islands.</li> <li>· Dependency – there is something of a culture of financial dependency on Scilly. The Islands have seen vast amounts of finance flowing in recently, mostly from European funding. Whilst this brought benefits it can create a dangerous mind-set of chasing grants and not thinking how the local economy can become more self-sustaining and resilient. This relates to our earlier point about living within our means and the carrying capacity of the Islands.</li> <li>· Water–An all-out move towards desalination should be given very careful consideration. Being such an energy intensive process, if water supply is directly linked to high energy demand, a basic necessity of life could be put in a somewhat perilous position if energy restrictions existed.</li> </ul>	The respondent's comments are noted. The control of emissions of existing modes of transport goes beyond the scope of the local plan. Any future policies and proposals will have to ensure that development supported is as sustainable as possible, which will include measures to reduce the reliance on fossil fuels. Where no planning permission is required then there is no control mechanism to curb carbon emissions. Again the issue of Sea-Level rises will be an issue for future development. Development proposals will have to demonstrate how they seek to both mitigate the effects of climate change and adapt to the inevitable effects, such as sea level rises. Current predicted sea level rises are published and look at the century ahead but it is clearly an issue that should and has to be addressed when considering any development, particularly in a geographically isolated island location such as Scilly, where sea level rises are likely to be felt, particularly in our lower lying towns.
RE066	Attached personal comment and illustration of poor planning decisions.	The respondent's comments are noted.



<b>RE069</b>	Monitoring: To ensure the objectives are smart they need to be measurable. A monitoring plan needs to be put in place and which sets out how each objective will be measured (what data will be collected). This should be tested so that it is clear and appropriate evidence is available or collectable through the planning process during the period covered.	The respondent's comments are noted. The local plan will include necessary and appropriate monitoring relevant to understand the implications of policies.
<b>RE073</b>	The Duchy of Cornwall is the owner of the majority of the land area of the Isles of Scilly and has been since its formation in 1337. The Duchy owns approximately 25% of the housing stock on the islands virtually all of which is let to local residents, as well as all commercial property on the off-islands and some on St Mary's. All the islands farms are owned and let out by the Duchy.	The respondent's comments are noted.
<b>RE075</b>	We need a long-term solution to separate waste collection techniques and procedures that not only allows but encourages people to take greater responsibility for managing their contribution to the islands' waste disposal and recycling issues.	The respondent's comments are noted. The issues of long-term solution to waste collection techniques would be very much supported by the Local Plan. It is likely that new development will be required to make provision for greater recycling and be able to connect to any future 'smart grid' solution particularly for energy and waste.
<b>RE079</b>	<p>Respective of type, any energy installation should be for the benefit of the islands community as a whole and not for individual or corporate gain.</p> <p>Given their absolutely critical functions, providing a lifeline to the mainland, St. Mary's Harbour and St. Mary's Airport should be recognised in the Local Plan as valued community assets that should be actively protected or enhanced.</p> <p>As stated above, it is essential to protect and where possible enhance the quality and distinctiveness of place – achieving a balance between development and the natural environment and the provision of facilities and services for both visitors and the resident community alike. With this in mind, the Local Plan should also serve to protect and enhance those assets, facilities and services on which the islands' community and economy relies. This includes both the natural assets (unique environment and landscapes, flora and fauna, historic sites</p>	<p>The respondent's comments are noted and agreed.</p> <p>The Harbour and the Airport are recognised as important transportation links for the island. The Governments Policy Statement on Assets of Community Value states that communities have a right to identify a building or other land that they believe to be of importance to their community's social well-being. The aim is that, if the asset comes up for sale, then they will be given a fair chance to make a bid to buy it on the open market. If the nominated asset meets the definition of an asset of community value, the local authority will list it. The owner will have a right to an internal review by the council, and a right of appeal to an independent tribunal against the result of the internal review. Both the airport and the harbour are owned by the Duchy of Cornwall with the Airport being operated by the Council of the Isles of Scilly and the Harbour being operated by the Duchy themselves. It is unlikely therefore that both would be sold off and lost as assets that are vital transportation links for the islands. The Local Plan has and will continue to create a</p>



	<p>etc.) as well as services and facilities that could contribute to an improved quality of life on the islands, including access to sports, leisure and cultural venues and facilities.</p> <p>The range and quality of Scilly's visitor offer (including accommodation) has undoubtedly improved in recent years and during the life of the last Local Plan. However, it is vital that the islands keep moving forward, providing the infrastructure and conditions for economic growth in new and emerging sectors as well as for our tourism industry and our aspiration to deliver a world class visitor experience. The Local Plan should therefore provide the conditions to support improvements to the existing offer as well as new development providing that it is of an appropriate type and quality to meet or exceed the expectations of today's (and tomorrow's) visitor.</p> <p>With specific regard to the visitor economy, it is important that the new Local Plan facilitates development and continued enhancement of the tourism offer, in particular new, high quality and distinctive visitor experiences together with new or improved holiday accommodation. The Islands' Partnership would encourage a robust study be undertaken into the future accommodation supply (both type, style and quantity) on Scilly in order that the long term growth ambitions for the visitor economy can be achieved. This would also help to identify where there is a need for the replacement or perhaps change of use of poorer quality or end-of-life accommodation. Equally, it would help to identify future investment priorities including the scope for new hotel development on St. Mary's or additional niche accommodation types that respond to changing market demands (e.g. eco-friendly, alternative, serviced apartments/units etc.)</p>	<p>positive policy framework to support development and business proposals that are proven to be necessary or viable where there is otherwise no adverse harm to the important aspects of the environment or community, which would include being resistant to any proposal that resulted in the loss of important transportation links.</p>
RE083	<p>Do not undertake any further unwanted and un-needed developments and no work should take place during the visitor season. Waste should not be shipped to the mainland at an enormous expense. The damage to the atmosphere by the exhaust fumes from the lorries and</p>	<p>The respondent's comments are noted.</p>



	ships exceeds any pollution that would be caused by the occasional burning at the dump.	
RE084	Extra traffic with extra housing. Allow house owners to improve their properties to modern day standards	The respondent's comments are noted. There are no policies in the current local plan or proposed for the new local plan that would prevent house owners improving their properties to modern day standards. Restrictions are imposed to ensure that potentially damaging form of development are appropriate controlled, such as the loss of traditional features that result on the erosion of its historic character.

## Supplementary Feedback

4.19 Outside of the questions set out in the questionnaire a number of respondents made other comments. These have been addressed below.

Ref	Other comments <i>*Grammar and Spelling is unchanged from the original submission.</i>	Officer Response
RE02	I fully agree that the Isles of Scilly needs more housing, which would accommodate sufficient extra people to be able to consider alternative employment here other than Tourism. Hence, in my opinion, any new housing should not be available for holiday accommodation, second homes, or retirees wanting to live here. New housing should be a mix of family 2-3 bedroom houses for people of working age, which must include a number of bungalows, or ground floors flats, suitable for the disabled, the elderly living on the islands who want to downsize, or childless couples That would also help relieve the pressure on Park House.	The respondent's comments are noted and agreed. The SHMA clearly sets out the need to plan for a mix of housing types that reflect the comments made.



	<p>There are many types of employment that the islands could offer if only we had a Business/Technical Park, where units, large and small, could accommodate electronic assembly, clothing manufacture, pharmaceutical company products, seaweed/seafood industry etc. all of which could offer employment for those island children who go on to University, obtain degrees, but are unable to find challenging, rewarding or worthwhile work on the islands, other than the hospitality/hotel/restaurant trades. I am sure there are many companies who would consider moving to, or opening new branches on Scilly. A particular hobby horse of mine is the kelp industry, widely practiced throughout the EU, a one time industry on Scilly, and here in Ireland &amp; Scotland. It could easily generate £3-5 million pa. on Scilly, by products of kelp going into paint, cosmetics. pvc, food products, toothpaste etc. We have thousands of tons of kelp growing here on our doorstep which renews itself annually, our sea is free of pollutants, we have no rivers creating pollutants - its an opportunity Scilly should grasp with both hands.</p> <p>I appreciate that more people and industry, large or small would place additional demands on our water, electricity supply, sewage system and public services, but unless the islands diversify and grow, and become less reliant on tourism, there is no realistic future here for future generations.</p>	<p>The respondent's comments are noted. It is unlikely that any large-scale manufacturing of the nature suggested would be viable on the islands due to the added costs of freight. Unless the products used in any manufacture, were from Scilly in the first place, then it is unlikely to be a viable business proposition even if the appropriate manufacturing space was available. The respondent's comments in relation to Kelp are interesting and this could be a reasonable diversification of the economy. It would however have to demonstrate that, on a large scale, it did not harm the delicate ecosystems of the seas around the islands. There is a food-chain to consider that might be affected by such a proposal.</p>
		<p>The respondent's comments are noted and agreed.</p>
RE05	<p>Dear Sirs, dear Ladies, you call for some comments concerning the framing of the future development of the Scillies. Here are mine. I am Swiss but have the privilege to own since more than 25 years a small house in St.Mary's (Sunny Creek Flat, on Garrison Lane) and spend every year one month or so on the Islands. I have come to love them and am interested by any plan promoting further developments. Here in a nutshell my ideas, without long comments .</p>	<p>The respondent's comments are noted.</p>
	<p>a) the Scilly Islands are UNIQUE. They are unique because they have a sea/landscape and built areas which have kept a harmonious proportion between each other. They are unique because they are islands without larger „developments“ , in Europe and soon in the whole world a rarity .</p>	<p>The respondent's comments are noted.</p>
	<p>b) This uniqueness is what on the long run will provide a sustainable economical life on the islands. In a civilisation in which the over-developed areas are rapidly becoming predominant, the Scillies will attract in the future even more people who will need a place where this „developpement“ – in fact: over-developpement- is not happening.</p>	<p>The respondent's comments are noted</p>



	<p>c) Any economical growth has to be planed accordingly. This implies to keep a strict limitation of the built areas, a reasonable control of noise pollution (airport, helicopters, power-boats, traffic) , to keep the atmosphere of a calm, restfull place and to promote besides tourism agricultural activities .</p>	The respondent's comments are noted. All such issues that are likely to arise as a result of development proposals would be taken into account when a planning application is submitted and assessed.
	<p>d) More specifically this perpective does not allow the establishment on the Islands of too many businesses not connected to the direct the needs of the tourist industry or of agriculture ( such as businesses invited to the newly-built business-center in Porthmellon). If too many of such businesses would be established, they would sooner or later trigger a chain reaction of building programmes – housing and infrastructures – and of traffic requirements (more flights etc) which could threaten the uniqueness of the Islands and its quietness.</p>	The respondent's comments are noted.
	<p>e) I do know that my view is shared by many islanders and it is to be hoped that any decision concerning the future frame of the economical policiy in the Islands will be reached by a large consensus.</p>	The respondent's comments are noted. The process of adopting a new local plan has to go through statutory procedures including public consultation. For a local plan to be adopted it has to be found 'sound' by an independent Planning Inspector who would also hold an Examination in Public
	<p>I would have loved to participate in the forthcoming discussion in the Wesleyan Chapel just below my flat but unfortunately I will be on Islands only after mid-July. But there will be for sure other opportunities to share ideas about the future of this incredibly beautiful spot on our rapidly over-developped Planet.</p>	The respondent's comments are noted.
RE010	<p>I believe that the future viability and prosperity of the islands depends on protecting and enhancing its environment and natural beauty, including its wildlife. This is insufficiently recognised in the Scoping Report. It should be the major consideration in considering the important economic and housing issues, and am surprised that it is not clearly stated as an overriding factor in the aims and objectives of the Economic Plan you have reproduced in paragraph 2.2, or in the subsequent issues considered in the Scoping Report. It should be the predominant consideration in the Local Plan.</p>	The respondent's comments are noted. Any policy or proposal of the local plan that did not result in a protection or enhancement of the environment would not be sustainable. The Scoping Report sought to notify the community of the intention to replace the current 2005 Local Plan and to set out what the authority considers to be the main issue to address.





<p>In this respect the first key issue you list in paragraph 2.2 is inadequate. “Supporting sustainable development” can surely not be regarded as an “issue”, since, like motherhood and apple pie, nobody would seriously argue against it - i.e. for unsustainable development or for no development at all. The key issue should be whether development should be permitted only where it preserves or enhances the environment. The Plan should recognise the need for ‘sustainability’; but, since this word is very loosely defined and subject to various interpretations in practice, the policies in the plan should not be too dependent on it and should be expressed in clearer, more specific terms. The wording of the policies in the Plan will be of great importance. It is not enough to rely on the Vision statement or on rehashed ‘objectives’, since these are usually so generalised as to be of limited practical value when considering development proposals.</p>	<p>The respondent’s comments are noted. The local plan will be subject to sustainability appraisal which is a process that runs in parallel to the local plan process and ensures that the different stages are assessed against a set of sustainability objectives. A new local plan could not be adopted if this SA work has not been carried out.</p>
<p>The environment of the islands can easily be harmed by additional development and so the very limited plots of land that could be developed without causing substantial harm should be kept for essential development that is vital to the islands’ future. So, for example, policies should prevent open market housing. And policies addressing issues 5, 7, and 8 should exert strict control with an overriding requirement for environmental protection and enhancement.</p>	<p>The respondent’s comments are noted. The Local plan has to create a positive policy framework for sustainable growth. In order to deliver this it may be necessary to permit some enabling development to cross-subsidise much needed homes due to the significant additional costs of constructing any development on the islands. It is anticipated however that any ‘open market’ housing would be conditioned to be occupied as a principle residence to avoid the loss of such properties to the ‘second homes’ sector of our housing stock. Any allocations would be located on sites that have been adequately assessed to ensure minimal visual impact.</p>
<p>I suggest that a reconsideration of the Conservation Area boundary or the introduction of settlement boundaries should not be pursued. As long as policy statements are clear and specific there will be no pressing need for them; and to provide for them in the Local Plan would open up a great deal of debate that would in my view significantly lengthen the time it would take to bring the Plan to adoption. As the existing Plan is an ‘old style’ plan as described in your paragraph 1.3, it is important to replace it as soon as possible. Otherwise, in view of changing national policies, the islands will be more vulnerable to harmful development proposals.</p>	<p>The respondent’s comments are noted. It is unlikely that we will pursue a revision of the CA boundary as part of the Local Plan process. The benefits of settlement boundary are also unlikely to result in sufficient benefits to warrant the work required to define settlement limits.</p>
<p>Finally I urge the Council to keep the text of the Plan clear, simple and meaningful. It should avoid the kind of gobbledegook that, for example, occupies the whole of paragraph 3.28 of the Scoping Report. Such excessive use of jargon makes the text turgid and difficult to understand. If used in the Local Plan it would taint the whole document.</p>	<p>The respondent’s comments are noted. Wherever possible we would seek to ensure that the plan is written in plain English to ensure its content and policies are clearly understood and accessible to all. We hope to avoid confusing jargon wherever possible.</p>



RE022	Other Comments: agricultural/fishing etc. Does provide a niche that could be further developed, but it is unlikely to be large scale and limited to the self-employed and low wage employment.	The respondent's comments are noted.
	However the "taste" and requirements of tourists will change, in that they will expect good value for money, particularly with accommodation and food; an improvement in this area is seen as a must.	The respondent's comments are noted.
	The digital age will bring new opportunities to Scilly for professionals and entrepreneurs. The constraint on this is housing and the transportation costs to and from Scilly.	The respondent's comments are noted and agreed. Whilst we can seek to ensure that appropriate policies and proposals are in place to deliver housing
	Transportation: The air link is unreliable and punctuality does not appear to be of a concern. Mainland transportation operators work to timetables. This is something Scilly needs to learn and despite many claims that this is to change, presently the integration of services is dismal.	The respondent's comments are noted. The issues raised go beyond the scope of the Local Plan.
	The Scillonian was built for day trip tourism and still operates this way. Staying in Penzance before and after a visit to Scilly is now costly. The ship should be based in Scilly, leave in the morning and return in the afternoon. This would also benefit islanders.	The respondent's comments are noted. The issues raised go beyond the scope of the Local Plan.
	It would also open up the possibility of one/two night island stays which would benefit Scilly rather than Penzance.	The respondent's comments are noted. The issues raised go beyond the scope of the Local Plan.
	The number of "day visitor hours" on the islands is probably now higher from cruise ships than the Scillonian. Visitors on the latter have just over 3 hours on the island, whereas cruise ship passenger hours on the island can be nearly three times as great.	The respondent's comments are noted. The issues raised go beyond the scope of the Local Plan.
	The demise of the helicopter service was a disaster from many viewpoints. It operated like a bus service in all but fog, whilst the small aircraft are cramped, do not like the wind and cannot presently operate in misty conditions. It also provided a unique selling point (USP) for the islands, something the air service can never achieve.	The respondent's comments are noted. The issues raised go beyond the scope of the Local Plan.
	The latest helicopters are almost as fuel efficient as the aircraft and are quicker. The ideal would be for the helicopter service to return, flying from Newquay and integrating with Flybe flights in particular, so an easy journey to London and the north becomes a realistic possibility.	The respondent's comments are noted. The issues raised go beyond the scope of the Local Plan.
	Housing: The main obstacle to economic development is housing.	The respondent's comments are noted and agreed.



	<p>Scilly requires entrepreneurs and professionals (Council health etc.) and they should be able to purchase a property that allows them to remain on the "property ladder". Having to rely upon a mainland property (which is probably mortgaged) will not attract the people needed to "run the islands" health and economic development. Keeping a home on the mainland and paying for rented accommodation is prohibitive.</p>	The respondent's comments are noted and agreed.
	<p>Predominantly the rental market is in the hands of a sole operator, the Duchy, who sets rents which are comparatively higher than the mainland (outside London). The Duchy have their own objective, which is to raise as much income as possible for the Prince of Wales. This objective is not compatible with economic development.</p>	The respondent's comments are noted. The issues raised go beyond the scope of the Local Plan.
	<p>A housing plan needs to be put in place that allows "soft" regulation of housing. The whole spectrum of housing is required from social to executive level.</p>	The respondent's comments are noted.
	<p>The option of designating every dwelling on Scilly, under pinned by legislation, as to its occupation, should be explored. E.g. - Social housing, rented for local occupation, rented for tourism, local owner occupation, second home owner (double or more council tax to apply), retirement occupation.</p>	The respondent's comments are noted.
	<p>In the first instance, a desktop exercise should be undertaken, whereby every dwelling is allocated a designation as to where it would fit in an ideal housing mix. From this, it would make it clear as to what action would be required to achieve the "ideal" housing balance.</p>	The respondent's comments are noted. The issues raised go beyond the scope of the Local Plan.
	<p>Registering a dwelling's use would become compulsory. If there was a need for a change of use, then this could be included as part of the planning process with the proviso that there be a totally independent appeal system. There would need to be a waiting list if a change was required, so that if changes were made, the housing could be kept in balance. The balance would need to be subject to annual review to ensure the ideal balance was still relevant, with changes in the economy etc.</p>	The respondent's comments are noted. The issues raised go beyond the scope of the Local Plan.
RE023	<p>Tourism: the heyday of the 60-80s is unlikely to return and the total visitor numbers are likely to be similar to those of the early 1960s. The advent of budget airlines has opened up other possibilities for tourists and due to the very high transportation costs to Scilly, the market will stabilize around the same level as the early 1960s.</p>	The respondent's comments are noted.
	<p>Is it really necessary at this stage of communication with the public to offer such a bureaucratic, government speak document/questionnaire?</p>	The respondent's comments are noted.



