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By Liv Rickman at 3:12 pm, Jul 18, 2022

Monaveen
Porthcressa, Hugh Town
St Marys, Isles of Scilly

17 July 2022

To:
Planning and Development Department
Town Hall, The Parade
St. Mary's, Isles of Scilly
TR21 0LW

Dear Sir,

Objection to Planning Application ref: P/21/041/FUL
Proposed Two Dwellings, Land at Porthcressa, Buzza Road, Porthcressa, St. Mary's

We are writing to object to the above proposed building application.
In our initial objection (dated 23 June 2021) we highlighted a number of points of concern.
In this letter we have added to these based on additional information provided by the applicant.

We believe the proposed development is significantly out of compliance with the Isles of Scilly Local Plan (2015-30) in a number of ways:

- Area of Outstanding Natural Beauty (AONB)
 - **Policy OE1** has not been considered or addressed by the application - "when considering proposals for development great weight will be afforded to the islands' landscape, seascape and scenic beauty and the aims and objectives of the AONB Management Plan".
 - Any development on this site will have a significant adverse impact given it is open space and its location adjacent to the shoreline.
 - No Landscape and Visual Impact Assessment (LVIA) has been carried out or submitted with the application.
 - Given the sensitivity of this site a full LVIA should be a minimum requirement before the application can be considered. Not making a request for an LVIA would be a failure of the duties of the Planning Officer and Council members and would be open to legal challenge.
 - The LVIA should meet the accepted guidelines and best practice for LVIA's (Guidelines for Landscape and Visual Impact Assessment 3rd edition) and should be submitted to the Planning Officer and Council members before any meeting so they can properly and diligently consider the application.
 - The photo montage provided with the application should not substitute for a full LVIA
- Heritage
 - **Policy OE7** has not been fully addressed by the application - "When considering proposals for development great weight will be given to the conservation of the islands irreplaceable heritage assets".
 - The site lies within the Archaeological Constraint Area: Buzza Hill, is in close proximity to a scheduled monument and contain the remains of a rare early type of Scillonian building
 - The conclusions of the applicant's own commissioned Heritage Impact Assessment concludes on page 13 with :
 - ***It is considered that several adverse impacts could not be effectively mitigated;***
 - ***- Extension of the present built environment of Hugh Town onto the side of Porth Cressa Bay beyond its modern limits below Buzza Hill;***
 - ***- Visual intrusion in the settings of designated assets around Porth Cressa, including the Benham batteries and the Buzza Hill entrance grave and tower;***
 - ***-Loss of potential to experience a rare early type of Scillonian house with its plot, on a piece of the coast relatively unchanged yet close to the core of Hugh Town.***

- Ecology & Protected Species
 - **Policy OE2** has not been fully considered for the site particularly regarding hedgehogs and the Scilly shrew.
 - Hedgehogs are now on the red list for British mammals and are considered vulnerable to risk of extinction.
 - Hedgehogs have been recorded on the grass outside the proposed development site and are likely to nest in the hedgerows of the plot.
 - No mention or desk study has been undertaken regarding hedgehogs in the preliminary Ecological Assessment
 - Likewise the possibility that Scilly shrews are present needs to be surveyed and assessed as the site adjacent to the seashore offers foraging habitat.
- The application has been completed incorrectly, specifically section 12 a & b where the applicant has answered “no”
 - The site is a Conservation Area, AONB, adjacent to the Heritage Coast and lies in close proximity to a scheduled monument and listed building.
 - The application should state “yes” in these circumstances and in the absence of evidence to the contrary.
 - The applicant has not carried out any landscape and visual impact surveys to support the application, the Heritage Impact Assessment concludes that several adverse impacts from the development cannot be effectively mitigated while the Ecological Assessment is incomplete particularly with regards to mammals (hedgehogs and shrews) on the proposed development site.

Given the major shortfalls in the documentation provided with the application, the development should not be considered by the planning committee at this stage.

We would like to be kept in touch with the planning process as we believe this application is incorrectly filed and in contravention of the Local Plan, in particular Policies OE1 and OE7.

Yours sincerely



Richard Smith