

# Council of the Isles of Scilly Planning Application

Ref: P/20/104/FUL  
P/20/105/FUL  
P/20/106/FUL

## Consultation Response

**Consultee:** CIOS - AONB

**Date:** 18<sup>th</sup> December 2020

This is a consultation on 3 planning applications, each for the erection of a new detached dwelling all on the site of an existing bungalow proposed to be demolished as part of application P/20/106.

**Ref:** P/20/104/FUL

**Site:** Sea View, McFarland's Down, Isles of Scilly.

**Proposal:** Construction of new dwelling and associated infrastructure.

**Link:** <https://www.scilly.gov.uk/planning-application/planning-application-p20104>

**Ref:** P/20/105/FUL

**Site:** Sea View, McFarland's Down, Isles of Scilly.

**Proposal:** Construction of new dwelling and associated infrastructure

**Link:** <https://www.scilly.gov.uk/planning-application/planning-application-p20105>

**Ref:** P/20/106/FUL

**Site:** Sea View, McFarland's Down, Isles of Scilly.

**Proposal:** Demolish existing bungalow and construction of new dwelling and associated infrastructure.

**Link:** <https://www.scilly.gov.uk/planning-application/planning-application-p20106>

You are being consulted on these applications as you may wish to make comments before a decision is made. Should you wish to make any comments on these applications, please complete the response form below and return to [planning@scilly.gov.uk](mailto:planning@scilly.gov.uk) by 12<sup>th</sup> January 2021 or by post to the Planning Department, Town Hall, The Parade, Hugh Town, St Mary's, Isles of Scilly TR21 0LW.

I look forward to receiving your comments in due course. If I have not heard back from you by the 12<sup>th</sup> January 2021 then I will assume you have no comments to make.

# Council of the Isles of Scilly Planning Application

Ref: P/20/104/FUL  
P/20/105/FUL  
P/20/106/FUL

Comments can be in general to cover all the proposals but if any comments relate to a specific application please leave them under the applicable reference number.

## Comments:

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Comments here -

## General:

Whilst there are some notable features within the application which are welcome, including the use of sustainable drainage & “fabric first” design, the 3 applications are light on detail specifically around commitment to sustainability & mitigation of the impact of the development in light of the effects of climate change on the islands. In addition, there is no indication visible within the application as to whether all 3 properties will be allocated for local need to help solve the housing shortage on the islands (although this is stated as “perceived” by the applicant).

Section 14 paragraph 149 of the NPPF (2019) states that ‘plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes.’ Paragraph 150(a) states that new developments should be planned for in ways which: ‘avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.

As evidence of extreme water scarcity is already being seen on St Mary’s with the two main water supply wells on St Mary’s running dry in 2018, desalination increased to 50% and a similar situation during the prolonged period of drought in 2020, it is vital that new developments take into account the additional abstraction which will take place as a result.

The sustainable design statements for this planning application (P/20/104-106) state that ‘it is intended to achieve a consumption of wholesome water of 110 litres per person per day.’ This could equate to a maximum of 1,320 litres of water daily, or a maximum of 481, 800 litres per year total for all three properties. Though the use of ‘low-flow appliances’ is welcomed, the applicant does not appear to consider that the development will see an increase in water consumption per se and whilst the possible inclusion of water butts for use in the garden would go a small way (if permitted) to help with reducing additional abstraction, much more could be done to mitigate and help to make the islands more resilient to climate change. For example; capturing water directly from the roofs, storage in rainwater harvesting tanks and utilising this captured water in washing machines and toilets, could provide a demonstrable way of helping to sustain the islands vulnerable water supply. The floor space of each dwelling is just over 100 sq m. Taking this as an estimate of the available roof area to capture water from, a standard rainwater harvesting system could capture up to 85,000 litres

# Council of the Isles of Scilly

## Planning Application

Ref: P/20/104/FUL  
P/20/105/FUL  
P/20/106/FUL

of water (100 sqm multiplied by 850-900mm of annual rainfall for the Isles of Scilly \*Met Office Data) per household, or a total of 255,000 litres for all three properties. This could equate to a reduction in freshwater usage of approximately 53% of the totals given in the sustainable design statement.

Section 14 paragraph 148 of the NPPF (2019) states that 'The planning system should support the transition to a low carbon future and should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions.' Section 14 paragraph 151(b) states that to help increase the use and supply of renewable and low carbon energy and heat plans should: 'consider identifying suitable areas for renewable and low carbon energy sources and supporting infrastructure, where this would help secure their development.'

The planning application proposes driveways which would permit a maximum of 3 cars per household. The Islands have committed to transition to a low-carbon future with the investment in the Smart Energy Islands and Go-EV projects. In line with this commitment and to assist with the government targets around usage of petrol and diesel vehicles it would be good to see Electric Vehicle charge points installed at the properties, to encourage the use of electric vehicles. Though the NPPF (2019) is clear that local planning authorities do not require applicants to demonstrate the overall need for renewable or low carbon energy, the local planning authority should recognise that even small-scale projects can provide a valuable contribution to cutting greenhouse gas emissions as seen in Paragraph 154(a).

Paragraph 175(d) of Section 15 in the NPPF (2019) states that 'developments whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around the developments should be encouraged, especially where this can secure measurable net gains in biodiversity.' It is disappointing that the proposed development does not provide any biodiversity statement, particularly in light of the recommendations outlined by the ecological surveys undertaken and included in the planning application. Section 15 paragraph 170 (a) of the NPPF states that 'planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality). We would therefore expect to see details of the species of hedgerow plants to be used in any new or replacement planting scheme, so that species which are known to have a negative impact on surrounding SSSIs are not used (to ensure that the development meets paragraph 170(a)). Paragraph 174(b) of Section 15 in the NPPF states that 'plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.' It is difficult to see how this development demonstrates that it meets this criteria, without production of a biodiversity statement.

P/20/104/FUL (new dwelling):

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# Council of the Isles of Scilly Planning Application

Ref: P/20/104/FUL  
P/20/105/FUL  
P/20/106/FUL

**P/20/106/FUL (demolish existing dwelling and erection of new dwelling):**

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**Name: Isles of Scilly AONB**

**Date: 13/1/21**