

To: The Carn Thomas site development team

15th December 2022

Residential redevelopment of the former Secondary School, Carn Thomas, Hugh Town, St Mary's

Thank you for providing the details of the above proposals in advance of their formal submission to the local planning authority. I am glad to provide informal comments on the development at this stage, on behalf of the Isles of Scilly Area of Outstanding Natural Beauty partnership.

As you will be aware, all of the islands fall within the Isles of Scilly Area of Outstanding Natural Beauty (AONB) designation. The AONB enjoys the very highest level of landscape protection. The primary purpose of the designation is to conserve and enhance the natural beauty of the area and planning policy requires that development within the AONB delivers this purpose.

The proposals seek to redevelop the former Secondary School, Carn Thomas, Hugh Town, St Mary's in accordance with Policy LC6 and Housing Allocation H1 of the Isles of Scilly Local Plan 2015 – 2030 (the LP). Policy LC6, amongst other matters, sets out support for a '*residential development of around 26 homes of an appropriate scale and design.*'

The northern end of the site fronts onto Telegraph Road. This lower end of the site is on a relatively level plateau with the public highway, before the land steeply rises up to the south. It then narrows (where a former play area / sports court is still visible), positioned on an elevated platform to the surrounding topography, with far-reaching views.

The site was previously occupied at the lower, Telegraph Road fronting end by the utilitarian/ functional school building, which provided no positive contribution to local distinctiveness or the character and appearance for the area. The upper elevated end of the site was predominately devoid of physical built form, with the exception of the hardstanding, and wire enclosures to the play area / sports court.

Due to the previous buildings on the site, from an AONB impact perspective, it is evident there is a clear capacity to re-develop the site with built form to the northern end that will lead to a visual character which represents a distinct enhancement over what previously existed. The principle of the re-development of the site to deliver much needed housing with a '*mix of dwelling types, sizes (in terms of number of bedrooms) and tenures to meet Local Housing Needs*' (as per paragraph 278 of the LP) is also fully supported by the IoS AONB partnership. Nonetheless, it is the detail of how the development is executed that is critical to its ability to appropriately integrate into the designated landscape.

This response is based on the documents provided to us. We do not have detailed information regarding the existing and proposed site levels, the detail of the proposed development or other supporting documents, such as a design and access statement, heritage statement or landscape appraisal. We reserve the opportunity to respond further, once the full details of the proposals are provided.

James Evans 15/12/2022

In summary our comments on the proposals in their current form are as follows:

