STRIDE TREGLOWN
TOWN PLANNING

Planning Design & Access Statement (Incl. Heritage Statement)

St. Mary's Airport Terminal, Isles of Scilly

Hitachi Europe Ltd and the Council of the Isles of Scilly

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Revision	**-**

Revisions

Revision	Description
-	DRAFT

Contents

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 18 & 20 x 300Wp solar Photovoltaic panels to the roof of the St. Mary's airport terminal, Isles of Scilly.

1.1.2 The proposed development forms part of the Smart Islands Energy Programme which has been set up sustainably and affordably tackle some of the Isles of Scilly's main infrastructure and utility issues, whilst providing a model for how other communities can profit from a rapid transition from being carbon intensive to having a low carbon footprint.

1.1.3 By implementing 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 the 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 (Photovoltaic) at locations across the island of St Mary's. These locations include the roof of the St Mary's fire station and a small parcel of land adjacent to the airport terminal, both of which are the subject of two separate 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.

2.1.3 The terminal building itself is a modern, low rise building with a concrete runway that transects north-west to south-east direction. The pitched roof of the building is constructed of Cambrian style concrete 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 had towards preserving the historic interest of the area. There are no listed buildings located 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, Chapter 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 in order 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 telecommunications 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 new Local Plan to the Secretary of State by July-August 20198 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 can be created to 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 installation of 16 no. solar panels to the roof 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.

5. Design & Access

5.1. Introduction

5.1.1 This application for full planning permission is accompanied by an Isles of Scilly Smart Energy Islands Project document titled “Airport Terminal Roof”. 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 to the roof of the airport terminal would consist of one string of 20 x 300Wp solar PV panels located on the east facing side of the pitched roof and one block of 18 x 300Wp solar PV panels located on the west side of the pitched roof. The proposed layout of the solar panels is as indicated on the image below.

