

Planning Statement for Construction of a Single Storey Extension, Shopfront Alterations and Installation of Plant

Co-op Food store and former Barclays Bank, Hugh Street, St Mary's, TR21 0LL

On behalf of Co-operative Group Food Ltd

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1. Introduction

- 1.1. This Planning Statement ('Statement') is submitted in support of an application for planning permission for the construction of single storey extension, shopfront alterations and the installation of plant equipment to facilitate the extension of an existing convenience store occupied by the Co-operative at 4 Hugh Street, St Mary's.
- 1.2. The Statement sets out the background to the site and development proposals, including the relevant planning history and planning policy framework, together with their physical context and assesses the proposals in terms of their compliance with policy.
- 1.3. This Statement should be read in conjunction with the supporting documents to the application, including drawings prepared by Bowman Riley.

2. Site and Surrounding Area

- 2.1. The 'Site' comprises the Co-op convenience store located at 4 Hugh Street and the adjacent former Barclays Bank unit (both Use Class E). The Co-op convenience store is a trading store but the bank has been closed for some time.
- 2.2. The Site is located within the defined town centre of Hugh Town on the Island of St Mary's. St Mary's is the Isles of Scilly's largest island and Hugh Town represents the central hub of the island. The Isles of Scilly as a whole are designated as an Area of Outstanding Natural Beauty (AONB) and Heritage Coast. The buildings on site are not Listed.
- 2.3. The Site is located in Flood Zone 3, an area with a high probability of flooding from rivers and the sea. It is also within the St Marys Flood Prone Land.
- 2.4. The two separate buildings are adjacent to one another but are not adjoining. The former bank is a two storey brick and stone building with render and a pitched tile roof. The Co-op convenience store is 2.5 storeys, with living accommodation within the roof space and with a white rendered finish.
- 2.5. Both units front onto Hugh Street which is a narrow road. The buildings located directly opposite the Site and on the opposite side of Hugh Street appear to be in residential use and these are two storey buildings of a stone construction. Land to the rear overlooks the beach and harbour. Other surrounding land uses are predominantly residential and commercial.
- 2.6. Within the site, there are also 5 no. existing flats comprising:
 - 2 flats over the Co-op (one on the first floor and one on the second floor) and 2 maisonettes to the rear of the shop overlooking the beach; and
 - 1 flat on the first floor over the former Barclays Bank unit
- 2.7. In addition to this Site, the Co-op is proposing to relocate its business into the former Seasalt retail unit on Garrison Lane during the construction period. This unit is an existing bay fronted shop unit with a first floor comprising residential accommodation. This shop is also located within the defined town centre of Hugh Town.

3. Planning History

- 3.1. Many of the planning permissions for the Co-op convenience store are minor in nature with some more recent and relevant exceptions as follows:
- Planning application reference P/16/O18: Conditional permission granted for the reconfiguration of existing doors 26.04.2016;
 - Planning application reference P/15/O54: Conditional permission for the reconfiguration of plant unit and installation of new warehouse doors and roller shutter 17.09.2015;
 - Planning application reference P.4193: Conditional permission granted for the enlargement of ground floor retail area, transfer warehouse to first floor and alterations to shop frontage 18.03.1997;
 - Planning application reference P.0644: Conditional permission granted for a new shopfront 04.11.1966;
 - Planning application reference P.0619: Conditional permission granted alterations and extensions to retail grocery shop and erection of maisonettes 10.10.1966; and
 - Planning application reference P.5376: Demolish structure and rebuild warehouse and 4 no. flats. We understand that the decision notice was not issued because the s106 legal agreement was not signed.
- 3.2. In relation to the former Seasalt retail unit, the planning history confirms that the lawful use of this unit is as a shop (Use Class E). "Erection of ground floor extension to provide additional retail floor area (Use Class A1) (As amplified by plans received 23/02/21)."
- 3.3. A pre-application ref. PA-24-046 was submitted in May 2024 to extend the Co-op convenience Store and create 1 no. additional residential dwelling. The residential element does not form part of these proposals however the pre-application response has been provided in Appendix 1.
- 3.4. The response outlined that the Local Authority supported the proposed reconfiguration, internal works and extension to of building, recognising the important of the Co-Operative convenience Store as the only supermarket on St Mary's.

