

Promoting a Sustainable Scilly

Issues: Housing | Environment | Infrastructure | Economy | Community Facilities

Aims

1. Maintaining an outstanding and world-class environment, and ensuring that its distinctive and significant seascape and landscape, heritage and nature conservation assets are protected, valued and enhanced.
2. Ensuring the provision of infrastructure and utilities to create a more sustainable, resilient and self-sufficient Isles of Scilly.
3. Creating a balanced local housing market that provides housing choice and meets the existing and future needs of the community, enabling economic prosperity.
4. Creating a more competitive, diverse and resilient economy based on an exceptional and inspirational environment that can adapt to change and challenges and maximise opportunities by building on its strengths and underpinned by effective infrastructure and an appropriately available and skilled workforce.
5. Engendering and supporting a strong, vibrant and healthy island community with an improved quality of life for its residents.
6. Adapting to the effects of climate change on people, wildlife and places by increasing resilience, matching the vulnerability of land uses to flood risk, and managing surface water in the most sustainable way.
7. Minimising carbon dioxide and other greenhouse gases, and supporting measures that contribute to carbon neutrality and mitigate against the effects of climate change.

96. Supporting a 'Sustainable Scilly' has to underpin all development that takes place in these islands. The objectives set out in the Local Plan are designed to work together to ensure that development is able to deliver the principal aim of the planning system, which is to enable sustainable places.
97. **Climate Emergency** At the Full Council meeting in October 2019 the Council of the Isles of Scilly signed up to a declaration of a 'Climate Emergency' with a

commitment for the Authority to be carbon neutral by 2030. The Council is therefore committed to encouraging and engaging with its partners and other local businesses and organisations to adopt similar ambitions to become carbon neutral by 2030. To reflect this commitment it is important that development proposals demonstrate a sustainable approach in terms of design, construction and occupation on a proportionate basis.

98. When considering all development proposals, there will be a presumption in favour of sustainable development, to reflect the NPPF. To achieve this purpose, the Local Planning Authority will proactively work with applicants, island businesses and the community, to find solutions that enable proposals to be approved, wherever possible, in accordance with the Local Plan, unless material considerations indicate otherwise. This proactive approach will ensure that any development improves the social and economic well-being of the islands where appropriate and relevant, whilst protecting or enhancing the environment.
99. While the Local Plan supports development that meets the social and economic objectives of the islands' community and businesses, it must also ensure that this objective is not at the expense of the islands' outstanding environment, and development must therefore meet the policies set out in the outstanding environment section. The Local Plan has an overarching commitment to protect the environment, as part of the wider task of balancing economic and social objectives.
100. In order to achieve sustainable development, ensure the most efficient use of land and protect the environment, development should be directed towards brownfield sites wherever possible. Due to the limited amount of brownfield sites, some greenfield land will be required to meet the social and economic requirements of the islands, particularly for much-needed new homes.
101. **Climate Change** The importance of understanding climate change locally is echoed in the NPPF, which requires Local Planning Authorities to adopt positive strategies towards dealing with climate change. The NPPF identifies a number of factors which need to be considered over the longer term.¹ For the Isles of Scilly this means a particular focus on securing sustainable energy and drinking water supplies, improved waste water treatment, more effective waste management and recycling and avoiding areas at risk of flooding, as part of the requirement to adapt to the effects of climate change. Development that protects against the impacts from coastal flooding or erosion will be encouraged, including measures that improve coastal defences, and protect water resources and the most productive agricultural land.
102. **Zero and Low Carbon Development** The Climate Change Act 2008 places legally binding targets for the UK to achieve an 80% reduction in greenhouse gas emissions by 2050² and 34% by 2020, against 1990 baseline levels. The Local

¹ CE01 [National Planning Policy Framework 2019](#) (Paragraph 20 and Chapter 14)

² CE11 [2008 Climate Change Act](#)

Plan can make a major contribution to achieving these targets locally, through the Spatial Strategy. Mitigating and adapting to climate change is achieved through criteria-based policies, which will also guide decision-making. The Local Plan, read as a whole, seeks to shape new and existing development through its policies and by supporting sustainable design, more effective site waste management and enhanced biodiversity. To support the islands' resilience to a changing climate and to tackle climate change locally, the Council is committed to ensuring that all new developments have as low a carbon impact as practically possible.

103. It is recognised that the Building Regulations are the primary means of ensuring energy efficiency in buildings, through its control over construction. The planning system does, however, have a role in promoting zero and low-carbon development through good design practices. Although the Local Plan is not proposing to apply an additional sustainability standard, support will be given to proposals that exceed current Building Regulations. Since 2007 the Isles of Scilly Design Guide, a Supplementary Planning Document (SPD), has promoted sustainable design.

POLICY SS1 Principles of Sustainable Development

(1) 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, by:

- a) conserving and enhancing the outstanding natural, built and historic environment;
- b) locating, designing and constructing development where it makes a positive contribution to reducing the islands' carbon footprint and consumption of natural resources;
- c) improving accessibility and creating a network of safe and well-connected routes by integrating measures that encourage and promote walking, cycling and electric vehicles as part of any new development wherever opportunities allow;
- d) promoting the value of biodiversity, geodiversity and soils, including the potential contribution from natural capital³ and ecosystem services⁴;
- e) taking into account the long-term implications of climate change and rising temperatures for flood risk, coastal change, water supply, biodiversity and landscapes;
- f) promoting cohesive and resilient communities on each island; and
- g) generating and sustaining economic activity.

104. **Sustainable Design** The detailed design of buildings and use of materials have provided the islands with character and identity. The Council will seek to maintain and strengthen the character and identity of each island and the

³ Natural capital can be defined as the world's stocks of natural assets which include geology, soil, air, water and all living things.

⁴ Ecosystem services are the benefits provided by ecosystems that contribute to making human life both possible and worth living and include provisioning, regulating, supporting and cultural benefits of natural environmental processes.

distinctiveness of areas within them by ensuring that development is undertaken using natural, sustainable materials and styles that complement those found in the local area, and which avoid proliferating the use of unacceptable or unsustainable resources. This approach does not require traditional construction methods and materials, given the viability and sustainability costs of sourcing such materials, but about ensuring designs and materials are otherwise sustainable in a complementary and appropriate manner.

