

Council of the Isles of Scilly Planning Application

Ref: P/21/002/OUT

Consultation Response

Date: 14th January 2021

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Site: Land to North of Ennor Farm, Old Town Lane, Old Town, Isles of Scilly.

Proposal: Outline planning application for 13 detached and semi-detached self-build homes with appearance as a reserved matter (Major Development)

You are being consulted on this application as you may wish to make comments before a decision is made. Should you wish to make any comments on this application, please complete the response form below and return to planning@scilly.gov.uk by 4th February 2021 or by post to the Planning Department, Town Hall, The Parade, Hugh Town, St Mary's, Isles of Scilly TR21 0LW.

Link to application: <https://www.scilly.gov.uk/planning-application/planning-application-p21002>

I look forward to receiving your comments in due course. If I have not heard back from you by the 4th February 2021 then I will assume you have no comments to make.

Consultee Name: AONB Partnership

Comments:

Resource protection and impacts on SSSI – particularly freshwater

The Draft Local Plan lists operations likely to damage the special interest of the SSSI including operations that are likely to change water levels, tables and utilisation. Past and current levels of abstraction have had and continue to have a negative impact on the SSSI and there is concern that 13 new dwellings and the subsequent increase in demand for freshwater, will further negatively impact the water levels of the SSSI because of increased rates of abstraction/draw-down (particularly during the summer months). To protect the SSSI from further damage from abstraction and to increase resilience from the future effects of climate change the partnership would expect to see the incorporation of green infrastructure such as 'rainwater harvesting' and 'greywater systems' built into the design of the houses as standard, to help secure a more sustainable freshwater supply into the future and limit the use of expensive, treated drinking water for flushing toilets for example.

The inclusion of permeable paving and the addition of SuDS to address any water quality risks and reduce the risk of flooding is welcomed. As the site forms a very small part of the overall catchment, the captured water might be better utilised to irrigate new plantings and the community orchard/allotments by using water directly captured from an attenuation tank rather

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than the inclusion of a drainage ditch to spread rainwater discharge. This would be another way of reducing the amount of treated freshwater used unnecessarily.

Biodiversity

The planting of species such as non-native Karo (*Pittosporum tenuifolium*) and Tree Bedstraw (*Coprosma repens*), should be avoided in any new planting scheme proposed as part of the application, particularly due to the proximity to the SSSI. The partnership would expect to see native tree species used in any replacement planting project to minimise the risk of non-native species from becoming established in the drier parts of the wetland.

The partnership welcomes the inclusion of a well-designed lighting programme for the development to minimise the impact on commuting and foraging bats. Further enhancement of the western boundary utilising native vegetation may also help break-up artificial light over the wetland and therefore minimise any impacts from light pollution on wintering or breeding bird populations.

Any native wildflower mix utilised as part of any programme of Biodiversity Net Gain is welcomed and the partnership would like to see a mix consistent with MG5 – *Cynosorus cristatus* – *Centaurea nigra* grassland community being adopted, a rare grassland community across the archipelago which has been used successfully in recent habitat creation schemes such as the Solar Garden Project at St Mary's Airport.

This significant development (in Scilly terms) should ensure best practice in design and build to ensure that there is minimal impact on natural capital because of the build process but also into the future. This is an ideal opportunity for the community to demonstrate our commitment to minimize the impact of all developments on the wider environment.