23 June 2021

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

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 on the following grounds:

- 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 ecological, heritage or landscape and visual impact surveys to support the application.
- Area of Outstanding Natural Beauty (AONB)
 - 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.
 - Policy OE1 has not been considered or addressed by the application.
 - 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 an LVIA should be undertaken and submitted as a minimum requirement before the application can be considered.

Heritage

- The site lies within the Archaeological Constraint Area: Buzza Hill
- The site is in close proximity to a scheduled monument and listed building.
- The applicant states there were previously 2 residences on the site but has provided no compelling evidence that any buildings on the site were residential.
- The photo provided is inconclusive and the applicants statements are speculative rather than factual.
- Anecdotally there is some limited evidence referring to a goat hut or shed on the site.
- No heritage statement has been prepared or submitted with the application.
- Given the sensitivity of this site within the Archaeological Constraint Area: Buzza Hill an accurate detailed Heritage Statement should be prepared and submitted as a minimum requirement rather than any reliance being made on the applicant's speculation.

Ecology & Protected Species

- The site has been open space for over 50 years.
- o Policy OE2 has not been considered in the application submitted.

- o No protected species survey has been undertaken or submitted with the application.
- o Relevant protected species include the Scilly shrew (associated with the seashore) and bats.
- The site and surrounding areas of green space, including Buzza Hill, are likely to provide ideal habitat for bats to roost (in the stone/rock face immediately behind the site) and forage for insects
- No bat survey has been undertaken or submitted with the application. A survey should be undertaken as a minimum to establish whether bats are present.
- Likewise the possibility that Scilly shrews are present needs to be surveyed and assessed as the site adjacent to the seashore offers foraging habitat.

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 OE2.

Yours sincerely

Richard Smith & Nicola Heneghan