105. Much of the identity of an area is derived from a combination of distinctive local building types, materials, layouts, the relationship between buildings, and making use of natural features. The pattern of development varies across the five inhabited islands. On St Mary's there will often be a discernible pattern of development, with either a historic core or obvious later modern developments with a particular style. New development should complement distinctive local features and patterns, with regard given to the orientation and character of the immediate area. The Isles of Scilly Design Guide supplements Policy SS2, and sets out the detailed design characteristics of the islands.
106. All new buildings should be carefully designed to respect and enhance their surroundings. Buildings that are out of scale can detract from the character and amenity of an area. A building's scale, including its height and massing (the combined effect of its footprint, volume and shape) determines its impact on views, skylines, and its relationship with surrounding buildings and spaces, as well as on neighbouring and wider amenity.
107. New buildings should be of a similar scale to other buildings in the surrounding area, unless they are required to reflect a development's function or to create a landmark in an appropriate location. In such cases, larger-scale buildings may be appropriate, provided that important views and vistas from the public realm are retained, especially those of landmark features.
108. Developments are generally more attractive if they have a degree of visual interest. The range of styles and materials used should be limited, to avoid a disjointed appearance. Visual interest can be provided through detailing, provided this does not detract from the character of an area. Original and innovative designs can be used to help raise the standard of design in an area, although it is important that such designs do not detract from the visual unity of areas that already have a successful and compatible mix of styles and materials.
109. Given the high environmental quality and finite amount of land, the efficient use of land will be supported where development is appropriately designed and sited in sustainable locations.
110. Extensions or alterations can have a cumulative impact on the character of the area, and can overwhelm an existing building to the extent that its original character and/or symmetry is significantly eroded. Proposals should therefore be subsidiary to the

original building and not of a dominant scale, and take into account the wider impacts upon the environment. Policy LC9 should be applied specifically to domestic extensions.

111. As part of the commitment to maintain and enhance the natural environment, consideration should be given to incorporating measures to increase biodiversity through, for example, following the guidance set out in 'Building with Nature'.⁵ As a minimum, bird and bat boxes should be incorporated into the design of buildings or extensions, with measures to reduce any impacts from current threats to biodiversity on the islands, including rats.

POLICY SS2 Sustainable Quality Design and Place-Making

(1) 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 by:

- a) respecting and reinforcing the character, identity and local distinctiveness of an area whilst not stifling innovation, and with the scale, density, layout, height, mass and materials responding positively to the existing townscape, landscape and seascape setting;
- b) ensuring that development does not dominate or interrupt important public views, key landmark buildings or significant cultural and heritage features;
- c) making efficient use of the land whilst respecting the character of the site and surrounding area and neighbouring land uses;
- d) safeguarding the amenity of individuals and properties by creating a high-quality environment that addresses issues of privacy, overlooking, overshadowing, overbearing impacts and unreasonable noise and disturbance;
- e) providing high-quality and clearly defined safe private, semi-private and public spaces, including recreational facilities and green infrastructure where appropriate;
- f) ensuring that buildings can easily be altered and adapted to meet changing social and economic conditions and are resilient to climate change, including features to mitigate or enable rapid recovery from a flooding event where recommended in a Flood Risk Assessment;
- g) providing opportunities for achieving measurable net gains in biodiversity by ensuring that natural and semi-natural features are created and enhanced as integral elements of the design, through the provision of features such as bird and bat boxes, and by incorporating measures that support the removal of any threats to the islands' biodiversity;
- h) promoting physical activity by incorporating Sport England Active Design principles⁶ wherever appropriate;
- i) requiring sensitively designed adverts and signage that are appropriate and sympathetic to their local setting in terms of scale, design and materials;

⁵ CE14 [Building with Nature](#)

⁶ CE15 [Sport England Active Design Principles](#)

- j) incorporating measures to reduce any actual or perceived opportunities for crime or anti-social behaviour, and which promote safe living environments;
- k) minimising the consumption of resources by requiring sustainable construction and design by:
 - I. incorporating high standards of energy efficiency and maximising opportunities for the micro-generation of renewable, low-carbon and decentralised energy, and where appropriate plugged into the Smart Grid;⁷
 - II. incorporating passive design measures for heating, cooling, ventilation and natural light, to reduce overall energy demand and improve energy efficiency;
 - III. using natural resources more prudently, including the use of locally sourced, recycled or low-carbon materials in construction where they are available and represent a viable option;
 - IV. reducing pressure on water resources and increasing re-use by incorporating effective water management measures, including Sustainable Urban Drainage Systems, green roofs and water-saving devices, and rain/grey water collecting and recycling facilities; and
 - V. providing appropriate vermin-proof waste and recycling storage appropriate for the scale of development proposed, and provision for kerbside waste and recycling collections consistent with the islands' waste management practices.

(2) Development proposals that involve the construction or conversion of buildings will need to be supported by a statement of Sustainable Design Measures (SDM) and a Site Waste Management Plan (SWMP).

112. **Re-Using Buildings** The re-use of previously developed land and buildings is a sustainable way of reducing the need to construct new buildings, and reduces the depletion of greenfield land. The Agricultural Buildings of Scilly project, which was carried out in 1995, sought to identify all existing traditional agricultural buildings on the islands. Many of these buildings still remain, and it is vital that any re-use of these, as well as other non-agricultural buildings, is sympathetic to the character and scale of the existing structures and surrounding landscape character. The re-use of any existing historic or traditional building, particularly those agricultural buildings listed in the Agricultural Buildings of Scilly Project, should be accompanied by a structural survey to ensure it can be viably converted.
113. To support growth and expansion of the rural economy, existing buildings that are suitable for conversion should be used for small-scale business uses, to help sustain the rural economy without creating the need for new buildings in the countryside. Employment uses will often require only minor alterations to the structure or exterior of the building, thereby maintaining a traditional appearance in the rural scene; and, in the case of buildings of historic or architectural merit, their original character.

⁷ The Smart Grid is one of the projects of the Smart Island Programme and concerns smart technology for homes.

