

PS.R01.1**Isles of Scilly Local Plan: Submission to Inspector's hearings**

1. The purpose of the Local Plan (LP)
This submission assumes that the LP is purely a 'Planning Document' with no obligation to specify how it is to be implemented.
2. The purpose of this response.
To pose questions from an independent viewpoint where it appears that proposed policies are based on insufficient evidence or likely to influence the Islands adversely rather than beneficially.
3. Lack of definitions of frequently used terms. 'Environmental', 'sustainable' and 'affordable' are used throughout the LP. These terms can have very wide interpretations and, without more precise definitions, there is vagueness and lack of precision in the LP's message.
4. 'Growth'. I question the wisdom of the total emphasis on 'growth':
 - 4a. It will inevitably change the nature of Scilly – its “prized environment”. It will give rise to more building development, more traffic and more environmental damage that will detract from the “beautiful unspoiled place that visitors come to see” and that distinguishes it from many other holiday venues. Many visitors who holiday in Scilly year after year come because they regard it as 'special' and notably different from other holiday destinations. ***The LP's thrust for growth will tend to push Scilly into becoming more like everywhere else and its 'special' nature will be lost.***
 - 4b. It will have inevitable repercussions for the **WATER SUPPLY**, which will in any case become the dominant issue in island life. There are already serious water supply problems for the existing indigenous population and current visitor numbers. Rainwater harvesting is an important and practical means of easing the water supply (for purposes such as toilet flushing and running washing machines) but, although it receives two cursory mentions, insufficient attention is given to it.
 - 4c. By making tourism a **central policy**, as the LP does, there is a danger that the LP becomes a developer's charter, especially if no adequate monitoring programme is in place as a follow-up to the LP (see below). There always a danger in basing an economy primarily on one enterprise.
 - 4d. The Local Plan fails to quantify the ecological and economic carrying capacity of the Islands, defined here as the level of production that does not impact undesirably on surrounding ecosystems and on the cost burden of services.

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- 4e Data are needed on the numbers of current bed spaces versus any projected upper ceiling, taking into consideration any extant permissions for public houses, restaurants etc. It is foolish to provide more bed spaces if supporting services are not there. ***Such services have been diminishing, especially in the 'shoulder periods' that the LP seeks to promote.***

5. Housing.

A prominent theme (policy LC1) is the assumed need to provide an additional 105 'affordable homes' but it is unclear how this figure is arrived at. It is proposed that "open-market residential development is justified as an enabler to deliver those affordable homes". A limit on such development is not stated, once again opening a route to more growth, with the adverse consequences discussed above. The LP relies to a great extent for its metrics in the ***Strategic Housing Market Assessment*** (SHMA) but in trying to make the case for additional new housing, the LP pays insufficient attention to the management of existing stock, particularly through linking small units for older people to households under-occupying their existing homes especially in the social sector. Emphasis is placed on housing allocations in Old Town. Given the closure of the convenience store and the seeming unlikelihood of a replacement, there is a strong argument that the Old Town sites should be re-scored.

There is a need to demonstrate where the jobs to support all these new households will be coming from; which sectors are to expand, and are the projections realistic? What is the current proportion of working and non-working households?

6. Climate change.

This is probably the World's most urgent issue as well as that of the UK and little Scilly. In comparison, all other concerns fade into insignificance. Sea level rise is already happening and will, within the lifetime of Scilly's youngest inhabitants, severely affect the way they live. The LP has little of practical significance to say about climate change and seems not to attempt to discuss how planning policies could contribute to reducing some of these threats. A response (8/11/19) by the Environment Agency to the Council's Planning Department in respect of a planning application to build housing on a site deemed to be vulnerable to future flooding suggests that nothing should be built below the 5.58m contour. This will have a major impact on the LP. In assessing the Islands contribution to a 'carbon foot-print', we need complete data on travel to and from the Islands categorized as 'day' vs 'staying visitors'. Day trips and cruise ships contribute greatly to the 'carbon foot-print'.

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7. Measuring and Monitoring.

For the assessment of the outcomes of the LP's proposals, an efficient monitoring programme is important. In the monitoring section of the LP there are few 'targets' or 'triggers'. This being the case, any serious monitoring exercise seems pointless if not impossible. There needs to be far more information on this subject and a discussion of monitoring techniques. Who will do the monitoring and how will they be appointed? There will be a need to measure and monitor such important issues as: (i) Energy and water consumption demand – how much slack is there in the system? (ii) Waste disposal – costs to the community of sewerage and waste disposal; (iii) Land use – by category – in relation to landscape character, degradation of sensitive wildlife habitat. Such measurements will be particularly important for 'peak demand periods', such as Gig Week, School holidays, Walk Scilly and other community events. How much could be added to these peaks before the system fails? If it is accepted, as I and many others believe, that these systems cannot or barely cope, adding more bed spaces would compound the problem.

Dr Michael I. Gurr, December 2019