4. The Proposal

- 4.1. This application seeks planning permission for the construction of a single storey extension, shopfront alterations and the installation of plant equipment. The Co-op has been exploring options to extend its convenience store on St Mary's for a number of years and has purchased the adjacent former bank in order to do this.
- 4.2. The proposal is that the sales floorspace will extend across the entire ground floor area of the existing Co-op shop unit with the back of house area to be located within the ground floor area of the former Barclays Bank unit.
- 4.3. Under this arrangement, the sales floorspace increases from 266 sq.m to 455 sq.m and the back of house (BOH) area from 148 sq.m to 442 sq.m. The latter is partly due to the proposal to knock down and rebuild the single storey warehouse to the rear of the Site and enclose part of the service yard between the rear of the former bank unit and the warehouse. The extent of the proposed works are identified on the plans submitted in support of this planning application.
- 4.4. A new shopfront is also proposed to the existing shop. No change is proposed to the servicing regime albeit the back of house ('BOH') area will now be larger and able to store more goods. External plant is proposed to remain in the same broad location as existing albeit will be relocated from the ground floor, to the first floor back of house roof.
- 4.5. The existing plant serving the Co-operative convenience store will be replaced with new plant equipment. This will consist of 2no. combined gas cooler and compressor packs and 2no. external air conditioning (AC) units. The AC units will be installed within acoustic enclosures and will only operate when the store is open. The refrigeration plant will operate at all times but will run at a reduced duty at night.
- 4.6. A new access is proposed from Hugh Street to the existing apartments on the first floor. No change is proposed to the existing refuse collection and storage arrangements.

5. Planning Policy

5.1. The following policy is considered relevant to this application.

Local Planning Policy

5.2. The adopted Development Plan comprises the Isles of Scilly Local Plan (2015–2030) and was formally adopted by the Council on 25th March 2021.

5.3. The Site is located within the defined Town Centre of Hugh Town on the Island of St Mary's according to the Local Plan Policies Map.

Isles of Scilly Local Plan (2015 – 20230)

5.4. **Policy SS1** of the Local Plan sets out the principles of sustainable development. It states that:

‘Development proposals will be permitted where they make a positive contribution to the social, economic and environmental needs of the Isles of Scilly in a manner that does not compromise the ability of future generations to meet their own needs and to enjoy the islands outstanding environment.’

5.5. **Policy SS2** of the Local Plan advises on sustainable quality design and place-making. It states that:

‘Development will not be permitted if it is considered to be of poor or unsustainable design. New development must be of a high-quality design and contribute to the islands’ distinctiveness and social, economic and environmental elements of sustainability.’

5.6. **Policy SS3** of the Local Plan encourages the re-use of buildings. It states that:

‘The re-use of redundant buildings for commercial use will be permitted provided that:

- a) the building is structurally sound and capable of conversion without substantial rebuilding, extension or alteration;*
- b) the proposal would not result in the requirement for another building to fulfil the function of the building being converted;*
- c) the proposed use is restricted primarily to the building;*
- d) the development would not harm its immediate setting or the amenity of adjoining/neighbouring properties or land uses; and*
- e) suitable nesting and roosting sites for birds and bats are incorporated into the design.’*

5.7. **Policy SS4** of the Local Plan entitled ‘Protection of Retailing, Recreation and Community Facilities’ is directly relevant to the proposed development. Part 1) of this policy states that:

'Development for new retail provision will be supported provided it is: i) appropriately designed, scaled and located in accordance with other policies in the Local Plan; and ii) does not harm the amenities of the surrounding area whilst maintaining pedestrian and highway safety.'

5.8. Parts 2) to 5) of the policy are not relevant because it provides criteria against which the loss of ground floor retail / other uses will be considered.

5.9. **Policy OE1** of the Local Plan advises on protecting and enhancing the landscape and seascape. It advises that:

1. *'Development will only be permitted where it aligns with the statutory purpose of Areas of Outstanding Natural Beauty (AONB), and therefore conserves and enhances the islands' landscape, seascape and scenic beauty. Development must take into account and respect:*
 - a) *the distinctive character, quality, scenic beauty and sensitivity of the landscape and seascape;*
 - b) *the undeveloped and special character of the Heritage Coast;*
 - c) *other qualities, such as important features and views, dark skies and tranquility, and having regard to the AONB Management Plan; and*
 - d) *the Isles of Scilly Landscape Character Study and any successor or associated documents.*
2. *Development will not be supported on the uninhabited islands.'*

5.10. **Policy OE5** advises on managing waste. It states that:

'3. All development proposals must demonstrate best practice in addressing waste management solutions, must align with the waste hierarchy, and a site waste management plan (SWMP) must be submitted to support planning applications.

