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By Liv Rickman at 10:26 am, Jul 02, 2024



Stella New
DM Team Leader
South Downs National Park Authority
On behalf of
Lisa Walton
Chief Planning Officer
Council of the Isles of Scilly
Old Wesleyan Chapel,
Garrison Lane,
St Mary's
Isles of Scilly,
T21 0JD

Dear Stella,

Apologies for the delay however please find below our responses to the points raised in the same order as referred in your letter dated 10th of June 2024: -

- **Design & Materials**

The proposed scheme has been designed entirely in accordance with the Isles of Scilly Design Guide and therefore utilises traditional forms and a simple palette of materials comprising of natural dual pitched slate roofs, painted render walls with areas of boarding and natural slate hanging to create some elevational relief particularly along the Telegraph Road frontage. All windows (which are predominantly portrait in format) are to be Aluminium triple glazed of composite manufacture, whilst all front doors are to consist of composite GRP. The gutters, fascia's, soffits, bargeboards and downpipes are currently proposed to be UPVC, for both low maintenance and cost purposes. In respect of the site's exposed coastal location the appropriate number of stainless-steel fixings in accordance with the manufacturer recommendations for severely exposed locations will be implemented. Similarly to avoid render 'rust staining', raised as a concern in the IoS ANOB Wildlife Consultation letter dated 15th December 2022 , we are able to confirm that all specified metalwork will be marine grade stainless steel combined with a traditional 2 coat sand and cement render finish painted with a good quality masonry paint that will be inspected periodically as part of a robust maintenance regime.

- **Completed Design and Access Statement**

This will be forwarded on shortly, explaining how an analysis of the Isles of Scilly Design Guide and Buzza Hill /Carn Thomas character area of Hugh Town, has informed the scheme's design proposals.

In respect of the proposed height of the dwellings fronting Telegraph Road, it is possible by lowering both the pitch and the point at which the roof intersects the external wall (to a minimum of 1.5 metres above floor level) to reduce both the ridge height and eaves level, albeit marginally. However, the key issue to consider is that buildings are not seen in true elevation, especially when viewed in perspective from street level. The height of a roof therefore only becomes apparent when seen from a distance or if its silhouette

breaks the skyline, which the current scheme avoids by virtue of being deliberately nestled into the landscape, again in strict accordance with the IoS Design Guide. The two factors that determine whether a proposed building may be construed as overbearing relative to the street scene, are its eaves height and also the set-back distance in relation to any adjacent buildings when viewed from the public realm. As the western most part of the Carn Thomas site fronts the junction of Church Road with the Strand, the street width of Telegraph Road adjacent to Plot 1 is 15.85 metres at its widest, whilst this narrows toward the centre of the site in front of Plot 7 to just 9.92 metres. This set-back distance has however been increased by the conscious decision to create defensive space in front of the proposed lower ground flats. These have been offset from the original building line of the former secondary school along Telegraph Road, by the width of the single storey mono-pitched storm porches (i.e. 2.4 metres). If the former Primary School site to the north of Carn Thomas, also allocated for residential development (HC2), was developed up to its southern street boundary this would result in setback widths of 18.26 metres reducing to a minimum of 13 metres. According to the Urban Design Compendium (Section 5.1.3) the height to width ratio for streets should be between 1:1.5 and 1:3. Based on the current proposed eaves height of 6.75 metres for the new dwellings fronting Telegraph Road, this would result in height to width ratios ranging from 1:1.9 to 1:4.6, so comfortably within the aforementioned parameters. The photomontages and perspective views submitted in support of the application showing the proposed scheme in situ, in our opinion contests the view that the scheme has an overbearing nature and an uncharacteristically high built form, especially when there are similar examples that exist in close proximity to the site. Finally in terms of elevational composition we also like to highlight how dormer windows that break eaves lines, especially in roofs with pitches less than 40 degrees are likewise considered to be in accordance with the IoS Design guide (Part 3: Design Elements: Dormers; P93) although with the proviso that too many should be avoided because it would give ‘...rise to a fussy, dissected appearance...’