114. Policy SS3 allows for the re-use of non-residential buildings as new homes. Allowing residential use needs to be balanced against the importance of retaining buildings that are capable of helping the islands' economy.
115. Conversion to residential use will only be allowed if it is specifically required to meet a permanent local housing need or for staff accommodation, and it has been demonstrated that commercial uses (excluding holiday lets) are not viable. In certain circumstances, residential use specifically for a holiday letting opportunity may be justified as an appropriate means of preserving a building of particular architectural or historic merit because it is the only means of funding its restoration and retaining its original features. In these circumstances, evidence should be provided demonstrating the reasons why a commercial proposal would not be appropriate for preserving the building.
116. Buildings constructed of temporary or short-life materials, or which are derelict or in an advanced state of disrepair, are not considered suitable for re-use. The extent of adaptation required to bring them into use is likely to have an impact on the landscape similar to that of a new building. It is recognised, however, that for sites closely related to existing built-up areas, a replacement building that does not have a significantly greater impact may be a prudent use of a previously developed site, particularly where it can be demonstrated that a good proportion of the existing materials could be re-used.
117. The re-use of traditional buildings with architectural or historic merit will be positively encouraged. The retention of buildings that are not in keeping with their surroundings, or are visually intrusive because of their location, form, bulk or general design, will be discouraged.
118. The aim of re-using traditional buildings is to protect their character by maintaining original or traditional structures, built form, architectural detail, materials and general design, whilst minimising new buildings. However, where proposals for alternative use require the creation of new ancillary buildings and/or extensions, these will be considered on their own merits. Uses ancillary to the new use of the building, such as additional car parking or open storage, must not have an impact on the surrounding landscape, including any extension of the curtilage of the development into the countryside. Account will also be taken of amenity issues such as noise, smell or external illumination.
119. The character of the landscape could be jeopardised if the many small-scale agricultural buildings that are still capable of continued use were used for more lucrative purposes, thereby generating the potential demand for new buildings. It is important not to permit a change of use of an agricultural building if a new building would be required on an agricultural holding to fulfil the function of the building being converted, unless the existing building is no longer suitable for agricultural use.

120. Existing buildings may provide homes for wildlife, particularly nesting birds and roosting bats, which are statutorily protected. Every opportunity should be made not only to avoid the disturbance of protected species, but also to enhance their provision by incorporating measures such as bat or bird boxes integrated into the building, in accordance with Policy SS2g and Policy SS3e. Additionally, opportunities should be made for biodiversity net gain, including habitat restoration and recreation, and measures to reduce any impacts from current threats to biodiversity on the islands including rats.

POLICY SS3 Re-use of Buildings

- (1) 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.
- (2) The re-use of traditional or historic buildings, worthy of retention for residential use will be permitted provided that all the above criteria are met and that:
- a) the proposal is to address a local housing need or staff accommodation, and is subject to appropriate occupancy restrictions in accordance with Policies LC2 and LC4; or
 - b) the proposal is for a holiday let on the basis that it has been demonstrated that there are no other viable means of protecting and retaining the building; and
 - c) the building is of local traditional architectural or historic merit, worthy of retention; and
 - d) the proposal is supported by a structural survey to demonstrate the amount of repair or rebuilding required to convert the building to the proposed use.
- (3) The re-use of non-traditional buildings for residential use will only be permitted provided that all of (1) criteria a)-e) are met and where the proposal is to address a local housing need or staff accommodation and is subject to appropriate occupancy restrictions in accordance with Policies LC2 and LC4.
- (4) Any demolition or re-roofing of a building should not result in harm to any protected species. A Preliminary Environmental Assessment should be submitted to demonstrate the impact of the proposal on any protected species present within of using the site.

121. **Retail** Retaining locally accessible shops, services and facilities is a primary aspect of maintaining a sustainable community. The protection of retail business is therefore recognised both nationally and locally as an important aspect of planning. On St Mary's, the main centre of Hugh Town supports a wide range of business

activities and is the islands' primary retail centre. The resident population of St Mary's and the off-islands provide year-round support for retail businesses that contribute positively to the commercial mix and viability of Hugh Town. During the main tourism season, the demand for retail and ancillary services increases; this is reflected in the emergence of mobile trading vehicles during the summer months, despite some of the town's ground-floor retail spaces remaining empty.

122. Retail includes shops for food and groceries, convenience stores, chemists or pharmacies, newsagents and clothes shops. Ancillary retail uses are usually located within a town centre and can include banks, cafes, restaurants, public houses, hairdressers and estate agents. These ancillary uses can create a crossover into the evening that is important to the local economy, particularly for tourism.
123. The loss of retail and ancillary retail uses can have a negative impact upon the vibrancy and vitality of a town centre, which in turn can impact upon the tourism industry, as well as the ability of businesses to operate on a year-round basis, as local residents find alternative ways of shopping. The increase in the reliability of internet shopping will continue to have an impact upon shopping habits. Given the remoteness from the mainland and the nature of the community on the islands, it is vital that the policies of the Local Plan set out appropriate criteria to resist the unnecessary loss of retail and ancillary retail uses within the Isles of Scilly.
124. **Mobile Trading** Mobile trading occurs within Hugh Town. Although such trading does not always require planning consent, an agreement with the land owner is needed. A Street Trading Licence will also be required from the Council's Licensing Department. If the sale of goods is on a fixed site, regardless of whether the vehicle is mobile, both a Fixed Trading Licence and planning permission would be required. Fixed traders must not give rise to amenity issues through, for example, noise or smells, and must ensure that pedestrian and highway safety is maintained when trading is in operation, in accordance with Policy SS4.
125. **Recreation** The islands have a wealth of publicly accessible beaches and permissive footpaths across all of the inhabited islands. The total amount of dedicated recreation sport and play spaces on the islands is around 15.8 hectares, in addition to a nine-hole golf course on St Mary's. This equates to around 6.9 hectares per 1,000 population, or 69 m² per head of population.⁸ In addition to dedicated recreation sites, there are seasonal water sports available on all inhabited islands, including gig-rowing, sailing, stand-up paddle boarding, kayaking, windsurfing and snorkelling, as well as a plethora of beaches which are all freely accessible to the community and visitors.
126. All of the inhabited islands are walkable communities with co-located community facilities, and given that the Local Plan does not seek to plan for a growth in the population, over the plan period there is no identified need to provide further

⁸ CE17 [Recreation Sites on the Isles of Scilly](#) (Agenda Item 10, Appendix B)

dedicated recreation sites or play pitches for sporting activities. It is, however, important that existing dedicated outdoor recreation and play spaces are retained and enhanced, to support the community's needs, as well as to provide enhancements for the islands' visitors.

