



**IMPORTANT – THIS COMMUNICATION AFFECTS YOUR PROPERTY**

## **COUNCIL OF THE ISLES OF SCILLY**

Old Wesleyan Chapel, Garrison Lane, St Mary's TR21 0JD  
Telephone: 01720 424455 – Email: [planning@scilly.gov.uk](mailto:planning@scilly.gov.uk)

Town and Country Planning Act 1990  
Town and Country Planning (Development Management Procedure) Order 2015

### **PERMISSION FOR DEVELOPMENT**

<b>Application No:</b>	<b>P/24/019/COU</b>	<b>Date Application Registered:</b>	<b>26th March 2024</b>
<b>Applicant:</b>	<b>Mr Adam Peters Latham Park, St Blazey Road, St Blazey, Par, Cornwall, PL24 2HY</b>	<b>Agent:</b>	<b>Angela Warwick Situ8 Planning Consultancy Millham Farm, Lostwithiel, Cornwall, PL22 0JA</b>

**Site address:** Circus Field Church Road Hugh Town St Mary's Isles of Scilly  
**Proposal:** Temporary use of field for construction site welfare facilities and the storage of materials in conjunction with planning ref P/24/006/FUL (AMENDED PLANS).

In pursuance of their powers under the above Act, the Council hereby **PERMIT** the above development to be carried out in accordance with the following Conditions:

- C1** The development hereby permitted is granted for a limited period only (18 months) expiring on 10/11/2026 on or before this date, the development carried out in pursuance of this permission shall be demolished/removed from the site and the land restored in accordance with the requirements of the Habitat Restoration Plan to be approved under Condition 3.  
Reason: The use hereby approved is associated with temporary construction works and not considered suitable as a permanent form of development
- C2** The development hereby permitted shall be carried out in strict accordance with the approved details only including:
- Location Plan 10711-2-field-SK01 REV A
  - Existing Block Plan 10711-2-field-SK02 REV A
  - Proposed Block Plan 10711-2-field-SK03 REV B
  - Access Section 10711-2-field-SK04 REV B
  - Heritage Impact Statement (Portico Heritage)
  - Statement of Archaeological Potential and Impact (Johns, 24 February 2024)
  - Scheduled Monument Plan (Johns, 11 April 2024)
  - Construction Environmental and Ecological Management Plan (Situ8, Apr 2024 received 09 May 2024)
  - Construction Waste Management Strategy (Situ8, Apr 2024)

These are stamped as **APPROVED**

Reason: For the clarity and avoidance of doubt and in the interests of the character and

appearance of the Conservation Area, Area of Outstanding Natural Beauty and Heritage Coast in accordance with Policies OE1 and OE7 of the Isles of Scilly Local Plan (2015-2030).

**C3 A) Within six months of the date of this permission, a Habitat Restoration Plan (HRP) shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall set out how onsite habitats will be restored to their previous condition in accordance with section 6.6 of the approved Ecological Assessment (Faulconbridge, Mar 2024) and a timetable for the restoration works, which shall include:**

- A species rich grass sward
- The Cornish Hedge
- Planting of new tree(s) to replace those removed.

**The development shall thereafter proceed in strict accordance with the approved HRP.**

**B) Within six months of completion of the works, photographic evidence to demonstrate satisfactory reinstatement of the above habitats shall be submitted to and approved in writing by the Local Planning Authority.**

Reason: To protect habitats and species identified in the ecological surveys from adverse impacts during construction in accordance with policy OE2 of the Isles of Scilly Local Plan 2015-2030 and to avoid an offence under the Wildlife and Countryside Act 1981, as amended and The Conservation of Habitats and Species Regulations 2017, as amended. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

**C4 The noise rating level (LAeq, T) from any generator installed and run on site shall not exceed the background noise level (LA90,T) at any time when measured at the nearest noise sensitive source.**

Reason: To protect neighbouring amenities from adverse noise impacts during construction in accordance with Policy SS2 of the Isles of Scilly Local Plan 2015-2030.

#### **Further Information**

1. In dealing with this application, the Council of the Isles of Scilly has actively sought to work with the applicants in a positive and proactive manner, in accordance with paragraph 38 of the National Planning Policy Framework 2023.
2. Please note that from the 6th April 2008 a fee is now payable for the discharge of any conditions where details are required to be submitted pursuant to that condition. Details of the exact amount and the procedure to be followed can be found on the Council's website.
3. It should be noted that some of the conditions attached to this consent are required to be complied with prior to the commencement of the development hereby approved, if those conditions are not fully adhered to, then the consent cannot lawfully be implemented, therefore a new application will be requested and consideration will be given to the expedience of enforcement action.
4. The Regulatory Reform (Fire Safety) Order 2005 applies, and the responsible person will be required to carry out a fire risk assessment to identify the risks and take reasonable measures to ensure people are safe from fire. The works may be considered 'controlled work' and therefore building control approval may also be required.
5. The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or being built. Planning consent for a development does not provide a defence against prosecution under this act. Trees and scrub are likely to contain nesting birds between 1 March and 31 August inclusive. Trees and scrub are present on the application site and are to be assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity on site during this period and has shown it is absolutely certain that nesting birds are not present.

6. Bats and their roosts receive strict legal protection under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010 (as amended). All work must stop immediately if bats, or evidence of bat presence (e.g. droppings, bat carcasses or insect remains), are encountered at any point during this development. Should this occur, further advice should be sought from Natural England and/or a professional ecologist.
7. Materials for the rebuilt boundary should, if possible, come from the breached section (as indicated on the proposed plan submitted in support of P/24/019/COU. If stone for facing the rebuild is to be brought on to site. it should be carefully chosen to replicate as closely as possible, the rock type, colour and size of the stonework within the existing boundary. Stone for re-facing should NOT be taken from other boundaries, historic buildings or any other archaeological feature.

Signed:



**Chief Planning Officer**

*Duly Authorised Officer of the Council to make and issue Planning Decisions on behalf of the Council of the Isles of Scilly.*

**DATE OF ISSUE:** 10<sup>th</sup> May 2024



# COUNCIL OF THE ISLES OF SCILLY

Planning Department  
Old Wesleyan Chapel, Garrison Lane, St Mary's TR21 0JD  
☎0300 1234 105  
✉planning@scilly.gov.uk

Dear Mr Adam Peters

## Please sign and complete this certificate.

This is to certify that decision notice: P/24/019/COU and the accompanying conditions have been read and understood by the applicant: Mr Adam Peters.

1. **I/we intend to commence the development as approved:** Temporary use of field for construction site welfare facilities and the storage of materials in conjunction with planning ref P/24/006/FUL (AMENDED PLANS) at: Circus Field Church Road Hugh Town St Mary's Isles Of Scilly **on:** .....
2. I am/we are aware of any conditions that need to be discharged before works commence.
3. I/we will notify the Planning Department in advance of commencement in order that any pre-commencement conditions can be discharged.

You are advised to note that Officers of the Local Planning Authority may inspect the project both during construction, on a spot-check basis, and once completed, to ensure that the proposal has complied with the approved plans and conditions. In the event that the site is found to be inaccessible then you are asked to provide contact details of the applicant/agent/contractor (delete as appropriate):

**Name:** \_\_\_\_\_ **Contact Telephone Number:** \_\_\_\_\_  
**And/Or Email:** \_\_\_\_\_

Print Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Please sign and return to the **above address** as soon as possible.

For the avoidance of doubt you are reminded to address the following condition(s) as part of the implementation of this permission. Although we will aim to deal with any application to discharge conditions as expeditiously as possible, you are reminded to allow up **to 8 weeks** for the discharge of conditions process.

### **Within 6 Months: Submission of Habitat Restoration Plan**

C3 A) Within six months of the date of this permission, a Habitat Restoration Plan (HRP) shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall set out how onsite habitats will be restored to their previous condition in accordance with section 6.6 of the approved Ecological Assessment (Faulconbridge, Mar 2024) and a timetable for the restoration works, which shall include:

- A species rich grass sward
- The Cornish Hedge
- Planting of new tree(s) to replace those removed.

The development shall thereafter proceed in strict accordance with the approved HRP.

B) Within six months of completion of the works, photographic evidence to demonstrate satisfactory reinstatement of the above habitats shall be submitted to and approved in writing by the Local Planning Authority.



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Planning Department

Old Wesleyan, Garrison Lane, St Mary's, Isles of Scilly, TR21 0JD

☎ 01720 424455

✉ [planning@scilly.gov.uk](mailto:planning@scilly.gov.uk)

**THIS LETTER CONTAINS IMPORTANT INFORMATION  
REGARDING YOUR PERMISSION – PLEASE READ  
IF YOU ARE AN AGENT DEALING WITH IS ON BEHALF OF THE  
APPLICANT IT IS IMPORTANT TO LET THE APPLICANT KNOW  
OF ANY PRE-COMMENCEMENT CONDITIONS**

Dear Applicant,

This letter is intended to help you advance your project through the development process. Now that you have been granted permission, there may be further tasks you need to complete. Some aspects may not apply to your development; however, your attention is drawn to the following paragraphs, which provide advice on a range of matters including how to carry out your development and how to appeal against the decision made by the Local Planning Authority (LPA).

### **Carrying out the Development in Accordance with the Approved Plans**

You must carry out your development in accordance with the stamped plans enclosed with this letter. Failure to do so may result in enforcement action being taken by the LPA and any un-authorised work carried out may have to be amended or removed from the site.

### **Discharging Conditions**

Some conditions on the attached decision notice will need to be formally discharged by the LPA. In particular, any condition that needs to be carried out prior to development taking place, such as a 'source and disposal of materials' condition, an 'archaeological' condition or 'landscaping' condition must be formally discharged prior to the implementation of the planning permission. In the case of an archaeological condition, please contact the Planning Department for advice on the steps required. Whilst you do not need to formally discharge every condition on the decision notice, it is important you inform the Planning Department when the condition advises you to do so before you commence the implementation of this permission. Although we will aim to deal with any application to discharge conditions as expeditiously as possible, you are reminded to allow up to **8 weeks** for the discharge of conditions process.

**Please inform the Planning Department when your development or works will be commencing. This will enable the Council to monitor the discharge and compliance with conditions and provide guidance as necessary. We will not be able to provide you with any written confirmation on the discharge of pre-commencement conditions if you do not formally apply to discharge the conditions before you start works.**

As with the rest of the planning application fees, central Government sets a fee within the same set of regulations for the formal discharge of conditions attached to planning permissions. Conditions are necessary to control approved works and development. Requests for confirmation that one or more planning conditions have been complied with are as follows (VAT is not payable on fees set by central government). More information can be found on the Council's website:

- Householder permissions - £43per application
- Other permissions - £145 per application

### **Amendments**

If you require a change to the development, contact the LPA to see if you can make a 'non material amendment' (NMA). NMA can only be made to planning permissions and not a listed building consent. They were introduced by the Government to reflect the fact that some schemes may need to change during the construction phase. The process involves a short application form and a 14 day consultation period. There is a fee of £43 for householder type applications and £293 in all other cases. The NMA should be determined within 28 days. If the change to your proposal is not considered to be non-material or minor, then you would need to submit a new planning application to reflect those changes. Please contact the Planning Department for more information on what level of amendment would be considered non-material if necessary.

### **Appealing Against the Decision**

If you are aggrieved by any of the planning conditions attached to your decision notice, you can appeal to have specific conditions lifted or modified by the Secretary of State. All appeal decisions are considered by the Planning Inspectorate – a government department aimed at providing an unbiased judgement on a planning application. From the date of the decision notice attached you must lodge an appeal within the following time periods:

- Householder Application - 12 weeks
- Planning Application – 6 months
- Listed Building Consent – 6 months
- Advertisement Consent - 8 weeks
- Minor Commercial Application - 12 weeks
- Lawful Development Certificate – None (unless for LBC – 6 months)
- Other Types - 6 months

Note that these periods can change so you should check with the Planning Inspectorate for the most up to date list. You can apply to the Secretary of State to extend this period, although this will only be allowed in exceptional circumstances.

You find more information on appeal types including how to submit an appeal to the Planning Inspectorate by visiting <https://www.gov.uk/topic/planning-development/planning-permission-appeals> or you can obtain hard copy appeal forms by calling 0303 444 5000. Current appeal handling times can be found at: [Appeals:](#)

[How long they take page.](#)

### **Building Regulations**

With all building work, the owner of the property is responsible for meeting the relevant Planning and Building Regulations. Building Regulations apply to most building work so it is important to find out if you need permission. This consent is to ensure the safety of people in and around buildings in relation to structure, access, fire safety, infrastructure and appropriate insulation.

The Building Control function is carried out on behalf of the Council of the Isles of Scilly by Cornwall Council. All enquiries and Building Control applications should be made direct to Cornwall Council, via the following link [Cornwall Council](#). This link also contains comprehensive information to assist you with all of your Building Control needs.

Building Control can be contacted via telephone by calling 01872 224792 (Option 1), via email [buildingcontrol@cornwall.gov.uk](mailto:buildingcontrol@cornwall.gov.uk) or by post at:

Building Control  
Cornwall  
Council Pydar  
House Pydar  
Street Truro  
Cornwall  
TR1 1XU

Inspection Requests can also be made online:

<https://www.cornwall.gov.uk/planning-and-building-control/building-control/book-an-inspection/>

### **Registering/Altering Addresses**

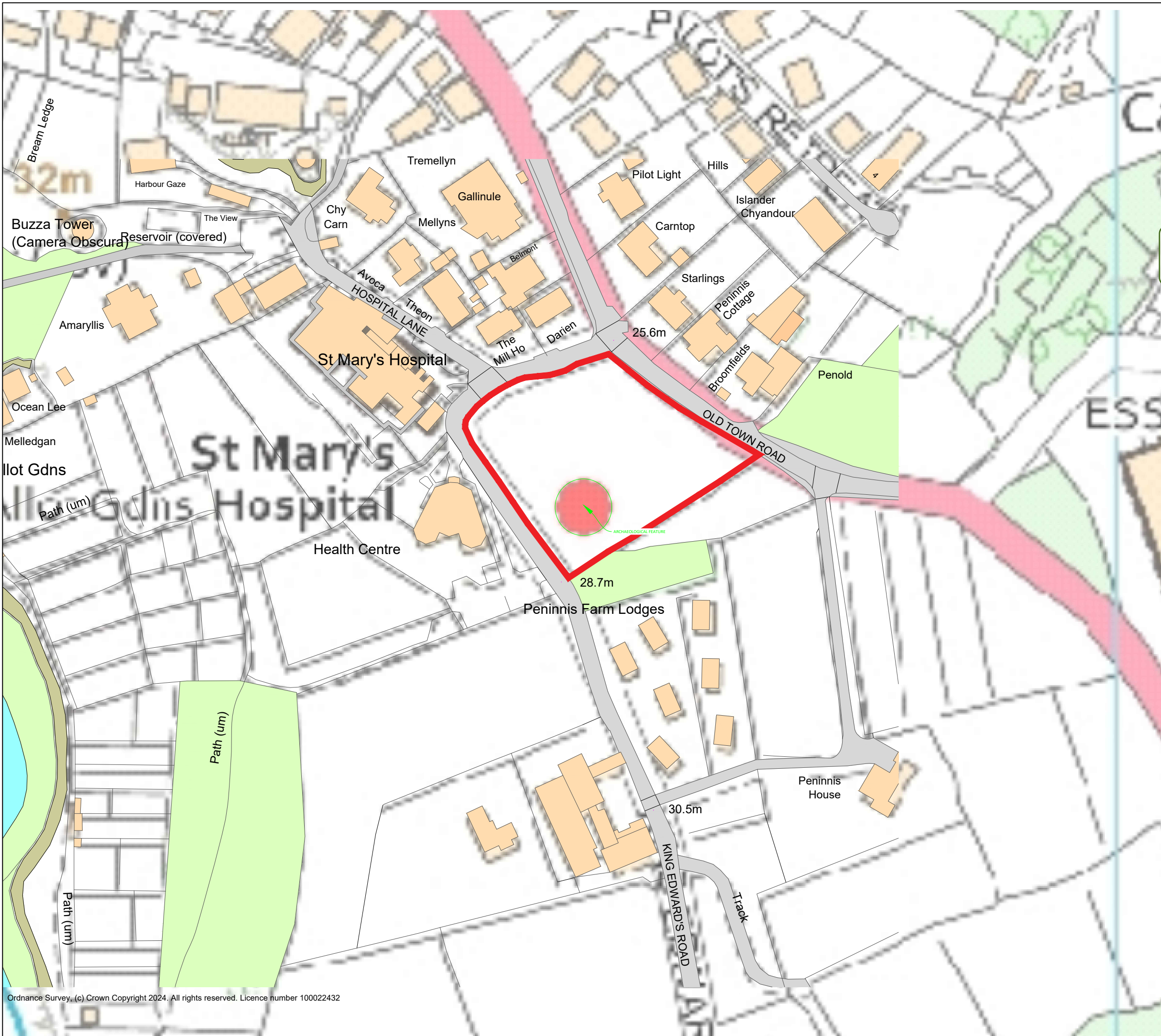
If you are building a new dwelling, sub dividing a dwelling into flats or need to change your address, please contact the Planning Department who will be able to make alterations to local and national databases and ensure postcodes are allocated.

