



Planning Design & Access Statement (Incl. Heritage Statement)

Land to the north of St. Mary's airport terminal, Isles of Scilly

Hitachi Europe Ltd and the Council of the Isles of Scilly

Stride Treglown job no.	151838
Prepared by	Ed Flood
Checked by	Tom Mills
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1. Introduction

- 1.1.1 This report has been prepared by Stride Treglown who have been appointed by Hitachi Europe Ltd, in partnership with Currie Brown and the Council of the Isles of Scilly to provide planning consultancy services for the installation of a 48kW solar array on land to the north west of the St. Mary's airport terminal, Isles of Scilly.
- 1.1.2 The proposed development forms an important part of the Smart Islands Energy Programme which has been set up to sustainably and affordably tackle some of the Isles of Scilly's main infrastructure and utility challenges. In doing so it aims to provide a model of how communities can benefit through a transition from a conventional carbon-intensive model to a resilient, low carbon local economy.
- 1.1.3 By delivering a set of interconnecting projects, the Smart Islands programme aims to cut energy bills by 40%, meet 40% of energy demand through renewable power, and see electric and low carbon cars make up 40% of vehicles.
- 1.1.4 The Smart Islands project, led by Hitachi Europe Ltd, and supported by the European Regional Development Fund, is the first project to be delivered by the Smart Islands Partnership. The founding members of the Smart Islands Partnership are the Council of the Isles of Scilly, Duchy of Cornwall, Hitachi Europe Ltd, the Island's Partnership and Tresco Estate.
- 1.1.5 This application for full planning permission forms part of a suite of proposals for the installation of roof top and ground mounted solar PVs [Photovoltaics] at locations across the island of St Mary's. These locations include the roof of the St Mary's airport terminal and the roof of St Mary's fire station, both of which are the subject of separate and concurrent applications for full planning permission.
- 1.1.6 It is the purpose of this Planning, Design and Access Statement to provide an overview of the site and its context, identify the relevant planning framework, provide a description of the proposed development and assess the key planning considerations.

2. Site Appraisal

2.1. Site Location and Description

- 2.1.1 St Mary's airport terminal is located to the south of the island of St Mary's, approximately 800 metres to the east of the main settlement of Hugh Town and approximately 240 metres to the north east of the smaller settlement of Old Town.



Image 1: Image indicating location of St Mary's airport terminal

- 2.1.2 The airport terminal is located at the peak of a gentle gradient from north to south and is visible from residential properties located to the south west of the site. It is accessed via High Cross Lane to the north which connects the terminal with settlement elsewhere on the Island and is the main gateway in and out of the Isles of Scilly.



Image 2: Image indicating location of proposed solar garden in relation to airport terminal

- 2.1.3 The terminal building itself is a modern, low-rise building with a concrete runway running primarily north west to south east. The pitched roof of the building is constructed of Cambrian style concrete tile and is formed of two parts – the main terminal itself and a radio tower positioned to the northern part of the building.
- 2.1.4 The Island of St Mary's is designated as a conservation area and as such, particular regard will need to be given towards preserving the historic interest of the area. There are no listed buildings within 200 metres of the airport terminal.
- 2.1.5 The island is also designated as an Area of Outstanding Natural Beauty [AONB]. The AONB designation recognises that people are an important part of the landscape, ensuring that its resources are protected, managed and capable of evolving in a sustainable way.
- 2.1.6 The site lies within Flood Zone 1 meaning that there is the lowest possible risk of flooding. For this reason, no Flood Risk Assessment has been submitted in support of the application.

3. Planning Policy Context

3.1. National Planning Policy Framework [NPPF] (March 2012)

- 3.1.1 The NPPF centres on a *“presumption in favour of sustainable development”*. This is seen as key to both *“plan making”* and *“decision taking”*.
- 3.1.2 With regards to plan making, local planning authorities (LPAs) should *“positively seek opportunities to meet the development needs of their area”* and *“meet objectively assessed needs, with sufficient flexibility to adapt to rapid change unless material considerations indicate otherwise”*.
- 3.1.3 With regards to decision making, LPAs should focus on *“approving development proposals that accord with the development plan without delay”* or *“where the development plan is absent, silent or relevant policies are out of date, granting permission unless material considerations indicate otherwise”*.
- 3.1.4 Paragraph 17 sets out 12 core planning principles that should underpin both plan-making and decision-taking. Planning should support the transition to a low carbon future in a changing climate and encourage the use of renewable resources which is central to the economic, social and environmental dimensions of sustainable development.
- 3.1.5 Paragraphs 97 and 98 of the NPPF state that in order to help increase the use and supply of renewable and low carbon energy, local authorities should have a ‘positive strategy’ to promote energy from renewable sources. Furthermore it states that policies should be designed to maximise renewable and low carbon energy development while ensuring that adverse impacts of proposals are addressed.
- 3.1.6 Section 10 supports energy efficiency and low carbon buildings. Section 11 requires that developments minimise impacts on biodiversity and provide net gains in biodiversity where possible.
- 3.1.7 In terms of conservation and the historic environment, Section 12 sets out guidance on conserving and enhancing the historic environment. Paragraph 28 states that *“in determining applications, local authorities should require an applicant to describe the significance of any heritage assets affected, including any contributions made by their setting. The level of detail should be proportionate to the assets’ importance”*.
- 3.1.8 Paragraph 129 of the NPPF requires LPAs to identify and assess the particular significance of any heritage assets that may be affected by a proposal. This assessment should be taken into account when considering the impact of the proposed development on the heritage asset so as to minimise conflict between the heritage asset’s conservation and any aspect of the proposal.
- 3.1.9 In determining applications, local authorities should consider the following in accordance with paragraph 131 of the Framework;
- The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that the conservation of heritage assets can make to sustainable communities including their economic viability; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.
- 3.1.10 When considering the impact of a proposed development on the significance of a heritage asset, paragraph 132 requires great weight to be afforded to the asset’s conservation. Any harm or loss should require clear and convincing justification.

- 3.1.11 Finally, where a development proposal will lead to less than substantial harm to the significance of a heritage asset, paragraph 134 states that this harm should be weighed against the public benefits, including its optimal viable use.

3.2. National Planning Practice Guidance

- 3.2.1 National Planning Practice Guidance was issued in March 2014 and effectively replaced the majority of Government Circulars, which had previously given guidance on many aspects of planning. The following items are relevant to the proposed development;

Paragraph: 012 Reference ID: 5-012-20140306 provides guidance on the particular planning considerations that relate to solar PV technologies. Particular importance is placed on the effective siting of installations to collect the most energy from the sun, and the importance of preserving Areas of Outstanding Natural Beauty and other designated areas. The colour and appearance of the modules is also an important planning consideration.