127. **Safeguarding Community Facilities** National policy states that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. This chimes with the Council's Corporate Plan,⁹ which aims to enhance the quality of life on the Isles of Scilly by enabling healthy lifestyles, independent living and access to good-quality healthcare.
128. The NPPF requires Local Planning Authorities to work with other authorities and providers to assess the quality and capacity of infrastructure for social care, to ensure that local strategies to improve health and social and cultural well-being are addressed through the planning process.¹⁰ Government policies also encourage care in the community, to help people remain in their home and live independently within the community.
129. Schools and associated educational facilities are provided on St Mary's (primary and secondary schools), Tresco (primary school for the islands of Tresco and Bryher), St Martin's (primary school) and St Agnes (primary school). St Mary's also has boarding accommodation for secondary-school students who would normally reside on an off-island. It is important that these facilities are safeguarded. The Five Islands School is part of a Multi-Academy Trust (MAT), and the Council, as the Local Education Authority, has an ambition to work with the academy trust to ensure that there is sufficient suitable housing on the islands to support the education workforce. It is equally important that the existing educational infrastructure is safeguarded and that future needs are delivered, particularly in relation to new homes. Provision for staff accommodation, including that required by the MAT, is supported under Policy LC1 and Policy LC4.
130. An isolated island community requires the availability of community services and facilities to support social sustainability, including those for leisure, recreation and sport. To address this issue and reflect Government guidance, support will be given for new community facilities or for the change of use of buildings to facilitate such uses. Additionally, the loss of a facility or service that supports the islands' community, including open space, sport and recreation, will be resisted unless it is adequately demonstrated that it is no longer viable, suitable or needed. Any proposals for the change of use of a community facility or service should provide evidence to demonstrate that there is no longer a need for the specific service or facility in the longer term; that a suitable replacement service or facility can be provided; or that there is an existing similar service or facility accessible to the local community. As listed in Policy SS4, to demonstrate that the loss is justifiable, evidence should be provided of attempts to market the property for its current and

⁹ CE18 [Council of the Isles of Scilly Corporate Plan](#)

¹⁰ CE01 [National Planning Policy Framework 2019](#) Paragraph 72 of NPPF 2019:

alternative uses, within appropriate publications and at an appropriate value, for a minimum period of 12 months.

131. In relation to the provision of community facilities, there is an ongoing project to deliver integrated health, social care and housing solutions for the islands' community. This project is known as 'Building Blocks for the Future' and is subject to a One Public Estate bid;¹¹ this is a Government initiative¹² to encourage publicly funded services to co-locate in order to achieve savings, free-up property for other uses, and ensure better customer-focussed delivery of services. Specific to this project is the integration of health and social care, including the Park House Residential Care Home. Park House itself is a dated structure not designed for the future needs of the islands, and it has limitations as a residential care home, given the increased levels of complexity of need.
132. Although it is known to be a development that is likely to come forward over the plan period, there is no specific site to allocate. It is likely that the preferred approach would be the replacement of Park House Residential Care Home with the construction of a new purpose-built integrated health and social care hub with a particular focus on frail elderly people. This project, which will respond to the anticipated increase in the proportion of the population aged over 65, could be one of the first in the UK to integrate social care and NHS services at one site, sharing resources and making significant savings. Policy SS4 seeks to ensure that appropriate support is given to providing the most appropriate site for the delivery of a new integrated health and social care facility on the islands.

POLICY SS4 Protection of Retailing, Recreation and Community Facilities

(1) Development for new retailing and community facilities, including recreation spaces and an integrated health and social care facility, will be supported where:

- a) it is appropriately designed, scaled and located in accordance with other policies in the Local Plan; and
- b) it does not harm the amenities of the surrounding areas and maintains pedestrian and highway safety.

(2) Development (including the change of use of existing premises) that involves the loss of ground-floor retail units, ancillary retail or public houses, within the defined Town Centre of the Policies Map, will only be permitted if it can be demonstrated that the use is no longer, or cannot be made, commercially viable. All applications that result in the loss of such facilities must be supported by appropriate marketing (for a minimum period of 12 months) and a financial viability assessment to support the proposal.

(3) Development that would result in the loss, or prejudice the use of a recreational or sporting facility, as defined on the Policies Map, or other community or cultural service or facility, will not be permitted unless it can be clearly demonstrated that:

¹¹ CE19 [Building Blocks for the Future: One Public Estate Bid](#) (Agenda Item 16)

¹² CE20 [One Public Estate Initiative](#)

- a) there is no longer a need for the specific facility or service by the community, including over the longer term; and
- b) a need for other permitted uses or other facilities and services has been explored and is not required; or
- c) a replacement facility or service is provided that is accessibly located to the local community and of at least equivalent standard; or
- d) in the case of a local commercial service, it cannot be continued and made viable over the longer term.

(4) In respect of (3) c), planning conditions or obligations will be used to ensure that the replacement provision, where this is essentially required, is secured at an appropriate time in relation to the redevelopment of the site/building.

(5) Where the case for a change of use is accepted, with respect to Parts (2) and (3) above, favourable consideration will be given to:

- a) Use Classes that fall within Class E, Class F.1 and Class F.2 of the Use Classes Order* before other employment uses are considered; or
- b) When it can be demonstrated that compliance with (3)a) above is not possible then a change of use to housing in accordance with Policy SS3 and Policy LC3 may be permitted.