### **Connections to Utilities**

If you require a connection to utilities such as water and sewerage, you will need to contact South West Water on 08000831821. Electricity connections are made by Western Power Distribution who can be contacted on 08456012989.

Should you require any further advice regarding any part of your development, please contact the Planning Department and we will be happy to help you.





**RECEIVED**  
 By Liv Rickman at 4:14 pm, Apr 19, 2024

**APPROVED**  
 By Lisa Walton at 2:26 pm, May 10, 2024

**Note**  
 All dimensions must be checked on site.  
 Discrepancies must be reported prior to the commencement or fabrication of any work.

Ref	Date	Rev.	Amendments
a	13/03/23	KJ	OS License made visible
b	18/04/24	KJ	Alt entrance removed

Community 1st Cornwall Limited  
 Blue Support House  
 Moorland Road, St Austell, PL25 5BS  
 Tel: 01872 260 525

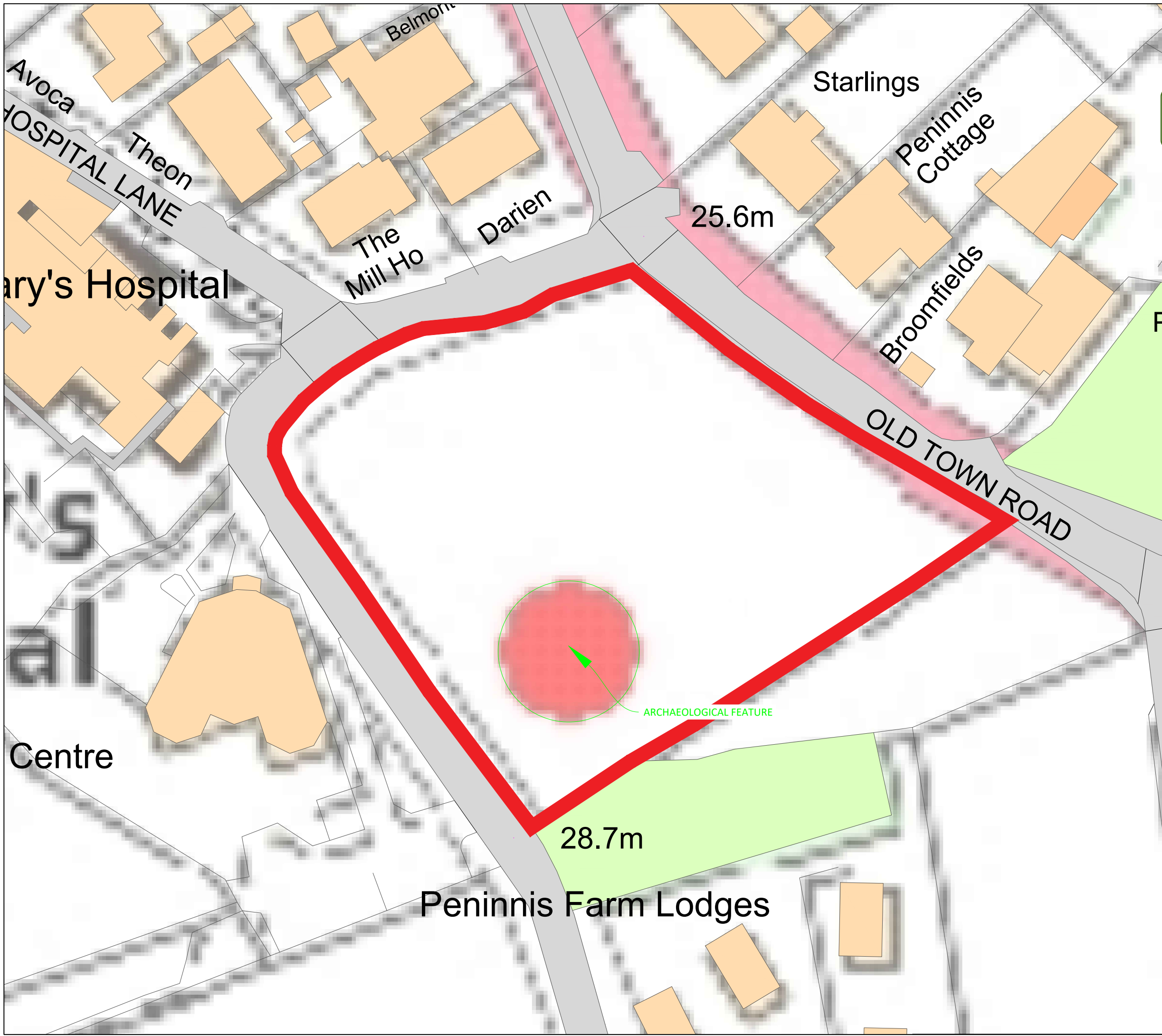
Client  
 Cornwall Partnership NHS Trust

Site  
 St Marys Hospital, Isles of Scilly

Project Title  
 Hospital works storage compound  
 in conjunction with P/24/006/FUL

Drawing Title  
 Location Plan

Drawn	Date	Scale	Drawing No.	Rev
KJ	18/04/2024	A3 - 1:1250	10711-2-field-SK01	b



**RECEIVED**  
 By Liv Rickman at 4:15 pm, Apr 19, 2024

**APPROVED**  
 By Lisa Walton at 2:27 pm, May 10, 2024

**Note**  
 All dimensions must be checked on site.  
 Discrepancies must be reported prior to the commencement or fabrication of any work.

Ref	Date	Rev.	Amendments
a	18/04/24	KJ	Alt entrance removed

Community 1st Cornwall Limited Blue Support House Moorland Road, St Austell, PL25 5BS Tel: 01872 260 525	Client Cornwall Partnership NHS Trust
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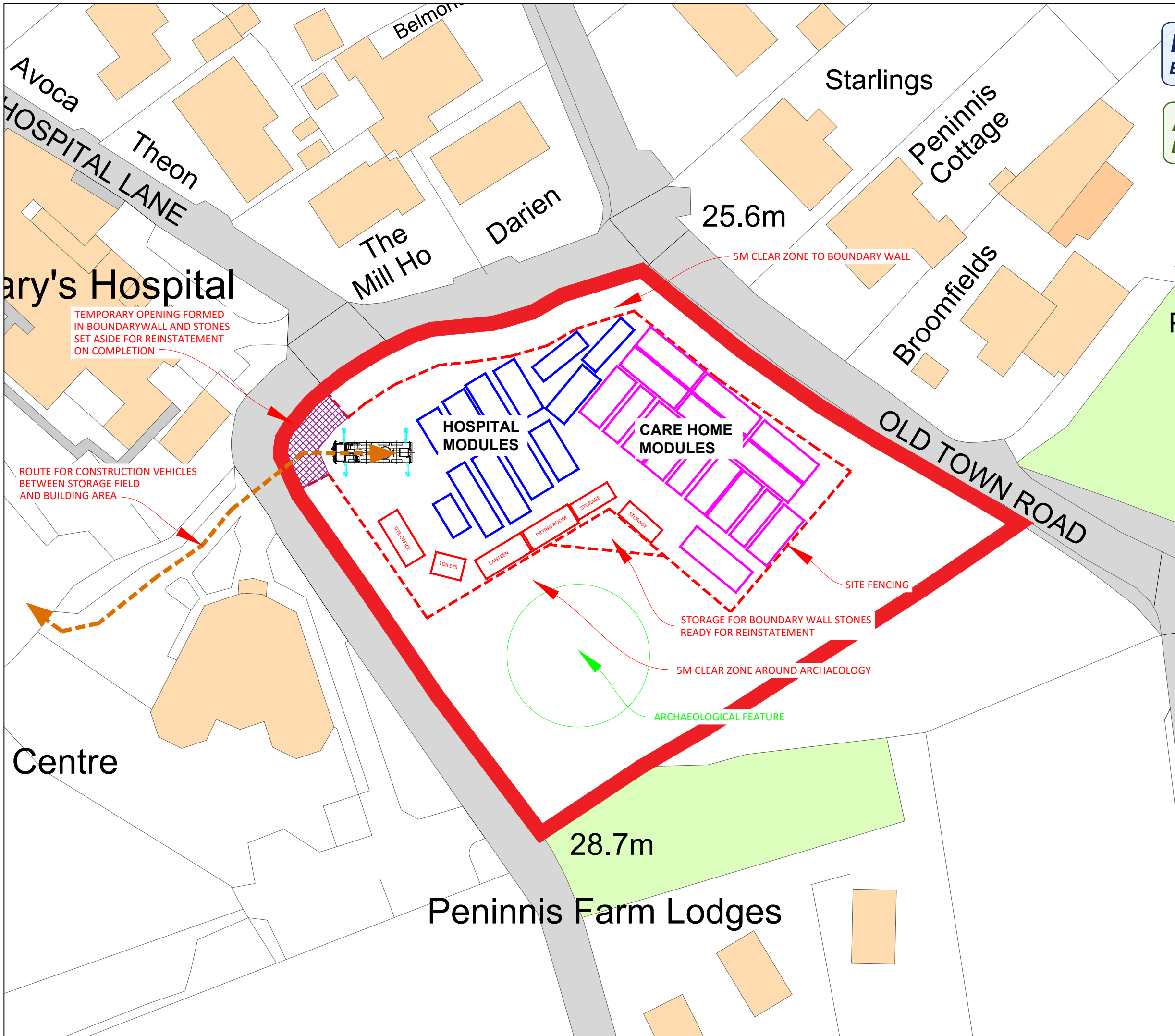
Site  
 St Marys Hospital, Isles of Scilly

Project Title Hospital works storage compound in conjunction with P/24/006/FUL	Drawing Title Existing Field plan
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Drawn KJ	Date 18/04/2024	Scale A3 - 1:500	Drawing No: 10711-2-field-SK02	Rev a
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**RECEIVED**  
By Liv Rickman at 4:12 pm, Apr 19, 2024

**APPROVED**  
By Lisa Walton at 2:27 pm, May 10, 2024



**Note**  
All dimensions must be checked on site.  
Discrepancies must be reported prior to the commencement or fabrication of any work.

Ref	Date	Rev.	Amendments
a	18/04/24	KJ	Alt entrance removed

Community 1st Cornwall Limited  
Blue Support House  
Moorland Road, St Austell, PL25 5BS  
Tel: 01872 260 525

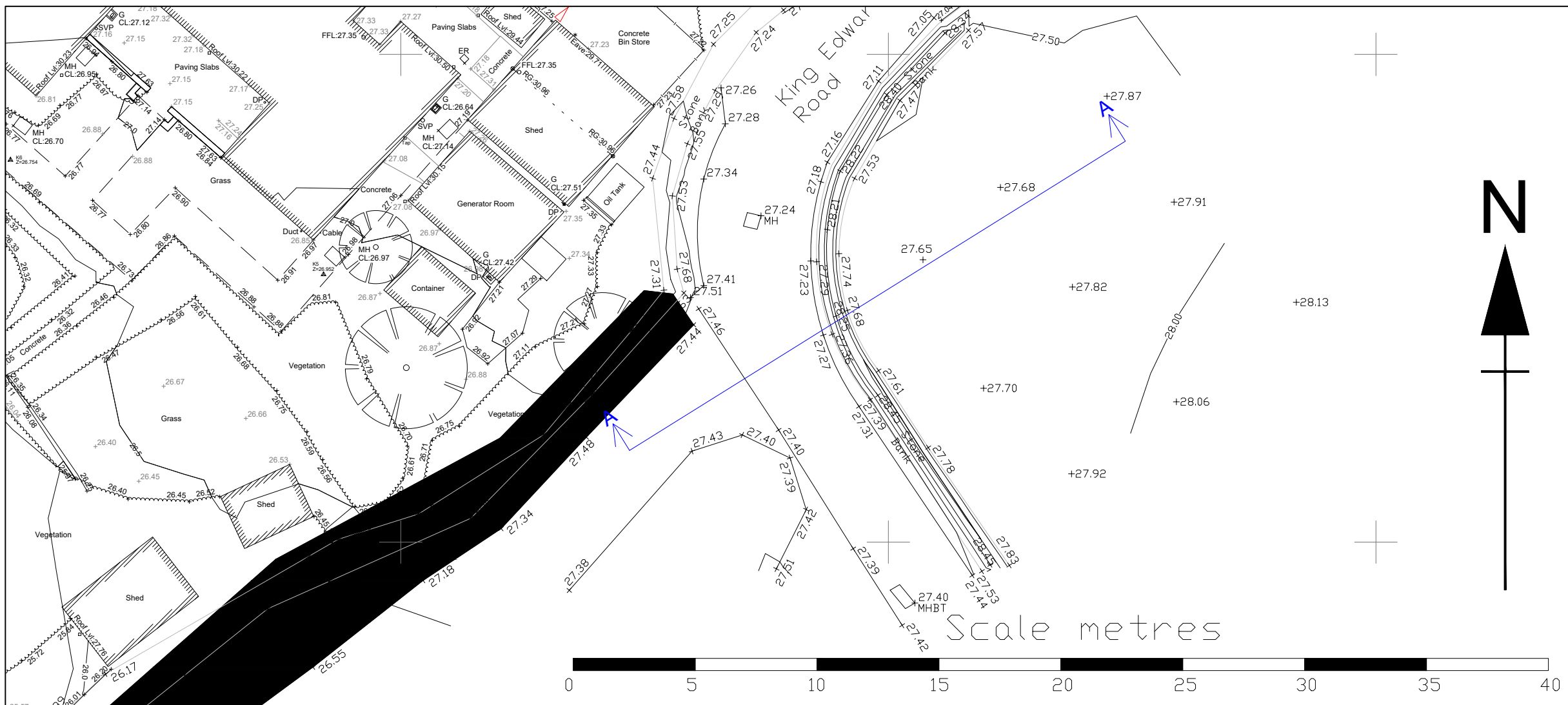
Client  
Cornwall Partnership NHS Trust

Site  
St Marys Hospital, Isles of Scilly

Project Title  
Hospital works storage compound in conjunction with P/24/006/FUL

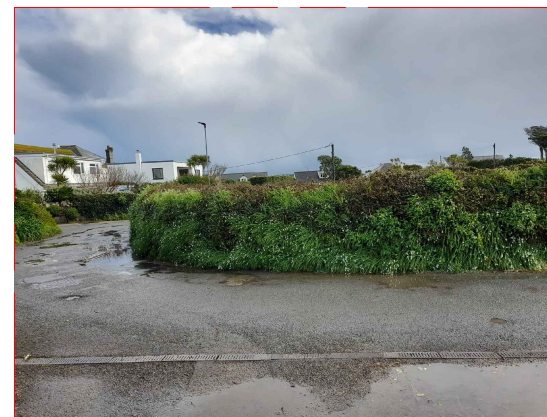
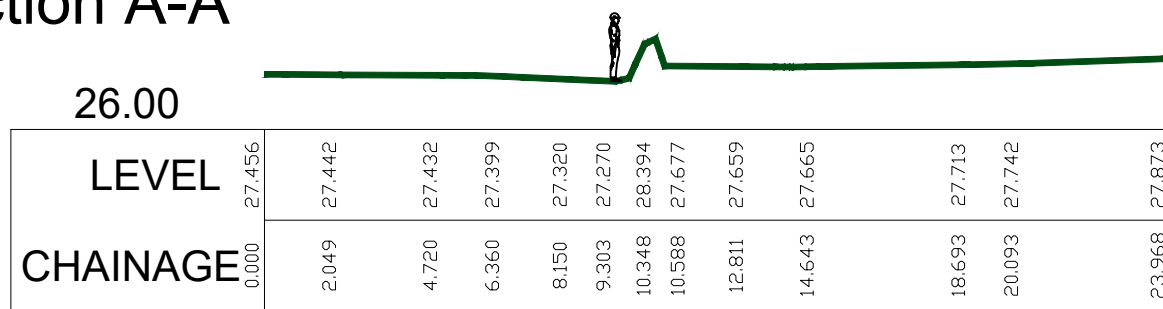
Drawing Title  
Proposed Field Plan

Drawn	Date	Scale	Drawing No.	Rev
KJ	18/04/2024	A3 - 1:500	10711-2-field-SK03	a



### Existing Section A-A

Horiz. 1:200  
Vert. 1:200

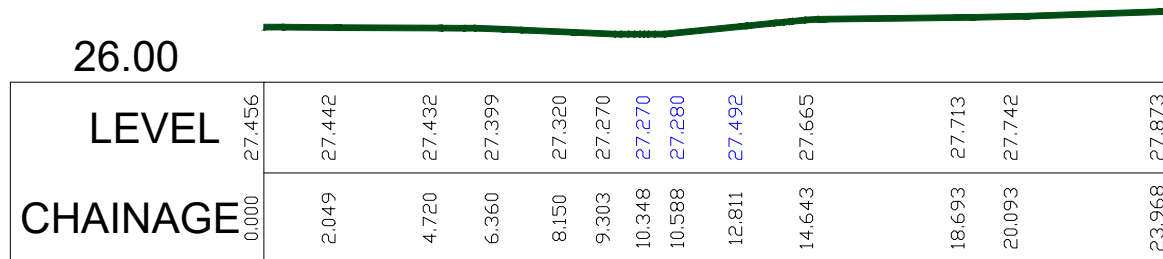


**APPROVED**  
By Lisa Walton at 2:28 pm, May 10, 2024

**RECEIVED**  
By A King at 9:01 am, Mar 28, 2024

### Proposed Section A-A

Horiz. 1:200  
Vert. 1:200



Section of wall to be temporarily removed, set aside and then re-built on completion of the works.