<p>A more concise approach is needed if you are seriously trying to connect with folks and creieve feedback. Apologies for negativity but the proposal document is extremely alienating to the public and I'm wandering if you will recieve a high number of replies after they've bothered to wade through such a long-winded document - A bit my opening above - boring isn't it?</p>	<p>The respondent's comments are noted. The issues raised go beyond the scope of the Local Plan.</p>
<p>1. tourism is now 90% of the islands econmy? Therefore what financial support is the council offering, I've heard next to nothing - without tourism there is no Scilly!</p>	<p>The respondent's comments are noted. The issues raised go beyond the scope of the Local Plan.</p> <p>The respondent's comments are noted. The Council of the Isles of Scilly have a statutory duty to provide services to the community and protect the environment. There are no resources to offer financial support to the tourism industry. The support to the tourism industry is to provide a clean environment, remove refuge, maintain a supply of water, foul drainage infrastructure, maintenance of public spaces and roads and support viable and sustainable communities through the planning service. The Council cannot supplement the incomes of the tourism industry. An economic base dependent on tourism is affected by the global economy and market forces. It is important that diversification of this economy is supported to build in resilience of the islands. If there were no Scilly without tourism then there would be no people living here during the winter and no need to retain a school or other healthcare services that are required by the community. I'm sure the respondent would agree that this support is essential for the islands and expected by visitors.</p>
<p>3. More affordable houses are needed to rent. A restrion is needed against the present government's idea of selling "housing association houses". Also Council houses. The 'Lagan' site, now used by contractors may make a possible are to develop in to affordable rented housing? Again regarding mainland transportation services I've never read so many words saying so little!</p>	<p>The respondent's comments are noted. The issues about selling HA housing is beyond the scope of the Local Plan. The fields at Parting Carn Farm (previously used by Lagan and Kier) have been restored as required, back to farm land. These fields are not located in close proximity to existing built-up areas of St Mary's and have not been submitted as potential housing sites, by the landowner. We cannot therefore seek to develop such sites for housing. All potential housing sites have to be assessed as available, suitable and viable. As this site has not been submitted for potential housing assessment they would not be considered.</p>
<p>4. Living on the Islands one takes the employment situation as read - we have all had more than one job at the same time to survive - that's the nature of the beast and part of the facts of living in such a lovely place. You have to personally weigh your quality of life.</p>	<p>The respondent's comments are noted.</p>
<p>5. Market gardening as can be seen through the past - that if too many do this - a bandwagon starts and no one makes a living - the islands population restricts, plus seasonal numbers - unless the businesses ship produce to the mainland, profits are restricted.</p>	<p>The respondent's comments are noted. The issues raised go beyond the scope of the Local Plan.</p>



	6. Most of the European funding projects have benefitted outside contractors - the resulting new buildings, oversize schools and oversized airport, but expensively built need vast amounts of money for upkeep and running.	The respondent's comments are noted. The issues raised go beyond the scope of the Local Plan. The Council are required to go through a Tendering process to ensure the best value for money. Such tenders are open to local people and companies.
	Waste collection and disposal is a matter of changing people's awareness separating their rubbish - compostable, glass etc. The Council's job is to supply the relevant containers after a simple consultation with other councils - this shouldn't mean the usual thousands of pounds consultation to consultants but good communication, enquiry and common-sense - As usual it's about good management and organisation.	The respondent's comments are noted. The issues raised go beyond the scope of the Local Plan.
	7. Renewable energy in the form of "solar power farm" may be a good idea - e.g. Money here may be a positive for once?	The respondent's comments are noted.
	12. there should be some kind of development restrictions.	The respondent's comments are noted.
	13. New developments should lean towards affordable rented accommodation (with buying and selling restrictions)	The respondent's comments are noted.
	14. Wooden windows are good only if the right long lasting timbers are used (which can be expensive). Note - you're asking for restriction on plastic windows whereas both the school and airport were steel, plastic and glass??	The respondent's comments are noted.
	Again apologies for such negativity.	Noted.
RE026	As the report states, Scilly has been designated an Area of Outstanding Natural Beauty, a Conservation Area, a Heritage Coastal Footpath; it also has a considerable number SSSI's...all in recognition of the necessity to protect the Islands from development in order to preserve their unique environment for generations to come.	The respondent's comments are noted.
	That those designations are not threatened is clearly revealed in the Local Plan review: Scoping Report; to quote 3.21 "a review could include recommendations to alter the boundaries of the designation, which would essentially take certain areas out of the Conservation Area".	The respondent's comments are noted. The wholesale designation includes areas that are not historically important such as the airport, the waste management site and industrial estate at Porthmellon, yet these are all included in the conservation area designation therefore the same high standard are imposed in areas that do not warrant such close scrutiny. It was a suggestion to gauge people's views on this issue. There is unlikely to be any changes to these designations but it was not a suggestion to take anything away from the value of the islands' heritage, but merely a suggestion to focus the value back on the heritage that is important to protect, rather than trying to protect non-historic areas.





	<p>I accept Scilly cannot be set in aspic would support "infill" houses on certain site for local residents; the move to build 90-120 homes (the majority on St Mary's) over the next 10 years as the way forward is questionable.</p>	<p>The respondent's comments are noted. An independent assessment of housing needs, through a Housing Survey and a Strategic Housing Market Assessment (SHMA). This work has identified the need to provide housing for local residents that are not being met by the current level of homes on Scilly. There is therefore no question about the need to deliver more homes over the life of the new local plan. It will be essential that the local plan creates a positive policy framework to ensure such developments can be delivered without compromising the significant and important aspects of the environment.</p>
	<p>Increasing the resident population as a method of tackling the housing problem cannot be a viable long term solution. More people would only exacerbate problems with regard to any sewerage system but particularly to the supply of water. Another 120 houses accommodating initially just 2 people, would allow further 240 residents. Eventually, as children arrive (who in their turn would require housing) cannot be seen to be the way to address any housing list now or in the future. What would have been gained...more importantly, what would have been lost?</p>	<p>The respondent's comments are noted.</p>
	<p>3.2 I'm not convinced that attracting 'entrepreneurs' is the way forward. Now that superfast broadband is available, there is nothing to stop them coming now and purchasing one of the many properties at present on the market, rather than looking to provide new housing for them. How would their enterprise in promoting their own businesses enhance Scilly's wellbeing...would they shop locally? Would their children attend the local school? Ownership of a car would be taken for granted adding to an already out of control problem.</p>	<p>The respondent's comments are noted.</p>
RE030	<p><b>WASTE</b></p> <p>We would expect the Local Plan to contain more information than appears to be anticipated in 'The Local Plan Review: Scoping Report' (the "Report"). At para 2.2 the Report stated that the key issues covered by the Local Plan could include:</p> <ul style="list-style-type: none"> <li>· Supporting sustainable development</li> <li>· Providing and safeguarding infrastructure</li> <li>· Ensuring the sustainable management of energy, fuel, water, sewerage and waste</li> </ul> <p>In respect of waste facilities, in fact the Local Plan must include the information required by the National Planning Policy Framework ("NPPF") and the National Planning Policy for Waste ("NPPW"), including that detailed below.</p>	<p>The respondent's comments are noted. As a unitary authority the Council have a duty to appropriately plan for waste and this is likely to be combined with the local plan. This would need to be supported by appropriate information and evidence which, at the time of the scoping report, was not available. The intention is however is to support sustainable development, provide and safeguard infrastructure and to ensure that the management of energy, fuel, water, sewerage and waste are sustainably managed in accordance with the national requirements.</p>





<p>In particular and without prejudice to the entirety of the NPPF and NPPW, we would expect to see consideration of the requirement for a sustainable supply of local construction materials (including recycled aggregates) to underpin the future needs of housing and infrastructure development and where that supply may be best located on the islands.</p>	<p>Noted. A site for such activities at Pendrethan Quarry benefits from a permit from the EA and planning consent through a CLUED. The local plan will support the sustainable supply of local construction material through the reuse of demolition &amp; excavation material wherever appropriate through for example the use of waste management conditions tied to individual planning permissions. The Council can also issue exemptions for the temporary storage and processing of inert demolition &amp; excavation waste in relation to individual projects to encourage reuse.</p>
<p>It is particularly important that such facilities are included within policies in the Local Plan given that the whole of the Isles of Scilly is an AONB and para 116 of the NPPF states that planning permission should be refused for major developments in an AONB except in exceptional circumstances and where it can be demonstrated they are in the public interest. Whilst it cannot be certain at this stage that such development would be 'major development' for the purposes of the NPPF, policy support would be significant in the event that any planning applications were to come forward to meet the needs of the Isles of Scilly.</p>	<p>The respondent's comments are noted. The LPA is aware of the waste requirements for the islands and that the AONB designation covers all of the land. A positive policy framework will be created to ensure that the right types of development, in the right places can be supported, where there is otherwise no adverse significant harm identified.</p>
<p>Without such policy to support any planning applications for this type of infrastructure, investment in such facilities will be likely to be harder to come by.</p>	<p>Noted.</p>
<p>NPPF Para 150 – Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities. Para 151 - Local Plans must be prepared with the objective of contributing to the achievement of sustainable development<sup>1</sup>. Para 156 - "Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver: · the provision of infrastructure for... the provision of minerals...".</p>	<p>Noted. The Local Plan will contain appropriate policies and proposals for the provision of minerals if considered necessary.</p>
<p>Para 157 - Crucially, Local Plans should: · plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework; · be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date; · indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map; · allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;</p>	<p>Noted.</p>



<p>Para 156 - "Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:</p> <p>3</p> <ul style="list-style-type: none"> <li>· the provision of infrastructure for... ..waste management ..."</li> </ul>	<p>Noted. The Local Plan will contain appropriate policies and proposals in relation to waste management if considered necessary, although it is anticipated that the current sites (e.g. Porthmellon waste management site and the off-island waste sites together with Pendrethan Quarry) will continue to meet most of the waste management required for the islands. However, there will need to be provision for the AD plant and gasifier as promoted through the Smart Islands project, which will utilise green &amp; organic waste streams to generate energy and heat. The local plan will support the sustainable supply of local construction material through the reuse of demolition &amp; excavation material wherever appropriate through for example the use of waste management conditions tied to individual planning permissions.</p>
<p>Para 162 – "Local planning authorities should work with other authorities and providers to:</p> <ul style="list-style-type: none"> <li>· assess the quality and capacity of infrastructure for... waste... ..and its ability to meet forecast demands;"</li> </ul>	<p>Noted and see above.</p>
<p>Para 163 – "Minerals planning authorities should work with other relevant organisations to use the best available information to:</p> <ul style="list-style-type: none"> <li>· develop and maintain an understanding of the extent and location of mineral resource in their areas; and</li> <li>· assess the projected demand for their use, taking full account of opportunities to use materials from secondary and other sources which could provide suitable alternatives to primary materials." </li></ul>	<p>Noted. The Local Plan will contain appropriate policies and proposals for the provision of minerals if considered necessary and as stated above will promote the reuse of any suitable waste materials arising from construction and demolition.</p>
<p>National Planning Policy for Waste (October 2014)</p> <p>Para 3 – "Waste planning authorities should prepare Local Plans which identify sufficient opportunities to meet the identified needs of their area for the management of waste streams. In preparing Local Plans, waste planning authorities should:</p> <ul style="list-style-type: none"> <li>· drive waste management up the waste hierarchy (Appendix A), recognising the need for a mix of types and scale of facilities, and that adequate provision must be made for waste disposal;</li> <li>· in particular, identify the tonnages and percentages of municipal, and commercial and industrial, waste requiring different types of management in their area over the period of the plan...;</li> <li>· consider the extent to which the capacity of existing operational facilities would satisfy any identified need." </li></ul>	<p>Noted. The Local Plan will contain appropriate policies and proposals in relation to waste management if considered necessary, although it is anticipated that the current sites (e.g. Porthmellon waste management site and the off-island waste sites together with Pendrethan Quarry) will continue to meet most of the waste management required for the islands. However, there will need to be provision for the AD plant and gasifier as promoted through the Smart Islands project, which will utilise green &amp; organic waste streams to generate energy and heat. The local plan will support the sustainable supply of local construction material through the reuse of demolition &amp; excavation material wherever appropriate through for example the use of waste management conditions tied to individual planning permissions.</p>



Para 4 – “Waste planning authorities should identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations. In preparing their plans, waste planning authorities should:

- identify the broad type or types of waste management facility that would be appropriately located on the allocated site or in the allocated area in line with the waste hierarchy, taking care to avoid stifling innovation (Appendix A);
- plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle, recognising that new facilities will need to serve catchment areas large enough to secure the economic viability of the plant;
- consider a broad range of locations including industrial sites, looking for opportunities to co-locate waste management facilities together and with complementary activities.”

Para 5 – “Waste planning authorities should assess the suitability of sites and/or areas for new or enhanced waste management facilities against each of the following criteria:

- the extent to which the site or area will support the other policies set out in this document;
- physical and environmental constraints on development, including existing and proposed neighbouring land uses, and having regard to the factors in Appendix B to the appropriate level of detail needed to prepare the Local Plan;
- the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport; and
- the cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential.”

Noted. The Local Plan will contain appropriate policies and proposals in relation to waste management if considered necessary, although it is anticipated that the current sites (e.g. Porthmellon waste management site and the off-island waste sites together with Pendrethan Quarry) will continue to meet most of the waste management required for the islands. However, there will need to be provision for the AD plant and gasifier as promoted through the Smart Islands project, which will utilise green & organic waste streams to generate energy and heat. The local plan will support the sustainable supply of local construction material through the reuse of demolition & excavation material wherever appropriate through for example the use of waste management conditions tied to individual planning permissions.

Noted. The Local Plan will contain appropriate policies and proposals in relation to waste management if considered necessary, although it is anticipated that the current sites (e.g. Porthmellon waste management site and the off-island waste sites together with Pendrethan Quarry) will continue to meet most of the waste management required for the islands. However, there will need to be provision for the AD plant and gasifier as promoted through the Smart Islands project, which will utilise green & organic waste streams to generate energy and heat. The local plan will support the sustainable supply of local construction material through the reuse of demolition & excavation material wherever appropriate through for example the use of waste management conditions tied to individual planning permissions.



<p>Response to Question 8</p> <p>We consider that the Local Plan should provide policy support for, and allocate a site for, the recycling of construction and demolition waste on the Islands.</p> <p>Such provision would be sustainable, reduce development costs, be in compliance with the waste hierarchy, and reduce the need for shipments from/to the mainland and therefore in accordance with the last three bullet points of the Objectives set out in paragraph 2.2.</p> <p>We consider that Pendrethen Quarry is the most suitable location for such a facility, it being a current lawful use of the site and already holding an Environmental Permit.</p>	<p>Noted. The Local Plan will contain appropriate policies and proposals in relation to waste management if considered necessary, although it is anticipated that the current sites (e.g. Porthmellon waste management site and the off-island waste sites together with Pendrethan Quarry) will continue to meet most of the waste management required for the islands. However, there will need to be provision for the AD plant and gasifier as promoted through the Smart Islands project, which will utilise green &amp; organic waste streams to generate energy and heat. The local plan will support the sustainable supply of local construction material through the reuse of demolition &amp; excavation material wherever appropriate through for example the use of waste management conditions tied to individual planning permissions.</p>
<p>MINERALS</p> <p>We would expect the Local Plan to contain Policies and text on minerals development. The Local Plan Review: Scoping Report does not currently contain any mention of minerals policy.</p> <p>In respect of minerals, the Local Plan must include the information required by the National Planning Policy Framework ("NPPF"), including that detailed below.</p> <p>In particular and without prejudice to the entirety of the NPPF, we would expect to see consideration of the requirement for a sustainable local supply of minerals for construction to underpin the future needs of housing and infrastructure development and where that supply may be best located on the islands. In addition, we would expect any such source to be identified and safeguarded in accordance with the requirements of the NPPF.</p>	<p>Noted. The Local Plan will contain appropriate policies and proposals for the provision of minerals if considered necessary. Pendrethan Quarry benefits from a permit from the EA and planning consent through a CLUED for the processing and reuse of inert construction and demolition material. The local plan will support the sustainable supply of local construction material through the reuse of demolition &amp; excavation material wherever appropriate through for example the use of waste management conditions tied to individual planning permissions. The Council can also issue exemptions for the temporary storage and processing of inert demolition &amp; excavation waste in relation to individual projects to encourage reuse.</p>
<p>NPPF</p> <p>Para 143 – In preparing Local Plans, local planning authorities should:</p> <ul style="list-style-type: none"> <li>· identify and include policies for extraction of mineral resource of local... importance in their area</li> <li>· so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously;</li> <li>· define Minerals Safeguarding Areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development, whilst not creating a presumption that resources defined will be worked; and define Minerals Consultation Areas based on these Minerals Safeguarding Areas;</li> </ul>	<p>Noted. The Local Plan will contain appropriate policies and proposals for the provision of minerals if considered necessary and as stated previously will promote the reuse of any suitable waste materials arising from construction and demolition.</p>



<p>It is particularly important that such facilities are included within policies in the Local Plan given that the whole of the Isles of Scilly is an AONB and para 116 of the NPPF states that planning permission should be refused for major developments in an AONB except in exceptional circumstances and where it can be demonstrated they are in the public interest. Whilst it cannot be certain at this stage that such development would be 'major development' for the purposes of the NPPF, policy support would be significant in the event that any planning applications were to come forward to meet the needs of the Isles of Scilly.</p>	Noted.
<p>Para 145 – “Minerals planning authorities should plan for a steady and adequate supply of aggregates by:</p> <ul style="list-style-type: none"> <li>· preparing an annual Local Aggregate Assessment, either individually or jointly by agreement with another or other mineral planning authorities, based on a rolling average of 10 years sales data and other relevant local information, and an assessment of all supply options (including marine dredged, secondary and recycled sources);”</li> </ul>	Noted. The Local Plan will contain appropriate policies and proposals for the provision of minerals if considered necessary.
<p>We are aware that the Cornwall Local Plan LAA includes the apportionment of crushed rock for Cornwall and the Isles of Scilly. Whilst it may not be appropriate for the Isles of Scilly to go to the full extent required by the NPPF in para 145, it is nevertheless important that the Isles of Scilly can demonstrate that an appropriate supply of aggregates can be sourced.</p> <p>Para 150 – Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities.</p>	Noted. The Local Plan will contain appropriate policies and proposals for the provision of minerals if considered necessary and as stated previously will promote the reuse of any suitable waste materials arising from construction and demolition in the interests of sustainability.
<p>Para 151 - Local Plans must be prepared with the objective of contributing to the achievement of sustainable development<sup>2</sup>.</p>	Noted.
<p>Para 156 - “Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:</p> <ul style="list-style-type: none"> <li>· the provision of infrastructure for... the provision of minerals...”.</li> </ul>	Noted.