Paragraph: 001 Reference ID: 5-001-20140306 notes the importance of planning for a renewable and low carbon energy footprint. Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses.

3.3. UK Renewable Roadmap

- 3.3.1 The UK Department of Energy and Climate Change set out a 'UK renewable Roadmap' promoting a steer towards a reduction in dependence on fossil fuels and provide a far greater focus on renewable energy solutions. Referring to paragraph 2.48 it states that *"the Government believes that solar PV has the potential to form a significant part of the UK's renewable energy generation mix"*.
- 3.3.2 It moves on to state that *"solar PV benefits from being easy to install on domestic and commercial buildings, and on the ground. With 82% public support it has a role in connecting individuals, communities and businesses with future development of renewable energy and the transition to a low carbon economy"*.

3.4. The Local Development Plan

- 3.4.1 Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990).
- 3.4.2 The development plan for the Isles of Scilly currently comprises the Isles of Scilly Local Plan (2005).

3.5. Isles of Scilly Local Plan 2005

- 3.5.1 The Isles of Scilly Local Plan – 2020 Vision was adopted in November 2005. The 2005 Local Plan provides a clear spatial planning strategy for the islands in a concise and precise manner, reflecting its relatively small population and geographic area. The key policies relevant to the proposals are presented below.
- 3.5.2 **Policy 1 – Environmental Protection** aims to protect and respect the recognised quality of the islands' natural, archaeological, historic and built environment through a number of criteria. Applications for development will be permitted where they;
- Conserve or enhance the natural beauty, wildlife and cultural heritage of the AONB and protect the unspoilt character and good appearance of the Heritage Coast;
 - Preserve nationally important archaeological remains and their settings;

- Preserve or enhance the character or appearance of the Conservation Area and preserve the architectural or historic interest of all listed buildings, including their features and settings;
- Safeguard the integrity and nature conservation objectives of Special Protection Areas (SPAs), Ramsar Sites and Special Areas of Conservation (SACs);
- Protect a statutorily-protected plant or animal species and the wildlife, geological and geomorphological interest and features of designated Sites of Special Scientific Interest; and locally important biodiversity habitats, species and landscape features; and
- Secure the future character, appearance and setting of any Parks and Gardens of Special Historic Interest included in the English Heritage Register.

3.5.3 **Policy 2 – Sustainable Development** aims to ensure the re-use of previously developed land and existing buildings for the economic, social and environmental benefit of the islands, taking into account any environmental designations set out in Policy 1. Policy 2 also aims to utilise natural resources efficiently through the use of renewable sources of energy generation.

3.5.4 **Policy 6 – Infrastructure for Sustainable Communities** supports development proposals, in keeping with the particular scale and character of the islands, where they are for renewable energy projects or where they facilitate improvements to the electricity supply network.

3.5.5 **Policy 10 – Air Travel Infrastructure, St Marys & Tresco** confirms that future development proposals should not impede or inhibit the continued operation, expansion or improvement of either St Mary's airport or Tresco Heliport.

3.6. Isles of Scilly Sustainable Energy Strategy 2007

3.6.1 The Isles of Scilly Sustainable Energy Strategy was adopted in November 2007 and aims to create a sustainable energy future for the islands. It takes a holistic approach to meeting the island's energy needs, integrating actions designed to minimise energy demand, increase energy efficiency, and promote the use of renewable energy sources.

3.6.2 The driving force of the document is the importance of conserving, and where possible enhancing, the character and quality of the landscape, heritage and biodiversity of the islands. The strategy's emphasis is on seeking to meet the energy needs of the islands without impacting on their character and distinctiveness.

3.7. The Isles of Scilly Design Guide 2006

3.7.1 The Isles of Scilly Design Guide was approved in 2006 to complement the Local Plan and the AONB Management Plan. It offers clear and practical guidance in order to achieve high quality and sustainable design and ensure the special character of Scilly is retained and where possible enhanced.

3.7.2 The Guide states, *"The introduction of renewable energy in the form of active solar technology is encouraged. Active solar technology can be divided into: Photovoltaic (PV) and Solar Water Heating (SWH). Both technologies use roof mounted equipment to collect radiation from the sun. PV is converted into electricity, SWH is converted into hot water. PV can be used as a building material. It can be integrated into the roof or facade through the use of solar shingles, glass laminators or most appropriate for the islands - solar slates. SWH panels are mounted on the roof. For best performance they need to be mounted at an angle of 20-40 degrees, depending on latitude and oriented due south"*.

3.8. Isles of Scilly AONB Management Plan 2015-2020

- 3.8.1 The Isles of Scilly AONB Management Plan recognises that there are several major community and infrastructural development projects proposed for the islands, including community and domestic renewable energy installations. The AONB partnership confirms its role in steering and supporting actions at a local level to ensure that renewable energy developments conserve and enhance the AONB landscape whilst at the same time delivering benefits to the local community and supporting planning to take into account climate change.

3.9. Draft Local Plan 2015-2030

- 3.9.1 In June 2015 the Local Planning Authority began a review of the Isles of Scilly Local Plan. The new Local Plan is intended to plan strategically for the period 2015-2030. A second round of public consultation will take place in February and March 2018, which will consult on the Draft Local Plan 2015-2030 and 5 consultation options.
- 3.9.2 Emerging **policy SS8 – ‘Renewable Energy Developments’** is designed to promote renewable and low carbon energy schemes, whilst ensuring that adverse effects are satisfactorily addressed, including any cumulative landscape and visual impacts. Renewable energy proposals will be supported where they do not compromise the cultural heritage or historic environment of the islands and where there would be no significant adverse effects on airport radar, air traffic control and telecommunication systems.
- 3.9.3 A number of other emerging policies are relevant to the proposed development, including;
- 3.9.4 **Policy OE1 – ‘Landscape Character’**. Proposals for new development will only be permitted where they would not cause significant harm to the character, quality, distinctiveness or sensitivity of the landscape, or important features or views, or other perceptual qualities such as tranquillity and dark skies, unless the benefits of the proposal clearly outweigh the impacts. Development proposals should be informed by the Isles of Scilly Landscape Character Study.
- 3.9.5 **Policy OE3 – ‘Development Affecting Heritage’**. Development proposals must conserve and enhance the special character or appearance of the Conservation Area and its setting, especially those positive elements identified in any appraisal.
- 3.9.6 **Policy OE2 – ‘Biodiversity and Geodiversity’** aims to conserve and where possible, restore and/or provide net gains to biodiversity and geodiversity.
- 3.9.7 The Council aims to submit the Local Plan to the Secretary of State by July-August 2018 with examination of the plan expected in Autumn 2018.
- 3.9.8 It is envisaged that the existing adopted Isles of Scilly Sustainable Energy Strategy will continue to inform the development strategy for the islands moving forwards.

