



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

14<sup>th</sup> May 2020

Dear Sirs,

**Planning Application P/20/022**

We write to object to the above planning application, on the grounds of:

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

Scale and Proximity to Filling Station and Electricity Substation

The submitted plans show a four-bay charging facility, covered by a canopy measuring 11.00m x 5.60m. The Block Plan provided is misleading, in that it fails to show our forecourt, highlighting instead just the building behind. It also lacking information such as ridge and eaves heights.

Prior to submitting the application, no consultation has been made with us as owners of the adjacent petrol filling station, nor the applicant's own Petroleum Officer. We therefore consider the application to be poorly researched and inadequately detailed.

We have measured the site and can confirm that the footprint of the canopy proposed is within 700mm of our filling station forecourt and 900mm of the electricity substation. This is simply too close.

The proposed structure will:

- unacceptably restrict access for users of the filling station forecourt;
- make it difficult for vehicles to manoeuvre;

- restrict access to our air line and water point;
- increase the risk of vehicular damage to the petrol pumps;
- conflict with the filling operation of our underground pumps;
- potentially fall foul of the Petroleum regulations in terms of distance of charging points from hazard zone.

We have further concerns relating to the fire risk of PV panels so close to the filling station forecourt, and of inadequate ground earthing given the proximity of our underground petrol storage tanks.

Whilst the electricity substation is not our immediate concern we note that, with the double doors to the substation open, the pathway to Porthcressa Flats will be completely blocked, and access to the substation itself will only be possible through the first vehicle charging bay. We also note that the doors to the substation may not even open fully if they conflict with the structural columns of the canopy.

Finally, 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

As previously noted, the canopy will project within 700mm of our filling station forecourt – significantly closer than the existing parked cars. Two footpaths converge at the corner of our building. The canopy will have the effect of funnelling pedestrians across our filling station forecourt, creating an unacceptable Health & Safety situation.

The canopy is also shown as being built over the footpath that runs behind the existing car parking spaces. The application states that the footpath “is seldom (if ever) used”. This is simply unfounded and untrue. It provides a safe route from Porthcressa Flats to Porthcressa Beach, avoiding vehicular areas. The proposal would re-route pedestrians across the open bays of the canopy, where vehicles will be reversing out. We consider this is unacceptable.

### Impact on Road Users

Porthcressa Square is already a busy and congested area for vehicles. In recent years the 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 takes four of the existing car parking spaces out of the general public domain. 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.

### 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 would therefore challenge 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.

- 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?
- We believe the scheme is grant funding-lead rather than demand-lead.
- Is it really sustainable? We understand the hire charge will be in the region of just £5 per hour. How can this possibly pay for the scheme's administration, property overheads, insurances, staff wages, vehicle and charging point maintenance, and for a sinking fund to replace the vehicles when they reach the end of their economic life? 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.
- What is the realistic mileage each vehicle will cover over 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.

Thank you for considering these representations.

Yours faithfully,

*Ian Sibley*

**Ian Sibley**  
**Sibleys Fuel & Marine Services**