- It is welcomed that the physical built development is to be positioned at the lower end of the site, in the approximate position of the former school buildings, sited in a linear manner with frontages presenting towards Telegraph Road. However, sectional details and topographic information should be provided to establish the levels of the dwellings in relation to the existing slope.
- The use of the upper sections of the site as a predominately landscaped and public open space, without physical buildings or enclosures, is supported. This will help to retain the landscape/ undeveloped characteristics of the site at this upper section, which in addition will provide for a positive landscape backdrop to the built form of the proposals.
- The solar PV panels are to be located in the position of the former play area / sports court, and will orientate to the south. It would appear therefore that visibility of the panels from public vantage points will be extremely limited, however it would be welcomed through the detail of the final submissions that a sectional detail is provided of the panels in relation to the proposed surrounding land/ landscaping cover to either side to provide further clarity on this.
- With regard to the proposed detailed design of the development, it would be beneficial to outline how the proposals have responded to the built form characteristics of the area, and the guidance provided in the Isles of Scilly Design Guide, such as achieving lower eaves heights to achieve a sympathetic scale in relation to adjacent buildings. As an example, we have concerns over how the dwellings fronting the street respond appropriately to the positive building characteristics of Hugh Town with regard to their overall massing. Similarly, we question the dormer positioning in relation to the eaves level and the relationship of the dormer windows with the positioning of the windows below.
- Further, whilst the use of render matches a common feature in Hugh Town, care needs to be taken with the quality of the render material to be used, to avoid matters such as rust effects and weatherproofing problems. It will be important to understand what materials are to be used and what the final finishes will be, being mindful of the extent to which render can discolour to give a very poor impression.
- Notwithstanding our comments above regarding the dormer windows, the general positioning and style of the window details (i.e. vertical emphasis), combined with the overall solid/void ratio is welcomed. We do however query the suitability of the positioning of the staircase window on the rear 2 storey dwellings, which is positioned between ground and first floor level, and appears somewhat disjointed with the regularity of the remainder of the elevations on these properties. We would welcome further reference back to the direction in the Design Guide on such design details as part of the final submissions.
- Further, and in recognition of the above, and the potential visibility and landscape effects of the development (from both the land and the sea), it is suggested that the proposals should be supported by a proportionate landscape and seascape appraisal, in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3). This should take account of the detail in the Isles of Scilly Landscape Assessment and the Area of Outstanding Natural Beauty Management Plan 2021-2025, including the Statement of Significance contained with the Management Plan.
- We also note that the online Historic Environment Record (ref MCO64413) as per https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=MCO64413&resourceID=1020 highlights a record of '*DOWN DERRY - Post Medieval village*', towards the southern side of the site. Further, the site is also within a Conservation Area and is in close proximity to the Listed Church and Chaplaincy to the south-west. Thereby, we would suggest that the application should be accompanied via a proportionate heritage assessment, as per Paragraph 194 of the National Planning Policy Framework 2021 (the NPPF). It would be of benefit in the above to refer to the Cornwall & Scilly Urban Survey for Hugh Town, which can be

found at:

<https://www.scilly.gov.uk/sites/default/files/planningapps/Hugh%20Town%20Urban%20Survey%202003.pdf>

- As per Policies OE1 and OE4 of the LP, we would also suggest that the proposals are accompanied via supporting documentation to demonstrate how they are responsive to, and seek to ensure that our existing dark skies are protected and maintained.

We are not commenting on the Biodiversity Net Gain proposals at this stage. We understand that IoS AONB partners such as Isles of Scilly Wildlife Trust intend to give these proposals their particular consideration.

I trust the above will be of benefit in the evolution of the final design of the proposals. We look forward to providing further comment, as appropriate, when the formal application has been submitted.

Yours sincerely,

James Evans BA(Hons) AssocRTPI

On behalf of the Isles of Scilly AONB partnership

Copies to: Lisa Walton, Chief Planning Officer, CloS
Tony Richardson, Chair, IoS AONB
Julian Branscombe, IoSWT (representing the AONB delivery plan partner)
Rebecca Williams, Interim Head of Environment, CloS

Legislative and Planning Policy Context

AONBs are designated under the National Parks and Access to the Countryside Act 1949 and in 1991 the Countryside Commission confirmed that the primary purpose of the AONB designation is to 'conserve and enhance natural beauty.' Subsequent legislation has emphasised that in pursuing this primary purpose, account should be taken for the needs of agriculture, forestry and rural industries as well as the economic and social needs of local communities.

Policy OE1 of the LP refers to '*Protecting and enhancing the landscape and seascape*' sets out that '*Development will only be permitted where it aligns with the statutory purpose of Areas of Outstanding Natural Beauty (AONB), and therefore conserves and enhances the islands' landscape, seascape and scenic beauty. Development must take into account and respect:*

- a) the distinctive character, quality, scenic beauty and sensitivity of the landscape and seascape;*
- b) the undeveloped and special character of the Heritage Coast;*
- c) other qualities, such as important features and views, dark skies and tranquillity, and having regard to the AONB Management Plan; and*
- d) the Isles of Scilly Landscape Character Study and any successor or associated documents.'*

The above policy amplifies and extends paragraph 176 of the NPPF which requires that (our emphasis underlined) 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development

within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.'