The level change across the field boundary wall is 400mm.  
 Allowing for a 1:10 minimum slope the limit of excavation will be approximately 4m inside the boundary wall.  
 Ramp to be covered with track mats or similar following excavation and all excavated materials to be set aside within the field for re-instatement on completion of the works.

**Note**  
All dimensions must be checked on site.  
Discrepancies must be reported prior to the commencement or fabrication of any work.

Ref	Date	Rev.	Amendments
a	27/03/24	kj	Photos added

Community 1st Cornwall Limited  
Blue Support House  
Moorland Road, St Austell, PL25 5BS  
Tel: 01872 260 525

Client  
Cornwall Partnership NHS Trust

Site  
St Marys Hospital, Isles of Scilly

Project Title  
Hospital works storage compound in conjunction with P/24/006/FUL

Drawing Title  
Section through field entrance

Drawn: KJ Date: 22/03/2024 Scale: A3 - 1:200 Drawing No: 10711-2-field-SK04 Rev: a

**RECEIVED**  
By Liv Rickman at 1:57 pm, Feb 29, 2024

**APPROVED**  
By Lisa Walton at 2:28 pm, May 10, 2024

February 2024

Integrated Health & Social  
Care Centre, Isles of Scilly  
Temporary Works Yard  
Heritage Impact Assessment



PORTICO HERITAGE

[www.porticoheritage.co.uk](http://www.porticoheritage.co.uk)

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# 1 Introduction

## Purpose

- 1.1 This report has been prepared to support the submission for planning permission for the temporary works yard related to proposals for the new Integrated Health & Social Care building as part of St Mary's Hospital on Hospital Lane, St Mary's, Isles of Scilly.
- 1.2 The purpose of the report is to set out the history and heritage significance of the site and its context and to consider the impact of the proposals on that significance.
- 1.3 The report should be read in conjunction with the plans prepared by Bluesky Architects and Design & Access Statement prepared by Situ8 Planning.

## Author

- 1.4 The author of this report is Nick Collins BSc (Hons) MSc MRICS IHBC. Nick set up Portico Heritage in 2014. Previously he was a Director of Conservation at Alan Baxter & Associates. Nick spent nine years at Historic England where he was a Principal Inspector of Historic Buildings & Areas leading a specialist team of historic building inspectors, architects, and archaeologists on a wide range of heritage projects in East & South London. Previously a Conservation Officer at the London Borough of Bromley, Nick began his career at real estate consultancy Jones Lang LaSalle as a Chartered Surveyor.
- 1.5 Nick has undertaken a considerable amount of work in the West Country, including for the Lost Gardens of Heligan in Cornwall, Plymouth City Council and the Hall for Cornwall in Truro.

## 2 The site and its context

### The Site

- 2.1 The site is located immediately to the east of St Mary's Hospital situated on the high ground to the south east of Hugh Town, just off the road to Old Town beyond Buzza Hill.
- 2.2 An agricultural field, it is known as 'Circus Field' and contains the Scheduled Ancient Monument: Platform Cairn on Northern Peninnis Head. (see figure 1). It is enclosed by a traditional Cornish Hedge.



Figure 1: Ordnance Survey Map 1875 with the site of the present hospital identified

### The heritage context of the site

- 2.3 Circus Field contains a Scheduled Ancient Monument: Platform Cairn on Northern Peninnis Head and the site also lies within the Isles of Scilly Conservation Area. There are a number of other designated heritage assets in the vicinity, including Grade II listed Buzza Tower and the Scheduled Round Cairn with Funerary Chamber on Buzza Hill. Both of the Scheduled Ancient Monuments (SAMs) are also located in 'Isles of Scilly Archaeological Constraint Areas' (although the Hospital itself is outside this area). This is shown in Figure 2.





Figure 2: Map showing the location of the nearby listed buildings (orange); Scheduled Ancient Monuments (hatched red) and Archaeological Constraint Areas (green)

- 2.4 The Historic Environment Record identifies other sites of interest, extant, archaeological and/or demolished. The closest to the site are a number of former quarry sites on and around Buzza Hill and two Bronze Age findspots to the north east the other side of Old Town Road.

### Assessing heritage significance

- 2.5 The conservation area, listed buildings and Scheduled Ancient Monuments are 'designated heritage assets', whilst other structures (including any identified as making a positive contribution to the character and appearance of the conservation area) are 'non-designated heritage assets' as defined by the National Planning Policy Framework (NPPF).
- 2.6 'Significance' is defined in the NPPF as 'the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic'. The Historic England 'Planning for the Historic Environment Practice Guide' puts it slightly differently – as 'the sum of its architectural, historic, artistic or archaeological interest'.
- 2.7 'Conservation Principles, Policies and Guidance for the sustainable management of the historic environment' (English Heritage/Historic England, April 2008) describes a number of 'heritage values' that may be present in a 'significant place'. These are evidential, historical, aesthetic and communal value.
- 2.8 The site, the listed and unlisted buildings nearby, and their relationship to one another and the conservation areas collectively illustrate the development of the Isles of Scilly.

## Isles of Scilly Conservation Area

- 2.9 The significance, character and appearance of the Isles of Scilly Conservation Area is embodied in the integration of the buildings and landscapes on Scilly and how its inhabitants have shaped the land over a long period.
- 2.10 The 'historic interest' to be found on the Isles of Scilly is well documented and the islands contain a remarkable abundance and variety of archaeological remains and thus 'evidential value' from over 4000 years of human activity.
- 2.11 The remote physical setting of the islands has lent a distinctive character to those remains, producing many unusual features important for the broad understanding of the social development of early communities.
- 2.12 The islands' archaeological remains demonstrate clearly the gradually expanding size and range of contacts of their communities.
- 2.13 By the post-medieval period (from 1540), the islands occupied a nationally strategic location, resulting in an important concentration of defensive works reflecting the development of fortification methods and technology from the mid 16<sup>th</sup> to the 20<sup>th</sup> centuries.
- 2.14 It was the construction of the defences at The Garrison (as well as other locations across the Islands) that directly and indirectly led to the growth of Hugh Town as the main urban and administrative centre of St Mary's and the Isles of Scilly. Similarly the encouragement of farming, flower growing and shipbuilding led to a growing of the economy and society. Important key buildings within Hugh Town that contribute to this evolution and character include the Town Hall, Church and former school.
- 2.15 Within this context the hospital makes an important contribution to the twentieth century social history and development of the Islands but is of little importance architecturally – described as '*plain and functional*' in Scilly's Building Heritage by Peter Madden. The building has been considerably altered and extended, particularly to the rear and is necessarily utilitarian.
- 2.16 The Cairns at Circus Field and Buzza Hill also lie within this wider conservation area context, as do the quarries and former windmill, now Buzza Tower – important elements of the evolution of St Mary's.

## Platform Cairn on Northern Peninnis Head

- 2.17 The cairn is located to the east of the hospital in a field known as 'Circus Field'. The SAM is largely 'below ground'.
- 2.18 Platform cairns are funerary monuments of Early Bronze Age date (c.2000-1600 BC)<sup>1</sup>. They were constructed as low flat-topped mounds of stone rubble, up to 40m in external diameter though usually considerably smaller, covering single or multiple burials. Some examples have other features, including peripheral banks and internal mounds

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<sup>1</sup> Historic England Scheduled Monument Description LEN: 1009284

constructed on the platform. A kerb of slabs or edge-set stones sometimes bounds the edge of the platform, and a peripheral bank or mound if present. Platform cairns can occur as isolated monuments, in small groups or in cairn cemeteries. In cemeteries they are normally found alongside cairns of other types. Platform cairns form a significant proportion of the 387 surviving cairns on the Isles of Scilly; this is unusual in comparison with the mainland. All surviving examples on the Isles of Scilly are considered worthy of protection.

- 2.19 This platform cairn on northern Peninnis Head has survived substantially intact with only minor disturbance evident from an antiquarian excavation and the modern cable trench. The prominent location of this cairn and its relationship with the other broadly contemporary cairns and field systems on and around Peninnis Head demonstrates well the nature of funerary activity and the organisation of land use during the Bronze Age.
- 2.20 The monument includes a prehistoric platform cairn situated on the summit of the northern end of the broad ridge forming Peninnis Head, in the south west of St Mary's in the Isles of Scilly. The platform cairn survives with a turf-covered circular mound of heaped rubble, 10m in diameter, straddling a slight crest on the spine of the ridge such that the mound is 0.6m high from the south west side and 0.3m from the north east, rising to a flattened upper surface 4m in diameter. A row of three large slabs, each 1m-1.2m long and 0.5m wide, considered to derive from an unrecorded antiquarian excavation at the cairn, lie parallel to each other embedded in the turf from 1m beyond the western perimeter of the cairn, with a further slab partly exposed to their south. A modern electricity cable trench is visible as a slight, turf-covered linear hollow, 0.5m wide and 0.03m deep, running north-south across the eastern perimeter of the cairn. Beyond this monument, further broadly contemporary cairns are located on the crest of the ridge from 750m to the SSE at the southern end of Peninnis Head, with prehistoric field systems fringing the lower slopes. Two broadly contemporary chambered cairns, of which one still survives, occupied the summit of Buzza Hill, 200m to the WNW, the north westward extension of the ridge containing this monument. Until modern development, these cairns were intervisible with this monument. The electricity cable and its service trench are excluded from the scheduling but the ground beneath is included.
- 2.21 Notwithstanding the fact that historically there was intervisibility between the cairns, today the setting of this cairn is visually and physically largely confined to the field within which it sits. 'Suburban' development has grown up on the northern side of Old Town Road and along Hospital Lane, as well as the hospital and Health centre breaking any historic connection between the sites.

### **Buzza Tower**

- 2.22 Buzza Tower is located approximately 200m to the north west of the Hospital. It was first constructed in 1821 as a windmill of squared and coursed granite. It stands on the site of a Bronze Age kerbed cairn previously excavated by William Borlase in 1752.

- 2.23 The structure was restored and extended in 1911 in commemoration of a visit by King Edward VII. Circular in plan the tower stands three storeys high and has a ground-floor veranda.
- 2.24 The reasons for its designation are twofold: Architectural – an interesting example of a pre-1840 windmill, later monumentalised; historical – a distinctive, commemorative monument marking the visit of King Edward VII. It is also recognised to stand on an unscheduled kerbed cairn, and beside a scheduled cairn with funerary chamber<sup>2</sup>.
- 2.25 Reinterpreted as a landmark in 1911, the contribution that the tower's setting makes to its significance is considerable. It is particularly prominent from across Hugh Town and from the Garrison peninsula where it is seen in the backdrop of the town, the highest landmark other than the waste disposal chimney.

### Round Cairn with Funerary Chamber on Buzza Hill

- 2.26 This round cairn on Buzza Hill has survived well. Its large mound remains intact and its large walled and slab-built closed funerary chamber is unusual. The recorded presence of this cairn as part of a cairn group on this hill and its relationships with the settlement sites on the coast of Porth Cressa Bay and the cairns and field systems on the ridge of Peninnis Head combine to illustrate well the diversity of funerary practices, the organisation of land use and the relationships between settlement and funerary activity among prehistoric communities.
- 2.27 The monument includes a large prehistoric round cairn with a central funerary chamber situated on the western crest of Buzza Hill, overlooking Porth Cressa Bay and the isthmus to the Garrison, on south western St Mary's in the Isles of Scilly.
- 2.28 The round cairn survives with circular, steep-sided mound of heaped rubble, 13.2m in diameter, situated across the western crest of the hill such that it rises up to 2.5m high on its west side and up to 0.5m high on the east. The funerary structure is visible near the centre of the mound's upper surface and survives as a rectangular chamber whose interior measures 2.4m long, north east-south west, by 1.5m wide and 0.9m deep. The chamber's sides are defined by a combination of edge-set slabs and coursed slab-built walling, whose upper edges are level with the upper surface of the mound. Each end of the chamber is closed by a single large edge-set slab, that at the north east end rising above the level of the other chamber sides to a height of 1.1m from the floor of the chamber.
- 2.29 The south west end of the chamber interior is covered by a large slab, called a capstone, rising proud of the mound's surface and resting on the side walling and end-stone. The capstone measures 2m long, across the chamber, by 1.3m wide and 0.5m thick.
- 2.30 This monument is one of a group of three recorded chambered cairns located on top of the prominent ridge forming Buzza Hill. The other two, of a type called entrance graves

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<sup>2</sup> Historic England List Description LEN 1291886

and located on the crown of the ridge, 45m to the east and 50m to the ENE, were the subject of the earliest recorded excavations at such cairns in 1752 by the antiquary Borlase, but both cairns have subsequently been destroyed as visible monuments by stone robbing and by the early 19th century construction of the Buzza Tower, formerly a windmill, believed to occupy the site of one of the cairns. A fourth funerary cairn, formerly visible from this monument until modern buildings intervened, survives on the northern end of the Peninnis Head ridge, 240m to the ESE. Prehistoric settlement sites are exposed in the cliff face on the eastern side of Porth Cressa Bay, from 180m to the SSE. Another, dispersed, cairn group is located on the southern end of Peninnis Head, with further prehistoric field systems around the flanks of the Head, from 950m to the south east.

- 2.31 Whilst the cairn is located in a prominent open position, with wide views in almost all directions, the setting of the monument relates primarily to those other cairns identified above. Being a largely 'ground level' structure its physical, visual setting is not large.

### Summary

- 2.32 Whilst the site of the proposed temporary yard and containers is neither listed nor within the boundary of the nearby Scheduled Monument, it does form part of the open setting to the SAM and is within the Conservation Area.
- 2.33 The field is partly enclosed by a Cornish Hedge which is a traditional characteristic of the agricultural parts of the islands and conservation area.
- 2.34 Although the SAM is 'buried' the open nature of its setting is an important element of understanding its significance, location and relationship with the Islands.
- 2.35 The proposals will not have any impact on any other above-ground heritage.

## 3 The proposed scheme and its effect

- 3.1 The proposed scheme is illustrated in the drawings prepared by Bluesky Architects and described in further detail in the Design & Access Statement and other documents accompanying this application. The proposal is for a temporary works site for the period of construction of the proposed new Integrated Health & Care Centre at St Mary's Hospital.
- 3.2 The proposals have been carefully considered to balance the practical operational needs of a site with the sensitivity of the location. A temporary opening is required in the Cornish hedge close to Hospital Lane and temporary surface laid to provide both level access and also a base for a series of temporary storage containers. None of the structures or works require any foundations or excavation. A second entrance to the site will be through an existing gate.
- 3.3 The location of the containers, temporary hard surface and opening in the hedge have been chosen to ensure that there is no incursion on the Scheduled Monument.

### Impact of the Proposals

- 3.4 There will be no physical impact on the Scheduled Monument, however for the duration of the project it will lose its open setting which will lessen the ability to appreciate an element of its significance for a temporary period.
- 3.5 Similarly, whilst only for a pre-determined period, the presence of the containers and the opening of the Cornish hedge will have a short-term negative impact on the character and appearance of the conservation area – being of a utilitarian design that will be visible from Old Town Road.
- 3.6 However, it is intended that following completion of the construction of the Integrated Health & Care Centre the site will be fully restored to its existing state – repairing the Cornish hedge, restoring the grassed field and, in doing so, restoring the open setting to the Scheduled Monument and the character and appearance of the conservation area.