3.10. Draft Sustainability Appraisal 2015-2030

- 3.10.1 The draft sustainability appraisal provides a comprehensive assessment of the sustainability attributes of the emerging local plan. The appraisal recognises that policies could be created that positively promote the use of renewable energy. A number of objectives are set out, one of which is to increase the renewable energy capacity of the islands in order to help achieve their aspirations for a low carbon future.

4. Pre-application advice

- 4.1.1 Pre-application advice was received from the Council of the Isles of Scilly on April 5th 2018. The Council's opinion was provided with respect to the proposals for roof mounted solar PV at the fire station, airport terminal and nos. 1 and 2 Trinity Cottages as well as the proposed solar garden to the north west of the airport terminal. The pre-application advice is appended to this report in Appendix A.
- 4.1.2 In summary, the advice concluded that the proposed erection of a 48 kV solar garden to the north west of the airport terminal would be acceptable providing that considerable weight is afforded to the visual impact of the proposals on the conservation area and any affected designated heritage assets.
- 4.1.3 Early engagement with St Mary's airport was recommended in order to ascertain whether there are any navigational issues associated with such an installation so close to the airport terminal. The application proposals have been discussed with the airport.

5. Design & Access

- 5.1.1 This application for full planning permission is accompanied by an Isles of Scilly Smart Energy Islands Project document titled “Airport Solar Garden”. The document provides details relating to locations and size of the solar PV panels as well as the generation capacity of the installation.
- 5.1.2 In short, the proposed installation will consist of ten strings of 16 x 300Wp panels with a potential generation capacity of 48kW. The proposed layout of the solar PV panels is indicated in the image below.

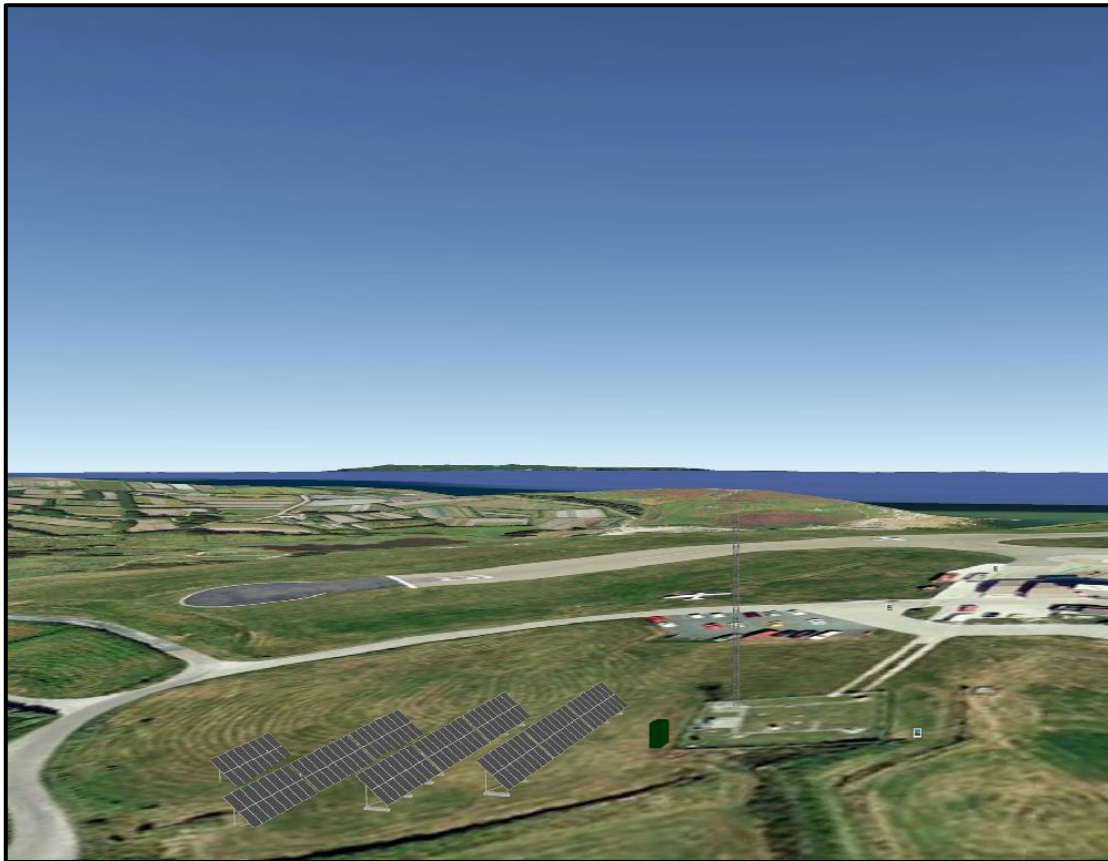


Image 3: Image illustrating proposed layout of solar PV panels

Use and Amount

- 5.1.3 The proposed ground mounted solar garden would utilise a small parcel of land to the north west of the airport terminal and would have a potential generation capacity of up to 48kW of renewable energy. The introduction of the necessary supporting framework and panels themselves would still enable grass to be grown on the site. In addition, the minimum physical intrusion of the development itself will mean that the panels are to be removed after 30 years of their lifetime and the land will be restored to its former condition.

- 5.1.4 The land remains ancillary to the airport and the current overflow vehicle parking space will be retained. The area of land on which the solar panels will occupy is not used for agriculture, therefore there would be no loss of agricultural land. As part of the proposed development, ecology enhancements will be sought through the sowing of wild flowers on the existing grass and use of native species of hedgerow plants in the introduced soft landscaping. There will be open space within the solar garden which will be offered to bee-keepers on the island to site bee-hives, which can help further enhance the ecology of the solar garden and the islands at large.

Layout

- 5.1.5 Ten strings of 16 x 300Wp panels will be arranged in four rows running from east to west. Each array will be mounted on a simple steel framework so that panels are looking true south in order to maximise their energy output.
- 5.1.6 Visually permeable mesh type (deer fencing) security fencing of approximately 2.4 metres in height would be installed around the edge of the solar garden. The fence would be located within the boundaries of the parcel of land and will prevent the general public from easy access into the field.

Scale

- 5.1.7 The scale of development on site has been determined by the equipment necessary to efficiently generate renewable energy. All of the solar arrays on site will be at or below single storey height (i.e. 2.615 metres in height) ensuring that they will not be readily visible from most viewpoints outside of the site. Even when viewed from nearby public vantage points, the scale of the development will not be overbearing due to its limited height and benign appearance.

