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By Liv Rickman at 8:51 am, Mar 08, 2024

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05 March 2024

Ms Lisa Walton
Chief Planning Officer
Council of the Isles of Scilly
Town Hall
St. Mary's
Isles of Scilly
TR21 0LW

Re: Planning Application P/24/011/FUL – Land to the South of Pungies Lane, St. Mary's

Dear Ms. Walton,

Thank you for the opportunity to comment on the above planning application. I am also grateful to the Duchy of Cornwall and its representatives for engaging with me (and others) on this matter, including hosting a drop-in session at St. Mary's Golf Club on 11 January.

I have an interest to declare in the above application; that being the land on which the proposed development is to be sited is currently let to my father and me by the Duchy of Cornwall on a long-term Farm Business Tenancy. Notwithstanding this interest, I fully recognise the need for additional affordable housing on our Islands.

In addition to this obvious need, I also feel that there is significant merit in the design of the proposed buildings, their sustainability credentials, and their sensitive, vernacular appearance. I am also very pleased to see the incorporation of solar power (an apparent reversal of previous Duchy policy), improved thermal efficiencies and the capture of rainwater within the proposed plans.

I do, however, oppose the project and have some serious reservations regarding the proposal. My reasons include the choice of the location of the proposed development, the use of a greenfield site when there are numerous brownfield sites currently unused, the number of empty properties that the Duchy is currently sitting on, the ecological and environmental impact of the proposed development, why the proposed properties are "intermediate/ market" and not "affordable", why questions raised at the consultation have not been answered and the potential loss of yet another good agricultural field. On a broader level, while we live in a beautiful, appealing place, we will always have a shortage of housing – if we try to build our way out of this issue, we risk destroying the very reasons we all enjoy living here.

1. Choice of location:

This site was not one that was identified within the Isles of Scilly Local Plan 2015-2030, and therefore must be treated as a "windfall site" as defined by the Local Plan. Building away from the main developed areas of Old Town and Hugh Town represents a departure

from a long held (and in my mind correct) view going back to the Jellicoe report of 1965 and echoed in Spatial Strategy 4 of the current Local Plan: “Concentrate new homes in the settlements of Hugh Town and Old Town as the most sustainable locations on St. Mary’s.”

One of the issue with “windfall sites” is where do they stop? If this development is approved, then the next adjacent fields become eligible under the “windfall” category and so on – we could end up with a scenario where Old Town and Hugh Town are joined, and development from Hugh Town, through Porthloo and up to Telegraph. Crucially, the Local Plan only allows for “windfall” sites to be used only for “**small scale**” residential development (paragraph 279). I would consider ten new houses for the Islands to be a larger scale development. If this project is approved, it is essential to define an outer limit on “windfall” sites for larger scale developments as I would categorise this as.

I have been told by a Duchy representative that one of the fundamental reasons for choosing this site above others mentioned in the Local Plan was that these sites were all within the coastal flood risk zone. As far as I can see, all of the sites (other than Sandy Banks site) are above the 5m contour line. Are we really shaping our planning policy based on these sorts of magnitudes of change in sea level? If so, we should be looking at re-siting most of Hugh Town, the Quay, the Industrial Estate and some parts of Old Town; if sea levels were to rise that far, we would be looking at re-investment on a scale that would make the Islands unsustainable to populate – the costs of a new Quay and Town would be vast. Given the global implications of this rise in sea level, I think spare capital for the Islands may be in short supply in this scenario! The storms and damage from the sea have been more significant in years gone by than in recent years – many islanders will remember the damage from 1963 storm and the gales of 1989.

One of the other themes running through the Local Plan is the need to reduce the number of vehicle journeys and unnecessary journeys. The Strategic Aim 6 on page 66 is to “reduce the environmental and social impacts of transport by reducing the need to travel...through the siting...of new development.” Building on this site significantly increases the likelihood of the residents needing to own a car, for example for commuting, shopping or pleasure use, particularly given the lack of public transport on the Islands. The Travel Plan Statement accompanying the submission confirms this: “Hugh Town is the most likely destination with all the services and facilities on offer including employment, eating establishments and shops.” To suggest in the Travel Plan that Hugh Town is “within acceptable walking distance” of the new site is questionable for many. While the Community Bus provides a good service, it is not year-round, and therefore unrealistic to expect any new residents in this area to depend on it; similarly it is unrealistic to expect all to walk, cycle or hire an electric car as the Statement implies.

If this project is approved, it would seem to me that it should be accompanied by a requirement by the developer to contribute to a sustainable, all year-round bus service.

2. Use of a greenfield site:

I accept that in order to deliver the number of homes suggested in the Local Plan, it is likely that greenfield sites may have to be used. However, given how important and sensitive our environment is, given that the Council have declared a Climate Emergency and given how restricted we are with sites here on the Islands, shouldn't we use all of the brownfield sites first? This policy is very much fronted in the Local Plan. Aim 1 in Strategic Aims and Objectives is to “Ensure...the reuse of previously developed land and the more efficient and effective use of all sites and buildings.” Paragraph 86 within the

Promoting a Sustainable Scilly section states: "...development should be directed towards brownfield sites wherever possible." Nothing has visibly happened to the museum site and so far nothing to either the Carn Thomas old primary or secondary school sites. I accept that building here is difficult and expensive (as is all building on Scilly), but if we really value our environment and our green spaces as is stated in the Local Plan, this is where we should be developing. Given the privileged position the Duchy exists in, the public grants it has accessed to improve its infrastructure (for example the quay extension and improvements and the recent sea defences), and the manner in which it acquired most of its Estate, I find it hard for the Duchy to argue that projects are too expensive. Why hasn't the Carn Thomas old primary school (which as far as I know is owned by the Duchy and has been empty for a significant period) been developed? If this site is too difficult for the Duchy to develop then surely it should sell the site to a developer or housing association who will develop these sites within the framework of the Local Plan.