<p>Para 157 - Crucially, Local Plans should:</p> <ul style="list-style-type: none"> <li>· plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;</li> <li>· be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;</li> <li>· indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;</li> <li>· allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;</li> </ul>	<p>Noted.</p>
<p>Para 163 – “Minerals planning authorities should work with other relevant organisations to use the best available information to:</p> <ul style="list-style-type: none"> <li>· develop and maintain an understanding of the extent and location of mineral resource in their areas; and</li> <li>· assess the projected demand for their use, taking full account of opportunities to use materials from secondary and other sources which could provide suitable alternatives to primary materials.”</li> </ul>	<p>Noted. The Local Plan will contain appropriate policies and proposals for the provision of minerals if considered necessary.</p>
<p>Are there any issues that you feel have been missed in this document that you would like to see covered by the emerging Local Plan? We consider that the omission of consideration of local primary minerals supply and recycled aggregates should be rectified in the Local Plan, which should provide policy support for, and allocate a site for, the supply of local stone and aggregate for construction on the Islands.</p>	<p>Noted. The Local Plan will contain appropriate policies and proposals for the provision of minerals if considered necessary.</p>
<p>Such provision would be sustainable, reduce development costs and reduce the need for shipments from/to the mainland and therefore be in accordance with the last three bullet points of the Objectives set out in paragraph 2.2. It would also be in line with the Conservation Area Character Statement which acknowledges that the stone (granite) of the local vernacular is different to the equivalent from mainland Cornwall. We consider that Pendrethan Quarry is the most suitable location for such a facility.</p>	<p>Noted. The Local Plan will contain appropriate policies and proposals for the provision of minerals if considered necessary. Pendrethan Quarry benefits from a permit from the EA and planning consent through a CLUED for the processing and reuse of inert construction and demolition material. The local plan will support the sustainable supply of local construction material through the reuse of demolition &amp; excavation material wherever appropriate through for example the use of waste management conditions tied to individual planning permissions. The Council can also issue exemptions for the temporary storage and processing of inert demolition &amp; excavation waste in relation to individual projects to encourage reuse.</p>





<b>RE031</b>	<p>In respect of the Local Plan Review we would urge the Council to delay any new development of housing or industry (other than re-development of existing sites), before ensuring the sustainable management of Water, Sewer, Fuel and Waste is deemed to be in place. It should also urgently look at the coastal protection of Hugh Town, the highest population area, by means, perhaps, of a low level narrow promenade on the southern boundary of Little Porth. This would help protect properties across this area of the sand bar which are in continuous danger from flooding, and should reach out, if possible, as far as the historical Garrison Walls where erosion will soon lead to their loss.</p>	<p>The respondent's comments are noted. Unfortunately the cost associated with upgrading the existing mains services, such as waste and water, are likely to only be possible as part of any development or redevelopment proposal.</p> <p>The coastal protection of Hugh Town is beyond the scope of the Local Plan. It will not be appropriate to draw up policies or proposals in the new local plan that sought to promote or encourage development in areas that are susceptible to coastal flooding or coastal erosion.</p>
	<p>In addition the number of cars parking off Hugh Street, due to the change in parking restrictions there, is now chaotic. With further housing added outside the Hugh Town boundary, and a large number of extra vehicles trying to get into town, the resulting congestion would be unimaginable. The emergency services would already have difficulty in reaching many homes at peak times during the day. There is now an added danger to pedestrians in these areas off Hugh Street, now used for parking. With immediate effect there should be a 7 day, all year, bus service allowed, with a late evening timetable, run by an enterprising company, to help restrict the vehicle presence now overwhelming Hugh Town.</p>	<p>The respondent's comments are noted. The current evidence base suggests that there is a need to plan for local needs housing on the islands. As there are only limited sites within Hugh Town it is likely that this 'need' would have to be fulfilled by developing sites outside of Hugh Town. We have no records to suggest that the existing road networks and parking give rise to issues of either highway safety or pose problems for emergency vehicles. The current Local Plan or moving forward to a new local plan does not prevent any person or company from setting up a regular year-round bus service. Such a business proposal would not require a grant of planning permission as there are no planning regulations to owning or parking vehicles on the islands.</p>
<b>RE034</b>	<p>We note that the definition of Sustainable Development in paragraph 2.4 is a partial extract from the forward of the NPPF. The most appropriate definition is that from the Brundtland Commission: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs". As the extract from the NPPF forward is only a partial one it fails to include the other strands of the definition of sustainability. Notably any reference to the including the natural environment. This present extract is therefore skewed to two strands of sustainable development (social and economic) but not importantly the third, the environment.</p> <p>The evidence base for the new Plan is insufficient at present, with some of the environmental documents listed in Appendix B out of date or unavailable online. We note for example that the evidence base for OAN is not available online, this, in conjunction with an updated environmental evidence base will be crucial to ensure development is sustainable.</p>	<p>The respondent's comments are noted. Yes the definition is a partial extract from the NPPF but it was not considered necessary to express the full definition. The new local plan should not conflict with NPPF but it should not be necessary to duplicate it either. It should be fundamentally supportive of development that is sustainable regardless of whether or not this is explicit in the local plan. In seeking to adopt a new local plan it will have to go through public consultation as well as an examination in public held by an independent planning inspector. If the plan and its contents are not supported by a Sustainability Appraisal then it would not be found 'sound' and could not be adopted.</p> <p>The respondent's comments are noted. At the time of consulting the public on our intention to progress with a replacement local plan we did not have a full evidence base on which to progress. The Objectively Assessed Need has now been addressed and is available online in the Strategic Housing Land Availability Assessment.</p>



<p>Sustainability includes 3 strands of economic, social and environment. The proposed vision, as it is for the economic plan, it is heavily weighted to economic objectives and is therefore not appropriate for the vision of a Local Plan which should address all 3 strands in order to be considered sustainable. The Vision should set out what the Isles of Scilly should "look like" by the end of the Plan Period. We would expect the vision to the realistic aspirations for the islands taking account of and working with its unique natural environment. Similarly the objectives of the Economic Plan only address economic objectives which are not sufficient for the local plan, which should consider all 3 strands. We look forward to engaging with the authority on the environmental implications of the Plan objectives. There are a number of environmental assets in or liable to be affected by the plan, and these need to be considered in the plan making process. These include: 1. The Isles of Scilly Complex Special Area of Conservation; 2. The Isles of Scilly Special Protection Area; 3. Isles of Scilly Marine Conservation Zone; 4. The Isles of Scilly Area of Outstanding Natural Beauty; 5. Sites of Special Scientific Interest; 6. More local features of wildlife value.</p>	<p>The respondent's comments are noted. The LPA is aware of the requirements of sustainable development and will ensure the designations referred to are appropriately considered.</p>
<p>We would expect that any allocations are demonstrated to be deliverable in the context of the NPPF and local policies to protect the natural environment. In particular we advise that the plan should address the following:</p>	<p>Noted</p>
<p>The Plan should take account of an up to date evidence base and coherent ecological networks mapped.</p>	<p>Noted</p>
<p>The plan protects habitats (internationally, nationally and locally designated sites) from water related impacts and seek enhancement to them. This should include run-off from development and effects from combined sewage outfalls on designated marine features. The necessary improvements in water abstraction, sewage and waste infrastructure cture will be an essential major consideration in considering additional development. Given the importance of these and the effect of not improving infrastructure on European sites and the need to ensure that any Plan proposals must be able to demonstrate certainty of no effects on European sites, this is an essential focus for the Plan given the finite resources of the island.</p>	<p>The local plan will be subject to Sustainability Appraisal including Habitat Regulations Assessments. Any policies or proposals that form part of the new local plan will ensure that development does not result in harm to the natural environment designations referred to. Any future planning submissions that are within close proximity will be screened to determine whether it is EIA development warranting a full EIA application.</p>
<p>The Plan should refer to and reflect AONB Management Plan objectives.</p>	<p>The respondent's comments are noted. It is anticipated that the local plan will certainly not conflict with the objectives of the AONB but assist in re-enforcing the importance of the designation.</p>



<p>The Plan should set out a clear criteria for appropriate development, including complying with the Major Developments test in paragraph 116 of the NPPF. Any allocations or apportionments should be able to be shown to comply with the major developments test and be supported by appropriate evidence, accepting that all planned development will be within the AONB. All development must comply with paragraph 115 of the NPPF.</p>	<p>The respondent's comments are noted. The local plan will not repeat policy or guidance set out in existing national legislation. Any major development proposals on the island will need to comply with the NPPF and be supported by appropriate justification to take place in an a highly designated environment.</p>
<p>The Development Management Policies should set out criterial to firstly avoid, then mitigate and, as a last resort, compensate for adverse impacts upon biodiversity, geodiversity or landscape sites, distinguishing between international, national and local sites. The Plan should contain a clear strategy for protecting and enhancing the natural environment.</p>	<p>The respondent's comments are noted. Local Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment, adapting to climate change and securing good design. They are also a critical tool in guiding decisions about individual development proposals, as Local Plans (together with any neighbourhood plans that have been made) are the starting-point for considering whether applications can be approved. It is important for all areas to put an up to date plan in place to positively guide development decisions.</p>
<p>The development strategy should propose sites for development with the least environmental or amenity value.</p>	<p>The LPA are considering whether the new local plan should contain specific proposals for development such as housing allocations. It is unlikely however that a development strategy will be able to anticipate all types of development proposals that could come forward over the plan period.</p>
<p>Policies for good design in order to avoid light spill generally preserving dark skies are encouraged.</p>	<p>The current design guide will be retained as it is considered that little has changed over the last 10 years with regard to the importance of local design. The respondent's comments in relation to the preservation of dark skies is noted and it is likely that policies will be written to ensure that unnecessary external lights are avoided or appropriately designed where they are justified to ensure minimal light pollution.</p>
<p>Any strategy on renewable/low carbon energy should take full account of the capacity of the natural environment to accommodate energy infrastructure based on criteria that ensure designated landscapes and sites are fully protected.</p>	<p>All development proposals should seek to be sustainable and would be encouraged to incorporate water/energy reduction measures and where circumstances permit energy generation measures. Where larger scale renewable energy projects are proposed then it will be expected that policies will create a framework to ensure minimum impact upon the landscape is achieved.</p>
<p>The plan should promote the use of public transport, walking and cycling to improve access to nature.</p>	<p>The respondent's comments are noted.</p>
<p>Green space policies should be linked to green infrastructure policies</p>	<p>The respondent's comments are noted. Due to the small scale nature of the islands it is unlikely that the plan will include green infrastructure policies.</p>
<p>The plan should have policies for conserving and enhancing the landscape which identifies and protects and enhances locally valued landscapes. The plan should take account of the character of different areas and recognise the intrinsic character and beauty of the countryside.</p>	<p>The respondent's comments are noted.</p>



The plan should consider, as appropriate, that relevant area of tranquillity are identified and protected.	The respondent's comments are noted.
The plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity and consider biodiversity at a landscape scale.	The respondent's comments are noted.
Planning policies should promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets and identifies suitable indicators for monitoring biodiversity in the plan.	The respondent's comments are noted.
The plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of green infrastructure. It should also recognise the role of green infrastructure in aiding climate change adaptation.	The respondent's comments are noted.
Soil is a finite resource, and fulfils many roles that are beneficial to society. As a component of the natural environment, it is important that soils are protected and used sustainably. The plan should recognise that development has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and to retain as many ecosystem services as possible through careful soil management during the construction process. Soils of high environmental value should also be considered as part of ecological connectivity.	The respondent's comments are noted.
The plan should safeguard the long term capability of best and most versatile agricultural land and make clear that areas of lower quality of agricultural land should be used for development in preference to best and most versatile land.	The respondent's comments are noted. The Agricultural Landscape Quality of the islands soils is not known, or certainly not mapped by DEFRA. It is noted that where high quality agricultural land is proposed to be lost this would need to be supported by justification to demonstrate that its loss is outweighed by the benefits of the proposal.
The plan should take account of the marine environment ensuring integration of the terrestrial and marine planning regimes. This is particularly important regarding the recently designated Marine Conservation Zone and the Marine SAC.	The respondent's comments are noted.
The Plan should maintain the character of the undeveloped coast and protect and enhance its distinctive landscape and seascape; the plan should identify and include policies for the heritage coast.	The respondent's comments are noted.



RE037

It is probably easier to criticize than provide constructive feed-back and my intention is not be negative. However, there lacks quantitative research to support some of the proposals. The proposal to develop the Scilly brand in food and products is great- please let's start using the land again. I can recall new potatoes and old potatoes season and other local produce. Seasons were defined by local produce- New potatoe season, Mackerel season- even black berry season. The flavour of locally grown new potatoes, tomatoes, local milk and beef are hard to beat. Tresco seems to have more success with reintroducing local farming to the community.

I am not sure about the research which justifies that 90-120 new dwellings are required. Big difference between lowest and highest number. How were these numbers reached? The term 'justifiable circumstances'- when referring to non-regulated housing. Justifiable- very subjective and not clear. I may have missed it- but I could not identify how many dwellings were considered appropriate for the old school site and Carn Thomas site? Both are excellent brown field sites in town- ideal for homes, especially if they are built to high specifications and people in older, less energy efficient social housing could be enabled to move into new, high tech two bedroom apartments, freeing up larger houses for the younger population.

Water and waste: probably the most significant issue for the Isles, but not referred to until after the comments on number of dwellings required. The infrastructure needs to be in place before any houses are built.

3.4: Entrepreneurs: What entrepreneurs? Alderney has the same population as the I.O.S- Alderney can and have attracted entrepreneurs because they have a 20% tax rate and are just 2 hrs flying time away from Paris and London. I can't see any incentive for these unspecified entrepreneurs to come to Scilly. I am not sure what sort of high tech, research based companies would want to relocate in the Isles of Scilly- you can relocate to the Channel Isles and pay a lot less tax.

The respondent's comments are noted. Whilst the plan can create a positive policy framework to encourage the production of local produce it is beyond the scope of the local plan to ensure that this would actually happen.

The Housing Growth Plan 2014 suggested the need for between 90 – 120 new homes over a 10 year period. This estimate is supported by the more recent Strategic Housing Market Assessment which included the findings of an up-to-date housing survey. The research therefore is supportive of the need to plan for a minimum of 120 homes over the plan period. This is just the local need and does not account for any growth. The figures have been reached by a careful assessment of population and household projections, demographics as well as an understanding of the existing housing market.

The respondent's comments are noted. Where new development seeks to connect to existing systems then it is important that the necessary improvements are made to ensure that existing systems are not overloaded. You cannot pre-emptively put in infrastructure until you know where it needs to go and you have an understanding of the capacity it needs to account for. The costs of improving the existing infrastructure mean that it is only likely to be achieved once a suitable site is identified and the necessary calculations made to ensure any new water or sewerage systems are appropriate. The LPA would expect any improvements or new systems to be put in place before any new development commences.

Noted.





	Travel: There is no resilience in our travel- this week there has been fog for 4 days (peak of the tourist season) and the Scillonian is limited to 350 passengers. I can recall the Scillonian taking 600 passengers and the Queen of Isles also providing a service for to the Isles.	Noted.
	Yes, Hugh town needs help- especially the one main food shop- missed opportunity at the old Wholesalers site. Why wasn't a better local food store considered?	Noted
	There I go being critical- however, one of the Porthcressa units rent (Carpet Shop) was/is £250 per annum. Was an evaluation undertaken to establish why these 'work-shop' units were not over-subscribed before the Wholesaler's site was developed into more units.	Noted
	I am not living in the 'golden days of Scilly'- we need to have a thriving, environmentally considerate community. I am not convinced the Local Plan fundamentally addresses this.	The scoping report sought to set out the key issues and seek the community views. The draft local plan will be subject to further public consultation ahead of its examination, which has to happen before it can be formally adopted by the Council.
RE038	We are pleased to have the opportunity to comment on the Isles of Scilly Local Plan review. The NFU is a professional body, which represents the interests of 60% of all farmers and growers nationally and a substantial number farm holdings on the Isles of Scilly. Our views are on behalf of the farming and land management sector in general.	Noted.
	Overall the NFU agrees with the vision and aims of the Local Plan (LP) as suggested under 2.2. In addition we would like to see the inclusion of the following objective:  "To enable businesses to modernise and meet new policy and regulatory requirements."	Noted. The ability of farmers on the islands to modernise in line with changing legislation would be supported where it does not conflict with the significant multiple designations covering the islands. It is because of the numerous and multiple designations that permitted development rights for agricultural holdings are removed on the islands.
	This objective relates to the requirement of farming businesses having to develop and modernise their farm infrastructure in line with new policies and laws. For example, the Silage, Slurry and Agricultural Fuels Order 1991 requires farms to increase storage capacities and improve design of storage. In addition farm machinery is getting more sophisticated and larger and requires new or enlarged buildings.	Noted.





