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Chief Planning Officer,
Council of the Isles of Scilly,
Town Hall,
St Marys,
Isles of Scilly TR21 0JQ.

1st July 2020

Dear Sir,

Planning Application P/20/022

We refer to the revised plans in respect of the above planning application.

We accept that these are an improvement on the initial scheme, in regards to:

- Retention of the pedestrian footpath adjacent to "Fairways".
- Marginally reduced impact on the filling station forecourt, and;
- "Apparent" loss of car parking provision.

However, we consider the proposals are still unacceptable, for the following reasons:

1. Scale, Design and proximity to Filling Station.
2. Safety of pedestrians.
3. Impact on road users.
4. Insufficient business case / questionable green credentials.

Scale, Design and Proximity to Filling Station

The revised plans show a two-bay charging facility, reduced from four in the previous proposal. There are no measurements of width & depth on the revised elevations, but we have scaled them and calculate the footprint to be approximately 6.65m wide x 5.96m deep. The original plans showed a canopy measuring 11.00m wide x 5.60m deep.

This leaves a maximum of approximately 4.35m of space for two car parking spaces, or 2.18m either side of the canopy, which is insufficient for average sized vehicles. We therefore contend that the revised scheme actually takes away four car parking spaces, and replaces them with just two covered spaces, leaving the land either side effectively sterilised.

Furthermore, by moving the canopy away from the Fairways boundary to retain the path, this pushes the built structure at least 1 metre further into the road, restricting visibility and compromising road safety.

The accompanying statement prepared by the GO-EV project manager, Jim Wrigley, asserts that the revised scheme satisfies proximity issues of the EV charging equipment to hazardous zones in connection with the adjacent petrol filling station. And yet at, the time of writing, no account has been taken of the fuel delivery vehicle's position when filling the underground tanks. This is important because the hazardous zones should be taken from the closest hazard point, in this case the discharge point on the delivery vehicle.

The statement also concedes that not all the regulations pertaining to EV charging stations at petrol filling stations can be met, because the filling station and charging canopy are in separate ownership. And yet the same proximity issues, that informed the current regulations, still apply regardless of who owns which facility. Is it really correct that the regulations should be side-stepped because of tenure technicalities?

Despite the reduction in size, we believe the proposed structure will:

- unacceptably restrict access for users of the filling station forecourt;
- make it more difficult for vehicles to manoeuvre;
- increase the risk of vehicular damage to the petrol pumps;
- conflict with the filling operation of our underground tanks;
- still potentially fall foul of the Petroleum regulations in terms of distance of charging points from hazard zone.

Our concerns remain relating to the fire risk of PV panels so close to the filling station forecourt.

Finally, we reiterate the point that, in times of storm surge (such as the Valentines Day storm of 2014), the car parking area was badly flooded and inundated with blown sand. Several cars parked in those spaces were damaged. Is this really the right location for sensitive electric charging equipment?

Safety of Pedestrians

Because of the width issues highlighted above, we believe that any vehicle attempting to use the inadequate car parking space to the left of the canopy will encroach on to our forecourt. Two footpaths converge at the corner of our building. Parking on this space will have the effect of funnelling pedestrians across our filling station forecourt, creating an unacceptable Health & Safety situation.

Impact on Road Users

Porthcressa Square is already a busy and congested area for vehicles. In recent years the same applicant has built three new commercial units and three new flats, without car parking provision, which has increased local congestion and restricted manoeuvring space. The current proposal now, effectively, takes four of the existing car parking spaces out of the general public domain. Any concession to allow the second charging space for non-electric vehicles is temporary at best. This can only have the effect of increasing congestion on the highway, and further restricting the flow of vehicles.

We are also concerned that users of the electric vehicles will be unfamiliar with their characteristics (silent running / high torque and acceleration) and will potentially create a hazard as they reverse out of the parking bays into other road users. This is particularly the case now that the canopy projects further in to Porthcressa Square.

Insufficient Business Case / Questionable Green Credentials

We understand that electric vehicles are here to stay, and that it is important for us all to do our part to live sustainably going forward. Which is why it is crucially important that green proposals are subject to full scrutiny to confirm their green credentials, particularly if they are funded through the public purse.

We previously challenged the Planning Department to fully scrutinize the business case behind the scheme generally, and particularly the car share scheme. If valuable public space is going to be lost to this scheme, it should be demonstrated that the proposal is viable, sustainable and has proven demand.

We asked the following questions:

- Is there any proven demand to justify 27 charging points around the islands?
- Will it really replace existing vehicles, or just add another 10 vehicles to the islands' roads?
- Is the scheme grant funding-lead rather than demand-lead.
- Is it really sustainable?
- What is the realistic mileage each vehicle will cover over its economic life?

We have since had some answers to our questions, both from the GO-EV Project Manager and from the Strategic Development Manager at the IOS Council. We have learnt that:

- A business case was not required for the funding.
- A viable business case has not been proven since.
- There is no proven demand for the GO-EV scheme.
- The hire charges are likely to be £5 per hour.
Presumably this will have to cover the vehicle's insurance, administration, maintenance, booking system, sinking fund for vehicle replacement, etc etc. If the scheme cannot self-fund at the agreed hire rate of just £5 per hour, there is every chance the project will end up anything but sustainable.
- Currently the GO-EV vehicles are available free of charge "as part of a trial stage of the project".
What is this proving? The vehicles are already here so it is too late to change that. Other than that, does it not just prove that it is easy to give something away?

No evidence was provided of the likely mileage each vehicle will reach during its economic life. Unless the vehicles can cover a sensible mileage, their purchase and use on the islands will be a waste of valuable natural resources and anything but environmentally friendly.

Given the huge uncertainty surrounding the viability of the scheme, we believe it would be negligent of the Local Planning Authority to grant consent without satisfying itself as to the viability, sustainability and true "green" credentials of the project. Likewise, we consider it would be irresponsible of the Local Authority to relinquish valuable public domain on an unproven project.

Thank you for considering these representations.

Yours faithfully,

Ian Sibley

Ian Sibley
Sibleys Fuel & Marine Services