### Compliance with legislation, policy & guidance

- 3.7 Taking into consideration the temporary nature of the project and the proposed mitigation measures, the proposals will ensure the long term character of the Isles of Scilly Conservation Area will be preserved and thus complies with S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

### The National Planning Policy Framework

- 3.8 This report has provided a description and analysis of the significance of the site and its heritage context, as required by Paragraph 200 of the National Planning Policy Framework.
- 3.9 The proposed scheme complies with Paragraph 207 and 208 of the NPPF in that it conserves the heritage assets whose setting it affects. For the reasons given earlier, we do not believe that the scheme involves any 'substantial' harm and that whilst an element of 'less than substantial harm to the significance of a designated heritage asset', has been identified - to the setting of the Scheduled Monument and character of the conservation area – this is temporary in nature, mitigated in full by the proposed restoration works and should be considered in the context of the considerable public benefits that the proposals facilitate through the construction of the Integrated Health & Care Centre.

### Isles of Scilly Local Plan – March 2021

- 3.10 With regards Policy OE7 of the Local Plan, irrespective of any potential temporary harm, the benefits of the health care provision for the Islands are substantial and clearly wholly exceptional. Further, this report and others submitted demonstrates that all reasonable efforts have been made to mitigate the impact of the proposal – ensuring heritage harm is visual rather than physical and temporary.
- 3.11 Overall, the proposals have attempted to strike a balance between the health care needs of the Islands with the temporary impact of any proposal on its surroundings. Even though a small element of temporary less-than-substantial harm is identified we believe that this has been adequately mitigated to allow for a balanced judgement to be reached when considering the substantial public benefits that the proposals will deliver.
- 3.12 We therefore believe that the proposals meet the legislative, national and local policy requirements and guidance relating to the historic built environment.

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**APPROVED**

*By Lisa Walton at 2:25 pm, May 10, 2024*

**RECEIVED**

*By Liv Rickman at 1:55 pm, Feb 29, 2024*



# Circus Field, Old Town Road St Mary's, Isles of Scilly

## STATEMENT OF ARCHAEOLOGICAL POTENTIAL AND IMPACT

Charlie Johns | Report No 2024/4 | 24 February 2024

<i>Circus Field, Old Town Road</i>	
St Mary's, Isles of Scilly	
Statement of Archaeological Potential and Impact	
Client	Ken Jones, Community 1 <sup>st</sup> Cornwall
Author	Charlie Johns
Status	Final
Date	24 February 2024

## **Acknowledgements**

The study was commissioned by Ken Jones, Community 1<sup>st</sup> Cornwall and managed by Angela Warwick, Director of Situ8 Ltd, Planning Consultancy. Licensed copies of Ordnance Survey mapping were provided by Will Partridge of the Cornwall & Scilly Historic Environment Record. The photograph of the scheduled cairn was provided by Katharine Sawyer and other photographs of the site were taken by James Faulconbridge.

The views and recommendations expressed in this report are those of Charlie Johns, Heritage Specialist, and are presented in good faith on the basis of professional judgement and on information currently available.

*Charlie Johns is a Member of the Chartered Institute for Archaeologists (MCI(A no. 381)*

Font cover: *The Scheduled Cairn in 2009 (photo: © Katharine Sawyer).*

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## 1 Summary

Community 1st Cornwall has commissioned this Statement of Archaeological Potential and Impact to support a planning application for a temporary storage area and site compound associated with the proposed extension to St Mary's Hospital.

The proposed storage area and compound is situated in a field known as 'Circus Field', lying to the south west of the Old Town Road at northern Peninnis (NGR 90820 10305) – 'the site'.

This study only concerns the potential direct impacts of the proposed development on the above- and below-ground archaeology of the site. The potential impacts on the setting of heritage assets in the wider area is the subject of a separate Heritage Impact Assessment.

There is one Scheduled Monument (SM), situated in the southern part of the site – *Platform cairn on northern Peninnis Head, 200m ESE of Buzza Tower* (NHLE 1009284). The position of the monument is indicated by a slight mound. There are no recorded undesignated heritage assets within the site.

It is proposed to use only the northern part of the site for the storage area and the compound. The ground surface will be protected with trackway matting, either composite or metal. Heras fencing will be used to enclose the storage area and compound. Therefore, this assessment concludes that the proposed temporary use will not have any physical (direct) impact on the SM or any potential buried heritage assets.

However, it is proposed to remove the existing north-west and south-east corners of the field – Cornish hedges – and create new temporary entrances and access. Although the sections of hedge will be rebuilt re-using stone from the original walls, this will have a minor negative impact on the historic farmed environment.

To avoid potential accidental damage to the Scheduled Monument it is recommended that an exclusion zone of 5m should be established around the circumference of the scheduled area of the cairn. A Construction Environment Management Plan (CEMP) may be required setting out how the contractor will implement and monitor the exclusion zone and how vehicle movements will be managed to avoid harm being caused to the SM. The contractor could nominate a Heritage Champion who will be responsible ensuring that no damage is caused to the SM.

In view of their historic value, archaeological recording during removal of the sections of the existing Cornish hedges should be considered.

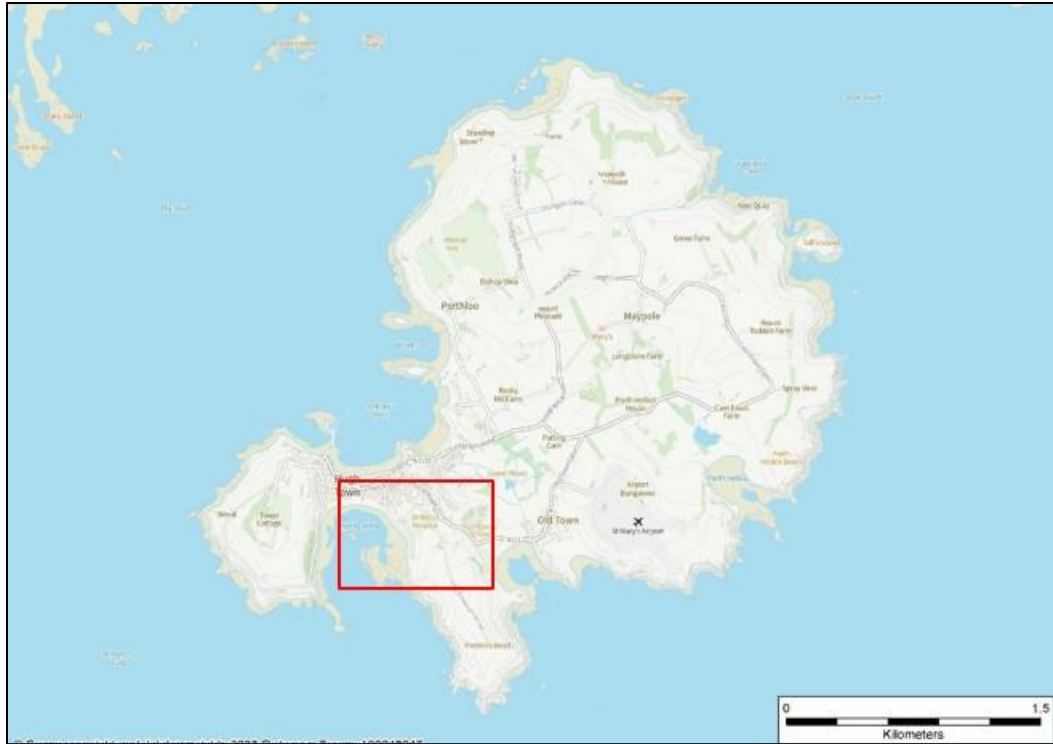


Figure 1 Location map, St Mary's.

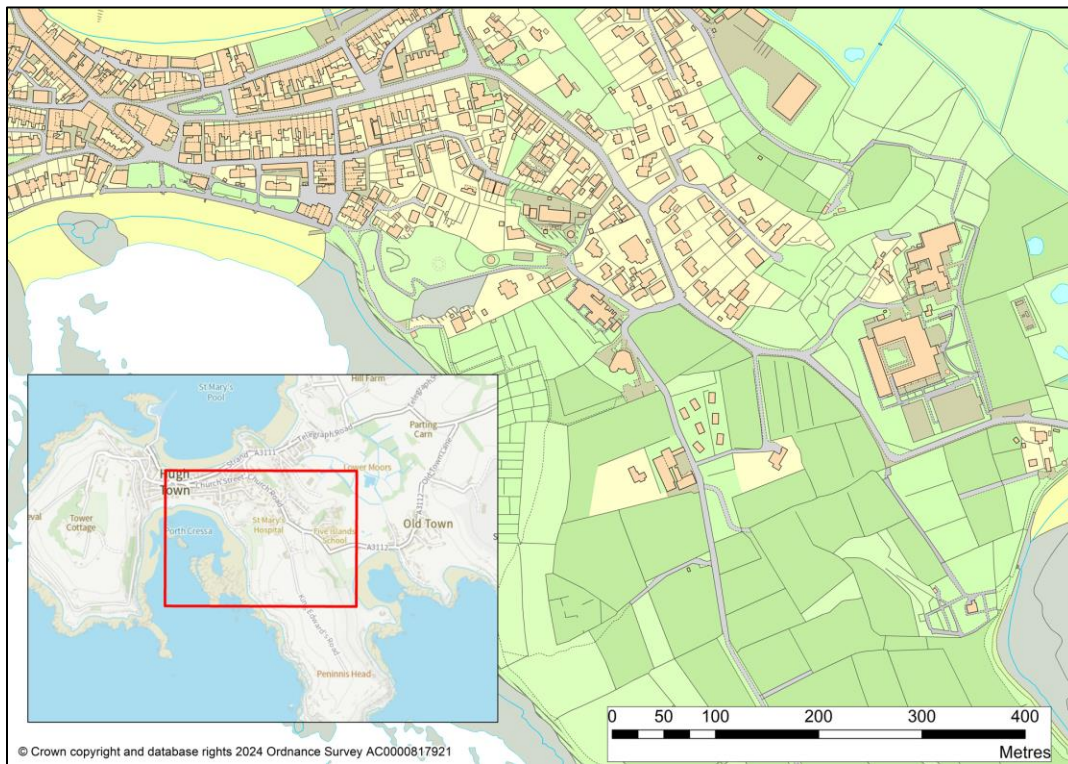


Figure 2 Location map, the site is outlined in blue.

## 2 Introduction

### 2.1 PROJECT BACKGROUND

In February 2023, Charlie Johns, Heritage Specialist, was commissioned by Ken Jones of Community 1<sup>st</sup> Cornwall to prepare a Statement of Archaeological Potential and Impact to support a planning application for a temporary storage area and site compound in the field known as the 'Circus Field' during construction of a new integrated health and social care facility at St Mary's Hospital, Hospital Lane, St Mary's, Isles of Scilly, TR21 0LQ.

### 2.2 METHODOLOGY

#### 2.2.1 Policy and Guidance

This report takes account of various relevant aspects of national and local planning policies and guidance including:

- Government guidance on conserving and enhancing the historic environment.
- The National Planning Policy Framework (NPPF) (2021) – specifically policies for 'conserving and enhancing the historic environment' (paragraphs 184-202) (see Appendix 1).
- The Isles of Scilly Local Plan (2015–2030).
- 'A Heritage and Cultural Strategy for the Isles of Scilly' (2004) and 'Historic Environment Historic Topic Paper: Enhancing the historic environment of the Isles of Scilly' (2017)', this supports the Local Plan 2015-2030 and sets out a positive strategy for the protection of the islands important historic environment.
- Ancient Monuments and Archaeological Areas Act (1979).
- Planning (Listed Buildings and Conservation Areas) Act (1990).
- The Hedgerow Regulations (1997).

#### 2.2.2 Scope

This study only concerns the potential direct impacts of the proposed development on the above and below ground archaeology of the Circus Field, henceforth referred to as 'the site'. The effects of the proposed development on the setting of designated and undesignated heritage assets in the wider area the subject of a separate Heritage Impact Assessment.



### 2.2.3 Aims

The primary aims of this study are to assess the following:

- The resource of identified heritage assets, both designated and non-designated, relevant to the site.
- The significance of the identified and potential heritage assets and resource within the site.
- The impacts of the proposal upon the significance of heritage assets and the settings of designated heritage assets within the site.
- Appropriate measures for mitigating impacts upon the heritage assets and resource within the site.

### 2.2.4 Desk-based assessment

This study was undertaken in accordance with the Chartered Institute for Archaeologist's (CIfA) guidance on undertaking desk-based assessment (CIfA 2020).

### 2.2.5 Significance

Determination of the significance of heritage assets has followed guidance issued by English Heritage (now Historic England) in 2008. The following criteria have been used to measure significance:

- Evidential – ‘the potential of a place to yield evidence about past human activity.
- Historical – ‘derives from the ways in which past people, events and aspects of life can be connected through a place to the present’.
- Aesthetic – ‘derives from the ways in which people draw sensory and intellectual stimulation from a place’.
- Communal- ‘derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory’.

### 2.2.6 Sources

During the desk-based assessment historical databases and archives were consulted in order to obtain information about the history of the site and study area and the structures and features that were likely to survive. The main sources consulted were as follows:

- Cornwall and Scilly Historic Environment Record (HER).
- The National Heritage List for England (a searchable database of designated heritage assets, excluding conservation areas).
- Accessible GIS data.

- Early maps, records, and photographs (see Section 7.1).
- Published histories and 'grey literature' (see Section 7.2).

#### 2.2.8 Site visit

The author is familiar with the area and at this stage it was not considered necessary to make a site visit. Photographs of the site were taken by Katharine Sawyer and James Faulconbridge for use in this report.

#### 2.3 AUTHOR

The author of this report is Charlie Johns BA (Hons), MCIFA. Formerly a Senior Archaeologist with Cornwall Archaeological Unit (CAU), I was the Unit's archaeologist for the Isles of Scilly from 2002 to 2018. Notable projects include the Bryher sword and mirror burial in 1999 (Johns 2002-3; Mays *et al* 2023); the Lyonesse Project, a study of ancient sea level rise in the islands (Charman *et al* 2016); and compilation of the Scilly Historic Environment Research Framework (Johns 2019).



*Figure 3 The pigeon coop and rough stone enclosure near the western boundary (photo: James Faulconbridge).*



*Figure 4 The scheduled platform cairn in February 2024 (photo: Katharine Sawyer)*

### 3 Location, setting and geology.

St Mary's, the largest of the Isles of Scilly, is located in the centre of the archipelago. The main part of the island is roughly circular, measuring approximately 3km north to south and 2.5km east to west, with promontories extending from this at Peninnis in the south and the Garrison in the south-west. It rises to a maximum height of 49m above sea level at Telegraph.

The island has a varied topography with the main settlement at Hugh Town on a low-lying sandy isthmus between the main part of the island and the Garrison. The interior is mainly undulating agricultural land with two areas of pools and marshland; the coast includes both rocky stretches with heathland above and sandy areas with dunes.

The proposed site, known as the 'Circus Field', is approximately 0.42ha in area and lies immediately to the west of Old Town Road (NGR 90820 10305) at the summit of the northern end of the broad ridge forming Peninnis Head. To the north west is St Mary's Hospital and to the south west the Health Centre.

The field is currently down to pasture (semi-improved). Photographs taken in 2009, when horses grazed it, show that the grass was close-cropped at that time. There is an existing gateway in the south-west corner. There are a couple of sheds and a disused pigeon coop within a rough, rectangular stone enclosure midway along the western field boundary (Fig 3). The scheduled platform cairn (NHLE 1009284) is situated in the south-west quadrant of the site, the diameter of the scheduled area is 18m (Figures 4, 6 and 10).

The geology of St Mary's is granite, with weathered periglacial head, known locally as *ram*, covering the lower hill slopes and valley floors; the geology supports soils suitable for cultivation and pasture (Geological Survey of Great Britain, 1975, Isles of Scilly, Sheets 357 and 358).

## 4 The Heritage Resource

This section presents a summary of the historical development of the site, provides detail of designated and non-designated heritage assets that have been identified, identifies potential heritage assets that may lie within the site, and reports on previous archaeological and historical work in the study area.

### 4.2 HISTORIC LANDSCAPE CHARACTER

The study area is characterised as 'Farmland: anciently enclosed land (prehistoric to early post-medieval)' by the Isles of Scilly Historic Landscape Assessment (Figure 5; Land Use Consultants 1996).