- **Accessibility**

Despite the very challenging topography of the site, the current scheme proposals will deliver 9 No. new dwellings that will meet the more onerous M4(2) access criteria, which represents a 33.3% provision that is well in excess of the minimum mainland requirement of 25%.

The remainder of the site will also comply with the requirements of M4(1) by virtue of the provision of a combined ambulant stepped and ramped approach to all new proposed dwellings, which is deemed acceptable by Building Control for sites with a greater plot gradient of 1 in 15.

Although the installation of a platform lift at the centre of the site was considered by LiveWest which would enable all but one of the dwellings to be M4(2) accessible, the cost of maintaining a lift in such an exposed location that would ultimately need to be covered by a substantial service charge paid by resident's was concluded to be excessive and unjustifiable.

In respect of disposing household waste, all residents will have level access to bin collection points without the need to negotiate steps. The new M4(2) designated dwellings located along Telegraph Road will be able to dispose all domestic waste in designated collection points between residential blocks adjacent to the kerbside. For homes accessed off the internal transfer deck/ mews street, they similarly will have access to refuse chute binnacles built into the flat roof of the centrally located (subterranean) communal bin store that is entered for waste collection purposes at car park level. To ensure the scheme is future proofed in readiness for the IoS Council's

proposed segregation of waste for re-cycling purposes by residents, the storage provision of 3No 600x400mm boxes and 25 litre food caddies for each of the house types has already been considered and provided. So, to summarise all refuse disposal and accessibility requirements relating to the scheme shall comply not only with the LoS refuse collection strategy but also Part H6 of the Building Regulations.

- **Visibility**

We are aware that all adopted highways on St Mary's are subject to the national speed limit and have had prepared as a result a Transport Statement undertaken by AWP Transport Consultants that was submitted in support of the current planning application. To inform this statement, a continuous 7-day traffic radar was installed in the vicinity of the site access to obtain volumetric and speed data. In the resultant summary of this survey (refer to Table 3:1, Page 11) the maximum speed recorded for vehicles travelling in a easterly direction was 17.2 mph (the 7 day average being 15.2 mph), whilst the maximum speed for those heading westward was 15.7mph (the 7 day average being 14.7 mph).

According to 'Manual for Streets' (Section 7.5, Table 7.1, Page 19), vehicles travelling at speeds of 19mph will require forward visibility splays / standard safety sight distances of 20 metres, whereas for streets with design speeds of 16mph this distance is reduced just to 16 metres. In their Transport statement, AWP established that the forward visibility splays achievable from the existing vehicular entrance is 20.6 metres to the west and 18.5 metres to the east.

In support of the current application, please find additional vehicle tracking information demonstrating how parked cars can enter and leave the site in a forward gear and how all parts of the scheme are accessible by a fire appliance in accordance with Part B1 of the Building Regulations. Also attached are swept path analysis diagrams (refer to MBA Drwg No. 21185 -32 -Rev A). These show how both refuse vehicles and fire appliances are able to safely enter and leave the site, assuming that both services would involve more than one operative /firefighter, who would therefore be able to stop oncoming traffic if necessary and guide the aforementioned vehicles out onto Telegraph Road.

Access, Cycle Storage and Car Parking

The current communal cycle storage area has been designed to accommodate 20 No. bikes in the internal under croft that is behind Plot 18 and also below Plot 20, with a further 10 spaces linked to an e-bike charging rank located nearby, under a green roofed canopy located outside in order to offset the increased fire risk. For families with small children who might use towed attachments there is an additional secure general storage area also behind Plot 18 and below Plot 21 that can be utilised.

In respect of car parking there is a proposed provision of 9 spaces, one of which is intended to be dedicated for use by an electric community car. This would appear to be wholly consistent with the two core policies in the LoS Council's Local Plan, namely living in balance with the environment and promoting sustainability, by discouraging private car ownership, which according to data referenced in AWP's Transport Statement (Section 2 pages 3- 9 & Table 5.3) is already at a low level.

This combined with the fact that the site is deemed to be in a sustainable location, within a 400metre radius or 5 minute walk (or an equivalent to a 1 to 2 minutes cycle ride), of the centre of Hugh Town where most retail, education, health, leisure, public recreation and worship facilities are available, should by default deter the use of private cars for short journeys.