It would seem to me that building on a greenfield site in Scilly (more than anywhere) should be a last resort. In the case of the proposed application, it would appear this is being done because it's the most convenient and cheapest option. In my mind, this is simply not good enough from the Duchy.

3. Unused Duchy properties:

In addition to the above, I feel we need to make better use of the housing stock we already have. The Duchy of Cornwall currently has a number of empty properties – some of which are substantial in size and have been empty for a considerable time. Surely before we build new, we should be re-using these empty buildings? I accept this will be expensive, but as mentioned above, the Duchy is a £1 billion estate and many of its assets it has never bought or built but assumed at for example the death of a tenant or the end of a lease. As an organisation, it should be investing and doing so in an imaginative and sustainable way. It would be a travesty if permission was granted for this development only for the Duchy to then convert its currently empty properties to high-end tourist accommodation. Categorical reassurance should be sought on this prior to any contemplation of planning permission being granted.

4. Environmental concerns:

One of the main themes which quite rightly runs through the Local Plan is the preservation and enhancement of our environment. In addition, it mentions the fundamental link between the environment and the economy of the Islands: paragraph 302 states that "the quality of the environment underpins the economy." Losing another greenfield site and building out of the main settlement areas risks degrading the environment, adding additional traffic and more hustle and bustle away from the more developed areas.

In addition, the field in question is part of our arable rotation, has been used for bulb growing in recent years, but is currently set to pasture for equine grazing. As far as I can see, the Ecological Survey does not mention the world-renowned "bulb field flora" that Scilly is famous for. Rosemary Parslow in her book "Arable Plants of Bulb Fields in the Isles of Scilly" (commissioned by the AONB) states: "The Islands' bulb fields host many rare arable plants...these are a distinctive feature of the AONB...many of these species are nationally important." This sentiment is echoed by Natural England in its National Character Area Profile on Scilly and the Isles of Scilly Biodiversity Audit of 2008.

Whilst I appreciate that the Ecological Survey which accompanies this application appears to be thorough, it was carried out on 14 December and 26 January – a time when many of the rarer plants are not visible or growing! This is noted by the author: when he states that many of the species are “constrained by the season”. Some of the species listed in the survey are recognised in the current AONB Management Plan as being at risk and rare such as Corn Spurrey. Given this, a further Ecological Survey should be carried out during the spring and summer when a number of other species of flora and fauna will be present before any permission is given.

Crucially, both the Ecological Report and the Design, Access and Planning Statement state that the application will be accompanied by a Biodiversity Net Gain Statement, which as far as I can see, is a requirement for planning. I can't find one included with the application and surely this must be provided before application is considered.

It is also essential that the additional documents outlined on page 3 of the Ecological Assessment are provided before any planning is considered.

5. It is unclear who will be eligible to live in these new houses:

Throughout the Local Plan, it talks of the need for **affordable** housing. This proposal is not for affordable housing; the application states that these houses are for an “intermediate” market. But even this is unclear - it then states on page 6 of the Design, Access and Planning Statement that these homes are for “**intermediate and market rental** homes”. Who determines the rent? As far as I can see, affordable homes are deemed to be 20% below the market rent, and intermediate between the two, but how is the market defined, particularly given that the Duchy control a significant amount of the housing stock? Will there be any mechanisms to ensure that these properties don't become open-market rentals?

Why aren't these affordable homes? Given the Duchy's privileged status and position, why should it leave a cash-strapped Local Authority or housing association to provide affordable housing? If there is no formal control implemented here, we may have 10 new homes which locals cannot afford.

In addition, page 11 of the Design, Access and Planning Statement talks of “attracting younger workers and households in order to slow the trend of an ageing population.” Does this mean that those who already live and work on the Islands will not be given priority in allocation of any new houses? If this is the case, and the idea is to attract people to the Islands, then this development will solve nothing of the current housing problem.

6. Loss of decent agricultural land

The Local Plan correctly reflects the need for the Islands' economy to diversify. It also states in paragraph 315 within “Building a Strong Working Community” that supporting agriculture is critical to the Islands' future. Behind every greenfield site there is both an environmental and an economic story; in this case, from an economic view, this field is part of our farm and equine enterprise which supports between 8-10 local full time working people and additional seasonal staff. Once a field is lost to development it is gone forever – who knows what food security or other strategic requirements like this will be needed in the future.

7. Consultation feedback.

I attended the consultation on 11 January at the Golf Club for the morning session. Whilst some of the points that were raised have been addressed in the Design, Access and Planning Statement, there were a significant number of points raised that haven't been mentioned in the consultation section of the application. I photographed the comments board at the consultation - just some of the points made that weren't mentioned include: "Need a decent bus service to cope with commute traffic", "Will the Duchy subsidise a year round bus service?", "Why this site – not on local plan", "Can we define essential need?", "Where will 10+ additional cars park?", "Why aren't we looking at other brownfield sites?", "Is the Duchy building on greenfield sites while converting existing property to holiday accommodation?", "Is housing demand ever satisfiable within constraints of the Islands?", "Biodiversity Net Gain: where and how will requirements be met?", "Take steps to prevent cars parking on main road", "Are we saying that building in Old Town and Hugh Town is no longer viable due to flood risk?", "Will essential need align with affordability?".

These are all important questions that as far as I can see haven't all been answered, and certainly not been addressed within the consultation section of the planning application.

I hope that the above can be reflected on when the application is being considered and I would be very pleased to discuss any aspects of this with any member of the Council or the Duchy's staff.

Yours sincerely,

[signed on original]

Matthew (Ned) Rogers.