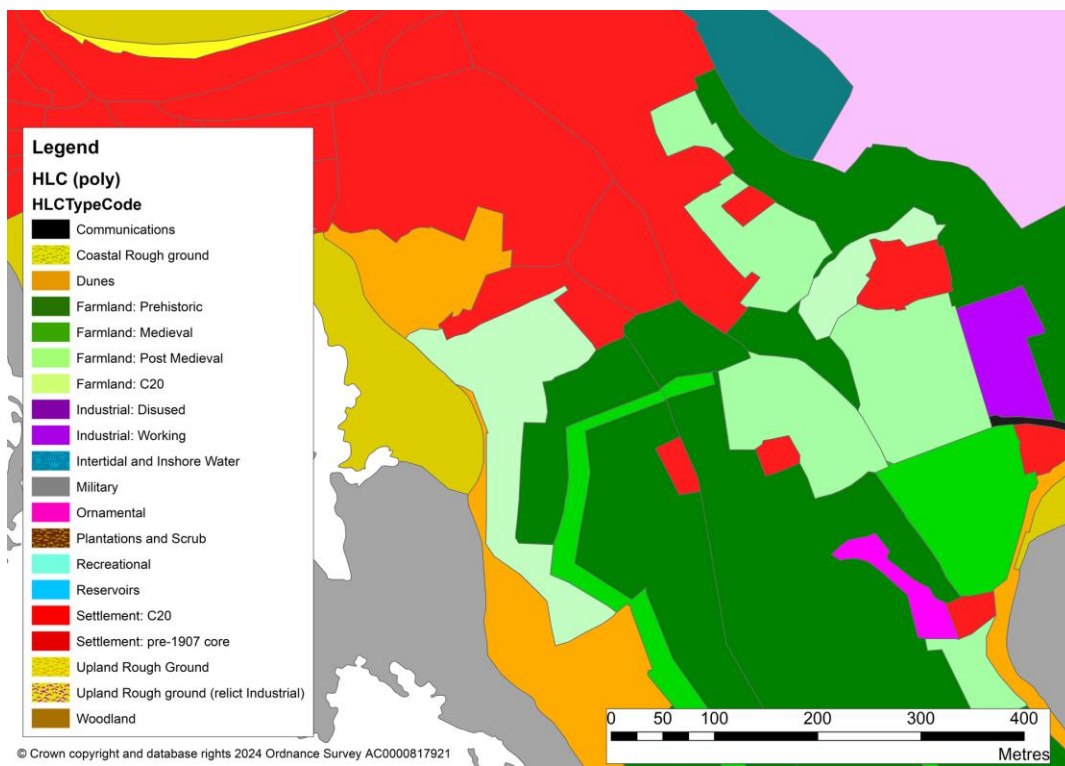


Figure 5 Historic Landscape Character of the area.

### 3.3 DESIGNATIONS

#### 3.3.1 Conservation Area

In 1975 the islands were designated as a Conservation Area, under Section 277(1) of the Town and Country Planning Act 1971. The Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty on Local Authorities to designate as conservation areas “any areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance”. This duty extends to publishing proposals for the preservation and enhancement of Conservation Areas. Since its designation in 1975 no comprehensive appraisal of the Isles of Scilly Conservation Area has been undertaken. In 2015 the Local Planning Authority (LPA) consulted on a Draft Conservation Area Character Statement for the Isles of Scilly as a Supplementary Planning Document.

#### 3.3.2 National Landscape and Heritage Coast

In 1976 the islands were designated an Area of Outstanding Natural Beauty (AONB) – renamed The Isles of Scilly National Landscape in 2023 - and defined as a Heritage Coast. The quality of the environment of Scilly for designation as an AONB was first recognised in a report of the National Parks Committee in July 1947 (the Hobhouse Report).

The Heritage Coast definition protects 64 km<sup>2</sup> of coastline around the islands which is 23 km<sup>2</sup> of foreshore, cliff and dune environments. The management of the heritage coast was originally undertaken by a non-governmental organization, The Isles of Scilly Environmental Trust. It is now managed by the Isles of Scilly Wildlife Trust through the Isles of Scilly National Landscape Partnership and Management Plan, which is updated every five years. The Conservation Area, National Landscape and Heritage Coast all overlap and cover all of the islands and the heritage coast occupies a substantial portion of the Isles of Scilly National Landscape.

#### 3.3.3 Archaeological Constraint Areas (ACA)

The Isles of Scilly Archaeological Constraint Maps were compiled in 1995 by CAU with funding from English Heritage and the Council of the Isles of Scilly. The maps indicate the location of recorded archaeological and historic sites and structures to be used to make an initial assessment of the impact of any proposed development on these remains. They are non-statutory and were intended to serve as a graphic aid to planning officers and others dealing with the management of the environment.

The site comprises the King Edward's Road, Hugh Town, Archaeological Constraint Area (Figure 6).

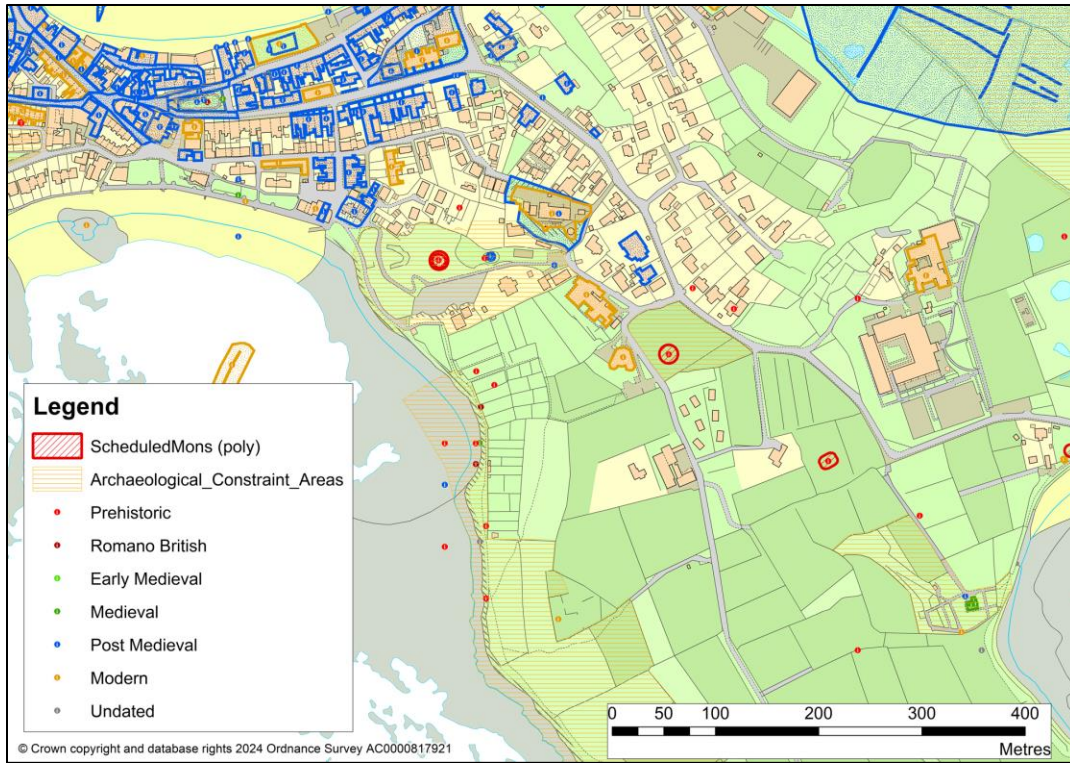


Figure 6 Heritage assets within the site and wider vicinity.

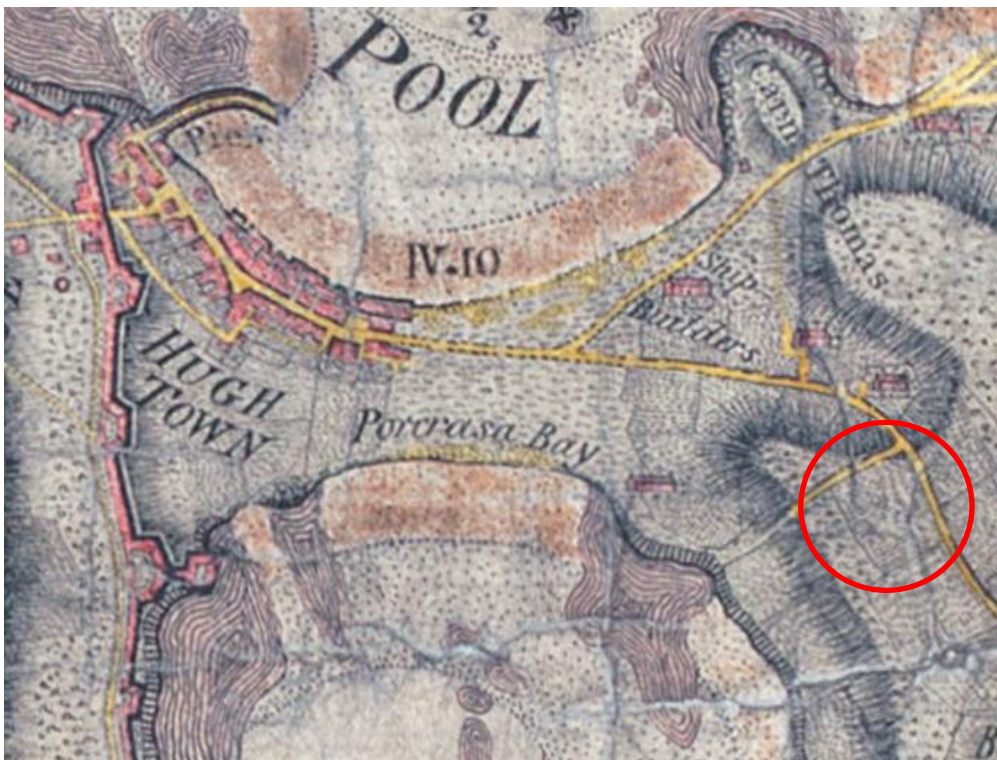


Figure 7 Detail from Graeme Spence's 1792 chart (sourced from the UKHO, Taunton).

### 3.3.4 Scheduled Monuments

There is one Scheduled Monument (SM) within the site – *Platform cairn on northern Peninnis Head, 200m ESE of Buzza Tower* (NHLE 1009284).

Platform cairns are funerary monuments of Early Bronze Age date (c2000–1500 BC), constructed as low flat-topped mounds of stone rubble, up to 40m in external diameter though usually considerably smaller, covering single or multiple burials. Some examples have other features, including peripheral banks and internal mounds constructed on the platform. A kerb of slabs or edge-set stones sometimes bounds the edge of the platform, and a peripheral bank or mound if present. Platform cairns can occur as isolated monuments, in small groups or in cairn cemeteries. In cemeteries they are normally found alongside cairns of other types. Platform cairns form a significant proportion of the 387 surviving cairns on the Isles of Scilly; this is unusual in comparison with the mainland. All surviving examples on the Isles of Scilly are considered worthy of protection.

This platform cairn on northern Peninnis Head has survived substantially intact with only minor disturbance evident from an antiquarian excavation and the modern cable trench. The prominent location of this cairn and its relationship with the other broadly contemporary cairns and field systems on and around Peninnis Head demonstrates well the nature of funerary activity and the organisation of land use during the Bronze Age.

The platform cairn survives with a turf-covered circular mound of heaped rubble, 10m in diameter, straddling a slight crest on the spine of the ridge such that the mound is 0.6m high from the south-west side and 0.3m from the north-east, rising to a flattened upper surface 4m in diameter. A row of three large slabs, each 1.2m long and 0.5m wide, considered to derive from an unrecorded antiquarian excavation at the cairn, lie parallel to each other embedded in the turf from 1m beyond the western perimeter of the cairn, with a further slab partly exposed to their south.

Beyond this monument, further broadly contemporary cairns are located on the crest of the ridge from 750m to the SSE at the southern end of Peninnis Head, with prehistoric field systems fringing the lower slopes. Two broadly contemporary chambered cairns, of which one still survives, occupied the summit of Buzza Hill, 200m to the WNW, the north-westward extension of the ridge containing this monument. Until modern development, these cairns were intervisible with this monument. The electricity cable and its service trench are excluded from the scheduling but the ground beneath is included.



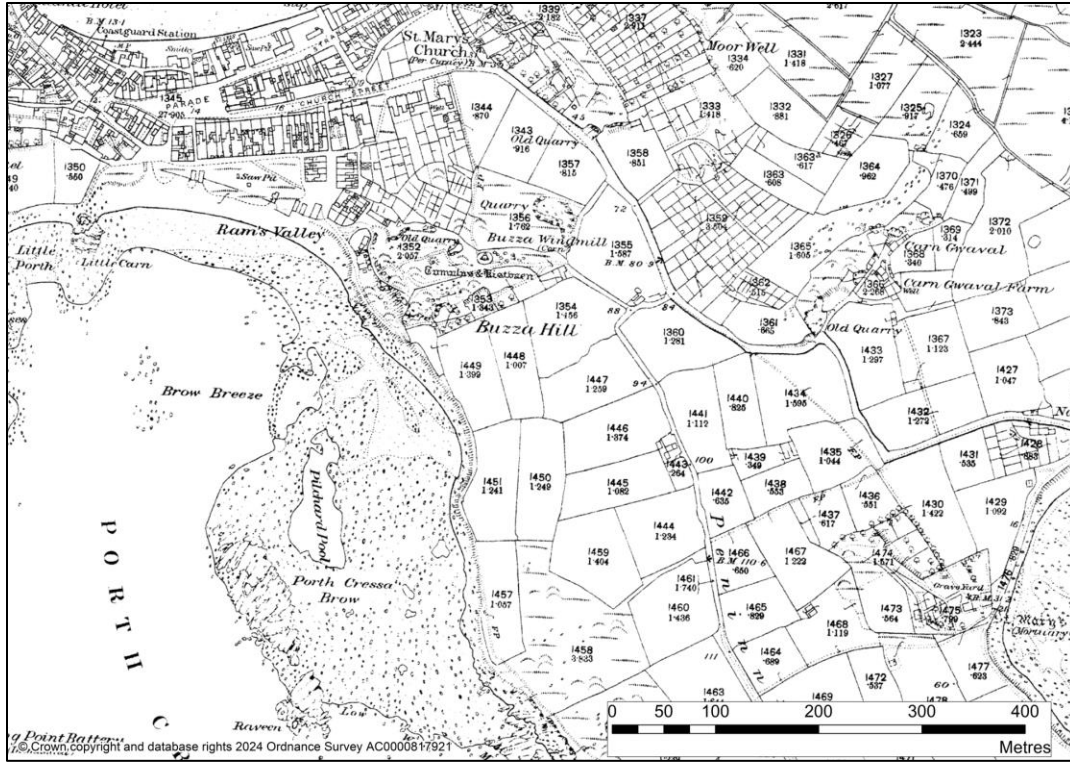


Figure 8 Detail from the c1880 OS map.

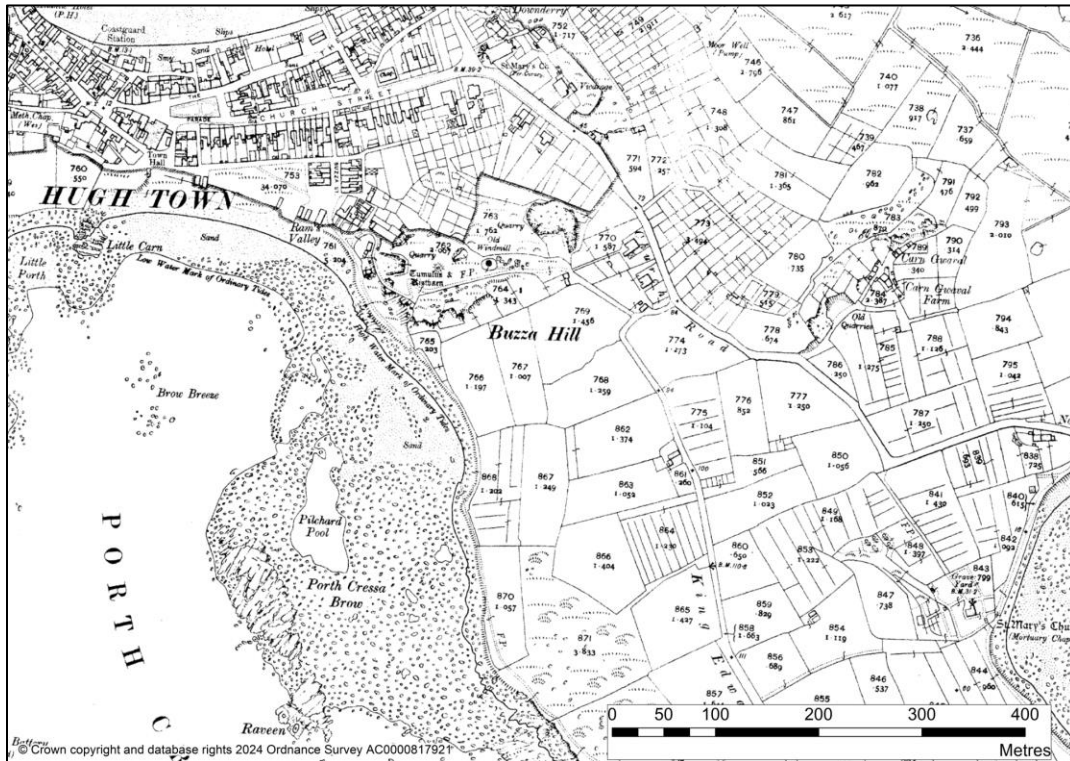


Figure 9 Detail from the c1907 OS map.