* The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (SI 2020 No.757)

133. **Physical Infrastructure** The islands are recognised as being carbon-intensive, due in part to outdated and inefficient infrastructure, and heavy reliance on imported fossil fuels and electricity to meet the community's needs, as identified in the Energy Infrastructure Plan.¹³ This high carbon intensity contrasts with the opportunities for self-sufficiency presented by the islands' location and natural environment. In recognition of a 'climate emergency' the Council have made a commitment to seek to achieve carbon neutrality by 2030, through its own activities and operations.
134. In addition to this inefficient energy infrastructure, historically the islands have had limited investment in improving or modernising their water or sewerage infrastructure. Much of the islands' waste water is dealt with by private treatment plants or septic tanks, with only Hugh Town and Old Town on St Mary's having a comprehensive, albeit aged, public sewerage network. The underinvestment in infrastructure in part reflects the lack of strategically planned development that could potentially leverage the investments to improve infrastructure. Although the Local Plan seeks to strategically plan for affordable new homes in response to existing housing needs, it is not promoting significant growth. Nonetheless, new development will have to ensure that there is no increased burden on the existing infrastructure.
135. In order to address legacy infrastructure systems and to ensure compliance with the Water Framework Directive, significant investments are planned for the islands' sewerage and water network over the plan period. It is therefore not considered necessary to levy developers for infrastructure contributions particularly as this would impact on the viability of delivering the necessary affordable homes. Development will, however, be expected to include any necessary or appropriate connections to

¹³ CE21 [Isles of Scilly Energy Infrastructure Plan 2016](#)

comprehensive water and sewerage systems, wherever possible, rather than perpetuate further private systems.

136. The planned investment will significantly improve the management of water supplies and foul waste water. Policy SS5 seeks to ensure that any improvements to the existing infrastructure take place before the implementation of any significant development, including the housing allocations identified in Policy LC6, particularly if existing networks are inadequate for the housing proposed. In addition, Policy SS6 seeks that new developments minimise water usage through both design measures and technological improvements, to ensure that environmental impacts are minimised.
137. The Smart Islands programme seeks to capitalise on the opportunities presented by the islands to enable an appropriate transition from a carbon-intensive community to a low-carbon community. In order to achieve this transition, it is necessary to improve the islands' existing physical infrastructure to create more holistic and modernised systems. These challenges include improving the resilience, reliability and management of the energy network, securing reliable sources of renewable energy, reducing fuel poverty and tackling the cost of waste disposal. It also includes significant improvements in the islands' sewerage and drinking water infrastructure through planned investments over the plan period. The Smart Islands programme is intended to meet these challenges through, for example, the provision of energy management systems and affordable, reliable and locally generated energy, and through renewable sources and the use of waste.
138. The planned infrastructure investments are intended to address many of the current infrastructure deficiencies. These investments are likely to take place over the plan period, to enable the sustainable development proposed in the Local Plan. The timing of new development, however, will need to take into account any planned investment at the time, to ensure the necessary infrastructure is available to support any proposal. As such, the timing of development may need to be phased to minimise the impact on existing resources, and to take into account planned investments and improvements in essential infrastructure. In some cases, the development itself may be required to provide or improve existing infrastructure to make the proposal acceptable. Planning conditions and/or legal agreements will be used to ensure that necessary improvements are obliged, if required, to phase development in line with planned infrastructure investments.
139. The provision of infrastructure should be taken into account when estimating the costs of a scheme and its viability, as well as connecting to or building in the capability to easily connect to any future Smart Island or similar energy grid. Where a proposal to deliver affordable homes, on an allocated housing site, has been made unviable by the level of infrastructure required, the Council will work with the developer to address the issue.

POLICY SS5 Physical Infrastructure

Development proposals, where they comply with other relevant policies within this Local Plan, will be supported where they are:

- (1) evidenced by the necessary existing or planned physical infrastructure to enable its delivery; or
- (2) for new physical infrastructure where this makes a positive contribution to the sustainability of the islands.

140. **Water and Waste Water** As of April 2020 South West Water extended their license to cover the islands are therefore now the Water Authority for the Isles of Scilly.
141. The water supply for St Mary's comes from the groundwater abstraction wells at Higher Moor and Lower Moor. There are five borehole abstraction wells: Venns, Carrs and Hales at Higher Moor, and Rocky Hill and Joneys at Lower Moor. The water supply for St Mary's is supplemented by the desalination plant, located on the east side of the island. The desalination is used to improve the quality of the water and help the ground water levels to re-charge and reduce the risk of saline intrusion. There are three reservoirs on St Mary's, all in the form of above- or below-ground storage tanks. All water extracted from groundwater boreholes or the sea is treated and distributed via the water pumping and treatment station at Porth Hellick above Higher Moor.
142. There are five water abstraction boreholes on Bryher that supply fresh water. These are all located just to the north east of Great Pool. Two replacement tanks and sampling facilities have been installed on Bryher to improve the water facilities on the island.
143. Tresco Estate supplies drinking water via a whole-island distribution system that includes appropriate blending and treatment. The Estate also manages waste water on Tresco and has a whole-island sewerage system with a screening plant. It also operates strict exclusion zones around its boreholes to mitigate the risk of any contamination of the water supply.
144. On St Agnes and St Martin's, water is provided through a combination of the Duchy of Cornwall and private boreholes, with waste water disposed of through private treatment plants, mostly in the form of septic tanks. Water supply on St Agnes is sourced from Big Pool SSSI in the north-west corner of the island, protected from the north and west by sea defences. St Agnes depends on the aquifer for its fresh water supplies via borehole abstraction. The water supplies on St Martin's are drawn from private boreholes, supplemented with rainwater collection tanks. Borehole water supplies on both St Agnes and St Martin's are vulnerable to pollution from agricultural chemicals and septic tank seepage.
145. The water environment of the islands is important for a number of reasons, not least its ecological value and as a source of drinking water for the islands' residents and

visitors. There are legal requirements through the Water Framework Directive¹⁴ to give full consideration to the quality and quantity of ground and surface water bodies, in order to aim to achieve 'good' status or 'good ecological potential' in all water bodies by 2027. As the Council has a role in supporting the delivery of these objectives, it is essential that development does not cause deterioration in the status of any bodies of water on the islands.

