



COUNCIL OF THE ISLES OF SCILLY

Planning Department

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Mr Paul Marino
Dunn Marino Associates
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Email only

7th June 2024

Dear Paul,

**PLANNING REFERENCE
DEVELOPMENT PROPOSED:**

P/24/028/FUL

Construction of 27 new homes including landscaping, surface water management, renewable energy, on-site road access and footpaths, vehicle parking, refuse and cycle provision, provision of public open space and single point of vehicular access off Telegraph Road (Major Development)

LOCATION:

Ex-Secondary School Site, Carn Thomas, Hugh Town, St Mary's, Isles Of Scilly,

Further to the submission of the above application, I am writing to advise you that we have a number of concerns in relation to this scheme which we would like you to address to allow the application to be taken to committee with a recommendation for approval. Whilst we have the below concerns, we are also conscious that we have not yet received all of the consultation responses. Should there be other issues, that we feel need to be addressed, then we will get back to you as soon as possible. We do however want to work with you to secure the most appropriate development for this site, and so we felt that we should relay our concerns as early in the process as possible.

Design and Materials

The scheme proposes a palette of render and tiles with upvc windows, doors and rainwater goods. As we advised at pre-application stage, such a finish on this scale of development will weather poorly in this exposed and prominent location, particularly for elements that are not designed to be corrosion resistant. Plastic guttering and downpipes deteriorate rapidly under uv light and are lightweight materials that can become unsecure in high winds, as regularly occurs here. Plastic materials also have particularly poor credentials in terms of their sustainability. In our experience upvc windows are difficult to repair and recycle and need to be replaced after 10 years. Conversely aluminium or timber windows can be easily repaired and recycled and can last 80-100 years (as shown on many listed buildings) when properly maintained. Rainwater goods should be cast aluminium and not upvc.

We also note that the Design and Access Statement has still not yet been re-submitted. Without a Design and Access Statement, which is a national requirement, this application is not technically valid. Please can this be addressed this as soon as possible otherwise we will have no option but to invalidate the application. The original document made no reference to the

site's specific context, or the Isles of Scilly Design Guide and it is unclear whether any analysis has been made of the Scillonian vernacular, or the character of Hugh Town. The design as it stands reads as an 'anywhere' modern housing scheme commonplace in the South West on the mainland. Notwithstanding the site's constraints, which are acknowledged, the scheme needs to make at least some attempt to reflect local character and ensure a long-lasting, high-quality appearance reflective of this part of the AONB and Conservation Area.

Accessibility

With the exception of the front ground floor flats, which have a level threshold, there does not appear to be any other accessible part of the site. Are there any proposed ramps to allow pushchairs, wheelchairs or ambulant disabled persons to walk around the site? Will occupants of the houses be expected to carry wheely bins up and down steps to the collection points?

Visibility

The adopted highways on St Mary's, which includes Telegraph Road, are subject to the national speed limit. Please can you confirm that vehicles can arrive and leave the site in forward gear with appropriate visibility for exiting the site, including refuse and fire tender. If the required visibility is not achievable, in light of the speed limits of this road, please can you demonstrate what visibility can be achieved and why, if below standard, this should be accepted? It is critical that the proposed level of development does not result in hazards for highway users or the road network generally. If these are below standard then we would expect traffic speed surveys to demonstrate that the visibility is commensurate with the speed of vehicles in the location.

Access, Cycle store and Car Parking

The proposed bicycle storage, if full, would appear to have very little manoeuvring space and no space for towed attachments, which can be a common solution for families with small children. As there are only 9 parking spaces for 27 homes can I ask how you would envisage reducing private car ownership, if at all, or what measures you can introduce to reduce the likelihood of cars being forced to park on the road. The site is on the brow of a hill and close to a road junction. Can emergency service vehicles access all of the properties in the event of an emergency?

Bin Storage

It is currently unclear how waste would be practicably managed. The refuse storage building appears to be an enclosed building for large, commercial sized wheeled bins, however the Council's domestic waste collection vehicles do not have the ability to collect large wheeled bins. Would there be space for a waste collection vehicle to access the bin storage area or would residents be expected to move all waste to one of the five collection points indicated on the Parking, Cycling and Refuse plan, and would this be just bagged waste or using wheeled bins? Would each of the 27 units have individual storage space for both domestic black back waste and recyclable waste? Please can you ensure all refuse storage and collection points are feasible in terms of their practicable use and management and are clearly shown on the plans.

Tenancy and Tenure of homes

I appreciate you are awaiting the Homes England grant funding decision, however we do need to establish the tenure split prior to determination. The tenure will also be secured in the S.106. The provision of 9 No Shared Ownership units (with a maximum 80% share) and 18 No Affordable Rental units (at 20% market rate) may be acceptable providing this meets the local need, as set out in the supporting text of policy LC2. Have you liaised with the Council's Housing officer to ensure the tenure reflects the existing need?

Rainwater storage

The scheme does not include any rainwater collection system but merely proposes to all surface water through the existing system. We would like to encourage both rainwater harvesting, grey water irrigation and re-use as well as the incorporation of rainwater gardens which have multifunctional wildlife/habitat and amenity benefits. Has the scheme calculated the surface water discharge and concluded the existing drainage would be able to cope with the amount of rainwater that would discharge from this site as a result of the proposal? If so this evidence needs to be provided.

BNG

Just to advise you that we are seeking advice from our ecology consultant with regard to the 30 year statutory monitoring. This is likely to require a Landscape and Ecological Management Plan to be conditioned and secured in the S.106, alongside a suitable contribution for discharging the necessary monitoring reports over the 30 year period.

We would like to work with you to find the most appropriate and long-lasting solutions for the islands. We appreciate that this is a 100% affordable housing scheme, which has many benefits, however there are other examples of similar schemes in protected landscapes that have been able to achieve all of the above. Please can you therefore amend the scheme and provide the additional information as appropriate. Please can you also advise your timeframe for re-submission so we can program the scheme into our Full Council forward plan.

Yours sincerely

Stella New

DM Team Leader SDNPA

Lisa Walton *MRTPI*

Chief Planning Officer

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