4. Construction and demolition waste should be minimised and must be managed and re-used on-island where there will be no harmful impacts. Where re-use on-island would result in an environmental risk to human health, biodiversity, the historic environment, the amenity of neighbouring properties or land uses, or the water environment, then appropriate off-island management or disposal will be required.'

5.11. **Policy OE7** of the Local Plan advises on development affecting heritage. It states that:

- 1) *'Great weight will be given to the conservation of the islands irreplaceable heritage assets. Where development is proposed that would lead to substantial harm to assets of the highest significance, including undesignated archaeology of national importance, this will only be justified in wholly exceptional circumstances, and substantial harm to all other nationally designated assets will only be justified in exceptional circumstances. Any harm to the significance of a designated or non-designated heritage asset must be justified.'*

- 2) *Proposals causing harm will be weighed against the substantial public, not private, benefits of the proposal, and whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long-term use of the asset.*
- 3) *In those exceptional circumstances where harm to any heritage asset can be fully justified, and development would result in the partial or total loss of the asset and/or its setting, the applicant will be required to secure a programme of recording and analysis of that asset, and archaeological excavation where relevant, and ensure the publication of that record to an appropriate standard in a public archive.*
- 4) *Proposals that will help to secure a sustainable future for the islands' heritage assets, especially those identified as being at greatest risk of loss or decay, will be supported.'*

5.12. **Policy WC1** advises that Development proposals that strengthen, enhance and diversify the islands' economy will be supported where they are appropriately designed, scaled and located, in accordance with other policies in the Local Plan.

5.13. **Policy WC3** advises on new employment development and states that:

1. *'The redevelopment or extension of buildings or erection of new buildings for employment use will be permitted provided that proposals accord with Policy WC1, and where:*
 - a) *it is well integrated within an existing settlement; or*
 - b) *it is in the countryside where the business activity and scale is appropriate to its location and demonstrates a functional and/or operational requirement to be in such a location; or*
 - c) *it is an extension to an existing business where relocation would be impractical or unviable; and in all cases.*
 - d) *it does not result in an unacceptable impact on the environment or residential amenities, in accordance with other relevant policies within the Local Plan.'*

Material Considerations

National Planning Policy Framework 2024 (NPPF)

- 5.14. The revised National Planning Policy Framework (December 2024) (NPPF') sets out the Government's policies for the planning system to ensure that the planning system helps to achieve sustainable development.
- 5.15. The key objective of the NPPF is to achieve sustainable development and paragraph 8 confirms that there are three overarching objectives which need to be pursued, namely economic, social and environmental. The economic role should contribute to sustainable development by building a strong, responsive and competitive economy and ensuring sufficient amount of and right type of development to support growth.

- 5.16. **Paragraph 11** confirms that a presumption in favour of sustainable development is at the heart of the NPPF and for planning applications this means proposals for development conforming to the Development Plan should be approved without delay.
- 5.17. **Paragraph 39** relates to decision making and confirms that *"local planning authorities should approach decisions on proposed development in a positive and creative way"* and that:
- "Decision-makers at every level should seek to approve applications for sustainable development where possible."*
- 5.18. **Paragraph 85** states that:
- "significant weight should be placed on the need to support economic growth and productivity, taking into account local business needs and wider opportunities for development."*
- 5.19. **Paragraph 98** states that planning decisions should:
- "plan positively for the provision and use of ...community facilities (such as local shops...) and other local services to enhance the sustainability of communities and residential environments."*
- 5.20. **Paragraph 198** states that development should:
- "mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life."*
- 5.21. Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local authorities should approach development decisions positively – looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Securing the optimum viable use of the property and achieving public benefits are key material considerations for application proposals.
- Isles of Scilly Design Guide SPD (adopted 2006)**
- 5.22. The Isles of Scilly Design Guide was approved in 2006 to complement the Local Plan and the AONB Management Plan. It offers clear and practical guidance in order to achieve high quality and sustainable design and ensure the special character of Scilly is retained and where possible enhanced.
- Biodiversity and Geological Conservation SPD (adopted 2008)**
- 5.23. The document is designed to assist those who are submitting and determining planning applications in Scilly to understand how to ensure that biodiversity and, where relevant, geodiversity is protected, conserved and enhanced as a consequence of development.
- Bats and Buildings Guidance (2014)**

- 5.24. If a planning proposal has the potential to disturb the habitats of protected species, an ecological assessment will need to be commissioned. In relation to bats, this would require a preliminary bat roost assessment (sometimes referred to as a 'bat survey') to assess the possibility of bats being present in your property. The guide 'What to expect from a bat survey' provides advice.