### 3.3.5 Listed Buildings

There are no Listed Buildings within the site.

### 3.3.6 Undesignated heritage assets

There are no recorded undesignated heritage assets recorded within the site.

## 3.4 CHRONOLOGICAL SUMMARY

### 3.4.1 Prehistoric (c10,000 BC–AD 43) and Roman (AD 43–410)

In the Early Bronze Age, the site would have been heathland, and a component ceremonial landscape associated the scheduled cairn (NHLE 1009284) and with the cairns on Buzza Hill (NHLE 1010174 and MCO30227). A Bronze Age agate bead was found in the garden of Pilot's Retreat (now Starlings) in 1970 (MCO31088) and two flint thumb-nail scrapers and two hammer stones were found at Pernold in the 1960s (MCO31081).

Later prehistoric or Romano-British settlements and cist graves are more likely to have been situated at a lower contour above Porthcressa or Old Town Bay rather than on an exposed hilltop. There are a number of prehistoric and Romano-British sites exposed in the cliff face at Porthcressa 250m to the south west. In addition, the HER records finds of Romano-British pottery and a possible prehistoric post-holed stone on Buzza Hill in the 1950s (MCO53363) – although the HER entry is confused about the location of these finds, and they are more likely to have come from the allotment gardens at Porthcressa.

Further afield is *the Iron Age to Romano-British fogou on Northern Peninnis Head, 170m south of Carn Gwavel Farm, St Mary's* (NHLE 1020142), approximately 200 south east of the site and the suite of scheduled monuments on Peninnis Head some 775m – 1km south east of the site.

### 3.4.2 Medieval, post-medieval and modern (AD 410–present day)

During the medieval and early post-medieval periods, the site would have been heathland – rough ground used for seasonal grazing.

A chart of 1792 by Graeme Spence, a maritime surveyor for the Royal Navy, shows that the site was enclosed within a large rectangular croft (Figure 7).

The c1880 and c1907 OS maps show that the site had assumed its present form (Figures 8 and 9). It is likely that the eastern, northern and western field boundaries, which are Cornish hedges, date from the mid-19<sup>th</sup> century. The southern boundary, a post and wire fence, reflects a more modern sub-division of the field shown on these maps.

An interesting undesignated heritage asset, not currently recorded in the HER, is a square stone with a square hole thought to be medieval in date and originally from

St Maudut's chapel in Hugh Town. Troutbeck (c1792) recorded that it was then on St Mary's Quay, apparently it was subsequently stored on Rat Island and has now been placed in front of the Health centre.

Grade II Listed Buzza Tower (NHLE1291886) is situated some 160m north east of the application site. This was originally a windmill, constructed in 1821 on the site of the Bronze Age kerbed cairn excavated by William Borlase in 1752. It was restored and extended in 1911 in commemoration of a visit by King Edward VII. There is also a disused post-medieval quarry and the site of a 20th-century electricity generating plant about 132m to the north west (MCO64382).

#### 4 PREVIOUS ARCHAEOLOGICAL WORK

Comparatively few archaeological finds have been reported in the vicinity of the site. No finds of archaeological interest were reported during the construction of the Hospital in 1939 or the Health Centre in 1999, although there was no formal recording in place.

No recent archaeological investigation appears to have taken place on the site or within area except for a watching brief during groundworks for a campsite at Peninnis Farm, 35m south of the scheduled cairn (NHLE 1009284). No archaeological features were recorded, the topsoil was 0.3m-0.4m deep with the natural substrate (known locally as *ram*) underlying it. The only finds were a total of eight sherds of 19<sup>th</sup> or 20<sup>th</sup> century glazed pottery (Sawyer 2013).

## 4 Assessment of Significance

### 4.1 BASIS FOR ASSESSING SIGNIFICANCE

'Significance' is 'the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting' (NPPF 2021).

#### 4.1.1 Cultural heritage value

Significance means the sum of the cultural heritage values of a place as set out in Historic England's 'Conservation Principles' (English Heritage 2008). Cultural heritage value has many aspects, including:

- Evidential value (includes archaeological value) — the potential of a place to yield primary information about past human activity. This means that there is potential, but its full extent is not yet known, e.g., below-ground archaeology before it is excavated. Once excavated it becomes historic, as we know what it can tell us about the past. In a building, an example might be when there is potential to uncover a blocked doorway hidden by plaster. Once discovered it would become historic.
- Historical value — the ways in which it can provide direct links to past people, events and aspects of life. This can be broken down into 'illustrative' and 'associative value.' Historic is an example of how the site works and what that tells us about the time.
- Aesthetic value (includes architectural value) — the ways in which people respond to a place through sensory and intellectual experience of it. This can be designed or fortuitous – the outcome of the way in which a place has evolved and been used over time.
- Communal value — the meanings of a place for the people who identify with it, and communities for whom it is part of their collective memory. Tends to be a more recent history rather than historic e.g., recent social history and current art connections etc.

In addition, the historic environment is a cultural heritage resource shared by communities characterised not just by geographical location but also by common interests and values. As such, emphasis may be placed upon important consequential benefits or potential, for example as an educational, recreational, or economic resource, which the historic environment provides.

The seamlessly linked cultural and natural strands of the historic environment are a vital part of everyone's heritage, held in stewardship for the benefit of future generations.

#### 4.1.3 Degrees of Significance

- **Outstanding Significance:** elements of the place which are of key national or international significance, as among the best (or the only surviving example) of an important type of monument, or outstanding representatives of important social or cultural phenomena, or are of very major regional or local significance.
- **Considerable Significance:** elements which constitute good and representative examples of an important class of monument (or the only example locally), or have a particular significance through association, although surviving examples may be relatively common on a national scale, or which make major contributions to the overall significance of the monument.
- **Moderate Significance:** elements which contribute to the character and understanding of the place, or which provide an historical or cultural context for features of individually greater significance.
- **Low Significance:** elements which are of individually low value in general terms or have little or no significance in promoting understanding or appreciation of the place, without being actually intrusive.
- **Uncertain Significance:** elements which have potential to be significant (e.g., buried archaeological remains) but where it is not possible to be certain on the evidence currently available.
- **Intrusive:** items which detract visually from or which obscure understanding of significant elements or values of the place. Recommendations may be made on removal or other methods of mitigation.

#### 4.2 STATEMENT OF SIGNIFICANCE

##### 4.2.1 Evidential Value

The scheduled platform cairn is, by definition, a site of National Importance. Any features that might be associated the Bronze Age ceremonial landscape on Buzza Hill and northern Peninnis Head are potentially of National Importance, any other features or finds are likely to be of Local Importance. Therefore, the evidential value of the site is assessed as being of **Considerable Significance**

##### 4.2.2 Historical value

The site illustrates the ongoing enclosure of heathland in the post-medieval period and is associated with the historic expansion of Hugh Town, so its historical value is assessed as being of **Moderate Significance**.

Field boundaries are a characteristic feature of Scilly's farmed landscape. As well as having landscape value the boundaries are of historic importance, both for showing how the landscape has changed and developed and for their archaeological potential; some have prehistoric origins. The islands' walling techniques are distinct from those of the mainland and in some respects differ

from island to island, although there are broad similarities in the suite of boundary types. With the progressive loss of traditional dry-stone walling skills, some field boundaries are losing their traditional character (Kirkham *et al* 2011).

The eastern, northern and southern boundaries of the site, which probably date to the mid-19th century, are Cornish Hedges (stone-faced earth banks). These fall outside the purview of the Hedgerow Regs at present ( <https://www.cornwall-aonb.gov.uk/cornish-hedges> but this is something Cornwall Council's Hedge Group they are working on. They stress the importance of hedgerows in the landscape, '*We are taking the stand that all hedges are important though as they all make a valuable contribution to Landscape, heritage, biodiversity, carbon capture, flood alleviation etc*'.

#### 4.2.3 Aesthetic value

The whole of the Isles of Scilly has been designated as a National Landscape because of its outstanding natural beauty. The aesthetic quality of the site, however, has been compromised by miscellaneous surrounding modern development. Therefore, the aesthetic value of the site is assessed as being of **Moderate Significance**.

#### 4.2.4 Communal value

The site is known as the 'Circus Field' because a travelling circus visited St Mary's in April 1964 and set up their tent here. The event is still remembered fondly by islanders of a certain age.

It seems that in the early 1980s an Upland Sandpiper, a rare American wader, appeared on St Mary's and took up residence in the field. It was assumed that it hadn't seen a human being before as it had no fear and people started feeding it worms which it ate. Quite a few birdwatchers visited the islands to look at it. It left after a week, but some local birdwatchers know the field as 'The Upland Sandpiper Field'.

The communal value of the site is assessed as being of **Moderate Significance**.





*Figure 11 Example of the type of ground surface matting which will be used..*



*Figure 12 Example of the type of storage modules which will be used.*



## 5.2 CRITERIA FOR GRADING OF HARM

The impacts of development on the historic environment may include positive as well as adverse effects. For the purposes of assessment these are evaluated on an eight-point scale:

**Positive/Substantial Benefit**

**Positive/Moderate Benefit**

**Positive/Minor Benefit**

**Neutral**

**Negative/Negligible (Less than Substantial) Harm**

**Negative/Minor (Less than Substantial) Harm**

**Negative/Moderate (Less than Substantial) Harm**

**Negative/Substantial Harm**

The additional **Negative/Unknown** used where an adverse impact is predicted or **Positive/Unknown** where a beneficial impact is predicted but where, at the present state of knowledge, its degree cannot be evaluated satisfactorily.

The assessment also distinguishes where possible between permanent and temporary effects, or between those that are reversible or irreversible, as appropriate, in the application of the scale of impacts.

To ensure that the judgements given in this report are as clear as possible this assessment uses the following definitions to develop a five-step grading of harm.

Substantial Harm		The change seriously affects a key element contributing to the significance of the asset, going to the heart of its significance.
Moderate (Less than Substantial) Harm		A major element of the heritage value of the asset is harmed whilst retaining enough value to justify identification as a heritage asset.
Minor (Less than Substantial) Harm		Some heritage values are harmed but these do not contribute a major element of the significance or its asset, and/or the change is offset of by enhancement or revelation of other heritage values.
Negligible (Less than Substantial Harm)		Minor negative harm to the heritage values of a place that are neither substantive or primary to its overall significance.
Neutral		No harm to the heritage values of the asset.

## 5.2 SUMMARY OF POTENTIAL PHYSICAL (DIRECT) IMPACTS

There will be no ground disturbance to the site. The ground surface will be protected with trackway matting, either composite or metal. The site will be enclosed with Heras fencing. Therefore, potential direct impacts are assessed as Neutral.

However, there is potential for inadvertent direct impacts to the Scheduled Monument by vehicular traffic which could cause Minor to Substantial Harm.

Creation of new entrances in the north-western and south-eastern corners of the site will entail the removal of sections of the existing Cornish hedges. The direct impact is assessed as being Minor (Less than Substantial Harm).

## 6 Options

This section offers options to reduce or mitigate adverse impacts on the historic resource which may result from the temporary use of the field for storage and site compound. These options are provided for guidance and the actual requirements for archaeological recording will be set by the LPA.

To avoid inadvertent damage to the Scheduled Monument it is recommended that an exclusion zone of 5m should be established around the circumference of the scheduled area of the platform cairn.

A Construction Environment Management Plan (CEMP) may be required setting out how the contractor will implement and monitor the exclusion zone and how vehicle movements will be managed to avoid harm being caused to the SM. The contractor could nominate a Heritage Champion who will be responsible ensuring that no accidental damage is caused to the SM.

In view of their historic value, archaeological recording during removal of the sections of the existing Cornish hedges should be considered.

## 7 References

### 7.1 PRIMARY SOURCES

Graeme Spence 1792. Maritime Survey of Scilly (UK Hydrographic Office, Taunton Ordnance Survey, c1880.

25 Inch Map First Edition (licensed digital copy from the HER) Ordnance Survey, c1907.

25 Inch Map Second Edition (licensed digital copy from the HER) Ordnance Survey,

MasterMap Topography

### 7.2 PUBLICATIONS AND GREY LITERATURE

Charman, D, Johns, C, Camidge, K, Marshall, P, Mills, S, Mulville, J, Roberts, H M, and Stevens, T, 2016. *The Lyonesse Project: a study of the historic coastal and marine environment of the Isles of Scilly*, Truro (Cornwall Archaeological Unit and Historic England)

CIfA, 2020. *Standard and guidance for historic environment desk-based assessment*, CIfA, Reading

English Heritage, 2008. *Conservation Principles, Policies and Guidance*. Swindon: English Heritage

Johns, C, 2002–3. An Iron Age sword and mirror burial from Bryher, Isles of Scilly, *Cornish Archaeol*, 41–42, 1–79

Johns, C, 2019. *Isles of Scilly Historic Environment Research Framework Updated Resource Assessment and Research Agenda 2019*, Truro (Cornwall Archaeological Unit)

Kirkham, G, Shepherd, F, and Johns, C, 2011. *Field boundaries in the Isles of Scilly: historic environment study to inform management for conservation*, Truro (Historic Environment Projects, Cornwall Council)

Land Use Consultants, 1996. *Isles of Scilly landscape assessment and management strategy*, Truro

Mays, S, Parker, G, Johns, C, Sawyer, K, Reich, D, Buikstra, and Hale, K, 2023. Sex identification of a Late Iron Age sword and mirror cist burial from Hillside Farm, Bryher, Isles of Scilly, England, *Journal of Archaeological Science Reports*

7.3 WEBSITES

<http://www.heritagegateway.org.uk/gateway/> Online database of Sites and Monuments Records, and Listed Buildings



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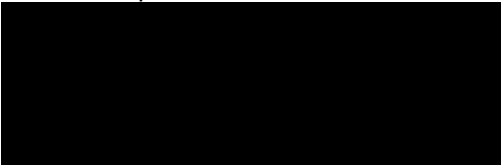
## 2 Statement Outlining the Protection of the SM during the Construction and Decommissioning of the Compound

- It is proposed to use only the northern part of the site for the storage area and the compound (Figure 1). The ground surface will be protected with trackway matting, either composite or metal.
- Record photographs will be taken of the SM by the project archaeologist (Charlie Johns) before any works commence.
- To avoid inadvertent damage to the SM an exclusion zone of 5m will be established around the circumference of the scheduled area
- Initially, a temporary safety barrier of mesh fencing mounted on road irons will be erected around the SM with a 5m buffer from the scheduled area. This will be marked out and implemented by the project archaeologist and the TMS Ltd site manager
- At the earliest opportunity the temporary barrier will be replaced by HERAS fencing.
- Dave Matthews, the site manager for TMS Ltd, will be appointed as a Heritage Champion for the contractors and will be responsible ensuring that no accidental damage is caused to the SM.
- Further record photographs will be taken by the project archaeologist when the compound is decommissioned and a concise report will be submitted to the LPA.

*Charlie Johns*

*Archaeologist*

*11<sup>th</sup> April 2024*



**RECEIVED**

By Liv Rickman at 3:04 pm, Apr 29, 2024

**APPROVED**

By Lisa Walton at 2:29 pm, May 10, 2024



## **Construction Environmental and Ecological Management Plan (CEEMP)**

Temporary use of the Circus field in conjunctions with the construction of the Integrated Health and Social Care Centre located to the south-east of St Mary's Hospital, Hospital Lane, Hugh Town St Mary's Isles of Scilly TR21 0LQ.