Landscaping

- 5.1.8 Ecological enhancements are proposed to the northern perimeter of the site and soft landscaping will be introduced to re-inforce the existing planting with groups of native trees and native structure planting. A wildflower meadow is proposed throughout the solar garden, providing a species rich grassland composed of wild flowers and fine grasses which can support a wide range of invertebrates, small mammals, reptiles and birds.
- 5.1.9 The introduction and reinforcement of native hedgerow species along the northern perimeter will add to the habitat of indigenous fauna as well as providing effective screening of the solar array from properties to the north of the site.

Appearance

- 5.1.10 Due to a combination of topography, the presence of existing buildings on site and the low level nature of the proposed development, it is considered that the majority of views from outside of the site will not be significantly affected by the proposed scheme. Initial appraisals of the site have revealed that the actual zone of visibility of the proposed development would generally be limited to the area of coast to the south west of the site.
- 5.1.11 The panels consist of semiconductors and photovoltaic cells protected by a thin layer of cover glass. They have a blue/black appearance and are designed to absorb the sunlight and convert light energy into electricity. As such, there is limited reflection or glare produced. In this they have an advantage over other structures found nearby such as greenhouses and conservatories which use highly reflective materials. The make and model of panels that have been specified in this proposal have been specifically selected because of their minimal reflectivity and monochrome appearance. An anti-reflective coating will be applied to the panels which will further reduce the appearance of glare and their visual impact in the landscape.

Access

- 5.1.12 Access to the site would be from High Cross Lane to the north. It is not proposed to make any amendments to this access, and the existing access will be sufficient for construction purposes.

Maintenance

- 5.1.13 Low and high voltage components of the solar PV array should be regularly inspected to ensure components do not overheat and the panels checked to ensure maximum generation potential.

Glint & Glare

- 5.1.14 A Glint & Glare report prepared by Pager Power is submitted in support of this application for full planning permission. The report concludes that potential reflections from the ground mounted solar PV panels proposed at the airport terminal may be “operationally tolerable”. The predicted intensity of reflection could cause a temporary after-image for approaching pilots. Potential effects are restricted due to the size of the proposed development, and the transient nature of the reflections. Early engagement with St Mary’s airport and the Civil Aviation Authority has been undertaken to ensure potential impacts of the solar panels on the operation of the airport are minimal.

6. Heritage Statement

- 6.1.1 The National Planning Policy Framework, Para.128 requires “applicant(s) to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential of the proposal on their significance”.
- 6.1.2 This Heritage Statement assesses the impact of the proposed solar garden at St. Mary’s airport on the wider conservation area. The development comprises the erection of solar panels and associated infrastructure on land to the north west of the airport terminal, St Mary’s. There are no listed buildings in close proximity to the airport terminal but consideration needs to be given to the potential impact of the proposed solar array on the Conservation Area which covers the entirety of the Isles of Scilly.
- 6.1.3 The image below indicates the location of the key heritage assets which will be assessed as part of this Heritage Statement.



Image 4: Location of key heritage assets assessed within this Heritage Statement

6.2. Significance of the Heritage Assets

Conservation Area

- 6.2.1 No listed buildings are affected by the proposed development but the Isles of Scilly are designated as a conservation area.
- 6.2.2 The Isles of Scilly were first designated as a conservation area in 1975. In 2015, the Council of the Isles of Scilly published a Conservation Area Character Appraisal (Supplementary Planning Document) Draft, including an analysis of the most important buildings and areas of St Mary's.
- 6.2.3 The need to design the proposal in a way which preserves the character and appearance of the surrounding conservation area is recognised. The Isles of Scilly Conservation Area Character Appraisal draft provides the following description for St. Mary's;

"The main part of the Island of St. Mary's comprises an undulating interior landscape of comparatively large fields, wooded valleys and low lying marshy areas. There are some places on St. Mary's from which the sea cannot be seen. The coastal strip is made up of exposed heaths, rocky coast with heathland and areas of sandy shore. On the southern part of the island, the small airport has a significant visual impacts as it is located on high ground and is therefore very prominent. To the north at Halangy Down there are a number of very tall communication masts which are visible from around the islands. These developments impact negatively on the intimate scale of the Scillonian landscape. However they provide some of the vital infrastructure necessary to support the islands' community and economy".

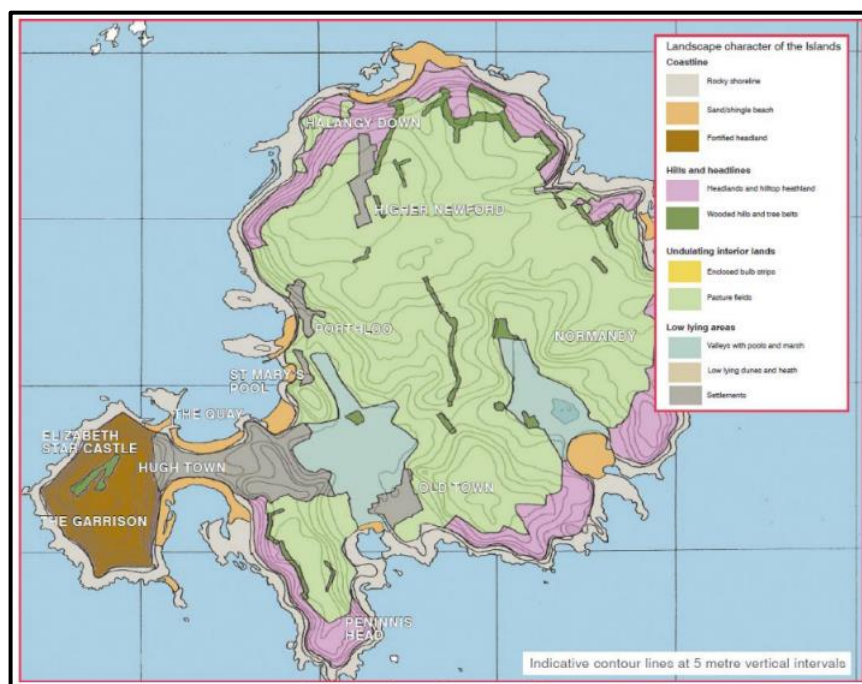


Image 5: Landscape Character Map for St Mary's

- 6.2.4 St Mary's airport is relatively isolated located to the south of the island. However, because the terminal is located on higher ground, a number of key views across the island are apparent on arrival to the airport, including towards the Garrison and towards Hugh Town. These views should be an important consideration in conjunction with any alterations to this vista, particularly since the airport is key to first impressions for visitors to the islands.