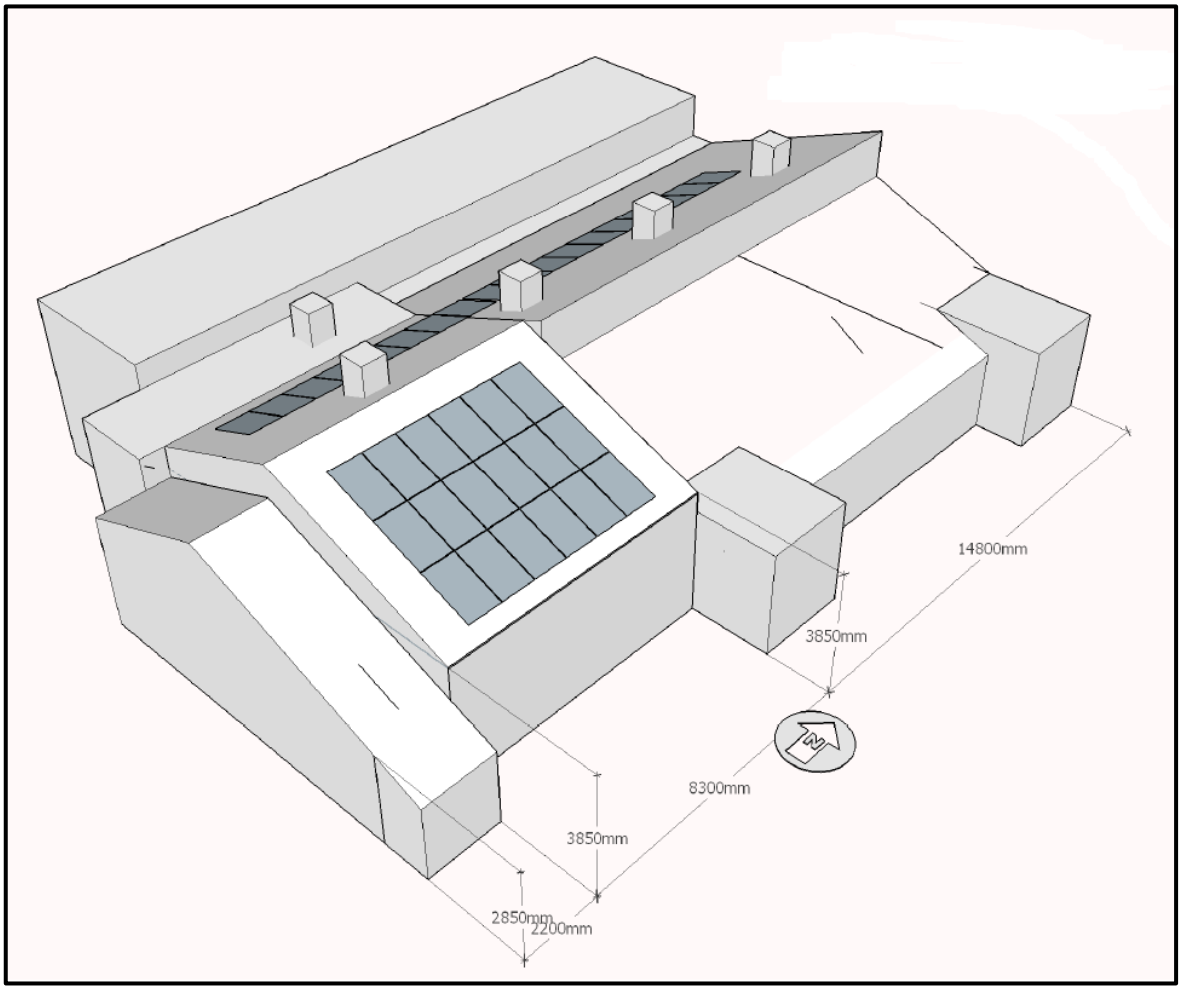

Image 2: Image illustrating proposed layout of solar PV panels

5.1.3 The spacing of the panels takes into account the increase in levels as the terrain falls away to the north

5.2. Use and Amount

5.2.1 The proposed rooftop solar PV panels would utilise the existing building without impacting upon its use as a airport terminal. The panels will be located on the south facing side of the pitched roof in order to maximise their generation efficiency. No panels are proposed to the north facing side of the pitched roof.

5.3. Layout

5.3.1 Two strings of 18 & 20 x 300Wp panels will be arranged in four rows running from east to west. The panels will not be replacing any part of the roof but will instead be fixed over it, and at the end of life can be removed, leaving the original roof intact.

5.4. Scale

5.4.1 The scale of development on site has been determined by the equipment necessary to efficiently generate renewable energy. The panels will be fixed to the roof of the airport terminal which measures 6 metres to eaves height and 7.73 metres to ridge height.

5.5. Landscaping

5.5.1 No alterations to landscaping are proposed.

5.6. Appearance

5.6.1 The proposed solar PV panels would be located on the roof of the airport terminal as per the accompanying roof plan, to minimise the proposal's effect on the external appearance of the building. The individual panels have a sleek black finish using non-reflective materials, covering approximately 80% of the roof area and not exceeding 50mm in depth as per the enclosed plans.

5.6.2 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.

5.7. Access

5.7.1 For the purposes of installation, 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.

5.8. Maintenance

5.8.1 Maintaining solar PV panels should involve the performance of safe, preventative and corrective maintenance activities on low and high voltage electrical equipment, and the maintenance of the site's mechanical and civil elements. The life expectancy for both roof top and ground mount solar PV is between 25 and 30 years and good maintenance should increase component longevity and performance and maximise power generation.