	<p>We support the section on housing but would like to see provision for succession within farming household. This would enable the next generation to take on the farm and its management whilst enabling the previous generation to move into dwellings on the farm and cease active management and/ or engagement in the farms management.</p>	<p>The respondent's comments are noted. The issues of 'succession' is not restricted through the planning system. Where a dwelling is tied to an agricultural holding then, from a planning perspective, there is nothing to stop the property being handed down to the owner's family, where the family continues to work in agriculture on the land.</p>
	<p>We fully support the employment and economy section and in particular 3.9 concerning the development of agriculture, market gardening and food. There are numerous opportunities to grow the sector and the NFU would be keen to support projects that have a benefit to the sector and the wider rural economy.</p>	<p>The respondent's comments are noted.</p>
	<p>Question 7 relating to encouragement of all types of renewable energy is very important. The NFU is supportive of all types of renewable energy but recognises that there will be restrictions to their development according to issues such as location and climate and also community visions. However, any policy must have a consideration of scale. Many farms will look to develop small-scale projects that meet their farm energy requirements. In addition larger scale projects can provide an excellent diversification for some farms and community benefits.</p> <p>The NFU does not have any particular views on which areas should or should not be part of Conservation Area. However, we do recognise that within Conservation Areas farm will need to develop their businesses in line with policy, regulations and markets and as such planning must reflect this need.</p>	<p>The respondent's comments are noted.</p>
	<p>I hope that you find our contribution to the consultation helpful. If you require further information or clarification of any of the points raised in this response please do not hesitate to contact me at the South West Regional Office.</p>	<p>The respondent's comments are noted.</p>
<b>RE039</b>	<p>As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. Marine plans extend seaward to the limit of the Exclusive Economic Zone or the maritime border with adjacent countries.</p>	<p>The respondent's comments are noted.</p>



<p>The Marine Policy Statement will guide the development of marine plans across the UK. More information can be found at <a href="http://www.defra.gov.uk/news/2011/03/18/marine-policy-statement/">http://www.defra.gov.uk/news/2011/03/18/marine-policy-statement/</a>. Marine plans are being developed on a rolling programme, with the first plans (East Inshore and East Offshore) adopted on 02/04/14 and the South Inshore and Offshore plans currently in development. Work has not yet commenced on the South West Plans but will do so in the near future, with the Isles of Scilly falling into this plan area.</p>	<p>The respondent's comments are noted.</p>
<p>Until such time as a marine plan is in place for the South West Plan Areas we advise you to refer to the Marine Policy Statement (MPS) for guidance on any planning/management activity that includes the marine environment. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the UK Marine Policy Statement unless relevant considerations indicate otherwise. Statutory agencies are also expected to provide any advice in accordance with the relevant marine plan or MPS.</p>	<p>The respondent's comments are noted.</p>
<p>Marine planning will complement and support existing measures including site-specific objectives and management plans. For reference, the East marine plans provide an example of how marine plans may relate to the South West Plan Areas (East Inshore and Offshore Marine Plans), however these relationships will continue to develop as the marine planning process and associated evidence matures.</p>	<p>The respondent's comments are noted.</p>
<p>Please note that if you are an authority developing a plan, you may find the Planning Advisory Service Soundness Checklist useful (<a href="http://www.pas.gov.uk/web/pas1/local-planning/-/journal_content/56/332612/15045/">http://www.pas.gov.uk/web/pas1/local-planning/-/journal_content/56/332612/15045/</a>). Pages 24-31 provide information on the integration of marine and terrestrial planning. You may also wish to refer to the MMO's guide for Local Authority planners that explains what local council planners need to know about marine planning (<a href="https://www.gov.uk/government/publications/marine-planning-a-guide-for-local-authority-planners">https://www.gov.uk/government/publications/marine-planning-a-guide-for-local-authority-planners</a>).</p>	<p>The respondent's comments are noted.</p>
<p>The MMO is also responsible for issuing marine licences under the Marine and Coastal Access Act 2009 in England. Amongst other things, a marine licence may be needed for activities involving the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence.</p>	<p>The respondent's comments are noted.</p>



	<p>Alongside marine licences, we also issue consents under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. We are also the authority responsible for processing and determining harbour orders in England and for some ports in Wales and for granting consent under various local Acts and orders regarding harbours.</p>	The respondent's comments are noted.
	<p>The applications we receive may be subject to various forms of assessment. This includes environmental impact assessment, Habitats Regulations assessment, marine conservation zone assessment and assessment for compliance with the Water Framework Directive. Early consultation with the MMO is always advised and we would encourage applicants to engage early with the MMO alongside any application for planning consent to ensure that the consenting process is as efficient as possible. We will look to follow the principles set out in the Coastal Concordat in considering any application which is linked to an application for planning consent.</p>	The respondent's comments are noted. The Local Plan process will be subject to Sustainability Appraisal and Habitat Regulations Assessment to ensure that the policies and proposals are not conflicting with the sustainability objectives identified in the Sustainability Appraisal Scoping Report.
RE041	<p>2 A Vision for the Islands (and your q 1): para 2.2: Vision: What does 'rooted in nature' mean? Aim: Need 'to grow and sustain the economy' rather than just grow it. Need also to add: 'to protect the natural environment' . This is essential, especially if 'rooted in nature' means anything. Objectives: It is essential to add: · to help to maintain existing local industries and businesses - there is no mention of the existing economic structure. (It is interesting to talk about future entrepreneurs (see housing section/Ash report/etc) but there are many existing enterprises and sources of employment here already - these should be valued and encouraged). · to ensure there is an affordable and appropriate local infrastructure (e.g. water, sewerage, transport) · to protect the natural environment - terrestrial and marine</p>	The respondent's comments are noted.



<p>2.2 ( and your q 1): Issues that could affect Islanders: It is essential to include:</p> <ul style="list-style-type: none"> <li>· the protection and development of existing local trades, industries and occupations, as well as the wish to foster new ones</li> <li>· recycling wherever possible</li> <li>· the conservation of energy, water and fuel - there is no mention of conservation anywhere in the text.</li> </ul>	<p>The respondent's comments are noted. The new local plan would not set out to create a policy framework that sought to harm existing local trades, industries and occupations. The Infrastructure department have been working over the last few years to transform the processing of island waste, away from landfill or harmful incineration to an island that seeks to recycle its waste. The Council have been part of the Smart Island Partnership that seeks to take this further and start using waste to generate energy and reduce fuel poverty. It is anticipated that this will be supported through a positive policy framework in the local plan to ensure that such proposals can come forward and be supported.</p>
<p>2.4 Although it could prove to be a useful broad framework, the definition of 'sustainable' may be so loose in practical terms as to be almost meaningless. It is important this is discussed because it should be the heart of the document. The text continues: development means growth. The implication in the text is that development is, possibly by definition, good, and will bring 'better lives for ourselves'. But there can be a confusion between 'development' and 'growth' and the goodness they each may dispense. Neither or either may be good and this will vary in different circumstances and according to different points of view.</p>	<p>The respondent's comments are noted.</p>
<p>So it may be that the generalised sentiments expressed in a forward to a National policy framework do not necessarily sit comfortably in Scilly. This may be partly because we are so small and the repercussions of development and / or growth can be easily and widely perceived. It may also be because many people here, while not opposed to growth or development per se, are aware that Scilly is easily changed, and possibly not for the long-term good of anyone or of Scilly. If we are not to 'compromise the legacy left to future generations', these statements about 'sustainable', 'development' and 'growth' should at least be debated and not, as implied in para 2.4, necessarily be accepted as a universal truth.</p>	<p>The respondent's comments are noted and agreed. The NPPF is a general document that does not fit the small island constraints of Scilly. What is clear however is the need for the local plan to reflect local circumstances.</p>



<p>3 Scope of the Plan: You state in 2.2 there are 'Issues that affect Islanders that (shouldn't this be 'which'?) the Plan could address'. But in section 3 you do not deal with each of the issues mentioned in 2.2. Instead you discuss 'the Council's views on the key issues that the Local Plan could address' (ie the six topics noted in Sections 3 onwards). That is, you establish two sets of issues, one for Islanders and one for the Council but only discuss those of the Council. Some of the two sets of topics are clearly the same, similar or are inter-related. But there is no simple layout and therefore clarity; this is confusing and does not always lead to clarity of thought.</p>	<p>The respondent's comments are noted. The Scoping document was not intended to be confusing or conflicting of issues. The Local Plan should seek to address the issues of the local area that are affected by development, which is the building of structures or the use of land, where planning permission is required. It is a document that seeks to reflect the views and expectations of the community balanced with the need to protect the important aspects of environment. It is regrettable that it has not achieved this.</p>
<p>Further to the above, this is also an interesting insight into thought processes: you raise issues which could affect Islanders and then write about Council ideas of what is important. Admittedly some of the topics viewed as important to Islanders may encompass topics of importance for the Council. But the point remains - surely the Council is supposed to represent Islanders and not be separate from them? Why then are the topics separated? (And those of Islanders not clearly discussed).</p>	<p>The respondent's comments are noted. Again it is regrettable that the document was unclear. The LPA have to write a local plan that has community consensus that is supported by up to date evidence. The draft local plan is independently examined in public where it has to be found 'sound'. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound". The local plan should and will represent the expectations of its community, in relation to development. It was not intended to separate out different 'issues' but merely set out what the LPA considered to be the main issues to be addressed in the local plan moving forward. The document sought to set what it considered to be the main issues facing the islands that should be addressed and invited the community's views on these issues. It was not intended to disregard the issues considered to be important to the community.</p>
<p>Housing (and your q.s 2, 3, 4) 3.2'...there has only been steady population growth...' To substantiate this assertion it would be helpful to have a population diagram/breakdown, island by island, and over time. (I have seen the Housing Growth report which contains figures and some interpretations).</p>	<p>The respondent's comments are noted. The Strategic Housing Market Assessment (SHMA), which was published since the respondent made these comments, does contain a detailed assessment of population changes. There has only been 'steady' growth of the population.</p>
<p>...there is now an acute shortage of housing...' Is this need only recent? Is it possible that there has been historically and there will always be need, however much is built?</p>	<p>If appropriate controls are in place to ensure that only those people who live and work on the islands are housed in those properties constructed to house the local population, such as Council housing or Social housing, then there would be sufficient 'churn' in the housing market to ensure that the amount of new housing needed was reduced each year. The problems lie in the effectiveness of such controls. Historically housing stock has been lost to second homes or holiday lets, pushing up house prices and resulting in local people being unable to occupy housing intended for them. Need and demand are two separate issues we have to plan for the need not for the demand. Scilly is a desirable place to own property.</p>



There appears to be documentation of homes with/without permanent occupants (in Housing Growth report). This should be included here and discussed.	It is unclear what the respondent is asking for.
Who are key workers and the entrepreneurs? Definitions and numbers please.	The definition of a key worker is clearly set out on the Council's website: <a href="http://www.scilly.gov.uk/sites/default/files/document/planning/Key%20Worker%20Policy%20%26%20Procedure%20Document.pdf">http://www.scilly.gov.uk/sites/default/files/document/planning/Key%20Worker%20Policy%20%26%20Procedure%20Document.pdf</a> .
How many houses are envisaged for the particular groups?	There are no specific numbers of these groups envisaged.
Do these groups, ie 'older households' and 'younger people who wish to get on the housing ladder', overlap with the other groups mentioned eg key workers and entrepreneurs?	I think the respondent is getting too concerned with the generalised content of the scoping report which was intended to be general information not detailed evidence of a particular situation.
Are there other groups not mentioned in the text?	It is possible. The scoping report was a general overview only.
Where will these houses be? Who will build them? Who will supply the capital? Who will get a return on this capital?	The draft local plan will be the subject of further public consultation which will contain draft policies and potential housing allocations. The LPA have to identify a 5 year housing land supply to meet the housing needs of the islands. This will look at sites submitted and make recommendations as to any that could be allocated for housing. It is not known who will build any new housing or who will supply the capital. It is assumed that those who supply the capital will expect to get returns on their investment.
.....on the housing ladder...' implies by definition 'freehold'. How many of these will be built, by whom and for whom and at what price and where? What price will they be sold for?	The issue of whether new housing will be freehold or leasehold will be up to the landowner. This is beyond the scope of the local plan. Reference to the 'housing ladder' was not intended to suggest the land would be freehold. It is common for property purchased on the mainland to be 'leasehold' but the person purchasing the property would still consider themselves to be 'on the housing ladder'. The prices of any property built is beyond the scope of the local plan.
106 agreements are not mentioned. Should they be?	No it is not considered that this should have been mentioned.
3.3 does not really answer these questions. 3.4, 3.5 and 3.6 do not really add much either. There are no firm guarantees (e.g. there could be 'restrictions and measures' is only a possibility not a guarantee) and no strict definitions are provided - is this paragraph just 'thinking aloud' plus a few honeyed words?	The respondent's comments are noted.
Interesting use of 'could' and 'should' in paras 3.4 compared with 3.5. Is this intentional?	No this is not intentional.
What is a 'sustainable location'? (3.5) Please clarify.	It is considered that a sustainable location on Scilly would be in an area that did not necessitate the ownership of a private car to access shops or facilities.
There is no real definition of 'settlement' - please supply one.	For the purposes of the scoping report there is no definition of settlement. It is generally considered to be a group of buildings that provide housing as well as easy access to other





		services and shops. A built-up area with houses and facilities or easy access to shops, services and facilities could be considered a settlement.
It would be helpful to have a summary of numbers and population group on the housing list for, say, the last 20 years.		The respondent's comments are noted. It is however unclear what information is being sought.
Surely there should be no more development of housing until the infrastructural problems are sorted out, particularly that of water.		The respondent's comments are noted. Where new development seeks to connect to existing systems then it is important that the necessary improvements are made to ensure that existing systems are not overloaded. You cannot pre-emptively put in infrastructure until you know where it needs to go and you have an understanding of the capacity it needs to account for. The costs of improving the existing infrastructure mean that it is only likely to be achieved once a suitable site is identified and the necessary calculations made to ensure any new water or sewerage systems are appropriate. The LPA would expect any improvements or new systems to be put in place before any new development commences.
Any building should account for traffic - parking and extra traffic generated.		Noted.
Any building should be as 'environmentally friendly' as possible.		Noted
Any building should be in any 'brown field' sites wherever possible. It would be of great concern if more good agricultural land were to be devoted to building.		Noted
The visual design of some of the off-island new houses looks good.		Noted
Any new building should be far less 'land-hungry' than some developments in recent years ie more houses per acre if possible.		Noted and agreed
Any building should take account of the natural environment . There isn't much point in building on Scilly if that destroys the things people live here or visit for. (Why does q 4 ask if the Council should 'be allowing' - why not just 'allow'?)		Noted
3.7 Where is the evidence for the statement that 'Historically there has been considerable under-employment on the islands'.... ? Anecdotal this is not obvious. Figures re employment and unemployment and working age population etc etc are all needed to support this statement. Without evidence this assertion is useless and following this, any conclusions drawn and also therefore of little use.		All the evidence to date suggests that average incomes of people living and working in Scilly are below the National or South-West Average. Underemployment is that the population have, on average, a higher level of skills or qualifications relative to the job opportunities available. The scoping report did not intend to confuse the low wages issue and underemployment.



Much of the rest of the paragraph is opaque. For example what is meant by all the words about jobs and more than one job and island economy, etc? Why is there a need for higher-paid part-time jobs - why not full-time? (Or do you mean that more part-time highly-paid jobs would help workers and the economy?) There are no figures. This para really needs polishing.	Noted
3.8 This text is dismissive of a large industry - tourism - in Scilly. Yet note your Objectives 'to improve the quality of the tourism offer'. This is a curious omission. Surely there should be more discussion here.	The respondent's comments are noted.
3.9 By 'promoted further' do you mean 'helped and safeguarded' or 'marketed'? There is little information or real discussion about how agriculture, market gardening and food could be 'promoted further', except possibly the development of an abattoir and (implied)? marketing using the 'local brand'. There is a passing mention of the cost of freight but no solution, (eg a freight subsidy), and there is no discussion of, for example, the serious lack of water and irrigation facilities.	The respondent's comments are noted.
Further, if areas for building and economic zones are designated, more agricultural land may be required. The land should be safeguarded.	The respondent's comments are noted.
Are there enough allotments? Should there be more or fewer? Should they be safeguarded?	The respondent's comments are noted.
Does 'food' include fishing or is this occupation too insignificant for you to include it?	The respondent's comments are noted. Yes food does include fishing. The document did not seek to set out every possibility but was generalised to seek engagement on the issues.
The suggestion that there could be a 'positive framework to encourage development' (whatever this means) could be helpful but would need to be much more specific.	The respondent's comments are noted. The local plan will not be able to predict all development proposals over the plan period but in order to enable development or economic opportunities that are proposed it is necessary to create a positive (as opposed to a negative) policy framework to enable a person to demonstrate why their particular proposal, which would inevitably be good for them, does not result in any other harm.
There is a paucity of knowledge, information and ideas here. Thus, although there is potential for growth in this economic area, your text does not really illuminate this.	The scoping document sought to inform the local community about the intention of the LPA to replace the 2005 Local Plan and set out what were considered to be appropriate issues to cover. There was no intention to offer up all of the answers.



