



***PLANNING, DESIGN AND ACCESS
STATEMENT – PROPOSED CHANGE
OF USE OF WORKSHOP TO LOCAL
NEEDS DWELLING AT SYLINA,
MACFARLAND DOWNS, ST MARYS,
TR21 0NS FOR MR J BROWN***

1. INTRODUCTION

This planning statement supports an application for conversion of workshop to letting accommodation for persons employed locally.

2. SITE DESCRIPTION

The current use of the site is an existing holiday let with residential accommodation. The proposed development site is a detached block built pitched roof building to the south-east boundary corner of Sylina. The new dwelling will have its own amenity space as shown in purple. There will not be a formal boundary created. There will be no impact on the existing holiday let or residential accommodation.

3. DESCRIPTION OF DEVELOPMENT

Conversion of redundant workshop to accommodation for local needs persons. The property will be upgraded to comply with the current building regulations. A small extension is proposed to form a utility area and bin store for the holiday let and residential accommodation.

4. DEVELOPMENT JUSTIFICATION

Amount of Development

Conversion of redundant workshop to accommodation for locally employed persons. The property will be upgraded to comply with the current building regulations. A

small extension is proposed to form a utility area and bin store. The proposal will have a wood burner with back boiler to provide sustainable heat and hot water. Rainwater harvesting is to be incorporated. The building will be insulated to the current building regulation requirements.

Layout, scale and external appearance

The layout, appearance and scale are clearly illustrated on the accompanying plans.

Highways & access

There are no changes to the existing vehicular and pedestrian access.

5. PLANNING POLICY

Promoting a sustainable Scilly (8)

98. 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.

99. 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.

100. 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.

101. 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.

Policy SS3 (1)

Re-use of Buildings

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.

138. 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.

Policy SS6

Water and Wastewater Management

139. With 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.

140. 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.

141. 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.

142. 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 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 metre 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.

143. 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.

144. 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.

145. 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.

146. 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.

147. 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.

148. 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 (SuDS) 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.

Protecting and enhancing the Natural Environment

A bat and owl survey has been carried out. Bird box, bat tile and bee brick are to be provided.

Policy OE2 (1)

Biodiversity and Geodiversity

- 1) Development proposals will be permitted where they conserve and enhance biodiversity and geodiversity, giving particular regard to ecological networks and areas with high potential for priority habitat restoration or creation, and should:
 - a) Protect the hierarchy of international, national and local designated sites in accordance with their status;
 - b) Retain, protect and enhance features of biodiversity and geological interest (including supporting habitat and commuting routes through the site and taking due account of any use by migratory species) and ensure appropriate and long-term management of those features;
 - c) Contribute to the restoration and enhancement of existing habitats and the creation of wildlife habitats and linkages between sites to create and enhance local ecological networks;
 - d) Seek to eradicate or control any invasive non-native species present on site; and
 - e) Be required to contribute to the protection, management and enhancement of biodiversity and geodiversity.

Policy OE2 (2) (3) Biodiversity and Geodiversity

- 2) Development proposals must:
 - a) apply the mitigation hierarchy to all proposals;
 - b) demonstrate how they conserve or enhance biodiversity and ecosystem processes;
 - c) follow local guidance on biosecurity to control the spread of invasive non-native species; and
 - d) ensure proportionate and appropriate biodiversity net-gain is secured.
- 3) Development proposals will not be supported where significant and harmful direct or indirect effects on biodiversity and ecosystem processes are identified, unless: a) the need for the development clearly outweighs the harm caused; and b) an appropriate scheme is proposed that will secure compensation and net-increases in biodiversity.

Policy OE2 (4) (5) Biodiversity and Geodiversity

- 4) Development proposals will not be permitted where a detrimental impact is identified to geodiversity sites unless the need for development outweighs the harm caused.

Avoidance, Mitigation and Compensation for Biodiversity and Geodiversity Impacts

- 5) Development should avoid adverse impacts on existing biodiversity and geodiversity interests as a first principle, and enable measurable net gains by designing-in biodiversity features and enhancements and opportunities for geological conservation alongside new development, in accordance with Policies SS1 and SS2. Where adverse impacts are unavoidable, it must be demonstrated that the

development cannot be reasonably located on an alternative site that would result in less or no harm to biodiversity or geodiversity interests; and impacts must be adequately and proportionately mitigated. If full mitigation cannot be provided, compensation will be required as a last resort. Clear arrangements for the long-term maintenance or management of the mitigation and compensation need to be provided.

Protecting and enhancing the Natural Environment (11) (12) (13) – No negative impact on the environment

Policy OE4

Protecting Scilly’s Dark Skies

No external lighting is required.

Policy OE5

Managing Waste

Responsible recycling will be carried out. Kerb side waste will maintained for collection.

Building a Strong Living Community

Policy LC1 (1) (2)

Isles of Scilly Housing Strategy to 2030

This application is for accommodation for people employed on the islands

Building a Strong Working Community (1)

297. The islands are a place where a variety of employment needs have to be met to support a working community. It is important that those employment needs are consistent with protecting Scilly’s natural and historic landscape, particularly as the economy is largely underpinned by its exceptional environment.

Building a Strong Working Community

Policy WC2

Home-Based Businesses

- 1) Small-scale home-based businesses will be supported in residential properties including:
 - a) the change of use of existing buildings, or
 - b) small-scale extensions, or

Building a Strong Working Community (6)

310. New Employment Development There are a number of existing employment sites across the inhabited islands; these have a variety of business or storage uses. Such sites comprise an important element of the island economy and provide local job opportunities. Within the boundaries of existing employment sites, proposals for redevelopment or intensification through extensions or new buildings will be permitted, provided there is no significant harm to the landscape, and that proposals deal comprehensively with the whole site. Proposals that involve the extension of the site boundary into the countryside will be considered on their individual merits. Open storage will only be permitted if it is not visually intrusive.

Policy WC3

New Employment Development

- 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
 - 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.

Building a Strong Working Community (10)

Staff accommodation is an important aspect of supporting the tourism industry. Where new or expansions of businesses are proposed that require additional staff accommodation, this would need to be in accordance with Policy LC4. If accommodation approved or already provided is no longer needed to support a business, Policy LC5 seeks to ensure that any change of use meets local housing needs, unless it is otherwise demonstrated to meet the criteria for other uses.

6. CONCLUSION

The building is currently unused. On the Isle of Scillys there is a desperate shortage of accommodation for people employed on the Islands. The conversion will make a valuable contribution to reducing the shortage without the loss of land.

We therefore consider your council should reasonably grant conditional planning permission.