5.9. Glint & Glare

5.9.1 A Glint & Glare report prepared by Pager Power is submitted in support of this application for full planning permission. The report concludes that "*effects would not be noticeable from within the Air Traffic Control tower because the panel areas that could reflect sunlight towards it are unlikely to be visible due to screening and separation distance".*

5.9.2 The report also concluded that impacts would be minimal in practice for pilots on approach to the airport, noting that "*reflections would be possible towards approaching pilots on all approaches at various times of the year due to the scattered locations of the rooftops and their varying orientations".* The predicted intensity of the glare, including the panels nearest the airport itself, is categorised as having a "*potential to cause a temporary after-image".*

5.9.3 As presented in the report, these effects are likely to be tolerable in practice because;

- Effects are restricted in duration for each individual panel due to their small size.
- Effects would be transient for a moving receptor such as an aircraft as it passes through the reflection zone.
- Many of the panels will be located outside of a pilot's primary field of views as the aircraft approaches the runway threshold to land.

5.9.4 Furthermore, the surrounding area contains reflective sources including glass conservatories and bodies of water. Still water has reflective properties and intensities similar to solar panels. The resulting impact of the proposed roof mounted solar panels may be a 'twinkling' of numerous small illuminations for an observer looking towards the panels.

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 roof top solar panels at St. Mary's airport on the wider conservation area. The development comprises the installation of solar panels to the roof of the St Mary's airport terminal. 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 panels on the Conservation Area, which covers the entirety of the Isles of Scilly.

6.2. Significance of the Heritage Assets

Listed Buildings and Scheduled Monuments

6.2.1 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. 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.

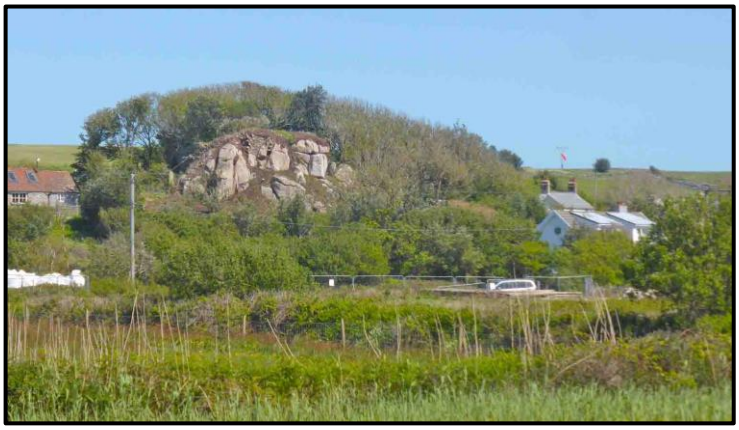

Image 3: Ennor Castle

6.2.2 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.

6.2.3 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.

6.2.4 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.

6.2.5 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 4: Giants Castle

6.2.6 Further afield lies the Grade I listed Garrison Walls surrounding the westernmost 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.

6.2.7 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 5: The Garrison Wall

Conservation Area

6.2.8 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.

6.2.9 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 Appraisal 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 impact 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"*