6. Planning Assessment

Principle of Development

- 6.1. This planning application proposes the construction of a single storey extension, shopfront alterations and the installation of plant equipment to facilitate the extension of an existing convenience store occupied by the Co-operative.
- 6.2. The 'Site' comprises the Co-op convenience store located at 4 Hugh Street and the adjacent former Barclays Bank unit (both Use Class E). The Co-op convenience store is a trading store but the bank has been closed for some time.
- 6.3. The Co-op convenience store provides a vital service to the population of St Mary's and the wider area. The proposal seeks to provide a more modern and efficient Co-op convenience store within the defined town centre of Hugh Town via integration of the adjacent, vacant commercial unit. No change of use is required to that unit to facilitate this integration into the larger Co-op convenience store. This is because both units have a lawful Use Class E use.
- 6.4. The Co-op convenience store is the only supermarket on St Marys, and therefore the proposed works to improve the store are essential. The Co-op convenience store has not had any major investment since a refit in 2015 and the proposed development will allow it to operate at its optimum level and supply a full range of stock for customers. This is particularly relevant during the summer months when it is difficult for the convenience store to hold the stock in the BOH area that it needs and for the sales floor to accommodate the additional customers.
- 6.5. Policy SS4 is supportive of new and seeks to protect against the loss of existing retail particularly in Hugh Town. The proposals to retain and extend the existing retail unit is therefore compliant with Policy SS4.

Design and Heritage

- 6.6. The Isles of Scilly Design Guide (2006) aims to ensure the highest standard of development are achieved by identifying key character areas and design principles to inform planning applications. The SPD provides an assessment of the character of Hugh Town and Hugh Street. It states the following:

'This is the only truly 'urban' settlement on the islands. The historic (mainly 18th and 19th Century) core extends from the ramparts and batteries of the Garrison to the west, along Town Beach on the north side and along Porthcressa Beach to Buzza Hill and Peninnis Head to the south. The isthmus upon which it is built is about 500 metres in length by about 150 metres in width. Within this small area there are a variety of townscapes. The historic town contains about 70% of the Listed Buildings on the Isles of Scilly. Any new development or redevelopment must be considered within this context.'

'Hugh Street has the greatest sense of enclosure, relieved by an informal 'square' to the east. The frontages are almost continuous with good 19th Century shop fronts and town houses.'

The Parade is the largest public space on the island. This was originally an unenclosed parade ground. It has now been grassed and surrounded by a hedge. It suffers from clutter of street furniture at its western end. The simple classical Town Hall dominates the space.'

'The remainder of Hugh Town is of the suburban form. The scarce supply of urban building land has meant that detached properties are situated on very small plots. In the case of the Museum building and Porthcressa Flats, it has resulted in three storey developments with flat roofs, built in the 1960s.'

- 6.7. The site is located in 'The Historic Core: the Bank and Hugh Street' Character Area as shown in section 6 of the Character Areas map excerpt below:



- 6.8. A Heritage Statement has been submitted in support of this application and concludes that the proposals are acceptable in the context of the Isles of Scilly Conservation Area and Area of Outstanding natural Beauty and Heritage Coast. There is no evidence to suggest that the archaeological potential of the Site should preclude development.
- 6.9. The extent of the proposed works are identified on the plans submitted in support of the proposals outlined above. The submitted plans show existing areas to be demolished and the new extension proposed.
- 6.10. A new DDA compliant entrance with bi-parting entrance doors are proposed. These shopfront alterations are minimal and necessary to upgrade the front of the premises for the occupation of unit as a Co-op convenience store. No changes are proposed to the principle elevation of the former Barclays Bank building. No change is proposed to the servicing regime albeit the BOH area will now be larger and able to store more goods.

- 6.11. The existing plant serving the Co-operative convenience store will be replaced with new plant equipment. This will consist of 2no. combined gas cooler and compressor packs and 2no. external air conditioning (AC) units. The AC units will be installed within acoustic enclosures and will only operate when the store is open. The refrigeration plant will operate at all times but will run at a reduced duty at night. This will screen the plant equipment and mitigate against a detrimental impact in terms of noise to residential amenity.
- 6.12. A new access is proposed from Hugh Street to the existing apartments on the first floor. No change is proposed to the existing refuse collection and storage arrangements.
- 6.13. The location of the plant towards the rear of the site and will be seen in the context of the BOH area where a level of plant and enclosures is expected to support a commercial use. As such, it will not appear out of place or cause harm to the character of the area or be detrimental to the Isles of Scilly Conservation Area.
- 6.14. The buildings on site are not listed and therefore demolition and a replacement construction would be acceptable to upgrade the Co-op convenience store.
- 6.15. The proposal is therefore in accordance with local plan policies OE1 and OE7 and national planning policy.