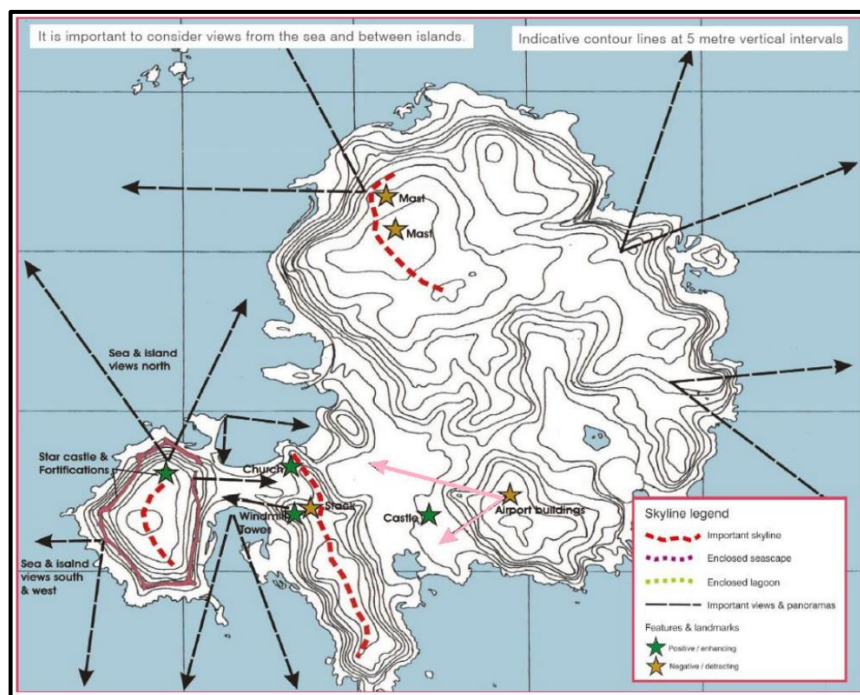


Image 6: Image to illustrate key views (pink) affecting the site

- 6.2.5 The (draft) Conservation Area Character Appraisal comments that the use of renewable energy will increase over time and it is important that any such measures are sensitive to the character of the Conservation Area.

Listed Buildings and Scheduled Monuments

- 6.2.6 No listed buildings are located within the immediate vicinity of the airport terminal. There are however a number of Scheduled Monuments within 500 metres of the site, including the remains of the Old Town Castle (Ennor Castle) located approximately 300 metres to the south west in the settlement of Old Town.
- 6.2.7 Although not immediately visible from the airport terminal, Ennor Castle is located between two key vistas towards Old Town and Hugh Town and the application proposal will need to take into account the impact upon the significance of the Heritage asset and the key views in and out of the site.
- 6.2.8 Other heritage assets to be considered as part of this Heritage Impact Assessment include The Garrison, located to the eastern peninsula of the island of St. Mary's, and Peninnis Castle located on the southern-most peninsula of the island between Porthcressa beach to the east and Old Town beach to the west. The Grade II listed Hugh House, a former officer's mess located within The Garrison, also forms part of this Heritage Statement.



Image 7: Ennor Castle

- 6.2.9 Ennor Castle lies on a small but prominent knoll and is formed from the remains of a small shell keep castle from the 13th or 14th Century, the only medieval castle on the Isles of Scilly. It became redundant after Star Castle at the Garrison was built in the late 16th Century, and much of its stone was then taken for buildings in the old town.
- 6.2.10 The remains are now overgrown with Mesemryanthemum, with the flowers brightening up the outcrop in the summer. Located on private land, the remains are best viewed from a distance as the site is now bordered to the east, west and south by modern housing.
- 6.2.11 Approximately 200 metres to the south west of the airport runway lies a settlement of at least five hut circles on the north eastern slope of Port Minick. The settlement is visible as a group of four closely spaced hut circles and is separated from the fifth hut circle by dense surface stone.
- 6.2.12 A number of Neolithic cairns are also located to the south eastern peninsula of the runway as well as an iron age cliff castle located approximately 230 metres to the eastern tip of the runway. The monument, called Giants Castle also includes remains of a Second World War firing target built into the outermost rampart of the cliff castle.



Image 8: Ennor Castle

- 6.2.13 Further afield lies the Grade I listed Garrison Walls surrounding the western most peninsula of the island of St. Mary's. With a history that spans 350 years, the defences of the Garrison on St. Mary's form one of the most remarkable coastal defence systems in England.

- 6.2.14 The Garrison's present character derives partly from its significance as an historic site, an impressive, well preserved and relatively complete multi-period defensive complex. The character and integrity of the historic elements of the Garrison have been eroded by the masking effect of the development which has taken place immediately in front of the curtain wall. It is arguable, however, that the dominant physical presence of the important historic structures which make up Hugh Town's western skyline has been diluted by the prominence of half a dozen bungalows immediately behind the curtain wall.



Image 9: Grade I listed Garrison Wall

- 6.2.15 Located within the confines of the Garrison Wall lies Hugh House, a former officer's mess before becoming the first residence of Augustus Smith, Lord Proprietor of the islands. Currently used as offices, the building is located in a prominent position overlooking Hugh Town with vistas facing directly towards the airport terminal in the distance.
- 6.2.16 Built in 1792, the Grade II listed building is constructed of coarsed granite with large timber windows and a gabled slate roof. As with the Grade I listed Garrison Wall, the character and integrity of the historic building has been eroded by the introduction of post World War II housing immediately in front of the building.