To ensure private car ownership does not result in cars being parked dangerously along the scheme's road frontage, LiveWest are able to impose a restrictive condition as part of the lettings procedure, only allocating the limited parking spaces available to residents for whom the use of a car is absolutely essential.

Another mechanism, which could be explored requiring the support of the IoS Council, residents and other stakeholders, would be to seek approval for a Traffic Restriction Order (TRO) involving the introduction of road markings.

- **Bin storage**

The bin strategy for the site was developed following consultation with the IoS Councils Waste collection department (in 2022), who confirmed that all domestic rubbish / recycled waste is transferred manually on to a flatbed lorry. It was consequently discussed this could be either from the proposed central communal bin store located on site or via designated kerbside collection points along Telegraph Road. For the avoidance of any doubt, the central communal bin store is proposed to be located in a 'subterranean' space that is accessed for collection purposes at the same level as the communal car park.

- **Tenancy and Tenure of Homes**

LiveWest have been liaising with both Sian Greenlaw (Housing Enabling Officer) and Nicola Stinson (Strategic Director for Place, Economy & Environment) throughout the land purchase and design development stages. The housing mix proposed in the information submitted therefore reflects what has been previously discussed and agreed. Indeed, in a recent e-mail to LiveWest (dated 23rd May 2024) Nicola Stinson confirmed that ... *'the housing need on the islands are so broad whatever homes are built under the affordable homes banner will meet a known need'*.

In respect of tenure, LiveWest are currently exploring with Homes England the grant implications of delivering the development as a 100% affordable (social) rented scheme. However, they have queried why the final tenure needs to be secured in a Section 106 agreement adding unnecessary cost, especially when the IoS Council already benefit from a restrictive covenant limiting the use of the site for Affordable Housing.

Rainwater storage

To paraphrase our Consultant Engineer, the basic principle of SUD's is to delay the passage of surface water on its journey from where it fell to its ultimate end destination, the sea, without increasing the risk of flooding to land and property downstream. Therefore, to artificially implement SUD's measures on a site that is already served by a more than adequate existing surface drainage system, to be enhanced by the installation of new oversized pipes on site designed to further attenuate surface water run-off, all in very close proximity to the sea, on land that is both topographically and geologically challenging for small incidental biodiversity net gains, is not only counter-intuitive but also likely to add significant costs that will threaten the viability of the scheme.

For more information regarding the proposed surface water strategy and design, please refer to MBA's Flood Risk Assessment (Sections 5.9-5.11, Pages 5-8) and Surface Water Drainage layout Drawing (No. 21885-200-P1) together with the supporting Infodrainage calculations (now also appended to this response), which demonstrates how the proposed system has been designed to accommodate a 1 in 100 year storm event, plus a 50% additional capacity for climate change purposes. The supporting

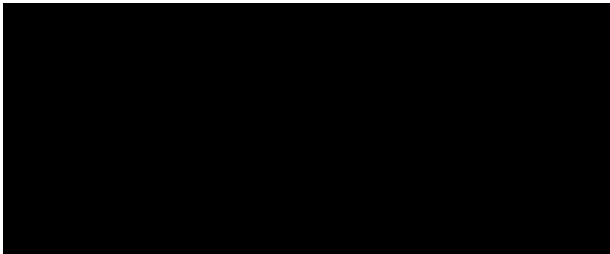
Infodrainage calculations demonstrate the existing drainage would be able to cope with the discharge from this site.

In respect of rainwater harvesting / grey water irrigation, the provision of water butts to all plots has already been considered and proposed as shown on our latest Green Infrastructure site layout plan (Drawing No. 21024 _GI_03_).

- **Biodiversity Net Gain**

With regard to the 30 year monitoring period associated with demonstrating a minimum 10% Biodiversity Net Gain, LiveWest have already anticipated the need to provide a LEMP and realise this requirement is normally dealt by means of an imposed planning condition, so are slightly perplexed why as a responsible registered housing provider there needs to be a Section 106 legal agreement in place for the sake of securing the payment of a commuted sum in order to fulfil a planning obligation.

Yours sincerely,



Paul Marino
On behalf of Dunn Marino Associates.