<p>3.10</p> <p>What are the 'unique circumstances and characteristics' which Scilly has? How will these be attractive to 'innovative research and development technologies' and what will this R &amp; D be? The distance from any serious high-level learning and knowledge centres - universities, technology centres, etc - and the chance to meet and 'spark' off others might prove to be a brake on this development?</p>	<p>The unique characteristics of Scilly that might be attractive for research purposes are its isolation, high levels of sunshine, gulf-stream climate for example. Infrastructure and energy are the basis of the smart islands project. Scilly has a mainland type of population (not so cut-off compared to a remote ocean island community) but a small model population, with a single source of energy (measurable load on the cable), waste, water and sewerage are all dealt with on the island, very high revenue costs which means alternatives can often be viable here where it wouldn't otherwise be viable on the mainland. Interesting model community where projects could be tested and if found to work could be applied to larger populations.</p>
<p>3.11</p> <p>Is it necessary in Scilly to designate zones for economic development?</p>	<p>No it's not necessary to designate zones.</p>
<p>Also - Is this really all you have to say about the economy? Where are the diagrams of what currently (and possible historically) constitutes the economy of Scilly? Where are discussions of all the many other sectors and various enterprises and sources of employment which exist in Scilly? This gap in the text is astonishing; this extraordinary omission should be remedied.</p>	<p>Noted.</p>
<p>Physical and Social Infrastructure:</p> <p>What exactly is 'social infrastructure'? Definitions and figures please. Clearly some of the policies in the physical infrastructure may have an impact upon and inter-relate with, the social situation here, but to put these two in the same section seems to undervalue each of them, and possibly to confuse discussion of these two important topics.</p>	<p>Social infrastructure is about providing all the right infrastructure to enable people to have access to services and activities without having to commute elsewhere such as shops, post offices, banks, Doctors, leisure facilities and schools for example. There was no intention to devalue either the physical or the social infrastructure. The document sought to try and include all topics without being overly lengthy, which may put-off people from commenting or reading the document</p>
<p>3.12</p> <p>The first sentence needs no 'can be' or 'sustainable'. Without infrastructure we could not live here, sustainably or otherwise....</p>	<p>Noted.</p>
<p>3.12, 3.13 (your q's 7 and 8)</p> <p>Certainly there must be changes to the water and waste systems, and there are opportunities for changes in energy. It is heartening to note the Council's mention of these.</p> <p>We should be a 'flagship' area for 'environmentally friendly' energy systems. What does your q 7 mean? eg 'in all areas'? Is this spatial, social, financial etc? (Why does q 7 ask if the Council should 'be encouraging' - why not just 'encourage'?)</p>	<p>The respondent's comments are noted.</p>



<p>3.14 Surely these three critical topics - 'drinking water supplies, waste water and the disposal of waste generally' - should not be in the same para. They deserve at least a section each. (If housing has so many words, why not these topics?)</p>	<p>The respondent's comments are noted.</p>
<p>We should be a 'flagship' area for 'environmentally friendly' systems and for recycling wherever possible.</p>	<p>The respondent's comments are noted.</p>
<p>3.15 This para seems to be about water only - please clarify. Also - if water is a problem, how can 120 houses be built? There is no real discussion of this in the housing section. Point of information - is drinking water on St Mary's 'primarily obtained through a desalination plant'? Conservation? There is no mention of this.</p>	<p>The respondent's comments are noted. Housing developments could not be built if the necessary infrastructure is not in place. Water on St Mary's is primarily supplied through a desalination plant.</p>
<p>3.16 This is very muddled and consequently almost incomprehensible. Please re-write to clarify. Your q 8 - there is no mention at all of conservation, new builds, conservation, use of grey water, conservation, use of roof water, conservation, etc....</p>	<p>Noted.</p>
<p>3.17 (your q.s 9, 10): Where is the evidence for the decline of shops, restaurants etc? What is the timescale this has occurred over, if it has occurred? Without evidence this assertion is useless. Are there protection measures already in existence? (eg Conservation Area, local planning, etc)? Why is housing seen as aggressive so that services need protection from it? What is the evidence for this? Without evidence this assertion is useless. Also - housing near to schools and work areas is surely helpful regarding extra traffic. This may/not apply to houses in town but there should be discussion of this topic. Also - what kind of housing? Holiday homes/local housing/hotels and guest houses/ etc? There should be discussion of this topic. Difficult to answer your q 9 without more evidence and discussion. In addition, (q 10) to take areas out of the Conservation Area might prove difficult and unworkable in such a small place. Which places are you thinking of?</p>	<p>This evidence is largely anecdotal of the shops and ancillary restaurants that used to be present on the islands. There are no policies to stop the loss of shops and restaurants as this is dictated by market forces. Often using a retail unit for residential purposes is more profitable for property owners as they don't have to pay business rates (although Council Tax would be due but these could be passed on to a new tenant) but they make more money from a residential rent. There are recent examples of property owners in Hugh Town seeking to change from retail to residential because of the demand and the economic benefits to the owner. It is this aspect of loss of retail that was suggested could be protected. Where a town centre is defined but an established retail unit within it wanted to change to residential, then a local authority, in the interests of protecting the town, would try and seek to resist this and only permit the loss of a retail unit where it has been sufficiently demonstrated that the retail unit is no longer viable. If permission is sought to change a retail or restaurant or business unit to residential then it could become a holiday let, local housing or second home unless appropriate conditions were considered necessary to restrict to a particular type of housing. The question was more about gauging what the public thought about trying to resist the loss of town centre appropriate uses through policies or whether there is a consensus to allow market forces to</p>



		enable property owners to choose the type of use they found most profitable for their property, even if this is detrimental to the vitality and viability of Hugh Town as the main shopping centre for the islands.
Protection and Enhancement of the Natural and Historic Environment: (your q. 11): 3.18 'Many people are unaware that there are restrictions...' How many people are unaware? Evidence for this statement?		The respondent's comments are noted. Officers have observed works and operations taking place around St Mary's, which do not have planning permission. When questioned about why consent was not sought it is apparent that there is a lack of knowledge about the designations. We are regularly asked whether planning permission is required and when we explain the restrictions it is apparent people are unaware. This is a common and we don't expect everyone to know or remember what restrictions or constraints are in place.
These restrictions perhaps help in the battle to preserve Scilly and in general they should not be vitiated unless there are good reasons. Is there any catalogued information about the buildings of Scilly and their historic value?		It is unlikely and Officers have not uncovered any catalogues about all buildings on Scilly. It would be extremely useful but there are increasingly fewer resources dedicated to the understanding of or recording the environment.
Your q 11 - these policies do not seem to work in some instances. Eg why did the Council members allow the windows with small panes in Silver Street to be replaced by windows with no small panes? Perhaps the policies should be strengthened? But perhaps this should be allied with smaller charges for permissions so that people will more inclined to consult?		The respondent's comments are noted. Planning fees are set nationally so we have no opportunity to increase or decrease planning fees. Interestingly in the Channel Island of Guernsey, if you apply retrospectively for planning permission, it costs more than if you had applied before carrying out the works. This approach would be a very useful incentive on Scilly to get more people to apply for planning permission before they carried out the works. Often windows are changed without formal consent being granted but the case to which the respondent refers was perhaps permitted because the Silver Street properties, although granite, are not period properties and are not of a traditional design or form.
Sustainable Development: (your q.s 12, 13, 14): It is a heartening to see the Council encompassing such ideas in the Local Plan - compare with even a few years ago. However there are sentences and ideas which need clarification. For example:		Noted
3.22 Which are the ecosystems which can be 'significantly if not irreplaceably, damaged by increases in carbon emissions'? Will this be any increase or some measurable increase?		Some of the natural environment designations are in unfavourable conditions due to the impacts of water quality, which in turn effects the life within them. This can be affected by increases in air or water pollution or at a different scale through a warming of the planet and inevitable sea level rises. This was a general statement about the effects of climate change not about specific changes.
3.23 This is a nice idea but how do we achieve 'genuinely sustainable'? (whatever that really is)		The term genuinely sustainable was used to stress that whilst we can be considered to be sustainable because we recycle waste, re-use plastic and cardboard we are still reliant upon the mainland for most of the islands food supplies and electricity supplies. If we could increase the amount of food and energy we generate/produce on this islands then we would be moving towards a genuinely sustainable place. Officers would like to ensure that if





		proposals come forward that seek to move towards this then the policy framework would be positive if it did not result in any other significant adverse harm to the islands.
3.24	<p>At last here is some welcome Council thinking which takes account of 'out of town' development. However this does not combine well with some of the sentiments expressed in the Housing section of this document, and, for example, the wish to build at Telegraph.</p> <p>And there might be a visual problem if, for example, Old Town and Hugh Town were further joined, or Hugh Town and Porthloo.</p> <p>A few Local Plans ago, the concept of developing existing 'settlements' was introduced into the Local Plan (Don MacKee??). Then, as now - how do you define 'settlement', especially in the Scillonian context? More than two or three houses, or a couple of houses and a shed?' If this is the case, very many areas would be available for building.</p> <p>At what point, in the Scillonian context, does the building of only one or two extra houses create a settlement? (This then, by definition as a settlement, can, in a few years' time, be an area for siting more buildings, and so the momentum of building is in a particular area is created and continues).</p>	<p>There are no easy answers to the respondent's questions. There is no set figure to use to establish a place as a 'settlement' as it is relative to the location. The most obvious places would be Old Town and Hugh Town as these are the most densely built-up places on the Isles of Scilly. It was suggested as a means to contain existing built-up areas and to focus development towards existing settlements rather than the principle of development anywhere being acceptable, as is currently the case. The preference would be to seek to use previously developed land over greenfield sites and be located close to the existing built up area to try and contain development. The intention was not to define all small groups of buildings as settlements.</p>
	<p>Inappropriate shapes are just as visually damaging as inappropriate materials but this is not mentioned (eg Silver St and Sally Port replacement windows; eg imagine the visual impact of different windows in Newman House).</p> <p>There is no mention of visual aesthetics relating to solar panels... (Or windmills...) All this needs discussion.</p> <p>The Council does not always lead by example (for example the Airport). If finance and practicality are considerations for the Council, why impose greater planning stringency on others?</p>	<p>The respondent's comments are noted. The current supplementary planning document in the Isles of Scilly Design Guide remains in place to seek to good design in all developments.</p>
Duty to Co-operate:		Noted.
3.26	<p>The 'co-operation' of the Route Partnership does not seem to have borne particularly productive results.</p>	
3.27	<p>This para combines LNP and LEP but only discusses LEP. Confusing... Who/what are/is our Local Nature Partnership?</p>	<p>The respondent's comments are noted. The LNP has the same status as the LEP in that the LPA have a duty to co-operate with these two groups which both represent Cornwall and the Isles of Scilly. The LEP in relation to economic aspects of life in the Cornwall and the islands and the Local Nature Partnership in relation to maintaining the special natural environment. The partnership of the latter of these groups is set up to consider the broader sense of the natural environment and includes not only the environment but also health, wellbeing, education and the economy. The group seeks to optimise the use of environmental assets</p>





		for their wider benefits, build skills, knowledge and understanding to increase the value of the natural environment in local communities and to improve decision making.
	<p>3.28</p> <p>The LNP is the focus of 3.28, where it is stated that this body (the LNP) has an 'ambition' to 'secure the natural capital of England'. What does this mean? Further, this body wishes to 'positively manage a world class environment'. Which environment is this - that of England or of Scilly? How does this apply here?</p> <p>What is 'environmental growth' and how do projects 'promote environmental growth' (whatever that means)?</p>	The respondent's comments are noted. The LPA have a duty to co-operate with groups including the LNP so it is important to understand what the ambitions are of such groups so we can co-operate on achieving mutual benefits. That is not to suggest that the local plan should seek to become the 'natural capital of England' but that we should positively manage our natural environment in a way that is both good for the islands and does not conflict with the ambitions of the LNP.
	<p>3.29</p> <p>Instead of the being last, this para should have been one of the opening, scene-setting paragraphs ('A Vision for the Islands').</p>	Noted.
	<p>Appendix B - It is understood that it may be that some of the questions raised in this comment would be answered by some of the documents mentioned in this appendix (many of which are, unfortunately, not available on line). Nevertheless, diagrams and evidence to support the text of this scoping document are essential and at the very least cross references should be made.</p>	Noted.
	<p>Appendix C - Why are the Duchy of Cornwall, the Sea Fisheries Committee, the AONB and the Wildlife Trust not included?</p>	Because these groups are not defined as Statutory Consultees. We do work closely and consult with them as it is important to work with such partner groups and organisations but it is not a statutory requirement to consult with them.
RE043	<p>Tresco &amp; Bryher Base Feedback</p> <p>Suggestion to turn the Carn Thomas site into a leisure centre, try to keep housing in one area on all islands. Would like more housing on Tresco and less holiday accommodation. Also consider turning the Carn Thomas site into a Youth Hostel to attract hikers, etc.</p>	The respondent's comments are noted.
	<p>St. Martins Base Feedback</p> <p>Didn't feel there was enough space on the island for more housing. Would like to see a cinema development at CT.</p>	The respondent's comments are noted.
	<p>St. Agnes Base Feedback</p> <p>Happy with current housing on St. Agnes. Would like some sort of activity centre at CT.</p>	The respondent's comments are noted.



	<p>St. Mary's Base Feedback</p> <p>Would like shopping centre or a proper cinema at the CT site (up to date films). Also a suggestion for an indoor sports dome. Shopping facilities at Telegraph. Felt housing was a problem when some individuals have family homes and some families are living in small accommodation with not enough bedrooms.</p>	The respondent's comments are noted.
RE044	<p>It is my view that Scilly is already quite heavily built and I consider 120 new homes would be a relative disaster and that such comparatively major development could contribute to any decline in the numbers of visitors, it would hence diminish the contribution that tourism makes to the local economy. Such a number of new residencies would not only be a blot on a very precious archipelago but would be irreversible.</p>	The respondent's comments are noted. The local plan has a duty to ensure it plans appropriately and strategically for its housing needs. The Housing Survey and the Strategic Housing Market Assessment identified the need to plan for this housing need. Any policies or housing proposals would have to be sensitively design and sites with appropriate infrastructure to ensure there is no significant wider harm to the islands as a result.
	<p>Additional housing to this extent would very likely mean approximately the same number of additional cars and all at one time or another jockeying for inadequate car parking space with deleterious effect on the Hugh Town Landscape.</p>	The respondent's comments are noted. There are no planning restrictions to remove the rights of any person to own a vehicle. The intention would be to site any new homes in areas to reduce the reliance of private cars, but that would not necessarily mean there would be no increase in car use. We cannot use the issue of car parking (lack of) or increase in cars as a reason not to provide local needs housing.
	<p>Additional Housing on this scale will almost certainly sometime or another but in say 25/30 years ahead to a repeat and similar proposal - the effect of such an un-proportional effect on shops and other infrastructure hardly bears thinking about.</p>	The respondent's comments are noted.
	<p>The perceived shortage of housing is slightly artificial and is mainly due to so much of existing stock not being lived in, but being occupied by owners only a few days each year and otherwise sub-let as holiday accommodation.</p>	The respondent's comments are noted.
	<p>Extra housing in itself will not result in employment - the way to ensure increase in employment of meaningful nature, by small businesses and science-based work will be a provision of rapid but affordable and reliable transport - travelling to and from the mainland is prohibitively expensive for visitors and residents - especially flying.</p>	The respondent's comments are noted.
	<p>The demise of the helicopter service to Penzance was effectively to push Scilly a further 40 miles west into the Atlantic.</p>	The respondent's comments are noted.
	<p>Before increasing accommodation it should be established what proportion of visitor spending remains in these islands?</p>	The respondent's comments are noted.



	Tourism is undeniably essential the Scilly economy but not when it increases to an extent that deters. Even Barcelona is actively considering reducing the total number of visitors because the present influx and consequential overcrowding has become a disincentive.	The respondent's comments are noted.
	We should all be aware that uncontrolled tourism eventually kills and destroys the attraction. The Jellicoe Report should be taken off the shelf and dusted off and the strictures therein be taken heed of and followed.	The respondent's comments are noted.
RE045	These schemes are gradually destroying everything that made the islands special; modern developments inevitably build in bland uniformity and destroy our individuality.	The respondent's comments are noted.
	Traditionally, developments were small-scale and discreet (e.g. Branksea House and the new dwellings at Well Cross, both good). Other building work and maintenance etc being done largely out of season.	The respondent's comments are noted.
RE047	I respond to the consultation from a perspective of Scilly over 70 years, 36 as a Councillor and 14 as a member of the AONB JAC. The designation of the islands as an AONB was and still is a recognition that they are so outstanding, not only Nationally but would also merit an international designation. Whilst those in authority pay lip service to what this entails, there is no voice to Champion the concept of protection, let alone to counter the steady march of despoliation in the name of economic development.	The respondent's comments are noted.
	Housing: The 'Islands Futures' document states that almost 100 houses have been built in Scilly in the last 10 years, with the implication that this has had no detrimental effect on the environment of the infrastructure. It should be obvious that there has been an impact on both. Water and Sewerage are barely able to cope. As for planning to build a further 100 plus houses in response, NOT for need but for DEMAND is madness.	The respondent's comments are noted.
	No attempt has been made to assess the optimum population the islands can support - it has long been accepted that there is a finite number, recognised by Augustus Smith in the nineteenth century and able to use draconian measures to reduce numbers. Not an option available today. The next generation may well be faced with the problems of overpopulation if this plan is implemented.	The respondent's comments are noted. The nature of what the islands can support is relative to how sustainable any development is and the types of employment or self-employment generated. The local planning authority through the local plan has a duty to ensure it plans appropriately and strategically for its housing needs. The Housing Survey and the Strategic Housing Market Assessment identified the need to plan for this housing need. Any policies or housing proposals would have to be sensitively design and sites with appropriate infrastructure to ensure there is no significant wider harm to the islands as a result.



	<p>FARMING: Farming on the islands has and will play a large part in shaping the landscape. However, there is a lack of in-depth understanding of where farming is at present and what it will look like in the future. For most of a century bulb and flower growing was the predominant activity, largely responsible for the landscape we see today. Now, apart from a handful of larger farms, most if not all smaller farms have ceased to grow flowers. What of the future? There is clearly potential for some diversification, as shown by projects as ducks, vineyards and apples for juice, but any widespread attempt to grow more crops to cater for the tourist trade, brings the use of the precious resource of water, for irrigation into conflict with residents and tourism!</p>	The respondent's comments are noted.
	<p>By far the most favoured diversification has been to tourist accommodation, in some cases this is now the only economic activity, not only to the detriment to farming but adding to the infrastructure problems.</p>	The respondent's comments are noted.
	<p>Conservation AREAS: Whilst the de-designation of some areas may be an attractive proposition, it would be difficult to administer and result in endless conflict.</p>	The respondent's comments are noted.
	<p>SUSTAINABILITY: Sustainable as a prefix to everything has been so misused as to become meaningless.</p>	The respondent's comments are noted.
RE049	<p>Are 3.22 - 3.29 "sustainable development" and "duty to co-operate" the Council's views (as stated) or are they those of the Council Officers? How many of these statements have gone before 'full council' (our elected representatives), have been fully considered and adopted by the Members? We are a democratic society but this section of the scoping report in particular does not sound like it, it resembles indoctrination!</p>	The respondent's comments are noted. The local plan, when examined independently in public by the Planning Inspectorate could not be found 'sound' if it does not satisfactorily address our duty to co-operate or promote policies and proposals that are found to be sustainable. In order to ensure the local plan is 'sustainable' in all aspects of this term, it is sustainably appraised in terms of environmental impacts. Elected Members of the Council do not have a choice about whether or not these two issues are addressed. Both of these aspects are a requirement of the local plan process but also difficult to demonstrate in such an isolated environment.
RE050	<p>The 'Vision statement' for 2005 is succinct, yet quite comprehensive and could hardly be disputed, we should think, by most residents. We question whether para 2.2, p6, is an improvement. Indeed it suffers from all the contemporary jargon and 'management speak' that characterizes so much documentation these days. It confuses rather than enhances one's understanding of the issues. Without wishing to be negative (or cynical!), phrases such as 'a thriving vibrant community, rooted in nature and excited about the future' hardly seem appropriate to a document that seeks to determine what are this community's down-to-earth priorities for the future at a time of huge financial constraint.</p>	The respondent's comments are noted.