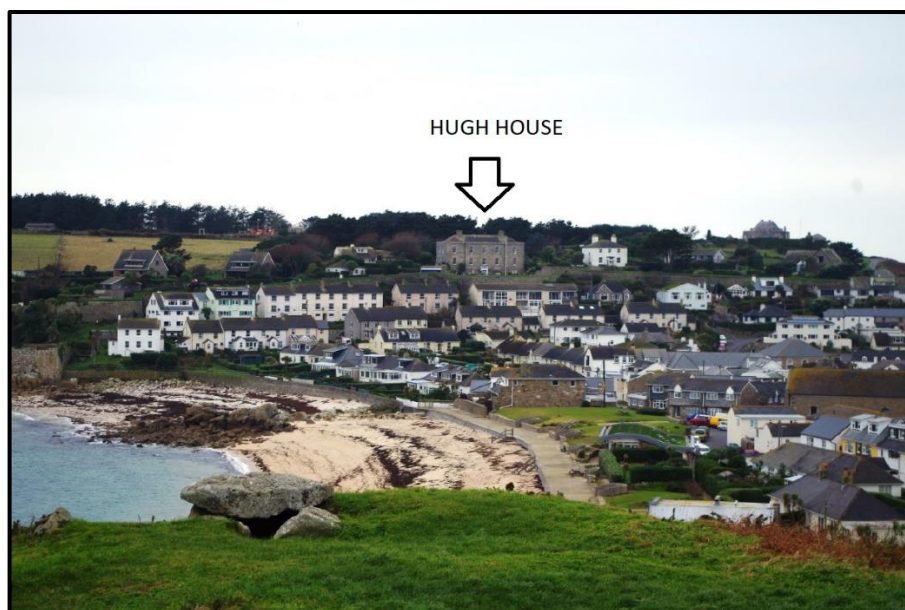


Image 10: Hugh House, situated behind the Garrison Wall



Image 11: View from Hugh House towards airport terminal

- 6.2.17 Located at the southern-most peninsula of the Island lies a former Civil War defensive complex, located on Peninnis Head. The remains form part of a designated scheduled monument and vary considerably in size and shape, including a gun battery to the southern tip of Peninnis Head.
- 6.2.18 The battery is located adjacent to a group of large natural granite outcrops called the Kettle and Pans. The other sides of the battery are defined by a bank, predominantly of earth and turves, measuring up to 4 metres wide and up to 0.75 metres above the battery's interior.



Image 12: Remains of WWII defensive complex at Peninnis Head

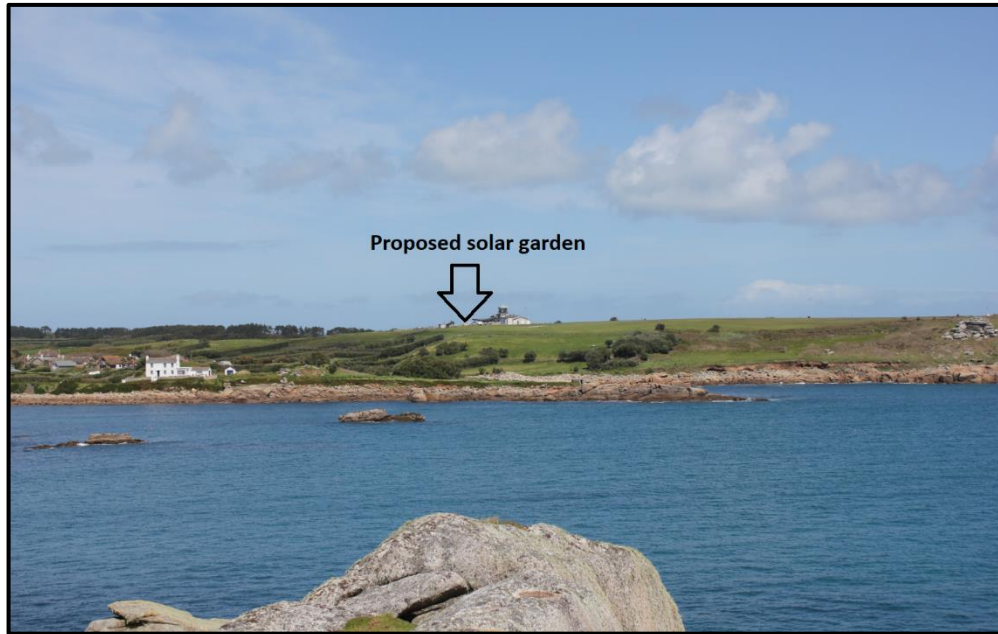


Image 13: View from Peninnis Head towards airport terminal

6.3. Impact Assessment

Introduction

6.3.1 The following issues need to be considered in assessing the impact on the heritage significance of the listed buildings and the surrounding conservation area:

- Impact on the historic fabric of any listed buildings;
- Impact on the character of the Conservation Area.

6.3.2 Each of these issues are addressed in turn below.

Impact on listed building

6.3.3 No listed buildings are affected by the proposed development. It is considered that due to the minor nature of the proposed works that there would be no impact on the setting of the nearby heritage assets. It is further considered that the proposed works will preserve the setting of those heritage assets in close proximity.

Impact on the Conservation Area

- 6.3.4 A Conservation Area is an area of special architectural or historic interest. The character, or appearance of which is desirable to preserve or enhance (Section 69 of The 1990 Planning (Listed Buildings and Conservation Areas) Act).
- 6.3.5 Historic England advice and guidance is set out in two documents; 'Small Scale Solar Electric (Photovoltaics) Energy and Traditional Buildings' (English heritage 2010) and 'Microgeneration and the Historic Environment' (English Heritage 2012).
- 6.3.6 Historic England believes that it should be possible to install microgeneration equipment on many buildings and conservation areas, if they are carefully positioned. The principle considerations are that:

- Efforts should be made to minimise visual impact
- Equipment should not damage key views in, out or within the conservation area
- There should be no loss to the overall character or historic interest of the conservation area
- The local planning authority should consider the cumulative impacts of the installation of different types of equipment.

6.3.7 The Conservation Appraisal states that the airport terminal itself has a significant visual impact as it is located on high ground and is therefore very prominent. The location of the proposed solar PV panels to the north west of the airport terminal may be visible from properties to the south west of the airport but it is expected that, due to distance and topography, the visual impact would be minimal.

6.3.8 At 2.615 metres in height, the proposed panels are relatively low lying, further reducing their impact upon the landscape and surrounding conservation area.

6.3.9 The nearest designated heritage of significance to the airport terminal is Ennor Castle. The setting, if not the significance, of Ennor Castle has already been compromised by the late 20th century housing developments at Launceston Close and Ennor Close as indicated in the image below.



Image 14: Ennor Castle viewed from airport terminal

6.3.10 Inter-visibility between the castle and the airport terminal is blocked by dense tree and vegetation as well as a number of intervening buildings. For this reason it is considered that the heritage impacts of the proposed installation of a solar PV array are negligible, providing that a high quality, non-reflective finish to the PV panels is used.