On behalf of The Cornwall Partnership NHS Foundation Trust

April 2024



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# 1. Introduction

Situ8 Ltd have been instructed to act on behalf of The Cornwall Partnership NHS Foundation Trust, to write a supporting CEEMP in relation to Temporary use of the Circus field in conjunction with the construction of the Integrated Health and Social Care Centre located to the south east of St Mary's Hospital, Hospital Lane, Hugh Town St Mary's Isles of Scilly TR21 0LQ. (hereinafter referred to as 'the site').

This Construction Ecological Environmental Management Plan (CEEMP) details the measures to be taken to protect habitats and species during the construction phase of the development.

It is the Policy of the Company to:

- Understand and comply with all legal requirements, codes of practice and regulations.
- Organise operations in order to minimise pollution and disturbance to neighbours and the general public.
- Provide assistance, training and information that may be necessary to personnel at all levels.
- Use materials and resources with regard to long-term sustainability.
- Employ a consistent framework for the management of environmental issues across all its operations.
- Audit environmental performance.

The successful management of environmental issues will be achieved by:

- Identification and management of environmental risks and aspects.
- Prevention of pollution.
- Minimisation of waste.
- Provision of prompt response to incidents and emergencies.
- Promotion of environmental issues and good practice.

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- Reviewing and reporting on the content and implementation of this policy.

This document has been prepared to discharge condition 3 of P/24/006/FUL;

**C3** *With the exception of ground strip for archaeological investigation purposes only, no development shall take place, including any demolition, clearance works or transportation of materials to or from the site, until a Construction Environmental and Ecological Management Plan (CEEMP) has been submitted to and approved in writing by the local planning authority. Thereafter the approved plan shall be implemented and adhered to in full throughout the entire construction period. The CEEMP shall include both the application site, and the adjoining Circus Field site, to be used for the storage of materials and plant, and incorporate:*

- i. A programme and timetable for implementation of works;*
- ii. The anticipated number, frequency and types of vehicles used during construction, including routing and parking;*
- iii. The erection and maintenance of security hoarding;*
- iv. The loading, unloading and storage of plant, materials and waste;*
- v. A site set-up plan;*
- vi. The storage of excavated spoil;*
- vii. No burning of construction materials on site;*
- viii. The provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway;*
- ix. A pre-commencement survey for nesting birds and rabbit burrows;*
- x. The Precautionary Method of Working for bats as set out in Appendix 4 of the approved Bat Presence/Absence Survey (Faulconbridge, Apr 2024:)*
- xi. A clearance strategy for the Circus Field and Hospital sites;*
- xii. Measures to protect retained habitats including boundaries and other onsite features;*
- xiii. Measures to protect nesting birds, bats, rabbits and other wildlife;*
- xiv. Measures to protect retained trees;*
- xv. Measures to address or minimise the risk of spreading invasive non-native species;*
- xvi. A Method Statement for the dismantling of the section of existing drystone wall and Cornish hedge and their subsequent restoration;*
- xvii. Persons responsible for implementing the works;*
- xviii. Measures to manage flood risk and control/minimise the emission of dust, dirt vibration, light and air pollution and odour during demolition/construction;*
- xix. No work to be undertaken on the site except between the hours of 08.00 and 18.00 on Mondays to Saturday inclusive and no work to be undertaken on Sundays, Bank and Public Holidays;*
- xx. Details of public engagement that shall be carried out both prior to and during the construction works.*

*The works shall be carried out in accordance with the approved details. On completion of the development any contractors' compound(s), temporary access and all plant, machinery, fencing, lighting and any other equipment or structures used as part of the construction process shall be removed from the site and, where appropriate, the land reinstated to its former condition within three months.*

Induction of Site Staff Prior to construction activities commencing, will be delivered to all site personnel by way of a site induction. The talk will cover the ecological features present or potentially present within the vicinity of the site and the legal and ecological imperatives for their protection. In the event that protected species are identified as being present on site during the construction period, all works are to cease until advice has been sought from a suitably accredited ecologist James Faulconbridge and appropriate action has been agreed.

This report is also submitted as part of the planning application for P24/019/COU.

## 2. A programme and timetable for implementation of works

- We would aim to start on 7<sup>th</sup> May 2024 (after Gig weekend).
- Construction period 12 months.
- End date will June 2025.

## 3. The anticipated number, frequency and types of vehicles used during construction, including routing and parking

### Deliveries

Modules measuring 10x3.5 4m(h) loaded on delivery Hiabs mid September 2024 for 2 weeks = 29 vehicle movements from Reachobite Slip to Circus Field Site Compound. Crane delivered using 6 wagons to deliver in and brought on site in parts and constructed on site. (August 2024 arrival)

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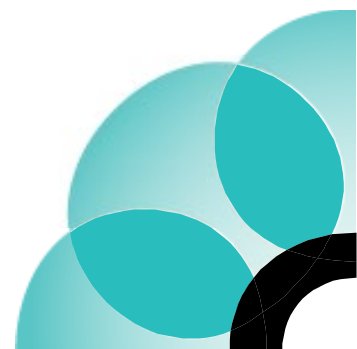
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there would be in reserve 6 wagon movements to transport dismantled crane back to Slipway for transport off the island ( Removal February 2025).

Precast concrete foundation units to be delivered to site July /August. 50 vehicle movements Porthloo slipway to site . (see logistics report lift map and insert in this report )

Various deliveries of materials within containers and transported on Hiab lorries (use of one on Island as per existing delivery arrangements)

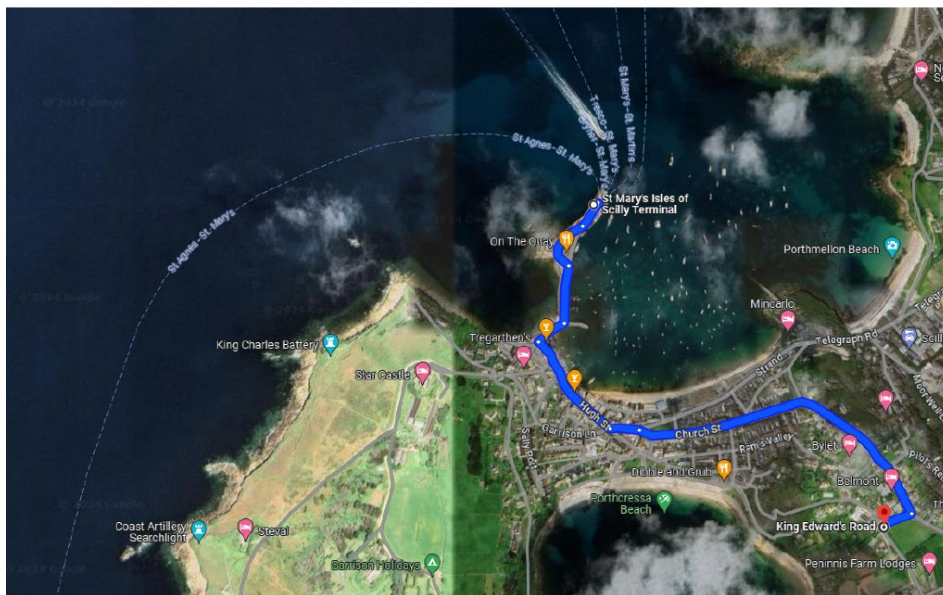
During construction site staff – walking / bikes / taxi.

Unloading of vehicles with the modules would take place from the section of Old Town Road, beyond the Hospital Lane junction, where the road is wider, and thus ambulance access to the hospital from the Hugh Town direction will not be disrupted. We will work with the Council for closures needed to off-load, into the field, so that we cause minimal disruption, but will have to follow the tidal access to the beach. Vehicles from Old Town will have to take the diversion via Telegraph Road for the short durations of unloading.

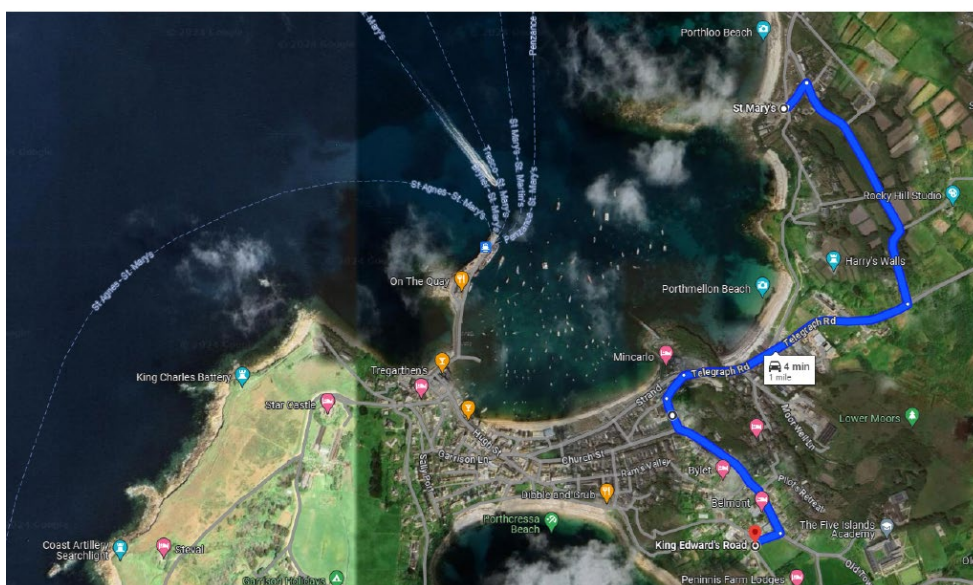


# 3.1 Planned vehicular routes for deliveries

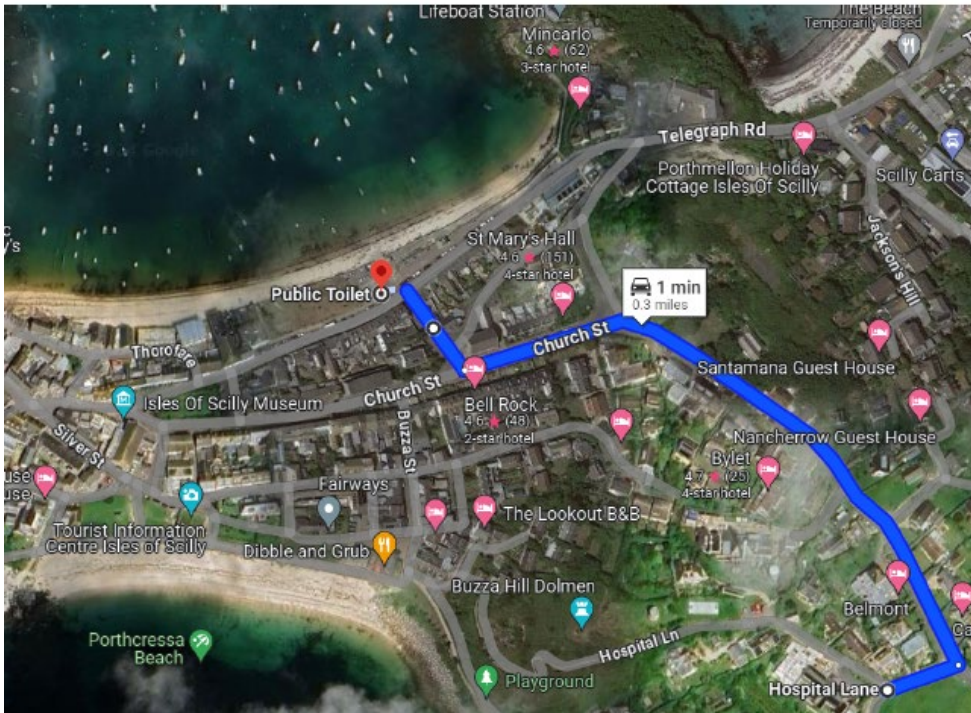
St. Mary's Quay route to St. Mary's Hospital



Delivery route, Porthloo Slipway to St. Mary's Hospital



Rechabite Slipway to St Mary's Hospital



## 4. The erection and maintenance of security fencing

Heras Fencing to be erected around the site and where illustrated on plan and discussed further in para. 14.

## 5. The loading, unloading and storage of plant, materials and waste

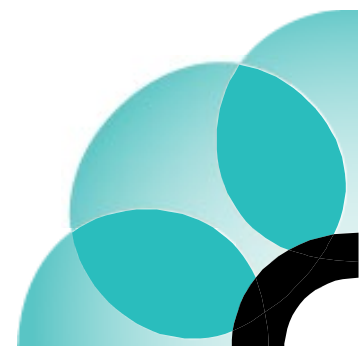
The loading and unloading of materials and equipment we will use a Hiab, excavator and tractor and trailer for lifting and manoeuvring materials from the Site compound to the development site. Wherever possible we will use local contractors on the island - Richard Hand Haulage. Etc

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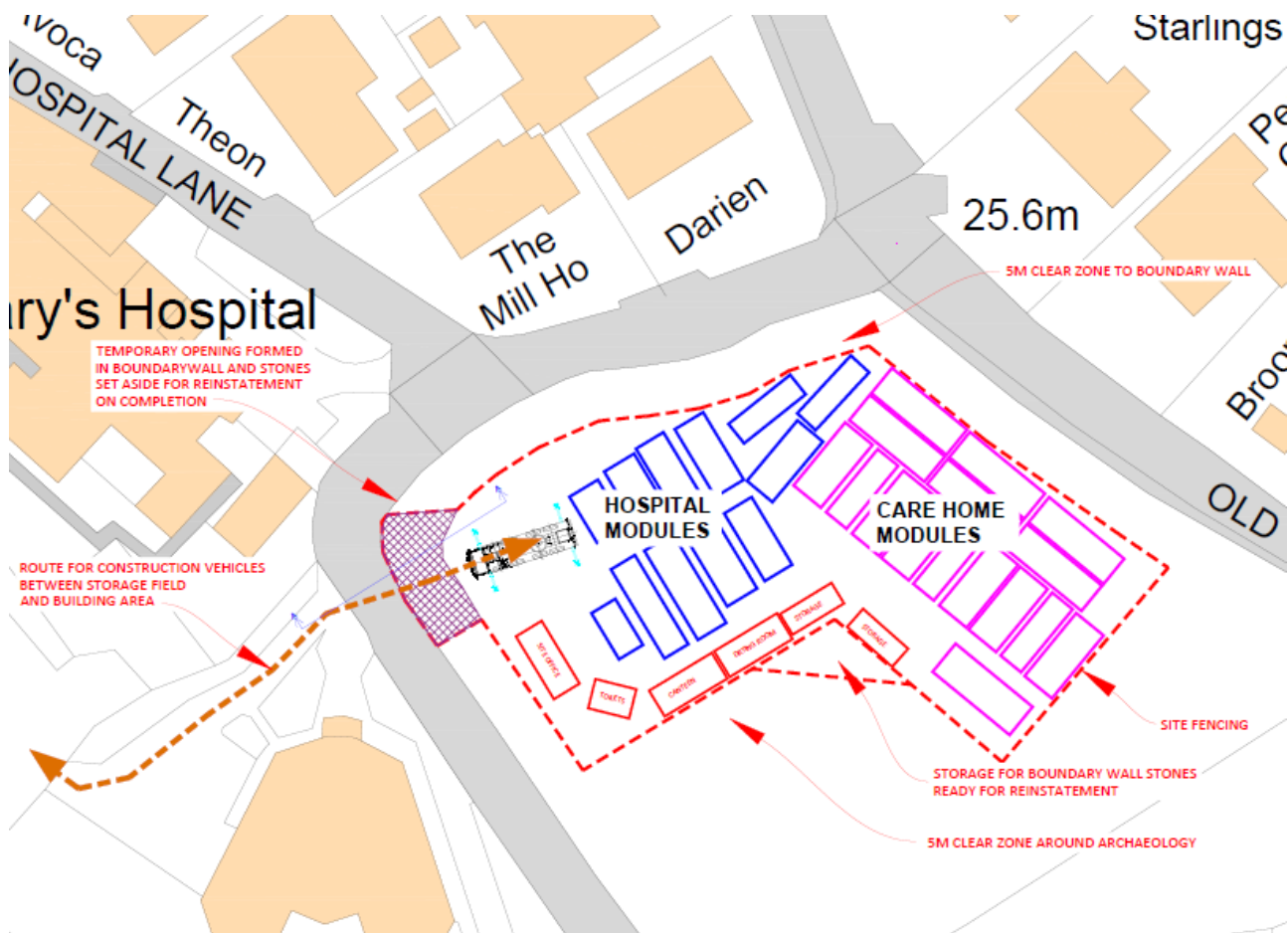
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To enable efficient on-island construction activities, material deliveries will need to be substantially completed prior to construction commencement to reduce the impact of inclement weather. Materials can be delivered during good weather and then stored securely and be easily accessible on Site compound.