	<p>Section 2, Objectives</p> <p>Each of these 6 objectives has been proposed, discussed and debated during the 25 years that we have lived in Scilly. The aspirations can hardly be denied but, at a time when money is short and we are in debt, they cannot all be afforded and therefore a process of prioritization must surely be adopted. Disappointingly, we see little in this document that discusses priorities. We think that there should be a hard-nosed attempt to determine costs of the principal aspirations and come to conclusions about what the priorities should be.</p>	<p>The respondent's comments are noted. Local Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment, adapting to climate change and securing good design. They are also a critical tool in guiding decisions about individual development proposals, as Local Plans (together with any neighbourhood plans that have been made) are the starting-point for considering whether applications can be approved. It is important for all areas to put an up to date plan in place to positively guide development decisions.</p>
	<p>Key issues (end of 2.2, p7)</p> <p>As listed, there are seven but in reality energy, fuel, water, sewerage and waste could well be distinguished as they could be separately costed and might be allocated different levels of priority. For example, the sewerage system in Hugh Town is clearly in urgent need of improvement (and a legal requirement by UK and EU Agencies) but is a separate issue from the management and recycling of waste materials in the Porthmellon area. We shall list our own key issues/priorities later.</p>	<p>The respondent's comments are noted</p>



RE055

Vision and Objectives: I feel that these objectives as stated are admirable but I am very concerned that the Council are not the ideal people to make decision which affect the economy of the Islands.

(2.2) Some form of sub committee is needed, formed of local business people who know what affects our economy to make suggestions and decisions which may 'grow the economy, etc"

Council officers may have no idea regarding the effects of their actions on local businesses, and should not be the ones to lead this procedure. They may be able to 'promote' the islands with regard to transport and tourism but observing their recent record in trying to assist businesses they appear to have done more harm than good – e.g. shops are generally having a problem making a living due to the decline in visitor numbers and the proliferation of additional retail outlets. This is proven by the fact that we have two empty shops who cannot find tenants at the present time (Gibson Kyne and Buccabu).

The council's answer to this problem appears to be that we have more outlets such as three new shops at Porthcressa, numerous possible outlets at Porthmellon and a new retail area on the quay. I am aware that grant money was available for two of these schemes but simply because finance was forthcoming does not improve the decision to provide these additional unwanted units./ Economy thrives on supply and demand not on a "build it because it is free" attitude.

I have always considered that housing is a key issue on these islands. Unfortunately, due to the Governments 'Right to Buy' policies this has decimated the rented housing stock which was available to the Council for social housing. This policy may have been a great benefit on the mainland but islands like ours, with a finite area available on which to build, have been severely affected. Now, it seems, even houses which were protected as they were under the control of Housing Associations, will also come under this 'Right to Buy' scheme proposed by Central Government.

We therefore need an alternative for our islands and the only way I can see for us to retain social rented accommodation is for it to be built by the Duchy of Cornwall or a private company, individuals or a 'self build' group. These possible future properties could be controlled by 'local need', essential worker or agricultural restrictions secured by S106 agreements attached to the planning approvals.

Planning Officers and staff within the Local Planning Authority, who are employed by the Council to make recommendations on planning decisions and produce the local plan, have no conflict of interest economically, socially or politically. The planning function of the Council of the Isles of Scilly does not have any vested interest other than for the benefit of the community and the environment. The respondent's comments suggest that the economic interests of the island outweigh everything else when it should be a delicate balance.

The respondent's comments are noted. Officers within the Council have sought to remove the islands from the 'right to buy' for the reasons set out in this response. This issue is however beyond the scope of the local plan.

The respondent's comments are noted





<p>This suggestion would not only solve the problem of available finance but it would mean that any income from rents received would remain on the islands and help our fragile economy.</p>	<p>Noted</p>
<p>I would also like to suggest that great thought is given to any proposed sites made available for housing. It is imperative that the housing provided is suitable for the islands and if possible improve the aesthetics of any area. With this in mind, any site should be pre-designed to a certain extent so, not only the properties proposed are compatible with the area, but that the properties do not end up as enormous edifices at the Pilot's Retreat development. In this area, understandably, the land purchases built as large a property as they could afford so as to allow for a 'letting' area to provide them with an income as well as accommodation.</p>	<p>The respondent's comments are noted. The Local Plan has to demonstrate a five year supply of housing land to ensure the housing needs of the area can be delivered over the life of the plan. In order to demonstrate this officers have carried out a Strategic Housing Land Availability Assessment which incorporates sites submitted to the authority by landowners. These are the subject of careful consideration by officers. Any sites assessed as 'suitable' would be the subject of public consultation before they are allocated for housing. Officers agree that any sites should be strictly controlled in terms of plot and dwelling sizes and that appropriate controls are in place to ensure local housing remains in perpetuity available for local people.</p>
<p>I understand that at present the proposed site on which housing is to be provided is one of the highest, most prominent fields at Telegraph. This is just another square field and I can imagine the housing envisaged will be just as plain and unexciting. These islands deserve much better!</p>	<p>The respondent's comments are noted. This is a site that is currently allocated for housing in the 2005 Local Plan. It is highly unlikely that this site would be taken forward as a housing site in the new local plan.</p>
<p>Can I suggest that thought be given to the provision of a small, neat, village style complex? Imagine traditional cottage style building tumbling down the hill and meandering towards Pendrathen Quay. This could be pre-designed and not only could this be made to complement its surroundings, the proposed residents would not only have exquisite views, they would have their own quay facility. This proposal would not only be unobtrusive from the land side, it could, if done sympathetically, improve a 'scruffy' area when viewed from the sea.</p> <p>I am sure there would be many problems but this or perhaps a similar scheme elsewhere would, I feel, be far preferable than just dumping new housing on a high square field.</p>	<p>The respondent's comments are noted.</p>



I agree that additional housing should be provided to accommodate changing living patterns and young or older people who have either been born here or have made the islands their long term homes.

I do not think we should even consider building anywhere near 120 houses in the next 10 years. This would mean even more demand in the future and this rate of development is unsustainable and undesirable on this island.

I have always felt that the Council should allow some limited open market housing on the island but the circumstances would need to be carefully considered. Just because we live on an island should not mean that we lose our normal rights to provide ourselves with a property unencumbered by restrictions. As far as I remember, the Inspector's Recommendation on the last Local Plan in 2004 suggested that very limited 'open market' development and some holiday accommodation be allowed. These recommendations were both ignored by the Council.

I do agree that there is potential to diversify in agriculture, but apart from the recent endeavours of Robert Francis to produce wine, I imagine our local farmers have tried any scheme I could think of.

I feel it would be foolhardy for the Local Plan to make any provision for agricultural reform apart from the erection of an abattoir which would greatly reduce prices for animal/meat preparation and perhaps allow our farmers to produce far more animal produce on the island. This, of course, would need a grant! (Could the Council get this ?)

Another possible way of providing employment would be to allow the erection of a restaurant on one or two of our beaches. Visitors often find it most difficult to book a restaurant at short notice and this would also improve the 'tourist experience'.

The respondent's comments are noted. The Local plan has to create a positive policy framework for sustainable growth. In order to deliver this it may be necessary to permit some enabling development to cross-subsidise much needed homes due to the significant additional costs of constructing any development on the islands. It is anticipated however that any 'open market' housing would be conditioned to be occupied as a principle residence to avoid the loss of such properties to the 'second homes' sector of our housing stock. Any allocations would be located on sites that have been adequately assessed to ensure minimal visual impact.

An independent assessment of housing needs, through a Housing Survey and a Strategic Housing Market Assessment has found that there are housing needs of existing local residents that are not being met by the current level of homes on Scilly. There is therefore no question about the need to deliver more homes over the life of the new local plan. It will be essential that the local plan creates a positive policy framework to ensure such developments can be delivered without compromising the significant and important aspects of the environment.

The respondent's comments are noted. There is no plan to push forward with agricultural reform. Questions in the scoping document were seeking the public's views on whether they thought it was sensible to create policies that would be supporting and encouraging of agricultural diversification.

The more recent funding opportunities for local businesses through the Voucher Scheme could be one source of funding towards the development of an abattoir. This is however beyond the scope of the local plan.

It is unlikely that policies would be supportive of the construction of building on beaches as this would be at risk of being affected by high tides, flooding and a serious risk to life in addition to the potential harm it could do to the delicate aquatic ecosystems of our seas and foreshore.



<p>You mention the airport and quay projects which are admirable. They are not perfect however and in fact, the airport appears to have been designed for the convenience of taxis and is far more inconvenient for the general population than was the old one. Local population needs should be far more important and any future scheme should not go ahead without an extensive input from the indigenous population.</p> <p>As a Surveyor I have, for many years, come up against the problem of inefficient drainage in Hugh Town. This is not only an unwanted restriction on development but a great inconvenience when the drains have to be cleaned at regular intervals in the middle of the holiday season.</p>	<p>The respondent's comments are noted.</p>
<p>I consider that St. Mary's would be an ideal place for any producer of renewable energy to test their products. We have a fixed number of inhabitants and our habits could easily be assessed.</p> <p>Perhaps we could encourage the council to be more active in trying to attract investment and provision of alternative energy?</p> <p>The obvious ones come to mind:</p> <ol style="list-style-type: none"> <li>1) Wave Technology</li> <li>2) Water Turbines</li> <li>3) Methane production</li> <li>4) Solar power.</li> </ol> <p>I have discounted wind as turbines are noisy, unsightly and out of place in an Area of Outstanding Natural Beauty.</p>	<p>The respondent's comments are noted. The Smart Island Project is assessing the existing infrastructure and the capacity for potential renewable energy solutions for the islands. It is anticipated that a positive policy framework would be created that would enable the best solution to come forward to meet the islands' energy needs.</p>
<p>There should be far more recycling.</p>	<p>Noted and agreed. The Infrastructure department have been working over the last few years to transform the processing of island waste, away from landfill or harmful incineration to an island that seeks to recycle its waste. The Council have been part of the Smart Island Partnership that seeks to take this further and start using waste to generate energy and reduce fuel poverty. It is anticipated that this will be supported through a positive policy framework in the local plan to ensure that such proposals can come forward and be supported.</p>
<p>I feel that the Council would only cause problems if they tried to 'define uses' in Hugh Town. Our habits, needs and numbers are constantly changing and this, together with tourist needs, will define what is needed. The Local Plan should allow these changes to be catered for by the fact that our businesses will want change and planning should allow them to do so. It would be of little use having restrictions which would apply at the present time but would be totally out of place and counter-productive in a few years' time. The Plan should allow the Town to evolve as the economy dictates.</p>	<p>The respondent's comments are noted.</p>



<p>There is no area which could be treated any differently than any other as we cover such a small area.</p> <p>Perhaps the standard of building design could be improved if any more work or alterations are done on the industrial estate as the existing buildings greatly reduce the beauty of the Porthmellon area. This comment does not include the new building which I feel is well designed externally.</p> <p>As the secondary school site is in such a prominent position, I feel the Council should consult with the population before any decisions are made as to its future use and design.</p>	<p>The respondent's comments are noted. The public are always consulted when an application for planning permission is submitted.</p>
<p>I generally agree with the concept of allowing new building on to existing settlements but as mentioned earlier, if we have to have so much new housing it could well be appropriate to allow pre-designed development to form a new settlement.</p> <p>Consideration should be given for the provision of development which would assist and enhance the tourist experience. I would suggest that we are in desperate need of an hotel which would provide all modern conveniences, facilities and services that today's tourists have come to expect. This would, of course, need beach access and would have to be carefully considered.</p> <p>Another form of accommodation which is also in demand is self-catering. Either attached to an existing complex or where space does not allow, on a new site altogether.</p>	<p>The respondent's comments are noted.</p>
<p>I generally agree that plastic windows should not be fitted in existing traditional buildings but see no reason why they cannot be used in modern style buildings. Perhaps the style of these could be controlled?</p> <p>i.e. There are new windows on the market with narrow profile frames which are almost indistinguishable from timber.</p> <p>There must be provision in the Plan to allow for new innovation and the decisions could be left to the Planning Officer who would be aware of these improvements as they happen.</p>	<p>The respondent's comments are noted.</p>



	<p>I, and most of the population are most concerned about the Authorities apparent acquiescence to a great number of new houses to be built in the next 10 years.</p> <p>If, as suggested, 90 -120 are to be built, the Council must consider where all these additional people are going to work, where they are to obtain essential items such as food? The existing shops cannot cope with the present demand, let alone another possible 300 -350 people.</p> <p>Where are they to park their cars – which they will all need if building is to be at Telegraph or in fact anywhere on the island.</p> <p>New classrooms will be needed at the school – new rooms are already needed for the present population.</p> <p>How will our water supply and drainage system cope?</p> <p>How will our over-stretched waste disposal system work (Moorwell Alp)?</p> <p>Etc.etc.</p>	<p>The respondent's comments are noted. All of the issues would be considered as part of the local plan. An independent assessment of housing needs, through a Housing Survey and a Strategic Housing Market Assessment has found that there are housing needs of existing local residents that are not being met by the current level of homes on Scilly. There is therefore no question about the need to deliver more homes over the life of the new local plan. It will be essential that the local plan creates a positive policy framework to ensure such developments can be delivered without compromising the significant and important aspects of the environment.</p>
	<p>The Local Plan should consider all these problems and all the repercussions if they do, in fact, allow so much extra housing.</p> <p>The existing population should be extensively consulted before decisions are made because it will be they who are not only inconvenienced if our services do not cope, they will also see our beautiful environment spoilt by over-development.</p>	<p>The respondent's comments are noted. The draft local plan will be subject to further public consultation before being submitted to the Secretary of State. Once submitted the local plan will be independently examined in public by a Planning Inspector who will then write a report on whether the local plan is sound and can be adopted by the Council. It will then be up to Members to adopt the Local Plan.</p>
	<p>We are a Conservation Area and Area of Outstanding Natural Beauty – the Plan should not allow the destruction or even deterioration of this status.</p>	<p>The respondent's comments are noted.</p>
<p><b>RE058</b></p>	<p>In running a small business we must not only perform the service for which we are paid but the admin creates a fulltime job for which there is no payment. The Council adds significantly to that burden. This would be fine if the returns on trading were high enough to cover an extra paid position but they aren't. Extra running costs in Scilly equate to more than the normal expected profit margin therefore the day we become mainland competitive in price is the day we cease to earn! Somehow costs to both business and living must be lowered if we are to continue. Rather than create an air of decadence in the form of leisure facilities for the better paid of St Mary's I should like to see the Council directing a drive to equality by by raising the standards for ALL across the islands instead of culturing resentment! Instead of providing a Children's service jet boat for one child, make the condition of the contract supply a scheduled service that all can use. Instead of creating vast projects only a mainland firm can tender for, create smaller ones that keep the wealth in Scilly..</p>	<p>The respondent's comments are noted.</p>



	<p>I was born on St Martin's in the 1970s, witnessed the demise of the flower industry, the introduction of Mains electricity. I have worked in small-scale agriculture, boat-building, fishing industry, catering and the building trade. My work has worked in the high end letting industry and we have two children. We are self employed but provide part time employment for several people as well as being the owners of a fishing vessel providing a share fishing living for a skipper. We are currently providing the school dinners for St Martins primary base. The current biggest problem is the large workload combined with poor returns which do not equate to a minimum wage and so prohibit employment. I attempted to stand for Council in 2013 but was unsuccessful, I am keen to see more opportunity than I experienced, and see conditions bright enough to encourage more young people to stay and help support the aging population who are in real danger of insufficient labour to cater for their needs in terms of transport, waste management and other services.</p>	<p>The respondent's comments are noted.</p>
RE059	<p>Housing: More homes are needed especially for young local families and for elderly people who wish to down size. So, if priority is given to building for the latter, the larger homes will be freed up for the former. Maybe residents could be encouraged to downsize with some incentive being given for them to make the home they are leaving available for local needs rather than selling on the open market where the property is privately owned.</p>	<p>Noted and agreed.</p>
	<p>The Carn Thomas Site: Ideally it would be best to convert it without any demolition, I some of the buildings are not fit for this of course they should be demolished, but any that are fit to be converted should be kept. If possible it should be used for building homes for the elderly with provision for sheltered care as necessary. I know this has been discussed over some time and may not be possible. Yet the problems still remains small <i>affordable</i> homes need to be prioritised.</p>	<p>The respondent's comments are noted.</p>
	<p>More Building: Wherever possible existing buildings should be re-used, followed by brownfield sites. If houses are built away from town (e.g. Telegraph has been suggested) is should be remembered that this will inevitably bring an increase in the number of cars on St Mary's. New homes should be built in the vicinity of existing ones, where possible. The environment should be given priority in all aspects of new building work. It should be remembered that it will be necessary to provide sufficient parking spaces for all new house building.</p>	<p>The respondent's comments are noted and agreed.</p>