Amenity

- 6.16. The site is an existing Co-op convenience store and the proposed development is to improve the convenience store and in turn its service provided to the local residents.
- 6.17. The proposed plant will be relocated from the existing location on the ground floor, to first floor level above the proposed back of house area.
- 6.18. A Noise Impact Assessment (NIA) has been submitted in support of the application. It has identified the nearest noise sensitive receptors as the flats above the Co-op convenience store and has assessed the likely impact from the proposed plant.
- 6.19. NSL Jaguar box acoustic enclosures are proposed around the outdoor AC units to mitigate noise levels and protect residential amenity. The AC units will run during the store opening hours only. The refrigeration plant will operate at all times but will run at a reduced duty during the night.
- 6.20. The report concludes that there will be no detrimental impact provided mitigating measures are implemented as recommended.

Flood Risk

- 6.21. The Site is located within Flood Zone 3 and within an area susceptible to coastal flooding. Scilly. The site is located immediately south of St Mary's Harbour.
- 6.22. As the proposals involve the extension of existing buildings on site on current hardstanding, there will be no change in impermeable area, or the flood risk vulnerability as a result of the development.
- 6.23. The majority of the proposed Finished Floor Levels (FFL's) will remain the same, at a level of 3.91mAOD. Any lower existing FFL's are proposed to also be raised to this level as part of

the proposed development. There are proposed re-grading works for the external levels up to the new goods-in door.

- 6.24. The proposal involves the construction of a single storey extension and shopfront alterations of an existing Co-op food shop. Para 176 of the NPPF states “Applications for some minor development and changes of use should not be subject to the Sequential or Exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 63 (small non-residential extensions with a footprint of less than 250m²).”
- 6.25. The proposed extension area is 244m² and therefore as the proposed extension area is less than 250m², the Sequential Test does not need to be applied for the proposal. On this basis, a Sequential Test should not be required for the proposed development.
- 6.26. A Flood Risk Assessment (FRA) and Foul Impact Assessment has been submitted in support of the application. A Flood Emergency Management Plan (FEMP) has been prepared and will be made available to staff who will be responsible for safely evacuating customers.
- 6.27. The FRA concludes that the proposed extension is proposed on an area of existing hardstanding and therefore, there will be no change in impermeable area compared to the existing arrangement. There will be no change in the amount of surface water leaving the site and, as such, there is no requirement (or opportunity) to alter the site’s current drainage arrangement. The proposals will continue to utilise the existing drainage infrastructure associated with the site.
- 6.28. The proposal is considered to accord with the requirements of the National Planning Policy Framework (NPPF) with residual risk to the site fully mitigated, and as such considered low risk.

Ecology and Biodiversity Net Gain

- 6.29. An Ecology Report has been submitted in support of this application. A walk over survey was carried out 6th May 2024 and a survey report provided.
- 6.30. The survey advises that the nature of redevelopment work proposed will fall entirely within the built environment and is considered unlikely to pose a risk to any of the features for which the SAC is designated, however a precautionary recommendation for a Construction Ecological Management Plan is made.
- 6.31. All habitats on site are of low nature conservation importance. No legally protected, priority or otherwise intrinsically notable habitats were recorded. No species were present on site where development is proposed.
- 6.32. In accordance with current guidance regarding Biodiversity Net Gain (BNG), the red line boundary for the proposed redevelopment is entirely occupied by previously developed land with a sealed surface. It is therefore exempted from the need to achieve mandatory BNG as it falls beneath the de minimis threshold.

7. Site Waste Management

- 7.1. Site Waste will be managed both at construction stage and during the operation of the retail use of the Site.

Site Waste Management Plan

- 7.2. A Site Waste Management Plan (SWMP) prepared by Weatherhead has been submitted in support of the application. It advises that it is difficult to dispose of waste locally as, if it is not re-used on site, it needs to be shipped to land fill sites on the mainland.
- 7.3. Weatherhead are the CDN Principal Contractor for the development and are responsible for:
- Obtaining relevant information from sub-contractors.
 - Updating the SWMP at least every three months as the project progresses.
 - Keeping the SWMP on site during the project.
 - Ensuring that other contractors know where the SWMP is kept.
 - Allowing other contractors and the client access to the SWMP during the project.
 - Handing the completed SWMP back to the client at the end of the project.
 - Keeping a copy of the SWMP for two years.

