

Coastguard's Retreat
Porthcressa
St Marys
Isles of Scilly
TR21 OJQ

Council of the Isles of Scilly
Planning Department
Town Hall, The Parade
St Mary's
Isles of Scilly
TR21 OLW

20 Jul 2022

Sir / Madam

Objection to Planning Application P/21/041/FUL

References:

- A. Council of the Isles of Scilly Planning Application Reference P/21/041/FUL dated May 2021.
- B. Council of the Isles of Scilly "Adopted Local Plan dated 25 Mar 2021.
- C. P-21-041 Design and Access Statement dated May 2021.
- D. Council of the Isles of Scilly document P-21-041 "Matters to Address to inform recommendation" dated 02-Jul-21.
- E. Cornwall Archaeological Unit Heritage Impact Assessment Report No. 2022R020 dated May 2022.

We would like to register our strong objections to the planning application at Ref. A, the proposed development of two houses on land at the eastern end of Porthcressa Bank adjacent to the coastal path. This development would significantly affect Scilly's highly important historic environment by building on an Archaeological Constraint Area (ACA), whilst providing only minimal contribution to Scilly's local housing needs with dwellings whose affordability for local people is questionable.

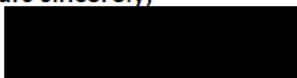
More specifically, we object on the basis of:

1. **Conformance with the Local Plan.** The proposed development site is not part of the housing allocation specified in the Local Plan (Ref. B) and is outside the existing S1 Hugh Town settlement. Furthermore, the applicant asserts at Ref. C that the site constitutes a 'windfall site'. This claim is dubious given the Chief Planning Officer states at Ref. D that "*the site does not clearly comply with our 'windfall' homes policy*". The proposal does not satisfy the Living Community criteria governing "**New Homes – Where to Build (18)**" and is at odds with policies **LC6 – Housing Allocations** and **LC7 – Windfall Sites**. This site should not be considered for housing development.
2. **Respect for Scilly's Natural and Heritage Environment.** This application, if approved, puts some of Scilly's irreplaceable heritage and natural assets at risk.
 - a. **Archaeology and Historical Interests.** The Heritage Impact Assessment (HIA) at Ref. E clearly states the development will directly impact the Heritage Environment through '*loss of a well-preserved rare post-mediaeval single-storey building*' and '*removal or truncation of buried remains in both enclosures.*' The HIA concludes this impact "**could not be effectively mitigated**".
 - b. The HIA also identifies that the development would result in additional indirect, visually detrimental impacts on historic, designated and non-designated sites nearby, and will affect the Coastal Path. These include the Benham Batteries, Buzza Hill, Clemmies Cottage, and the row of cottages adjacent to the proposed site.
 - c. **Distinct Character of eastern end of Porthcressa.** The report specifically mentions the "*low density*" housing in the immediate vicinity, further highlighting the "*informal, 'unplanned' quality*" that characterises this part of Porthcressa. To be consistent with the adopted Local Plan this clearly must be respected and preserved. With one additional house already

approved at the foot of Buzza Hill, a further two will detract from this area's low-density nature and risks forever spoiling its unique character.

- d. **Extending the Settlement.** The proposal unnecessarily seeks to extend the boundary of the current Hugh Town settlement thereby failing the stated Spatial Strategy of concentrating *"new homes in the settlements of Hugh Town and Old Town as the most sustainable locations"*. Again, the HIA concludes this impact *"could not be effectively mitigated"*.
 - e. **Loss of Greenspace.** Furthermore, this proposal would remove a much-valued green space on the edge of the town and encroaches on the coastal path, part of the Heritage Coast that the Local Plan tasks the Council with preserving.
 - f. Overall, these impacts contravene Strategic Aim 1 of the Local Plan, which has an objective to *"Protect the distinct identities and characteristics of individual islands and settlements"*.
3. **Affordability.** The application fails to clearly identify what dwelling types are proposed and hence how these would be affordable for local people. It seems unlikely that the landowner, who lives in the USA, intends to build these houses, so presumably the land will be sold either for self-build or to a developer. The Local Plan acknowledges the already challenging *"context of exorbitant building costs compared to the mainland UK"* even without additional significant costs for archaeological monitoring during construction that are identified in the HIA, which will be transferred to whoever develops the site.
 4. **Planning Application Deficiencies.** The application's supporting documentation does not include either a Landscape and Visual Impact Assessment (LVIA) or a comprehensive Ecological Assessment.
 - a. **LVIA.** An LVIA is vital to assessing the visual impacts identified in the HIA. The site is in an ACA adjacent to, or within sight of, Scheduled Monuments, Designated Sites and the Heritage Coast. The photo montages submitted recently fail to adequately portray the scale and effect on the relevant views. Given this area's sensitivity, planners should request an LVIA in line with the requisite guidelines before any decision to approve.
 - b. **Ecological Assessment.** The Preliminary Ecological Assessment (PEA) that has been provided does not identify relevant habitats for protected species other than bats and birds. However, we regularly see hedgehogs and the occasional Scilly Shrew near the houses at the bottom of Buzza Hill, along the coastal path, and in the play park. It is highly likely these species nest in the area. Although not specifically identified in Wildlife and Protected Species section of the Local Plan, hedgehogs are endangered in the wider UK and merit consideration as part of this application. A more detailed Environmental Assessment should be provided.
 5. **Great Weight placed on the Outstanding Environment.** We wish to remind the Council that the Local Plan (OE1) specifically informs decision makers that *"great weight must be given to the conservation of the islands' irreplaceable heritage assets and that any development affecting Heritage can only be justified in wholly exceptional circumstances"*. Developments should be *"weighed against the substantial public, not private, benefits"*. Moreover, OE1 clearly states that Development will only be permitted where it ... conserves the islands' landscape, seascape and scenic beauty. Development must ... respect ... the undeveloped nature of the Heritage Coast.
 6. We do not feel there are wholly exceptional circumstances to support this development given the Local Plan already has sufficient allocations to meet its stated needs. We also believe the public benefits of preserving this area of Hugh Town outweigh the potential private gains.
 7. We strongly urge you to reject this application.

Yours sincerely,



John Heneghan



Nicola Heneghan