- 6.3.11 In terms of the Grade I listed Garrison Wall, it is also considered that the proposed solar PV installation would have no impact. As discussed above, the setting of the Garrison Wall has had views from the east impacted by the houses immediately in front of the wall. Views eastwards from the Garrison Wall towards the airport terminal are broken up by a mixture of vegetation and residential dwellings. Together with distance, topography and the proposed soft landscaping, it is considered that the impacts of the proposed solar PV array will be negligible.
- 6.3.12 At a distance of 1.7 km to the east, St Mary's airport terminal is faintly visible from Hugh House. Due to distance, topography and a number of intervening features such as the introduction of modern housing immediately in front of Hugh House, it is considered that the significance of the Grade II listed Hugh House would not be affected. Furthermore, the proposed solar garden at the airport terminal is unlikely to be visible from Hugh House due to the height of the proposed solar panels (2.615 metres) and the intervening distance between Hugh House and the airport terminal itself.
- 6.3.13 Whilst Peninnis Head itself provides excellent views across the island, views from the Scheduled Monuments located at the tip of the peninsula, towards the airport terminal, are interrupted by topography, vegetation and the built environment of Old Town to the east. Again, it is considered that because of the height of the proposed solar panels, their benign appearance, and the distance between the two receptors, that the impact of the proposed development on the setting of the scheduled monuments at Peninnis Head would be negligible. Public benefits of the proposal
- 6.3.14 Whilst this Heritage Statement has confirmed that there will be no impact on any heritage assets as a result of the proposed works, it is important to outline the considerable public benefits of the proposal and the benefits they can bring to the conservation area.
- 6.3.15 The installation of the proposed solar PV array on land immediately to the north west of the airport terminal is an integral first step to achieving significant public benefits delivered through the Smart Islands Energy programme. By 2020 the initiative aims to deliver an islands-wide energy control system providing cheaper, reliable, renewable power.
- 6.3.16 These first steps will lay the foundations for the wider Smart Islands programme which aims to cut electricity bills by 40%, meet 40% of energy demand through renewables, and see 40% of vehicles being electric or low carbon.
- 6.3.17 This proposed renewable energy project benefits the local environment conventional energy such as fossil fuels release greenhouse gases, carcinogens and carbon dioxide which solar panels do not. The use of solar energy on the islands can help reduce the transport of fuel that would otherwise be used for heating. This further reduces carbon emissions and provides a long-term secure source through harvesting our 'indigenous' energy.
- 6.3.18 Biodiversity gains sought as part of the proposed development will provide an added benefit. The wildflower planting immediately south of the solar panels will benefit the local flora and fauna as well as creating a visually attractive spectacle for users of the St Mary's airport.
- 6.3.19 For this reason it is considered that the proposals will preserve the heritage assets of the island, but also provide an opportunity to enhancement in the islands sustainability criteria, which is of paramount importance as a public benefit.
- 6.3.20 The real and unique benefit of this proposal is the ground-breaking nature of the Smart Islands Energy project that integrates clean renewable generation with cutting edge communication technology to balance the ebb and flow of energy across the island. The proposed solar garden is an integral element of the project that benefits the environment, benefits the island's economy and community and can be a blue print for a local, low-carbon economic model that can benefit island communities across the world.

7. Planning Issues

7.1.1 It is considered that the main issues to be considered in the determination of this application are as follows;

- The landscape and visual impacts of the proposed development;
- The impacts of the proposed development on the setting of nearby heritage assets and the wider conservation area;
- The impacts on aviation.

7.1.2 These issues are addressed in turn.

7.2. Landscape and Visual Impacts

7.2.1 The proposed solar array will be built on land immediately to the north west of the airport terminal and would retain key landscape characteristics such as topography, boundary hedgerows and trees. Located within the Isles of Scilly Conservation Area and AONB, the proposed development will need to have minimal impact on views from within these designated areas.

7.2.2 Due to topography, distance and the screening effect of the numerous existing hedgerows, mature woodland, as well as the current built up environment of the airport terminal, it is evident that the zone of visibility associated with the proposed development would be limited mainly to the immediate environs of the site.

7.2.3 The undulating topography to the west of the site, and the amount of hedgerow and trees along the nearby fields, greatly limits views from residential properties approximately 200 metres to the south west. The images below indicate the views from nearby residential properties towards the airport terminal.



Image 15: View from nearby residential properties towards airport terminal

7.2.4 In terms of views from key viewpoints and heritage assets across the island, it is considered that the visual impact decreases with distance. The images overleaf show views from each key viewpoint from across the island indicating that the visual impact of the proposed development is minimal from these locations.



Image 16: View from Peninnis Head towards airport terminal

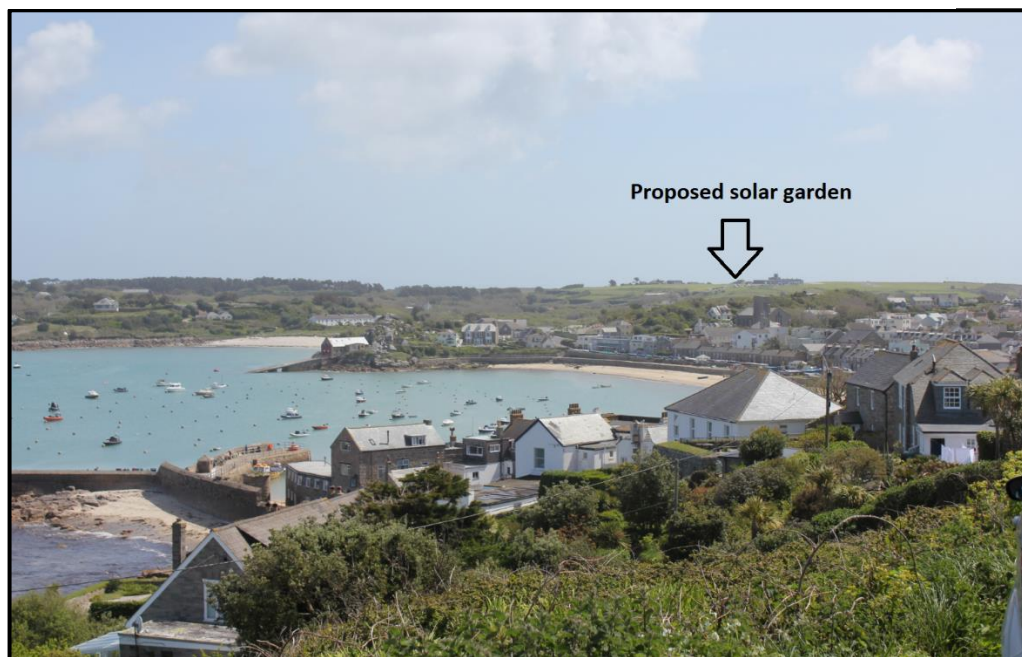


Image 17: Image from The Garrison towards airport terminal

- 7.2.5 It is considered that due to a number of factors, including distance, topography, natural screening and screening from the airport terminal itself, that the actual zone of visibility would be restricted to the immediate environs of the site. Due to a steep incline between the residential properties to the south west and the airport terminal itself, the proposed solar array would not be visible from nearby residential dwellings.
- 7.2.6 Views from key landmarks and heritage assets across the island would not be severely affected by the proposed development.

- 7.2.7 This assessment demonstrates that the proposed development could be successfully accommodated and assimilated into the surrounding landscape without causing significant harm to the landscape character of the surrounding AONB or the visual amenity of the area.