146. Promoting more efficient use of water will be essential to help balance the needs of the community and the environment. Policy SS6 uses the proposed higher Building Regulations requirement for housing and the BREEAM,¹⁵ for non-residential, to secure increased water efficiency; such as, for example, rainwater harvesting and grey water recycling. Alternative approaches to securing the equivalent level of water efficiency sought through criteria d) and e) of Policy SS6 will be considered where supported by appropriate evidence.
147. As waste water can be harmful to both the environment and human health, it is necessary to ensure that sewerage disposal is appropriately managed. Groundwater on the Isles of Scilly is vulnerable to contamination. The soils are shallow and groundwater flows through the fractured granite aquifers with elevated nitrate and bacteria levels. Regulations require landowners to obtain a permit from the Environment Agency to discharge sewage effluent close to boreholes and wells that provide a drinking water supply.
148. Any development proposal must ensure that there is adequate infrastructure available or provided, and it must not lead to a deterioration in water quality and water resources. Foul drainage is a particularly important consideration, as this falls under Environmental Permitting Regulations requirements. Applications will need to consider the effect on designated marine and terrestrial areas, as well as the proximity to boreholes and fragile groundwater reserves.
149. With the exception of Tresco, the off-islands have limited capacity for the disposal of foul drainage because of the reliance on septic tank systems, some of which are in close proximity to private drinking water boreholes; a situation that elevates the risk of cross-contamination. The amount of land on the off-islands that is considered suitable and safe for the siting of septic tank drainage fields is also limited.
150. Policy SS6 protects the environment and public health by requiring connections to existing networks that are fit for purpose, and with the appropriate existing or planned capacity where available. As a last resort, proposals must provide a new private package treatment system appropriate to the scale of development proposed. The installation of new sewage treatment packages should obtain the necessary permit from the Environment Agency, in accordance with the General Binding Rules.¹⁶

¹⁴ CE22 [Water Framework Directive](#)

¹⁵ CE23 [BREEAM: Building Research Establishment Environmental Assessment Method](#)

¹⁶ CE24 [General Binding Rules](#)

POLICY SS6 Water and Waste Water Management

(1) Development that requires a new connection to mains or private drinking or waste water systems will be permitted provided that:

- a) it does not result in the deterioration of, and where possible assists in improving water quality, to support the attainment of the requirements of the Water Framework Directive;
- b) it complies with national policy and guidance in relation to flood risk;
- c) it does not result in a risk to the quality of groundwater, and there is no risk to public or private water supplies;
- d) all new homes (including replacement dwellings and conversions) achieve a water consumption standard of no more than 110 litres per person per day;
- e) all new non-residential developments of 500 sqm or more achieve the BREEAM107 'excellent' credit required for water consumption; and
- f) it does not impact on habitats and designated sites

Criteria d) – f) need to be satisfied unless it can be demonstrated that it is not financially viable to do so.

(2) If neither a mains nor package waste-water treatment plant is feasible to deliver the requirements of a new development, then a system incorporating septic tanks may be considered, provided there are no adverse environmental or public health effects from the installation.

151. **Flood Risk** The islands are a flooded landscape that was originally connected to Cornwall until around 10,000 years ago. The rising sea level created the islands of St Agnes, Annet and the Western Rocks at around 3000 BC. The other modern-day islands remained a single island until a period from around 1000 BC onwards. This process of inundation is ongoing, and the predicted rise in sea level varies from 15 cm to 60 cm over the next 75 years. As such, the islands are, and will remain, vulnerable to coastal flooding.
152. Development will be permissible where it complies with the NPPF and national guidance, takes account of local evidence and strategies (including the Local Flood Risk Management Strategies (LFRMS) and the Shoreline Management Plans (SMP)), and incorporates appropriate mitigation. To assist in the process, the Environment Agency is mapping the islands in terms of flood risk zones,¹⁷ which will be rolled out during the plan period.
153. The LFRMS for the Isles of Scilly was published in 2017¹⁸ and states that the primary flood risk for the islands will be from coastal flooding. Coastal flooding occurs when the sea level rises above the level of coastal land. It is exacerbated by tidal movements, ground sea swell, strong winds or other extreme weather conditions, as well as low atmospheric pressure and/or heavy rainfall.
154. The Isles of Scilly Climate Change Strategy 2011 indicates that the climate change impacts for the region include the likelihood of warmer, drier summers, milder, wetter

¹⁷ CE25 [Flood Map for Planning](#)

¹⁸ CE26 [Local Flood Risk Management Strategy 2017](#)

winters, and rising sea levels. In addition, the area will be subject to more extremes, including increases in intense downpours, both in terms of volume and frequency; shorter return periods for high-water levels at the coast; storm surge levels being predicted to exceed current levels; as well as an increase of around 1 m in average annual offshore wave heights by 2080. High spring tides are predictable, but weather conditions can create storm surges and groundswell that add to the water levels. Future predictions indicate that the islands can expect an increased level of flood risk, due to a combination of rising sea levels (at a rate in the South West that is faster than the rest of the UK); more intense storm activity, with storm surge levels that exceed current levels; along with increased offshore wave heights.

155. The higher frequency and ferocity of storm events will increase the severity and incidence of tidal flooding and the rates of coastal erosion. Given that it is not viable to continually raise the height of sea defences, the maintenance and strengthening of existing defences, both man-made and natural, will be important to protect property and critical infrastructure. The islands will need to adapt to flooding by developing effective mitigation and recovery measures.
156. Historic flooding events have affected all of the inhabited islands in recent years, with certain areas known to be at greater risk than others. Within these areas, the LFRMS and SMP advocate a range of approaches, including taking no active intervention (NAI), Holding The Line (HTL), and Managed Realignment (MR). Areas known to be at a higher risk from coastal flooding and erosion are below the 5-metre contour (5 metres Above Ordnance Datum (AOD), Newlyn), and are identified on the Policies Map of this Local Plan. Development proposals in these areas should be avoided where possible, or subject to a Flood Risk Assessment (FRA) as required by Policy SS7, to ensure that vulnerable uses are protected and risks mitigated.
157. The submission of a site-specific FRA will be required, to ensure that development proposals that have to take place in areas at risk of flooding are resilient to those risks. A FRA must demonstrate a knowledge of the flood risks and ensure that the physical damage of flooding on homes and businesses is both minimised and recovered quickly (i.e. the time it takes to make the property usable/habitable again, with more advice provided by the Flood Repairable House guidance¹⁹). Further policy and guidance on undertaking a Flood Risk Assessment can be found on the Environment Agency website and National Planning Practice Guidance on Flood Risk and Coastal Change.²⁰
158. As of 2019, a £3.4 million Sea Defence Works and Dune Management Project is being prepared by the Council, with funding from the ERDF²¹ and the Environment Agency. This project is anticipated to take place during the plan period.