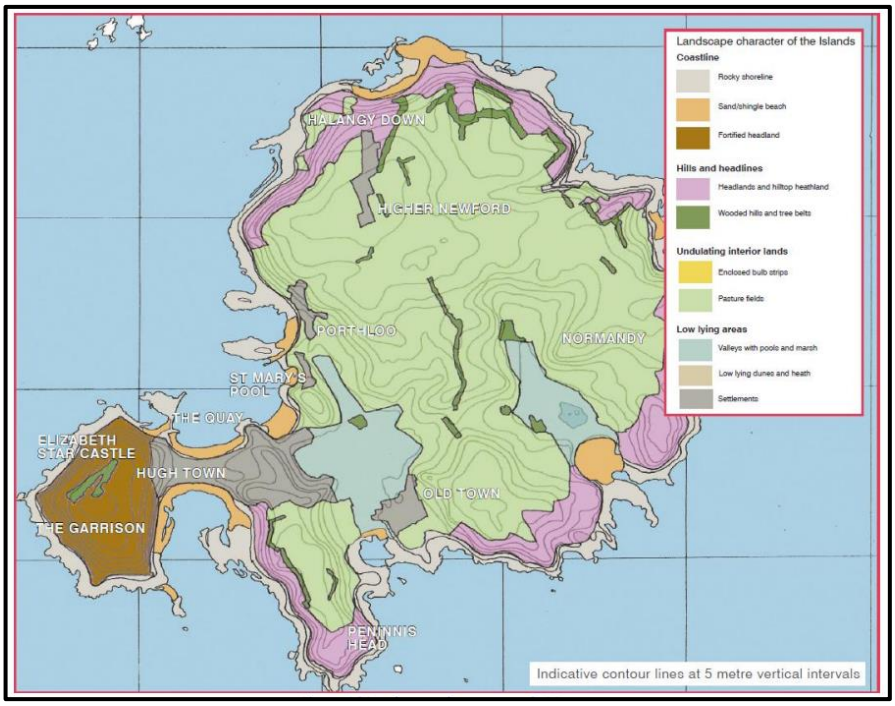

Image 6: Landscape Character Map for St Mary's

6.2.10 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.

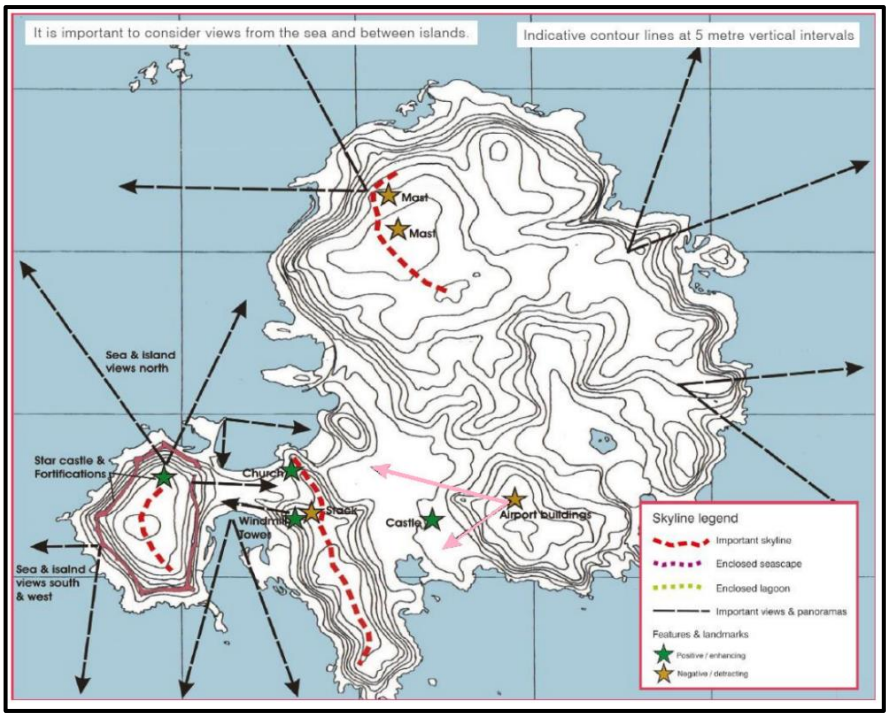

Image 7: Image to illustrate key views (pink) affecting the site

6.2.11 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.

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 buildings and scheduled ancient monuments

6.3.3 No listed buildings or scheduled ancient monuments 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.

6.3.4 In terms of the Grade I listed Garrison Wall, the proposed solar PV installations would have no impact. As discussed above, the setting of the Garrison Wall is already impacted in terms of views from the east by the houses immediately in front of the wall. Views westwards from the Garrison Wall towards the airport terminal are broken up by a mixture of vegetation and residential dwellings. Together with distance and topography, it is considered that the impacts of the proposed rooftop solar panels will be negligible.

Impact on the Conservation Area

6.3.5 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).

6.3.6 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).

6.3.7 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.

6.3.8 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 roof of the airport terminal may be visible from properties to the south west of the airport terminal but it is expected that, due to distance and topography, the visual impact would be negligible.

6.3.9 The nearest designated heritage asset 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 8: Ennor Castle (shrouded in vegetation, centre of image) and nearby residential properties

6.3.10 Inter-visbility between the castle and airport terminal is blocked by dense tree and vegetation growth. There are also a number of intervening buildings, therefore the heritage impacts of the proposed installation of rooftop solar panels are assessed as negligible, providing that a high quality, non-reflective finish to the PV panels is used.