7.3. Heritage Impacts

- 7.3.1 The impacts of the proposed development on nearby heritage assets and surrounding conservation area are assessed in the Heritage Statement previously in this document.
- 7.3.2 The Heritage Statement concludes that the installation of solar PV panels in this location will deliver substantial public benefits in terms of new renewable energy generation on the island whilst having minimal heritage impacts.

7.4. Aviation Impacts

- 7.4.1 A Glint & Glare study was prepared by Pager Power in November 2017 and accompanies this application for full planning permission. This assessed the impacts of the proposed solar array at the airport terminal on aviation security.
- 7.4.2 The report concludes that reflections from the ground-mounted solar array may be operationally tolerable. The predicted intensity of reflection could cause a temporary after-image for approaching pilots. Potential effects are restricted due to the size of the development, and the transient nature of reflections. The results of the Glint & Glare study have been made available to St. Mary's airport for discussion.

8. Summary and Conclusions

- 8.1.1 The NPPF encourages local planning authorities to support the transition to a low carbon future, encouraging the re-use of existing resources and promoting the use of renewable energy schemes. In deed the transition to a low carbon future and the use of renewable energy forms one of the 12 core planning principles of the NPPF detailed in Paragraph 17.
- 8.1.2 Paragraphs 97 and 98 of the NPPF state that to help increase the use and supply of renewable and low carbon energy, local authorities should have a 'positive strategy' to promote energy from renewable sources. Furthermore, it states that policies should be designed to maximise renewable and low carbon energy development whilst ensuring that adverse impacts of the proposal are addressed.
- 8.1.3 The design and access issues of the solar garden to the north west of the airport terminal has been assessed. It is considered that the benign appearance of the scheme and the degree of natural screening afforded to the site, that the proposal would not have an unacceptably adverse impact on the visual or amenity value of the surrounding environment.
- 8.1.4 In policy terms there is no conflict with either national or local planning policies. Indeed, the proposed rooftop solar PV installation would represent a good use of land which can be restored to its original condition at the end of the solar garden's lifespan. The impact upon the surrounding conservation area and AONB would be negligible.

9. Appendix A: Pre-application response

Edward Flood

From: Walton Lisa <Lisa.Walton@scilly.gov.uk>
Sent: 05 April 2018 12:27
To: Edward Flood
Cc: Schild Russ; King Andrew; Dryden Craig
Subject: RE: Request for pre-application advice - Solar PV
Attachments: Heritage Impact - Solar PV (6.33 KB)

Categories: Filed by Newforma

Dear Ed

Unfortunately whilst there was wifi at St Agnes no one had the code. Apologies.

In relation to your enquiry then any application now would still be assessed under the [2005 Local Plan](#) (policy 2) and the [NPPF](#) (para 7 Core Planning Principle). A [review of the 2012 NPPF is currently out to consultation](#) (see para 147-153) . Should you submit an application later in the year then greater weight will be given to the emerging policies of the new Local Plan 2015-2030: <http://www.scilly.gov.uk/planning/local-plan/draft-local-plan-2015-2030/public-consultation-march-may-2018> (currently out to public consultation). This does contain specific policies on renewable energy and providing there is no adverse harm identified then RE installations would be supported. You can have a look at Policy SS8 in the above link. In both the current and the draft plan the principal of RE installations is considered acceptable. Clearly however considerable weight will be given to assessing the visual impact of any installation and the conservation area and any other affected designated heritage assets will need to be taken into account. I would certainly advise an Historic Impact Assessment is carried out to ensure the most appropriate/suitable locations are used for the installations (particularly on the Garrison) as well as the products that are less noticeable. The attached advice would be applicable to Trinity Cottages.

In terms of the airport – I would suggest you contact Russ Schild to see if there are any navigational issues associated with such an installation in close proximity to an airport (russ.schild@scilly.gov.uk). Unless you are digging significant foundations then there are unlikely to be particular impacts on designated heritage, but again this is a conservation area and aonb so it will be important to minimise the visual impact as much as possible.

A planning application would take 8 weeks, from receipt of a valid application, and would likely be determined at Full Council.

We would require the full completed application forms (either via the planning portal: <https://1app.planningportal.co.uk/Form/StartPlanningApplication>) or downloaded from the Council's website here: <http://www.scilly.gov.uk/planning/make-planning-application/planning-application-forms> (form no 04). The fee can be checked here: https://ecab.planningportal.co.uk/uploads/english_application_fees.pdf and will depend on the scale of the proposal (£462 for sites note more than 5 hectares) – if applying through the Portal then it will

advise on the fee based on the information you provide.

We would need OS based Scale Location (1:1250) and Site Plans (1:500) that do not breach copyright. You should draw a line around the site area in each case including any areas for maintenance, access and cabling etc) Guidance on Location and Site plans can be found here:

https://ecab.planningportal.co.uk/uploads/1app/maps_plans_and_planning_apps.pdf

We will need scale drawings and specifications of the proposed solar installations both in plan form and in profile this should show the precise location of installation, any equipment and the scale of the equipment.

We would need a Design and Access statement, which can include the heritage assessment, design and scale: <http://webarchive.nationalarchives.gov.uk/20110118111019/http://www.cabe.org.uk/files/design-and-access-statements.pdf>

Please note than any views expressed are an informal officer opinion only and not a formal determination under the Town and Country Planning Act.

Regards

Lisa

Lisa Walton *MRTPI*

Senior Officer: Planning and Development Management

Council of the Isles of Scilly, Town Hall, St Mary's, Isles of Scilly, TR21 0LW

Direct Line: 01720 424456 | Reception: 0300 1234 105 |

lisa.walton@scilly.gov.uk Internal Direct Dial: 404456



STRIDE TREGLOWN

Bristol

Promenade House
The Promenade
Clifton Down
Bristol BS8 3NE
T: +44 (0)117 974 3271

Bath

St George's Lodge
33 Oldfield Road
Bath, BA2 3NE
T: +44 (0)1225 466 173

Cardiff

Treglown Court,
Dowlais Road,
Cardiff CF24 5LQ
T: +44 (0)29 2043 5660

London

3 Cosser Street
London SE1 7BU
T: +44 (0)20 7401 0700

Manchester

Commercial Wharf
6 Commercial Street
Manchester M15 4PZ
T: +44 (0)161 832 9460

Plymouth

Norbury Court
The Millfields
Plymouth PL1 3LL
T: +44 (0)1752 202088

Solent

One Wessex Way
Colden Common
Winchester SO21 1WGT: +44
(0)2380 671991

Truro

55 Lemon Street
Truro TR1 2PE
T: +44 (0)1872 241300

Abu Dhabi

AS Business Centre
Al Ain Road
Umm Al Nar
PO Box 129865
Abu Dhabi UAE
T: 00 971 (0) 2 510 2416

stridetreglown.com