Operational Waste Management Plan

- 7.4. The operational waste is also important to consider. Currently, with regards to food waste, it is collected from a large bin at rear of convenience store on Mondays, Wednesdays, and Fridays.
- 7.5. In urgent circumstances, collections can be arranged for the same day, such as when Co-op have mass waste, due to fridge or freezer breakdowns.
- 7.6. The waste is collected using a standard refuse vehicle by Richard Hand Haulage, who then take the waste to the council waste site for incineration.
- 7.7. The refuse vehicle reverses down the back lanes behind the convenience store in the same way as deliveries come to store. They hook the bin onto the back of the vehicle, and it lifts and auto tips.
- 7.8. All other waste is backhauled in the same way as every other Co-op convenience store across the UK which gets collected by island carriers and taken back to the mainland. Delivery vehicles deliver their goods to the store on pallets and the rubbish and recycling is palletted up before leaving site.
- 7.9. Overall, the waste created as a result of demolition will be dealt with by Weatherhead in accordance with a SWMP. There is already an Operational Waste Management Plan in place



for this Co-op convenience store. The proposals are therefore compliant with Local Plan Policy OE5.

8. Conclusion

- 8.1. This application seeks planning permission for the construction of a single storey extension, shopfront alterations and the installation of plant equipment. The Co-op has been exploring options to extend its convenience store on St Mary's for a number of years and has purchased the adjacent former bank in order to do this. The proposed development will allow the Co-op to make a significant investment in the upgrading and improvement of the Islands' main food store. This will benefit residents all year round as well as holiday makers during the summer period.
- 8.2. It has been demonstrated that the proposal will have no harmful impact on visual amenity, or on the amenity of residents close to the site. Nor will there be a harmful impact on the character or appearance of the local area, Isles of Scilly Conservation Area and Area of Outstanding natural Beauty and Heritage Coast.
- 8.3. The submitted reports conclude that the proposals would be acceptable in terms of Ecology, Biodiversity Net Gain and Flood Risk.
- 8.4. The proposal is therefore in accordance with the aims of local and national planning policy.



Appendix 1 – Preapplication Response ref. PA-24-046



COUNCIL OF THE ISLES OF SCILLY

Postal Address:

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18 June 2024

Dear Chris,

Re: PA-24-046 The Co-operative Supermarket, St Mary's

Further to your email of 02 May 2024 and our follow-up Teams meeting on 20 May regarding the above. Thank you for your patience whilst we consider the questions you have raised. As you are aware, the store in Hugh Town, is located in the Isles of Scilly Conservation Area. Although the building of the Co-op, Barclays Bank and its warehouse building are not listed buildings, Hugh Street is the primary retail frontage and situated in the heart of the historic environment. Proposals that seek to improve the physical appearance of the Co-op and its warehouse are very welcome. There appears to be a deterioration in appearance of this building and the back of house/warehouse facilities. Similarly, since becoming vacant, the former Barclays Bank building has declined. Proposals that would see improvements in this area would be supported, provided no other harm is identified.



1. Advice on the Principle

I guess in response to your first point, I would note that, as residents living on the Isles of Scilly, and I don't think I'm overstating the matter, we recognise the

reconfiguration and internal works to the Co-operative Store on St Mary's are both essential, as the only supermarket on St Mary's, and would likely improve the overall shopping experience for islanders and visitors alike. As you note Policy SS4 is supportive of new, and seeks to protect against the loss of existing retail particularly in Hugh Town. New residential units are supported where these are required in connection with staff accommodation needs of an existing business and are restricted as such, or are to meet a local need and again are restricted as such. In relation to material changes of use to achieve staff accommodation, then these should not displace existing uses, if storage space is still required by the business, for example. We have no objection to the principle of these proposals.

2. New residential for staff accommodation.

Our usual route to support an application for additional staff accommodation is to require a case to be made about the circumstances of why, if the business is existing, there is a need for additional staff accommodation. This could be that the business is successful, and it wishes to expand and requires additional staff; or the accommodation previously available is inadequate or has just been lost, with an explanation as to why it may no longer be available. In the former, so we can be assured on the longevity of the business we may ask for a business plan to support the need for accommodation.