<p>Parking &amp; Traffic: the number of cars has increased on St Mary's and the number parking spaces has decreased, so, people are much more liable to be tempted to parking in unsuitable places in sheer desperation and frustration, or else drive round and round looking for a spot, so increasing the traffic flow. The restriction of parking spaces does not prevent the use of cars! Though more should be given to areas that could be used and space available used more efficiently. One suggestion would be on the Strand. If the lower walkway between the Strand Shelter and Mincarlow was improved to provide a pleasant promenade/pavement, the current very wide pavement could be used for cars to park at right angles to the road, this space would accommodate many more cars than the present arrangement where they park in line with the road. This scheme would have the benefit of freeing up space on the road so that vehicles could pass opposing traffic and so avoid congestions.</p>	<p>The respondent's comments are noted.</p>
<p>In many places both in town and also in especially in the countryside pavements are too narrow for wheelchairs or children's buggies, and surfaces are in poor condition causing pedestrians to walk in the road. Many pavements are overgrown with weeds, brambles are a problem to pedestrians (and cyclists in places without pavements) particularly at eye level. This leads to a dangerous situation where pedestrians regularly walk on the roadway instead, it is a lot easier and more comfortable. I know that trimming of hedges is the responsibility of the occupier of the adjoining land but when they fail in this the Council can get the work done and bill the occupier, but this does not appear to be happening.</p>	<p>The respondent's comments are noted.</p>
<p>Ideally pavements would be converted into cycle tracks and footpaths made the other side of the hedge at the edge of fields (as has been done between the bottom of Rocky Hill as far as opposite the end of Grenofen Lane) and clearly marked for pedestrians. The improvement to the road surface has had the unfortunate, unforeseen consequence of increasing the speed of vehicles making walking or cycling less safe or pleasant. I know of parents reluctant to allow their children to cycle to school. I know there is a problem in making and upholding speed limits. I wonder if, using some creative thinking between the Council, Police and residents a solution could be possible. (One thought I had would be; if the police let it be known that anything over a certain speed would be considered dangerous, different speeds being applied to areas, e.g. in countryside or town or very narrow spots; and that if an incident occurs this will be taken into consideration.</p>	<p>The respondent's comments are noted.</p>



	<p>Water and Sewerage: Would it be possible to reduce the pressure in order to reduce consumption? When considering the very necessary up-dating of the sewerage systems 'green' systems should be used, not only for environmental reasons but looking towards the future the Government might well make such schemes compulsory resulting in any new work not complying having to be destroyed and replaced.</p>	<p>The respondent's comments are noted.</p>
	<p>Parking Problems: Allow winter parking in Hugh Street as at times of the frequent bad weather and strong winds parking in Silver Street and the Porthcressa area can be very unpleasant with sand blowing in your eyes and difficulty keeping hold of car doors when opening them. This previously used to be allowed. There are not a lot less pedestrians about then and I don't think that it would cause any serious congestions and would make a lot better experience for those living out of town. A lot more car parking places need to be made available, Cars are going round and round looking for places making more congestions. Two or more places could be made in Garrison Lane opposite the Wesleyan Chapel. Reduce the size of the bus parking area in the Strand to what it was before the new surface. Another idea would be to allow ALL TIME parking in Hugh Street and the Square/Bank area but make strategically placed double lines opposite the Paper Shop and opposite the Post Office to have a clear place for traffic to wait for oncoming vehicles. I strongly feel this would solve a lot of the parking problems and make visiting the town a much easier experience. I don't think having to wait a few seconds at either end of Hugh Street is a great problem (on the mainland you have to wait at traffic lights a lot!!)</p>	<p>The respondent's comments are noted.</p>



RE066

I gave a lot of time and thought when I responded to the 2020 vision plan and largely, those views remain but the previously approved developments 'in the country' (of which I was accepting but no advocate) need careful reconsideration. The newly developed/extended properties in this area (whilst few) have had a marked, negative impact due to the associated traffic. No though or requirement for off-road parking or garaging was given to such developments, resulting in dangerous corner from Telegraph into Pungies Lane. The corner has up to 5 waste bins of various types now, which attract more vehicles (including those of outlying businesses). The combination of visitors (who have congregated at this point, to map-read, take stock etc), parked cars (often right up to the very corner) produce sales, a bus stop, pedestrians, cyclists and frequent, heavy traffic, create a real concern and hazard for everyone. Unregulated warning notices, but those anxious for children's safety, highlight the problem! The adverse impact of this small change suggests that future development would be far better confined to the boundaries of Hugh Town and Old Town, where they would also benefit from mains infrastructure and amenities. McFarlands Down suffers badly from rainwater run-off and difficulties associated with water and sewage disposal, particularly due to poor absorption of soil types and lack of proper regulation.

Smart Energy may or may not be appropriate for the islands. I need a better understanding before being able to comment but to be smart about the basics - improving and maintaining what we have and raising it to an acceptable standard is demanded above all. Water and sewerage are the most important areas to be tackled and define how much development can be sustained. The essential, communications mast forms part of 'my backyard'. This has rapidly developed from an analogue TV and radio mast to a support for mobile phone, police radio, digital tv, and wifi antenna and dishes. The effects of electro-magnetic frequency - particularly for children - should be taken seriously, as it is by Swedish experts. Please consider the proximity to residents before advocating more masts/improved signals.

The respondent's comments are noted.

The respondent's comments are noted.



	<p>The current 'open market' for housing has been depressed, especially noticable since the loss of the Helicopter service., It is difficult for me to comment in some areas as my husbands interests may seem conflicting. I think it is wrong to build for 'entrepreneurs' - by definition risk takers. If they are successful there is opportunity for them. I continue to consider myself extremely priviledged to live on the islands. When I purchased my home i was happy to accept any limitations to further development by local planning policies. It was affirmation that the islands were being protected. TWenty years on, resources are more stretched than ever and planning has been greatly relaxed.</p>	The respondent's comments are noted.
	<p>NIMBYism? IN McFarlands Down, planning decisions made by the Council have adversley impacted on the only route serving the residents' properties - by increasing traffic of all types and by failing to regulate water runoff. Some, in not all residents, have a duty by deed to maintain and make good this road, which is now impossible to do. It has become hazardous approach to and from our homes. I take seriously my responsibilities to my own environment, especially where it may affect others - attending to water/energy saving, sewerage - practicing oraganic gardening and food production, encouraging wildlife habitats, enhancing significant views. I try to see all points of view and recognise the difficult constraints faced - but any future local plan must look at the detail and realise that everyone's enjoyment of proeprty and life deservesd protection.</p>	The respondent's comments are noted.
	<p>Realism need not be negativity. The Conservation Area Character Statement and Scoping Report cover vital points needed to protect the islands. Scilly is a unique microcosm. I hope that the 2015-2013 Local Plan will retain this very special environment by recognising and embracxing its qualities and natural limitations.</p>	The respondent's comments are noted.
RE067	<p>We are pleased to see "Protecting and Enhancing the historic environment" and usually view this as being indicative of a positive rather than merely reative approach, which is important in the context of the "positive strategy for the conservation and enjoyment of the historic environment" required by paragraph 126 of the NPPF.</p>	The respondent's comments are noted.



<p>However the questions posed about the historic environment are rather single issue. A review of conservation area boundary's is indeed appropriate from time to time. In the context of a local plan, looking at a wide number of issues from transport to housing and a significant number of heritage assets, the only tangible intention is conservation area amendment. As we say, this does appear a little single issue, but perhaps more importantly in terms of NPPF it does not appear to be concerned about producing a positive strategy for the historic environment based on a sound evidence base, particularly, for example, when the isles have a number of heritage assets at risk.</p>	<p>The respondent's comments are noted. The LPA would welcome specific guidance ways in which, without duplicating the policies of the NPPF, the local level historic environment can be addressed. The majority of 'at risk' heritage assets are scheduled monuments where the cause is coastal erosion, plant growth or collapse of structures and in areas where the LPA would not consider supporting or proposing development.</p> <p>The Council, through the support of a 2 year grant from Historic England, have a contract with Cornwall Archaeological Unit to monitor Heritage at Risk, which will feed in to the Local Plan process to ensure a full and up-to-date understanding of the historic environment is taken into account as part of the local plan process.</p>
<p>Since the adoption of your Core Strategy, the NPPF has of course been published. Local Plans are required to take the NPPF into account [2] and be consistent with NPPF policies [151]. It is Historic England's view that the NPPF requires more of local plans in respect of the historic environment than the former pps 5 - the NPPF makes it clear that the conservation and enhancement of the historic environment is an integral part of sustainable development and sets out a number of specific requirements for the historic environment in local plans.</p>	<p>The respondent's comments are noted. The LPA intends to comply with the requirements of the NPPF with an up-to-date and proportionate evidence base.</p>
<p>Local Plans should: Set out a positive strategy for the conservation and enjoyment of the historic environment [126]; include strategic policies to deliver the conservation and enhancement of the historic environment [156]; contain a clear strategy for enhancing the natural, built and historic environment [157]; identify where development would be inappropriate, e.g. for its environmental or historic significance [157]; be based on adequate, up-to-date and relevant evidence about the historic environment [158-169].</p>	<p>The respondent's comments are noted.</p>
<p>Historic England has produced in May 2015, with the wider heritage sector, Good Practice Advice Note 1: "The Historic Environment in Local Plans", available on Historic England Website, which provides advice on these matters.</p>	<p>The respondent's comments are noted.</p>
<p>Although the last of the requirements above, an adequate, up-to-date and relevant evidence base to underpin the strategy and policies of the Local Plan is really the starting point. The English Heritage GPA Note 1 contains advice on what such an evidence base should cover. The Council should assure itself that its evidence base for the heritage policies in the Local Plan Review is adequate, up to date and relevant. I note in appendix b that the list of technical reports has only a report on Historic Landscape Character (1996). I strongly suspect this is not adequate</p>	<p>The respondent's comments are noted. The GPA Note referred to will be used to assist in understanding the implications on the historic environment. The technical reports referred to in Appendix B is not a particularly accurate reflection of documents that will be used to assist in the development of the draft local plan. The local plan evidence base library which has been compiled since the scoping report was published includes an extensive section on the historic environment. A resource that will be used to inform the development of policies.</p>



<p>Advice is also contained in the English Heritage GPA Note 1 on a positive (and clear) strategy for the conservation and enjoyment (and enhancement) of the historic environment, including heritage assets most at risk through neglect, decay or other threats. The strategy should include strategic policies to deliver the conservation and enhancement of the historic environment and, in developing this strategy, the NPPF also advises that local planning authorities should take into account: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the wider social, cultural, economic and environmental benefits that conservation of their historic environment can bring; the desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place.</p>	<p>The respondent's comments are noted.</p>
<p>We also consider the positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment required by the NPPF should consist of more than a strategic policy. There should be recognition throughout the Plan of the historic environment's role in delivering the plan's vision and the wider economic, social and environmental objectives for the plan area.</p>	<p>The respondent's comments are noted.</p>
<p>Building on the Conservation Area Character Statement, we will also be looking to the Local Plan Review to Develop the strategy further through a detailed development management policy or policies setting out the requirements of development proposals and providing a clear indication of how a decision maker should react to a development proposal as required by the NPPF.</p>	<p>The respondent's comments are noted.</p>
<p>This policy should include criteria for assessing the potential impact of development proposals on the significance of all relevant heritage assets: designated assets such as listed buildings, Scheduled Monuments, conservation areas, and non-designated heritage assets, such as those of local significance as identified on local lists, archaeological deposits and historic landscapes.</p>	<p>The respondent's comments are noted.</p>





	<p>The development management policy or policies should reflect the NPPF requirement that any harm or loss of a heritage asset should require clear and convincing justification, most often in the form of public benefits. In accordance with paragraphs 132-135 of the NPPF, the more important the asset, the greater the weight that should be given to its conservation the greatest weight should be given to designated heritage assets of the highest significance, then other designated assets, then locally important assets (including archaeological remains) and finally ordinary "heritage assets" .</p>	<p>The respondent's comments are noted.</p>
	<p>We would expect the development management policy or policies to set out what is required of applicants e.g. Applications which affect, or have the potential to affect, heritage assets will be expected to; i) describe the significance of the asset and its setting, using appropriate expertise;; at a level of detail proportionate to its significance and sufficient to understand the potential impact of the proposal; using appropriate references such as Historic Environment REcords and, if necessary, original survey (including for assets of archaeological interest, an appropriate desk-based assessment and, where necessary, a field evaluation survey); and ii) to set out the impact of the development on the heritage assets and a suggested mitigation that is proportionate to the impact and the significance of the heritage assets and a suggested mitigation that is proportionate to the impact and the significance of the heritage asset, including where possible positive opportunities to conserve and enjoy heritage assets as well as recording loss and advancing knowledge.</p>	<p>The respondent's comments are noted.</p>
	<p>Where development is permitted that would result in harm to or loss of the significance of a heritage asset, developers will be required to record and advance understanding of the significance of that asset, in a manner appropriate to its importance and the impact, and to make that evidence publicly accessible.</p>	<p>The respondent's comments are noted.</p>



<p>The Policy or Policies could also address issues such as important views or scale, mass, materials and should address heritage assets at risk of which there are a significant number on the isles. The NPPF requires the latter to form part of the positive strategy for the integral part of sustainable development and sets out a number of specific requirements for the conservation and enjoyment of the historic environment and we suggest wording along the lines of: "The Council will monitor buildings or other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk through discussions with owners and willingness to consider positively development schemes that would ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers".</p>	<p>The respondent's comments are noted.</p>
<p>It would also be helpful in demonstrating the Council's commitment to, and its positive and clear strategy for, the conservation, enjoyment and enhancement of the historic environment if it set out somewhere the measures the Council will employ to ensure that it will <u>deliver</u> the conservation and enhancement of that historic environment in addition to development management e.g. Conservation Area Appraisals and Management Plans, the use of Article 4 Directions where appropriate, the compilation of a local list in conjunction with local communities if such a list does not exist, a survey of lower grade designated assets at risk etc.</p>	<p>The respondent's comments are noted.</p>
<p>As regards site allocations, Historic England will expect the selection of site to be allocated for housing (or any development) to be based on, inter alia, full and proper consideration of the potential impacts of development on the historic environment; in particular on heritage assets and their setting, and the need to conserve and enhance those assets. This will require the use of comprehensive historic environment evidence base including historic landscape character assessment, other historic characterisation exercises, the National Heritage list, the Cornwall and IoS Historic Environment Record, and the Heritage at Risk Register</p>	<p>The respondent's comments are noted.</p>
<p>We will expect the Council to demonstrate how the historic environment has influenced its choice of sites, and to set out detailed overriding justification if it proposes the allocation of any sites that would have an adverse impact on a heritage asset or assets. We are preparing additional advice on Site Allocations, which should also be available in 2015.</p>	<p>The respondent's comments are noted.</p>



RE068	<p>Thank you for consulting us on the Scoping Report for your Local Plan 2015-2030.</p> <p>In summary we consider that your Authority will need to update the evidence base on flood risk to have a better understanding of how this will affect the Islands over the Plan period. Without this update it will be difficult to demonstrate how the objectives and vision of the Plan could be achieved, with the consequence that the Plan could be considered unsound.</p>	<p>The respondent's comments are noted. Work on understanding flood risks and coastal erosion is informed by the Shoreline Management Plan and work is underway to understand flood risks more generally, which will inform the local plan. All of the local plan is subject to sustainability appraisal and any policy or proposal will be assessed in terms of sustainability impacts.</p>
	<p>We broadly agree with the vision and are pleased to see that the Council has identified that it needs to be ready for change. However, to be ready for these future changes the Council needs to be aware of what they may be and have an understanding of the likely challenges that meeting this vision will encounter.</p>	<p>The respondent's comments are noted.</p>
	<p>Initial investigations from the Shoreline Management Plan Review 2 (SMP2) indicate these future changes are significant for the Islands and that they will disproportionately affect the Islands in comparison to those anticipated on the mainland owing to their low lying nature, detached vulnerability and acute exposure to the dynamic nature of the Atlantic Ocean. Therefore, these changes need to be further researched and their potential impacts identified to enable your Authority to adequately plan, adapt and potentially manage for them.</p>	<p>The respondent's comments are noted.</p>
	<p>Funding is available for the Council from the Environment Agency to map flood and coastal erosion risks to all of the Islands, and also specifically to identify locations of critical infrastructure that may be impacted. We remain committed to assisting the Council in understanding these risks and managing them as best as we can together, recognising the distinct skills and understanding the Council has in dealing with its local issues.</p>	<p>The respondent's comments are noted.</p>
	<p>We strongly recommend that prior to further Plan preparation the Council makes use of the funding currently allocated from us and maps its current and future Flood and Coastal Erosion Risk Management (FCERM) issues in detail. This will ensure the decisions that need to be made for the Plan are based on up to date evidence.</p>	<p>The respondent's comments are noted. It is understood that colleagues within the Authority are progressing this work.</p>



<p>It is apparent that some of the existing key locations such as Hugh Town and Old Town, and key infrastructure such as the drinking water sources and telecommunication connections for all of the Islands are at risk presently and in the future from coastal flooding and erosion. It is also understandable that it may not be practical to attempt to relocate these sites, especially given the small size of the Islands and lack of development sites. Therefore, if development boundaries are extended and development is located in these at risk areas, along with a reliance on the infrastructure that is also at risk, then the Council will need to understand what the potential implications of these decisions are, along with what the potential future burden may be to protect these sites and mitigate the risk. Once the Council has mapped these risks using the funding available from us, we recommend that a long term strategy is produced in conjunction with the Local Plan preparation, to understand what the long term management options may be, and how these could be funded and incorporated to enable the sustainability of the Island communities.</p>	<p>The respondent's comments are noted. Potential development land that the LPA could consider allocating for housing will be subject to further consultation before it is allocated for housing.</p>
<p>Notwithstanding the above, the SMP2 Review, the 2011 water resources report including flood defences and the Environment Agency datasets including the State of the Nation flood risk assessment provide a good, but high level, overview of the FCERM risks the islands face and the recommended current and future actions to mitigate for these risks. Therefore, at the very least the Local Plan should make reference to these recommendations and associated action plans in the preparation of this Plan.</p>	<p>The respondent's comments are noted.</p>
<p>In addition, given the unique natural status of the islands and the high degree of designation for various environmental reasons, we recommend that the strategy considers the potential changes at these sites also, as interestingly some of the designated freshwater habitats, such as Lower Moors, Porthellick and the various pools on the outer islands will face increasing pressure in the near future and a potential change in their characteristics from saline intrusion via percolation through the geology, increased frequency of inundation from the sea and pressure from the additional demand on drinking water supply. A strategy of this type can be bid from Environment Agency funding, and we would support an application of this type in the next round of the Council's medium term plan funding application.</p>	<p>The respondent's comments are noted.</p>