6.4. Public benefits of the proposal

6.4.1 Whilst this statement has confirmed that there will be no impact on any heritage assets as a result of the proposed works, it is worth outlining the considerable public benefits of the proposals and the benefits they can bring to the conservation area.

6.4.2 The installation of the proposed solar PV panels to the roof of the airport terminal would be amongst the first steps in delivering significant public benefits by the Smart Islands Energy Programme. By the end of 2019, the project aims to deliver an islands-wide energy control system providing cheaper, reliable, renewable power. The project also aims to provide support for community enterprise to share the benefits of cheaper electricity.

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

7.1.2 These issues are addressed in turn.

7.2. Heritage Impacts

7.2.1 The impacts of the proposed development on nearby heritage assets and surrounding conservation area are assessed in the Heritage Statement previously in this document.

7.2.2 The Heritage Statement concludes that the installation of PV panels to the roof of the airport terminal will deliver substantial public benefits in terms of new renewable energy generation on the island whilst having no detrimental impacts on the islands heritage assets

7.3. Impact on Aviation Security

7.3.1 A Glint & Glare study was prepared by Pager Power in November 2017 and accompanies this application for full planning permission. This assessed the impact of the proposed root top solar panels at the airport terminal on aviation security.

7.3.2 The report concluded that reflections from the rooftop panels are likely to be insignificant with regard to aviation safety. Specifically, the assessment found:

- Effects would not be noticeable from within the Air Traffic Control tower because the panel areas that could reflect sunlight towards it are unlikely to be visible due to screening and separation distance.
- The resulting impact of the rooftop developments may be a 'twinkling' of numerous small illuminations for an observer looking towards the panels. Such effects can be experienced from windows and other reflective surfaces in an urban environment, commonly encountered by pilots.
- The surrounding area contains reflective sources including glass conservatories and bodies of water. Still water has reflective properties and intensities similar to solar panels.
- Impacts would be minimal in practice for pilots on approach to the airport. Reflections are possible towards approaching pilots on all approaches at various times throughout the year. This is because of the scattered locations of the rooftops and their varying orientations. The predicted intensity of the glare in some cases, including the panels nearest the airport itself, is categorised as having 'potential to cause a temporary after-image'. These effects are likely to be tolerable in practice because;
    - Effects are restricted in duration for each individual panel, due to their small size.

- Effects would be transient for a moving receptor such as an aircraft as it passes through the reflection zone.

- Many of the panels will be located outside of a pilot's primary flied of view as the aircraft approaches the runway threshold to land.

7.4. Landscape and Visual Impacts

7.4.1 The Sustainable Energy Strategy for the Isles of Scilly (2007) emphasises the importance of conserving, and where possible enhancing, the character and quality of the landscape, heritage and biodiversity of the islands.

7.4.2 The proposed solar PV panels will be located on the roof of the airport terminal and would not impact upon key landscape characteristics such as boundary hedgerow 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.

7.4.3 The Isles of Scilly Design Guide published in 2006 states that the airport has a significant visual impact as it is situated on high ground and is therefore very prominent. The airport does, however, provide vital infrastructure necessary to support the islands' community and economy.

7.4.4 The terminal building itself is a modern structure of some architectural merit. The building consists primarily of a glazed frontage and a plain tile roof, meaning that the installation of solar panels to the roof of the building would not detract from the architectural quality of the building, nor its setting within the wider landscape.

7.4.5 It is considered that the proposed rooftop solar PV installation at the airport terminal would make good use of existing buildings without impacting upon the wider conservation area and AONB.

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. Indeed 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 the adverse impacts of the proposal are addressed.

8.1.3 The design and access issues of the proposed rooftop solar installation at 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 proposed development will 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 existing buildings with negligible impact upon the surrounding conservation area and AONB.

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.pd

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

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