We would expect the application to be supported by a statement explaining the existing circumstances: how many staff are employed and the current arrangements as well as the proposed circumstances: how many staff are employed and the proposed arrangements. If the case meets the reasonable staff accommodation needs of the business, and there are no other issues of harm to consider, then we would be supportive of new staff accommodation. These will be subject to conditions that any new unit created is only used by staff in connection with that specific business. If the accommodation is for permanent year-round use, then we would expect it to meet minimum space standards as defined in the [Governments Technical Housing Standards](#).

3. Feedback on the overall scale

Although you have provided us with some existing and proposed floor plans, there only appears to be proposed ground and first floor plans, for both the Coop and Barclays Bank, but only existing plans for the coop, no existing plans for Barclays Bank. I note you have not provided any elevations. As you note, a heritage impact assessment will be required to assess the full impact on the Conservation Area and the setting on nearby listed buildings. The Islands are also designated as an Area of Outstanding Natural Beauty and Heritage Coast. Both [Policies OE1 and OE7](#) will be relevant, and it will be critical that the overall development, in terms of design and scale, reflect these designations as a National Landscape, which is given the highest status of protection. Any development that is deemed to be inadequately protecting

or enhancing the character of the Conservation Area or scenic beauty of the AONB would be refused. It is tricky to provide feedback on the overall scale without the elevations.

I would draw your attention to the [Isles of Scilly Design Guide](#) which is still an adopted SPD relevant to development on the Isles of Scilly. We would advocate for traditional forms, natural materials and highly sustainable design that respects and enhances the wider character of this area. You note that you would demolish the existing single storey warehouse building and replace this with a two storey building. Clearly the height and massing will be important in terms of the harbour elevation, in particular, but also the potential for higher buildings to affect the amenity and outlook of existing property. Although *loss of a view* is not a material planning consideration, we would require the design and scale to ensure the *reasonable* outlook of existing property is not adversely affected. Higher buildings can also have an impact in terms of light and overshadowing. If the proposal is higher than the existing, then we would suggest the [Building Research Establishment \(BRE\) guidance](#) could be used to establish how existing properties are affected. Please refer to our [Local Validation Checklist](#) for other matters to consider in relation to submitting an application on the Isles of Scilly.

4. Advice on the acceptability of the other detailed issues discussed in this letter.

The proposed incorporation of the adjoining Barclays Bank, given the lack of use as a bank for several years, would see the re-use of a key building within Hugh Street, which, if retaining a commercial use, could deliver much needed vitality into the town centre. As noted above the principle of achieving additional staff accommodation is acceptable, providing the units meet the Nationally Described Space Standards for their size and intended number of permanent occupants. Splitting the larger flat above into two smaller flats is acceptable in principle. Please ensure the split is designed with the Building Regulations in mind, in terms of fire safety, sound attenuation, construction and means of escape. There may be implications from a flooding perspective, as noted below, requiring appropriate and proportionate means of escape including flood recovery to be included in a Flood Risk Assessment.

The use of former Seasalt store on Garrison Lane, as a food store on a temporary basis would be acceptable, without any further change of use. If new signs are required, then they would either be deemed consent if falling under [Class 5 of Schedule 3](#) of the Advertisement Regulations. If proposed signs exceed what is deemed consent, then an application for Advertisement Consent would be required.

5. Any further policy requirements or pertinent issues that should be considered and/or incorporated if this proposal is progressed to submission of a planning application.

A detailed **Heritage Impact Assessment** should be produced to guide and inform the resulting development to ensure appropriate account is taken of the wider Conservation Area and nearby listed buildings and the heritage coast. A **design and access statement** should also reflect on vernacular and how the proposal has been designed to enhance both the street scene and harbour elevations. The latter should also achieve accessibility improvements for customers. This latter is clearly going to be an important consideration given the nature of the development. We would also expect that if external lighting is proposed, this is the minimum necessary to operate safely and these are timed to go off when not required. If additional lights are required, over and above the existing lights then I would suggest a **lighting strategy** is submitted to assess the impact on the Dark Skies, in accordance with Policy OE4.

Other issues, please submit a **Site Waste Management Plan**, both for short-term construction waste and long commercial waste purposes. We are likely to require a **Construction Environmental Management Plan** (CEMP) which is usually submitted by pre-commencement condition, if the development is approved. As the site is located close to the [Isles of Scilly Complex Special Area of Conservation \(SAC\)](#) it may be worth formally requesting an Environmental Impact Assessment (EIA) and a Habitat Regulations Assessment (HRA) Screening Opinion. The proposal should not adversely affect the [qualifying features of the SAC](#). There is no official requirement to obtain a screening opinion on this, but we would need to ensure the development was not going to result in any harm to this designation.