<p>Page 10: Physical and Social Infrastructure            Para 3.14: We are pleased to see that the Council considers the management of drinking water supplies, waste water and waste disposal is a significant challenge for the islands. The Plan must ensure that that with regard to this 'environmental infrastructure' growth protects it and would not lead to deterioration in water quality and water resource. Such deterioration could have an adverse effect on tourism and the economy of the islands. We agree with the statement on page 11, para 3.16 on this matter.</p>	<p>The respondent's comments are noted.</p>
<p>Sewerage: The foul drainage discharges will fall under Environmental Permitting Regulation requirements. Applications will need to consider the effect on designated areas (terrestrial and marine) and the proximity to boreholes and fragile groundwater reserves. The off islands have limited capacity for the disposal of foul drainage because they are all reliant on septic tank systems some of which are close to private drinking water boreholes; elevating the risk of cross contamination. The amount of land on the off islands suitable and safe for the siting of septic tank drainage fields is also limited. Plan policy should ensure that development will only be permitted where it is demonstrated that the discharge will not adversely affect the receiving environment.</p>	<p>The respondent's comments are noted.</p>
<p>Waste: Page 11: question 8. We consider that wastes arising from the planned growth over the Plan period will need to be capped because of the lack of space for new waste management facilities. The Plan must embed the principle of waste recycling at source for new development. A suitable policy should ensure that development has provision for the segregation of wastes so that wastes can then be accommodated at the new waste transfer station, minimising the need for further treatment. The Plan will need to consider wastes arising from construction activities (e.g. facilities for the management and recycling of construction and demolition wastes), and planned growth (both commercial and residential).</p>	<p>The respondent's comments are noted. Future policies or proposals that are supportive of new developments that result in the generation of waste, such as residential development or new economic developments, will require space to accommodate refuse. Although on-island recycling is currently, and has historically been, limited the Smart Island project is aimed at reducing waste, through a diversion of waste streams to energy generation. Moving forward it will be important that new developments have capacity within their sites to accommodate adequate levels of recycling for storage and collection. Once the Smart Island projects are realised then the waste and its storage will be less of a limiting factor for any necessary growth.</p>



	<p>Water resource: Water resources on the islands are very finely balanced especially on the main island of St Mary's given the dependence on the desalination plant which is currently facing some operational challenges. Marginal water resources are particularly sensitive to the influences of climate change and this issue needs to be accommodated whilst developing related policies. The evidence base on water resources needs to demonstrate that there will be availability to support growth on the main and off islands over the Plan period within environmental limits.</p>	<p>The respondent's comments are noted. It is agreed that water resources are finely balanced and any additional pressure on demand will need to ensure existing usage is not compromised as a result.</p>
	<p>The Plan should ensure a strategy of development to ensure growth is located so that it protects sensitive locations of water resources and water quality. A sequential approach to allocations should be taken; using the least sensitive locations if these are equally feasible. Strategies should not only seek to protect existing resources, but also deliver environmental gain.</p>	<p>The respondent's comments are noted and agreed.</p>
	<p>Page 11: Protection and Enhancement of the Natural and Historic Environment</p> <p>We agree that there needs to be a policy to ensure development protects and enhances the natural environment. However the discussion on this topic does not include reference to sites designated under EU and UK legislation (Special Areas of Conservation and Sites of Special Scientific Interest). The Islands are protected for ecological reasons at the highest level (SAC and SSSI) therefore development needs to be located to the least sensitive areas to ensure compliance with EU and UK legislation and that it is compliant with the NPPF para 118. Natural England are the lead for these sites. The Plan should also consider how development can support/ allow adaptation of these habitats with a changing climate.</p>	<p>The respondent's comments are noted. The LPA is aware of all the important natural environmental designations and would not look to site any development within these areas. Any development proposed would need to demonstrate that the environmental quality is not degraded but enhanced.</p>
	<p>Ground contamination:</p> <p>The Plan should include a policy to secure appropriate assessment and remediation of land affected by contamination through the planning regime.</p>	<p>The respondent's comments are noted.</p>





	<p>Page 12: Sustainable development</p> <p>We support the recommendation for development to be designed to adapt/ be resilient to a changing climate. Appropriate policy should ensure this for new development over its lifetime. We support the use of renewable energy in new development. As highlighted at the beginning of our response, understanding the implications of a changing climate for the Islands is fundamental to delivering sustainable growth.</p> <p>We continue working with the Council and Defra on waste, drainage and drinking water challenges on the Islands. We would welcome further discussion on the evidence base for the Plan and would be happy to advise and assist with further Plan preparation. We look forward to working closely with the Council of the Isles of Scilly in the future.</p>	The respondent's comments are noted.
RE071	<p>The Cornwall and Isles of Scilly Local Nature Partnership, as a prescribed body under The Localism Act Section 33A (9) would like to offer the following contribution to the Consultation on the Isles of Scilly Local Plan Review: Scoping Report. This submission is intended to support the Council of the Isles of Scilly as the Local Planning Authority to comply with its "Duty to Co-operate in relation to planning of sustainable development" in order to develop its Local Plan.</p>	The respondent's comments are noted.
	<p>The Partnership welcomes development of the Isles of Scilly Local Plan; good planning is essential to vibrant communities that have the appropriate balance of jobs, services, facilities and homes.</p>	Noted and agreed.
	<p>The Local Nature Partnership would like to highlight a number of key points within the scoping document that it considers to be of significance during the next stage of the development of the Local Plan:</p> <p>2- It is concerning that there is a proposal to revise the 2005 Vision Statement, that makes reference to 'preserving the islands' outstanding environment and natural beauty' is not replaced with anything similar, it is hoped that this element would be emphasised or indeed made stronger.</p>	The respondent's comments are noted. It is anticipated that revisions to the 'vision' for the local plan will ensure the appropriate emphasis on the preservation of its existing important qualities.
	<p>3.13- We would welcome encouragement in the Islands to utilise the opportunities offered by Smart Grid technologies as a vital method of handling varying energy provision and demands on a local scale. The use of renewable energy should be promoted in new developments above the reliance on non-renewable sources; equally encouragement to retrofit renewable generation technologies onto to existing infrastructure should also be an essential part of the Plan.</p>	The respondent's comments are noted. It is anticipated that a positive policy framework will be created to ensure that the most suitable forms of renewable energy can be supported. Any associated developments required by smart grid technology would be similarly supported where there is no other adverse harm identified.



	3.16- The LNP would strongly encourage the Council to explore options to join-up solutions to the different challenges of energy, waste, water and sewerage management on the Islands.	The respondent's comments are noted and agreed.
RE072	Many thanks for consulting Cornwall Council's Local Planning Team on the Isles of Scilly Local Plan Review: Scoping Report, an updated Statement of Community Involvement and emerging Isles of Scilly Conservation Area Character Statement SPD.	The respondent's comments are noted.
	We support the overall emphasis in the Scoping Report in reflecting the National Planning Policy Framework. In particular we also welcome the recognition at paragraphs 1.8 and 3.26 of the Duty to Co-operate between neighbouring planning authorities and the undertaking at paragraph 1.12 to continuous engagement with statutory consultees including Cornwall Council. Cornwall Council is committed to ongoing dialogue as both the Isle of Scilly Local Plan Review and the Cornwall Local Plan progress.	The respondent's comments are noted.
	In particular, we support the inclusion of an Objective " <i>to secure resilient, year-round transport services to Cornwall ...</i> " and we will continue to engage with you on the land use implications. We also welcome policy seeking to move the processing of waste up the waste hierarchy by providing policy for re-use and recycling as well as exploring the possibilities for energy recovery on the islands.	The respondent's comments are noted.
	The updating of the Statement of Community Involvement to reflect the requirements of the NPPF is helpful. For clarity we would be grateful for Cornwall Council to be named as a statutory consultee.	The respondent's comments are noted. Cornwall Council is identified as a Statutory Consultee in the Local plan process. The statement of Community Involvement does not list statutory consultees.



#### RE073

##### A Vision for the Islands

It is vital to have a clear statement (or set of statements) which summarise what the 'vision' for the island should be, however, the format with separate headings of 'Vision', 'Aims', and 'Objectives' may cause confusion and create uncertainty as to exactly what it is that really matters in the context of the Plan Review. A simpler statement including the key phrases such as: sustainability, economic development, robust transport, reinforcing local communities, environmental protection and enhancement; should be used but in a single, clear statement.

The main strands of the 'Vision' are rightly priorities for the islands during the next Plan period, but it important that other factors such as health, education, recreation, waste and energy (possibly others) are not overlooked and so the new Plan should have policies relating to these also. The Plan needs to be able to cope with one-off projects which may not be easily defined with a particular criteria but which nevertheless would be beneficial to the islands. Some solutions for island issues are likely to be provided by mainland organisations and so care should be taken in using broad statements such as 'to make the island more self-sufficient' as self-sufficiency may not always be the most appropriate answer across the board.

The respondent's comments are noted and agreed. It is likely that the vision, aims and objectives would be simplified. It is agreed that the plan needs to create a general positive framework for future developments that would be of benefit for the islands and the community, where there is no other adverse harm identified. Policies that are too tightly drawn or too specific would not be flexible enough to deal with future development proposals.



## Housing

The Duchy agrees with the Council in that housing is a fundamental issue for the new Local Plan. Before any detailed Planning can be considered, there must first be a better understanding of the type, size, tenure requirements and number of houses that are needed in order to satisfy the island's existing, short and medium term requirements. It is essential that a comprehensive Housing Needs Assessment is carried out in order to allow informed decisions on what provision should be included in the Plan and where.

Caution should be taken in reproducing figures such as 'between 90 and 120 new houses are required' when no explanation of how these figures were determined is given. Such a fundamental issue must be resolved using facts and careful analysis, if the Plan is to truly improve the lack of supply.

The Duchy agrees with the Council that current policy has made building more houses unviable and this is why historically more houses have not been built on Scilly.

The Duchy agrees with the Council in that further assessment is required to take into account a whole market approach to housing issues. This should include where appropriate, provision of some market houses where this is required to make a wider development of non-market houses, viable.

Numbers of each type of house in the mix, should be determined by the results of careful analysis of a viability appraisal.

Sites for new family homes should:

- be close to the school to minimise vehicular traffic and parking
- Close to shops and services to minimise vehicular traffic and parking
- Be contiguous with existing development
- Be architecturally in keeping with Scillonian styles
- Enhance the environmental quality of the island and not detract from it
- Be built to a good standard
- Be as energy efficient as possible – EPC grade C minimum

Sites for accommodation for the elderly should largely be assessed against the same criteria but proximity to the school is not important.

Policy should also be developed to support the creation of seasonal staff accommodation where this is essential to the viability of important island businesses.

The respondent's comments are noted. The Housing Growth Plan 2014 did assess the population and demographic data sources in order to suggest the proposed 90-120 homes. This was caveated to ensure that moving forward the Council undertook more detailed assessment of need. This further assessment took place in 2015/16 when a Housing Survey was carried out and a Housing Market Assessment produced. This looked at the population, demographic and housing market in greater detail as well as the views of islanders. The Strategic Housing Market Assessment (SHMA) was published in 2016 and concluded a similar amount of new housing was required to meet the objectively assessed needs of the community. The SHMA also made recommendations on the size and tenure of future housing to ensure the most appropriate size and type of properties are constructed to best meet the needs of the community.

Further viability assessment would be required to determine whether a proportion of open market is required to deliver local houses.



#### Employment and the Economy

It would be helpful to quantify the statement regarding historic under employment on the islands: Low wages and under-employment should not be confused. Since the consultation on the new Local Plan is an evolving process, it should be acknowledged that some assistance to wages might be gained from the proposal in this month's Budget for a 'Living Wage'.

As well as seeking to develop policies to support sectors other than tourism, Policy should support the expansion of tourism and in particularly the extremes of seasonality which it currents experiences.

The Duchy agrees that agriculture, market gardening and food could and should be promoted further on the islands.

Policy should support the development of knowledge-based technology and creative businesses where by doing so will create employment and opportunities for the wider benefit of the island and its residents, particularly utilising science, technology, engineering and maths subjects.

The new Plan should be written to be able to enable appropriate significant projects which would boost the islands economy such as a new hotel or further education establishment.

The respondent's comments are noted. All the evidence to date suggests that average incomes of people living and working in Scilly are below the National or South-West Average. Underemployment is that the population have, on average, a higher level of skills or qualifications relative to the job opportunities available. The scoping report did not intend to confuse the low wages issue and underemployment.



<p><b>Physical and Social Infrastructure</b></p> <p>The new Local Plan should enable investment and development of infrastructure such as smart grid technology, water, sewerage, waste and power.</p> <p>It is important that Scilly is able to accommodate renewable energy technology and policy should encourage this, as appropriate. However, given that the land area on the islands is very limited and is such a precious resource as well as being environmentally sensitive, it is important that renewable energy schemes which use valuable land (either economically or environmentally) are not permitted. Even when placing PV panels on roofs, care must be taken so that the presence of these (particularly in a Conservation Area) do not have a negative visual impact on the islands. Sympathetic off-shore schemes are likely to be more appropriate for Scilly. Any Policies relating to dealing with waste, sewerage and water must promote 'whole island' solutions. Given the aged and piecemeal nature of many of the islands resources, the new Local Plan should support installation of whole new systems should that become a prospect in future.</p> <p>The Duchy agrees that 'centres' or 'zones' where existing services and distinct uses are, should be defined so that Policy can be developed specifically relating to these areas. For instance, towns, small settlements, industrial, waste etc. It is the historic lack of zoning, or clearly defined parameters for where development should take place, which has contributed to some of the 'ad-hoc' development which the islands have suffered, in recent decades.</p>	<p>The respondent's comments are noted and agreed. Whilst it is unlikely that specific sites would be allocated for specific types of renewable energy it is anticipated that a positive policy framework would be supportive of such appropriate technology.</p> <p>It is widely acknowledged that the mains infrastructure for water and sewerage is in need of significant investment. Any development proposal proposing an increase in demand or pressure on this infrastructure would need to address the infrastructure issues. The respondent's comments are noted. The Smart Island Project is ascertaining the infrastructure of potential renewable energy solutions for the islands. It is anticipated that a positive policy framework would be created that would enable the best solution to come forward to meet the islands' energy needs.</p>
<p><b>Protection and Enhancement of the Natural and Historic Environment</b></p> <p>The Duchy would support the continuation of the whole of the islands being designated as a Conservation Area.</p> <p>Some siting aspects of the built development across the islands appear disconnected from adjacent land uses and so it is important that contiguousness of use in future, is provided for. Also, some aspects of design in relatively recent developments are not particularly in keeping with their surrounds and so it is important that local design principles are adhered to in new buildings.</p>	<p>The respondent's comments are noted.</p>





	<p><b>Sustainable Development</b></p> <p>The Duchy agrees that new development be as sustainable as possible. In fact, it would go further to say that sustainability should be at the heart of all development on Scilly.</p> <p>By defining settlements and zones where certain uses are to be made would help provide clarity to Planning Applications remove uncertainty which may lead to sporadic and less controlled development. Separate consideration will need to be given to the off-islands where it may be more appropriate to carry out a character assessment to set out guidelines for development rather than using defined areas.</p>	<p>The respondent's comments are noted and agreed. The local plan will be subject to sustainability appraisal to ensure that all policies and proposals would result in sustainable development being supported and development that is not being refused.</p>
	<p><b>Other Duchy Comments</b></p> <p>It is important that the new Plan has Policies to encourage the re-use of redundant farm buildings.</p>	<p>The respondent's comments are noted and agreed. It appropriate to encourage the re-use of previously developed buildings, that are of sufficient aesthetic or historic value to be worthy of retention. A positive policy framework that facilities this is anticipated.</p>

## 5. The Next Steps

- 5.1 In order to progress to the adoption of a new local plan the local planning authority intend to continue to prepare the draft plan taking into account the views expressed above. The plan preparation will take into account the necessary steps to ensure the production of a legally compliant plan. This will include developing the preferred option for the future of the islands and considering the alternatives for the preparation of the local plan. This will be continually assessed through sustainability appraisal and against a proportionate, up-to-date and credible evidence base.

Activity	Legal Requirement	Guidance Reference	Additional Notes	Possible Evidence
Continue to collect and update the evidence base to inform policy formation.	The Planning and Compulsory Purchase Act 2004, Section 13	NPPF paragraphs 158 – 177		Strategic Housing Market Assessment (SHMA) Strategic Housing Land Availability Assessment (SHLAA) Housing Topic Paper Historic Environment Topic Paper



				The Authority Monitoring Report (AMR) Strategic Flood Risk Assessment
<b>Continue to ensure the options and the draft local plan is subject to Sustainability appraisal and Habitat Regulations Assessment.</b>	The Planning and Compulsory Purchase Act 2004, Section 19(5)	NPPF paragraphs 165-167 Strategic Environmental Assessment Guide, Chapter 5		Sustainability Report Scoping Document and compliance test. Sustainability Appraisal Report
<b>Develop a Framework for monitoring the effects of the Local Plan</b>	<p>The Planning and Compulsory Purchase Act 2004, Section 35</p> <p>The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012, regulation 34.</p> <p>The Environmental Assessment of Plans and Programmes Regulations 2004 No1363, Regulation 17</p>	<p>NPPF paragraphs 165 – 168</p> <p>SEA Guide, Chapter 5</p>	The LPA need to decide what to include in the monitoring report and to ensure they are prepared in accordance with relevant UK and EU legislation.	<p>Sustainability Appraisal Report.</p> <p>The Authority Monitoring Report (AMR)</p> <p>Other reports or documents setting out the appraisal and monitoring framework.</p>
<b>Preparing the Pre-submission Draft Local Plan including reasonable alternatives for evaluation during preparation.</b>	The Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 12(2)	<p>NPPF paragraphs 152 – 182</p> <p>SEA Guide, Chapter 5</p>	The sustainability appraisal report and supporting documents relevant to the preparation of the plan should form part of the	Documents supporting decisions on alternatives and any preferred strategy.



			submission documents, as set out in Regulation 17	
<b>Assessing the alternatives against:</b> <ul style="list-style-type: none"> <li>- Consistency with national policy.</li> </ul>	The Planning and Compulsory Purchase Act 2004, Section 19(2), Section 24	NPPF paragraph 151		Supporting documents
<b>Ensuring the plan has regard to other matters and relevant strategies relating to:</b> <ul style="list-style-type: none"> <li>- Resources</li> <li>- The local economy</li> <li>- Waste strategies</li> <li>- Hazardous substances</li> </ul>	The Planning and Compulsory Purchase Act 2004, Section 19(2)  The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012, regulation 10.			Supporting documents Correspondence with the relevant bodies.

- 5.2 Once the local planning authority has assessed the options to address all the necessary requirements it will move forward with the production of a pre-submission draft local plan. This will be subject to further public consultation in accordance with the adopted Local Development Scheme, which is published online and updated annually.