¹⁹ CE27 [Flood Repairable: Planning to Recover Quickly and make your home flood repairable](#)

²⁰ CE28 [Flood Risk Assessment for Planning](#)

²¹ European Regional Development Fund.

159. Where appropriate, development proposals need to consider adequate and appropriate drainage systems to direct flood waters without putting other areas at risk, as well as the use of permeable surfaces. This requirement could include the identification of appropriate sites for containing those flood waters during storms, prior to their release at times of low tide or when the storm event abates. Sustainable Drainage Systems (SuDS²²) will have an important role in the management of rainfall and surface water, particularly in low-lying or flood-prone areas, as well as helping to improve water quality.
160. During the plan period, the following areas have already been identified as likely to be subject to flood and coastal risk-management works.

St Mary's Location	Existing Defence	Potential or already identified Enhancement
The Mermaid Wall	Sea wall.	Storm damage repairs.
The Quay to Customs House	Existing building line and stop logs.	Assessment of defence line and development of adequate standard of defence, including third party assets.
Customs House to Carn Thomas	Sea wall and secondary wall.	Storm damage repairs, development of adequate standard of defence.
Porthmellon	Embankment (south end), sand dune, sea wall (north end).	Sand dune management plan, rock armour to protect south end, sea wall repairs at north end.
Porthloo	Bank.	Rock armour and toe protection for bank.
Pelistry Ledges	-	Management of cliff recession.
Porth Hellick	Gravel Bank.	Replenishment.
Old Town Slip to Old Town Church	Sea walls and embankment.	Storm damage repairs. Demountable defence at east end of bay.
Old Town Quay to Tolman Point	-	Management of cliff recession.
Porthcressa, Little Carn to Sally Port	Sea wall.	Storm damage repairs.
Porthcressa, Slipway to Playground	Rock armour, sea wall.	Management of cliff recession.
Garrison, Sally Port to Morning Point	-	Management of cliff recession.
St Martin's Location	Existing Defence	Potential or already identified Enhancement
Higher Town West End	Rock armour / revetment.	Replenishment.
Tresco Location	Existing Defence	Potential or already identified Enhancement
South Beach / Pentle Bay	Sand dunes.	Dune management plan, dune toe protection.

²² Sustainable urban drainage systems (SUDS) can be used in all types of development to provide a natural approach to managing drainage in order to prevent water pollution and flooding, and they can create or enhance green spaces and habitat for wildlife.

New Grimsby, Quay to Flying Boat Club slip	Sea wall and rock revetment.	Storm damage repairs. Replenishment.
New Grimsby Quay	Breakwater.	Storm damage repairs.
Bryher Location	Existing Defence	Potential or already identified Enhancement
Great Porth North end	Bank, sea wall and rock revetment.	Repairs to damaged revetment.
Great Popplestones	Rock revetment and sea wall.	Repairs to damaged revetment.
Little Popplestones	Embankment and sand dune.	Replenishment. Potential leat instatement.
Church Quay access	Limited rock revetment.	Development of defence line.
St Agnes	Existing Defence	Potential or already identified Enhancement
Pereglis Slip to Ginamoney Carn	Embankment.	Replenishment and strengthening.
Ginamoney Carn to Browarth Point	Embankment with concrete revetment.	Repairs to damaged revetment.
Browarth Point to Kallimay Point	Embankment with concrete revetment, sea wall.	Repairs to damaged revetment. Repairs to sea wall.
The Quay to Turks Head Slip	-	Management of cliff recession.

161. Whilst there is no development permitted on the uninhabited islands, it is known that sea inundation and coastal erosion continues to impact upon important heritage, including Scheduled Monuments and important wildlife features such as nesting sites for storm petrels. The Heritage at Risk Register²³ identifies a number of problems as a direct result of coast erosion.

POLICY SS7 Flood Avoidance and Coastal Erosion

(1) Development proposals to build below the 5 metre contour (5 metres above Ordnance Datum, Newlyn) or in other areas shown to be at risk of flooding or coastal erosion, as set out in the policies map, will not be permitted unless an appropriate and proportionate Flood Risk Assessment (FRA) demonstrates how the flood risk will be managed, and that:

- a) the development, taking climate change into account, does not create a flood risk over its lifetime to existing or proposed properties and/or surrounding land;
- b) appropriate acceptable mitigation and recovery measures can be undertaken to ensure no significant adverse impact on human health or the natural and built environment as well as cultural heritage; and
- c) if there is any doubt, the precautionary principle^{37F} will apply.

²³ CE29 [Heritage at Risk - South West Register 2018](#)

(2) All major developments, regardless of location, should also be accompanied by a proportionate Flood Risk Assessment and appropriate sustainable drainage system.

(3) Natural dune restoration and works connected with flood resilience and coastal defence will be supported where any natural and historic environment designations, that may be affected, have been adequately addressed in accordance with Policy OE2 (Biodiversity and Geodiversity) and OE7 (Historic Environment).

162. **Renewable Energy** The electricity distribution network operator (DNO) is Western Power Distribution (WPD). As established in the Energy Infrastructure Plan (EIP) 2016, all energy on the islands is imported, other than a small number of photovoltaic (PV) installations. During 2018 the Smart Islands project progressed a number of solar installations, including permitted development installations of a number of solar panels on suitable Council houses. Planning permission was also granted for a solar garden at St Mary's Airport and on the roofs of the Council's waste site building and the on St Mary's Fire Station building, both at Porthmellon. Whilst these installations will increase the provision of a renewable source of energy managed by a Community Venture, the two major non-renewable energy demands remain for electricity and petroleum products. The level of import, and especially the isolated nature of the islands, results in an energy supply that can be vulnerable to interruption, though historically this has been classified as 'reliable' when considering Ofgem²⁴ targets.
163. Western Power Distribution's 33 kilovolt (kV) electricity subsea cable, installed in 1988 with a capacity of 7.5 MW, became damaged in March 2017 and was unable to supply the islands with electricity. Whilst the provision of energy for islanders was maintained, this was provided by generation at the islands' 5.7 MW diesel power station on St Mary's.
164. In addition to the diesel power station on St Mary's, there are two satellite power stations on Bryher and St Agnes, each with twin 180 kW diesel generators (enough for current average demand). St Mary's, Tresco and St Martin's are on a loop of power distribution cables, allowing supply to be back-fed if there is an issue with the supply cables. Bryher and St Agnes are on spurs from this loop, and the lack of opportunity to back-feed has required two local backup power stations.
165. The major issues with the current electricity supply are the potential requirements to replace the sub-sea cable from the mainland and the backup power station on St Mary's. These are likely to be delivered and funded by Western Power Distribution as part of the standard investment programme, and may not be required over the current plan period.
166. Renewable energy generation for the islands will improve the reliability of the islands' electricity supply. The Government has set a UK target to deliver 15% of the UK's