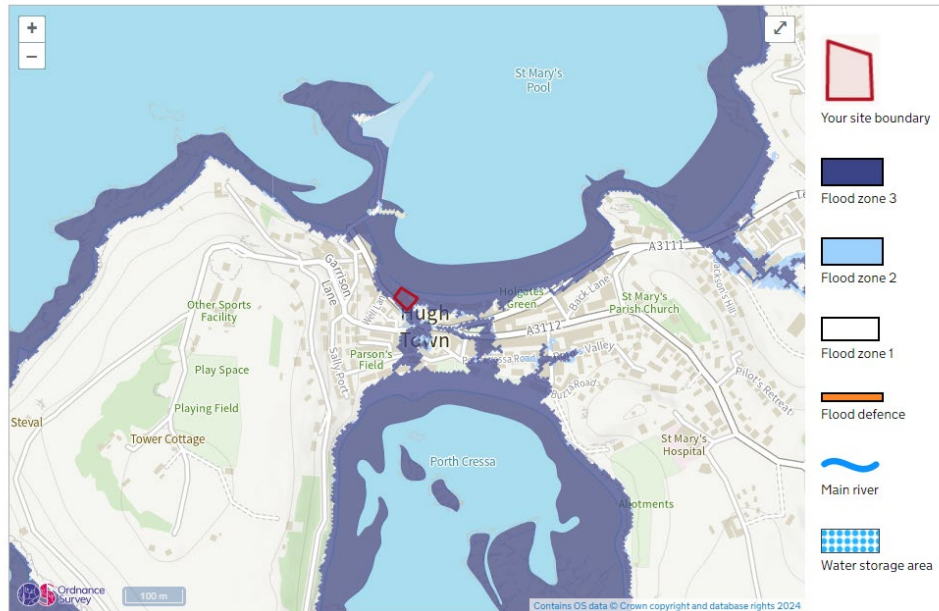
You may be aware that Hugh Street is an area susceptible to coastal flooding. The Local Plan policies map for this area is show below and the blue hatch is areas at risk of flooding:



Any development in this location has to be supported by a **Flood Risk Assessment** to demonstrate how users/occupants would be safe in the event of a flooding

situation. This would be required for the replacement warehouse, in particular, and the increase in residential units. So, although it does not appear there would be additional residential at ground floor, any means of escape from the building should be considered.

The Environment Agency show this area as Flood Zone 3 and as such also requires a Flood Risk Assessment:



Other issues include the need to assess the buildings for protected species. Any demolition or alteration of a roof would require an application to be supported by a **Preliminary Ecological Appraisal**. If there is a probability of buildings/structures to be active habitat for species then further assessment may be required which, in the case of bats and birds, may only be carried out when relevant species are active. There is a [list on our website](#) of ecologists who may be able to assist in carrying out any relevant assessment.

As of 02 April 2024 it became mandatory (with [some exemptions](#)) for development to deliver 10% **Biodiversity Net Gain (BNG)**. The measure is calculated using the [DEFRA Small Sites Metric Tool](#). Further advice on this should be sought from an ecologist in terms of the implications for your development. If this is not clearly addressed as part of your application, then it may be that it is invalid.

6. A list of documentation that will be required for the validation of a future planning application for the proposed development.

Please see our [Local Validation Checklist](#).

I hope that the above information is of use to you should you progress with an application. As we do not currently charge for a pre-application advice service, there

is a limit to the feedback we can provide on specific proposals. Whilst we recognise the significant improvements that this development could bring, and will seek to provide further comments, if I have missed responding to any particular point, but we do advise that, if you disagree with our response, you seek your own independent professional planning advice, particularly if the property has complex planning history, for example, or if you require more detailed guidance and advice on interpreting the requirements and planning policies when making a planning application.

Any advice given by Council officers for pre-application enquiries does not indicate any formal decision by the Council as Local Planning Authority. Any views or opinions are given without prejudice to the formal consideration of any planning application. The recommendation on any application can only be made after the Council has consulted local people, statutory consultees and any other interested parties in accordance with statutory procedures. The final decision on an application will then be made by the Full Council or by the Chief Planning Officer under delegated powers in accordance with the Council's approved Scheme of Delegation and Planning Protocol and will be based on all of the information available at that time. You should therefore be aware that officers cannot guarantee the final formal decision that will be made on your application(s).

Yours faithfully,



Lisa Walton

Chief Planning Officer | Council of the Isles of Scilly

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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