²⁴ [OFGEM](#) is the Office of Gas and Electricity Markets:

energy consumption from renewable sources by 2020, and also has an ambition that by 2020, 12% of heating should come from renewable sources. At a local level, the Smart Island programme establishes a target that seeks to achieve a 40% reduction in energy bills for residents by 2025, and for 40% of island energy demands to be met through renewable generation by 2025. Additionally and as referenced earlier in this document, the Council of the Isles of Scilly have signed up to a declaration of a 'climate emergency', which sets a target to ensure the Council is carbon neutral by 2030.

167. Policy SS8 is designed to promote renewable and low-carbon energy schemes, whilst ensuring that adverse effects are satisfactorily addressed, including any cumulative landscape and visual impacts and potential negative effects on nature conservation interests. Community-led initiatives, in appropriate locations, are also encouraged for renewable and low-carbon energy schemes.
168. In 2015, the Government published a Written Ministerial Statement (WMS) that introduced a requirement to fully assess any development site suitable for on-shore wind power generation as part of the Local Plan process. This is required to demonstrate that the planning impacts affecting the islands have been fully addressed. Whilst the 2016 EIP does consider the potential of both onshore and offshore wind to assist in the delivery of a sustainable energy supply for the islands, no site has been subject to a full assessment. Due to the scale of the islands, it has not been possible to identify a site for onshore wind.
169. Whilst the Council is supportive of renewable energy, wind turbines are, by their very nature, likely to be intrusive in such an intimate landscape such as the Isles of Scilly. Although there would appear to be potential to exploit wind as a renewable source of energy, opportunities are likely to be limited due to the high potential of harming the landscape and tranquillity of the islands. The islands are particularly sensitive to intrusive developments.

POLICY SS8 Renewable Energy Developments

(1) Except for proposals for on-shore wind energy generation, development proposals for renewable energy that contribute towards creating sustainable island communities, including the implementation of projects that form the Smart Islands programme, and any other community programme or project that seeks to reduce greenhouse gas emissions and move towards a carbon neutral island environment, will be supported where they:

- a) contribute towards meeting domestic, community or business energy needs within the islands;**
- b) conserve the scenic beauty, landscape, seascape, cultural heritage or historic environment of the islands, including any cumulative and inter-visibility impacts;**
- c) protect and enhance biodiversity and the maintenance of wildlife populations such as sea birds;**
- d) they provide environmental enhancement and community benefits wherever possible;**

- e) they would not have a significant adverse effect on the amenity of local residents in terms of noise, dust, odour, reflected light, traffic or visual intrusion;
- f) there would be no significant adverse effects on airport radar, air traffic control and telecommunications systems; and
- g) they contribute directly to energy conservation.

(2) Proposals should include details of associated developments, including ancillary buildings and transmissions lines, which should be located below ground where possible in order to reduce the visual impact. Where appropriate, planning permissions will be subject to conditions that require the implementation of a satisfactory restoration scheme following decommissioning of the equipment and apparatus.

170. **Travel and Transport** The development of an affordable, efficient and reliable integrated transport system between the mainland and each island is essential to meet the long-term social and economic needs of the Isles of Scilly. Transport between the mainland and the islands relies solely on private transport for the movement of people and goods. Tourism, commerce and industry are also dependent on the transportation of goods and people by sea and air. The geographic isolation of the islands makes access to key services such as education and healthcare difficult to achieve locally and places a cost on the provision of goods and services in general. As such, it essential that the islands transport infrastructure in relation to air, land and sea is protected and improved wherever possible, including all of the quays and slip-ways on each island, St Mary's airport and Tresco Heliport.

POLICY SS9 Travel and Transport

The islands' transport links are identified on the policies map.

- (1) Development proposals that prejudice the effectiveness and efficiency of the operation of transport links and associated infrastructure will not be permitted.
- (2) Support will be given to proposals that improve the islands' air and sea links and associated infrastructure.

171. **Managing Movement and Sustainable Travel** Although each of the five inhabited islands is geographically small in scale, there remains a high proportion of cars, particularly on St Mary's. As of 2018, there were 906 vehicles registered to travel on the roads of St Mary's.²⁵ To encourage sustainable modes of transport and minimise unnecessary car travel, the location, design and layout of development will need to encourage walking and cycling, with the amount of off-street car parking limited. All routes and access points in new development must be safe and functional for all users, including those with mobility or sensory difficulties. All of these requirements can be achieved through good design and the control of the scale and/or type, location and layout of new development.

²⁵ CE30 [Registered Vehicles on St Mary's 2018 DfT Statistics](#)

172. The Local Plan supports the drive towards cleaner vehicles by seeking provision of charging points for electric vehicles in relation to residential as well as non-residential developments. Where there is a proposal for new commercial or residential development, then there is a requirement to include electric vehicle charging points in car-parking areas. This requirement chimes with the Government's commitment to promote sustainable transport as set out in the NPPF. This supports development that is designed to enable the charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.²⁶

POLICY SS10 Managing Movement

(1) Development that has the potential to generate vehicular movements and car parking will be permitted provided that:

- a) provision is made to support and promote the use of sustainable transport such as walking, cycling and electric vehicles, where appropriate;**
- b) it does not have an adverse impact on the function, safety and character of the local highway network; and**
- c) an appropriate level of off-street cycle and car parking and electric vehicle charging is provided, taking into account the scale and type of development and the accessibility of the location to facilities and services.**

(2) Development that generates significant amounts of movement must be supported by a Transport Assessment and Travel Plan.

²⁶ CE01 [National Planning Policy Framework 2019](#) Chapter 9: Promoting Sustainable Transport, paragraph 110.