## 6. Site set-up plan

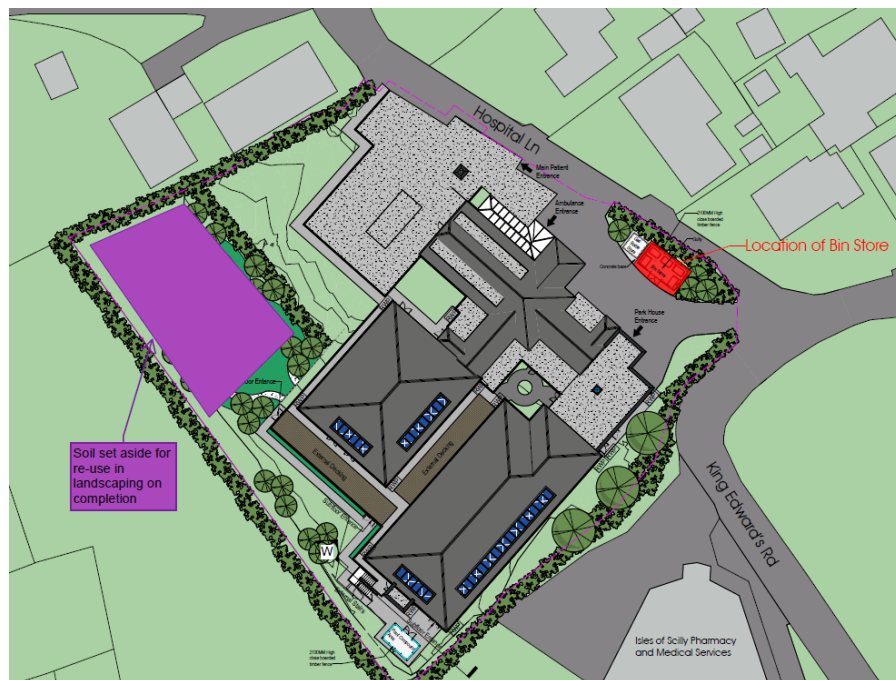
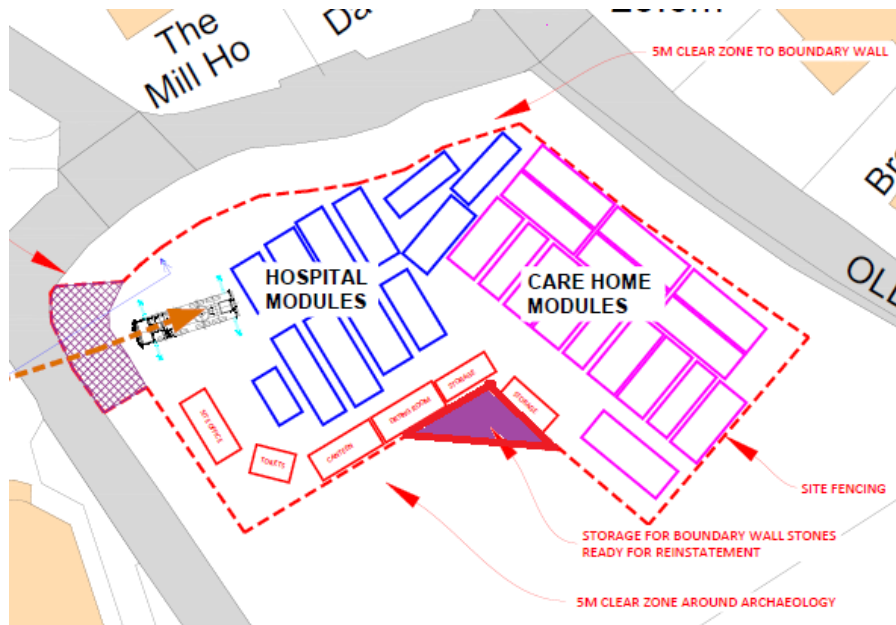


## 7. The storage of excavated spoil

Storage of spoil on Circus Field compound and the hospital site is shown in areas coloured purple on plans below.







## 8. Fire hazard

There will be no burning of construction materials on site.

The CDM Regulations 2015 also impose duties including the requirement to prevent risk from fire.

The fire risk from site activities must be assessed and precautions taken to control:

Combustible material – the quantity of combustible materials on site will be kept to the minimum and all such materials safely stored and used.

Ignition sources – we will eliminate, reduce and control ignition sources on site.

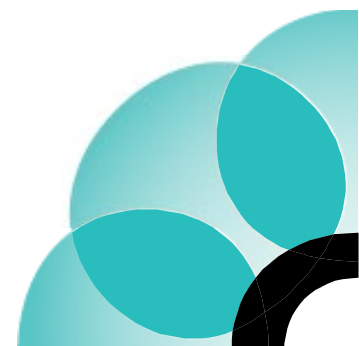
## 9. The records required in connection with this project are as follows:

1. Record of inspection of oil and fuel devices for leaks and spillages. Frequency: - At commencement of operations, followed by daily visual checks and a weekly summary report. A nil report is to be entered in the log in the event of no spillages or leaks during any week.
2. Excavation. A record of the area excavated, the total area cleared, cross referenced with the names of the members of the excavation team involved to be maintained weekly.
3. Noise pollution measurements are to be taken prior to the start of operations to establish the background noise levels, followed by measurements at the start of the various activities. Measures are to be taken to ensure the noise levels fall within acceptable limits and the actions taken to achieve this shall be recorded. Once satisfactory noise levels have been established, weekly repeat measurements will be taken and the results recorded in the operational log.

The Contracts Manager will be responsible for liaison with the local Council and its inspectors and shall record any steps agreed with the same that involve any noise or noise abatement issues. The Contracts Manager will be responsible for ensuring that items of plant are fitted with conforming noise abatement devices and a record of any deficient items kept.

Steps to produce low level noise at the start of operations will be included in the task list for all personnel at the outset of each day's operations.

4. Record of any breaches of Permit, or Environmental Accidents or Incidents.



## 10. Water management

Our ecologist will be consulted prior to the commencement of work to advise of mitigating impacts from specific activities as required. The integrity of all watercourses and drainage systems will be safeguarded by preventing any potential sources of contamination from reaching watercourses/drainage systems. There are no open water courses running through site. - minimal impact.

All refuelling of plant and machinery is to take place within the designated refuelling area with spill kits and plant nappies to hand. Drip trays are to be put in place underneath mobile fuelled plant equipment when parked on-site at the end of each working day. No wastewater is to be discharged to any controlled water, surface water or foul drain, unless formal, documented authorisation has been obtained through a discharge consent notice or environmental permit.

## 11. The provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway

- The wheels and chassis of vehicles shall be cleansed by hand at the point of loading in order to avoid the spread of mud, debris and dust onto the public highway.
- Ensuring that vehicles leaving the site carrying debris or waste are properly covered and not overloaded.
- Cleaning the carriageway near the site entrance as required.
- Spraying water to suppress dust e.g., damping down excavation sites at the construction phase.
- If feasible, excavations and earthworks activities should be avoided during very dry or windy weather.



- Stockpiles will be sealed compressed so smooth to allow effective run off.
- Materials that have the potential to produce dust should be removed from site when no longer needed.
- When stationary, vehicle engines will be switched off.
- Low-emission plant and equipment will be utilised, where available.
- Plant will be regularly inspected to ensure that the exhaust emissions comply with the appropriate limits and that it is working efficiently.

## 12. A pre-commencement survey for nesting birds and rabbit burrows

To ensure legislative compliance with regards to the Wildlife and Countryside Act (1981, as amended), works would be undertaken in a manner which avoids damage, disturbance, killing or injuring of nesting birds.

To ensure legislative compliance with regards to the Wild Mammals (Protection) Act 1996, works would ensure that rabbits are not entombed or subjected to unnecessary suffering.

### 12.1 Pre-commencement inspections – Nesting birds

Prior to site clearance and establishment works on both the Hospital and Circus Field sites, a nesting bird survey would be carried out by the Ecologist. This would include all semi-natural habitats and built structures including:

- **Onsite buildings** to be removed including **sheds** and **dilapidated structures**;
- The **main hospital building** at the locations where the new modular units will be tied in;
- **Areas of trees, shrubs** and **dense herbaceous habitat** including the hospital garden and boundary shrubs;
- **Boundary features** including the **Cornish hedge** and **drystone walls**;

- Areas of **rough** or **tussocky grassland**, especially within the western edge of the Circus field;
- **Offsite habitats** where works would occur in close proximity to **retained shrubs or trees**. Careful observation of any potential nesting sites would be undertaken to ensure that the parent birds are not visiting a nest and provisioning the young.
- Where active nests are identified, works affecting these areas would be delayed until the chicks have fledged the nest. The Ecologist would establish a buffer zone to ensure that works do not take place in close proximity to the nest and to ensure that the parent birds are able to successfully fledge the brood. The buffer zone would be clearly demarked in an appropriate manner in consultation with the contractors and Site Manager.
- Once it is confirmed that nests are absent or no longer active, the works can proceed.

## 12.2 Mid-phase inspections – Nesting birds

Any new phase of clearance works may require an updated pre-commencement inspection as birds can establish new nests in intervening periods.

The requirement for additional surveys would be identified by the Ecologist through discussion with the Site Manager after the completion of the initial survey, taking into account the remaining habitat and the proposed programme.

Where the sequence of works means that initial impacts to a discreet location will occur outside of the nesting bird season (March – September inclusive), for example the tying in of the new modular buildings to the existing hospital building, temporal avoidance of impacts can be achieved and a mid-phase inspection would not be required.

The mid-phase inspections would follow the same strategy as outlined for the pre-commencement inspections.

## 12.3 Pre-commencement inspections – Rabbits

Prior to site clearance and establishment works, a rabbit survey would be carried out by the Ecologist in the following locations:

- **Circus field** including boundary habitats.

- The **grassland habitats** to the west of the Hospital Site (previous pasture field).
- **Buildings** where there is scope for rabbits to burrow beneath.

A site walkover would identify and map any rabbit burrows present, and identify the potential for impact to these locations arising from the proposed works. Where there is uncertainty regarding the active use of a warren, trail cameras would be used to establish activity.

In the first instance, impacts would be avoided where possible through retention and protection of burrows to prevent entombment. This may be facilitated through minor modifications of the layout of matting within the Circus Field.

Where avoidance is not possible, a strategy of careful removal would be required. This may involve gradual digging out of the burrow by hand or with care to ensure that any rabbits present are identified and can be removed to a safe location before they are injured. The use of ferrets to flush the rabbits out would be an additional option if required.

## 13. A clearance strategy for the Circus Field and hospital sites

### 13.1 Aim

To ensure good practise when undertaking the initial clearance of the Circus Field and Hospital Sites including avoidance of impacts to Protected Species; and minimisation of ecological harm to habitats and other ecological receptors.

A Reasonable Avoidance Measures Method Statement (RAMMS) would be implemented to avoid killing or injury of small fauna species including amphibians, hedgehogs or white-toothed shrew.

### 13.2 Woody vegetation removal

Any removal of woody vegetation would be subject to pre-commencement inspections for nesting birds to be carried out by the Ecologist.

Woody vegetation would be removed to ground level and arisings chipped and removed from site to minimise the risk of nesting birds or other species such as hedgehog occupying brash piles.



A period of 24-48 hours would then be allowed to elapse to allow any species present to respond to disturbance and re-locate. Roots would then be removed by an excavator or similar in order to facilitate the development.

### 13.3 Herbaceous vegetation and grassland removal

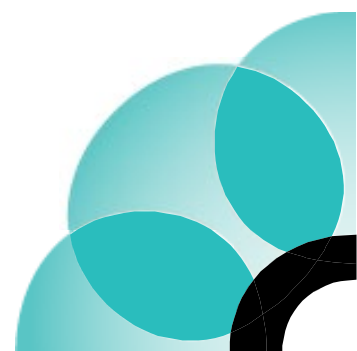
Any removal of herbaceous vegetation or grassland sward would be subject to pre-commencement inspections for nesting birds and rabbits, to be carried out by the Ecologist. Vegetation including ruderals, tall herbaceous and ornamental species, would be strimmed or cut to a minimum of 10cm above ground level to create disturbance and encourage any small mammals or other species to respond to disturbance and re-locate. The area would then be left for 24-48h before removal of remaining vegetation and roots.

Long grass and pasture sward would be cut initially with a blade height of no less than 10cm. The area would be left for 24-48h before a second pass when the remainder of the grass is removed to ground level. Short grassland such as areas of amenity sward found within the hospital garden can skip the initial step and proceed to immediate removal to ground level.

Excavators or other equipment can then be used to undertake removal of remaining vegetation and spoil as required to facilitate development.

### 13.4 Building removal - Overview

There are a number of buildings due for removal within the Hospital site – these are identified and described in the Ecological Assessment submitted in support of the application and illustrated in the following map.





Any removal of buildings would be subject to pre-commencement inspections for nesting birds and rabbits, to be carried out by the Ecologist. This would include ensuring that rabbits are not present in burrows beneath structures.

All debris and other arisings from building removal would be moved offsite at the earliest opportunity in order to ensure that nesting birds or other species such as hedgehogs and small mammals do not use refuse piles as nesting habitat or places of shelter.

**Building Removal - B1, B2, B3, B5, B8 and B10**

Buildings B1, B2, B3, B5, B8 and B10 do not offer suitable roosting habitat for bats; therefore these can be removed without any further ecological constraint following the pre-commencement inspection for nesting birds or rabbits.

**Building Removal – B4, B7 and B9**

Buildings B4, B7 and B9 would be subject to Presence/Absence Surveys (PAS) in April and May





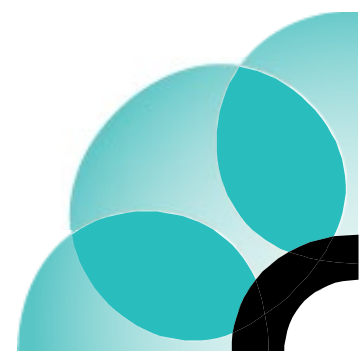
2024 to identify if bats are utilising the structures.

Contractors must be aware of their own legal responsibility with respect to bats – this would involve inclusion within the site induction process and could be supplemented by a toolbox talk if required. If any roosting behaviour is identified within buildings to be removed, an European Protected Species Mitigation Licence (EPSML) would be sought and works would then proceed in line with the strategy outlined in the Method Statement. This document would be informed by the precise results of the survey and can not therefore be detailed in advance; however it is likely to include exclusion of bats; soft-strip of selected features under the ecological oversight of a Licenced Bat Worker; and creation of new roosting features. The status of the EPSML as a derogation licence to permit an otherwise unlawful activity would provide a robust legislative means to control works and avoid impacts to protected species.

If no roosting activity is identified, works to these buildings would still proceed under a Precautionary Method of Works (PMW). This would involve the removal of the following features by hand and with care:

- **Fascias** - there are intermittent gaps where the fascias meet the walls on various elements of the buildings. During the initial stages of demolition, fascias would be carefully removed and the gaps behind them exposed in such a way that, in the unlikely event that bats are present, they are not injured or killed by the action. Once these areas are fully exposed, they can be visually inspected by contractors. Any cavities exposed by this action would also be carefully inspected and features dismantled by hand where necessary until absence of bats can be confidently confirmed.
- **Roof Sheets** - there are gaps created where corrugated sheets overlap both on roofs and walls on some structures. There is a negligible potential for these minor gaps to be used by individual roosting bats on an exploratory/opportunistic basis. As a precaution, the cavities created by the overlaps would be visually inspected using a torch prior to the removal of the sheets. If any bats are present, or suspected, works would pause and the Licenced Bat Worker contracted to review the situation. If it is not possible to fully and comprehensively confirm the absence of bats in these minor niches, then the sheets would be removed carefully and by hand, beginning with the apex sheet and working down the roof or wall until all gaps are exposed and inspected. Care would be taken to lift the sheets in such a way that, in the unlikely event of bats being present, they are not crushed or otherwise harmed by the action. If no bats are present, the sheets can be fully removed and works can continue.

If bats are identified during the PMW, works would cease and the Ecologist contacted immediately for advice. If the bat is in a safe situation, or a situation which can be made safe, the bat should remain undisturbed. Only if the bat is in immediate risk of harm would the bat be moved with care and using a gloved hand by a contractor. This is a last resort and would only be undertaken for



humane reasons if the bat is at immediate risk of harm and if the ecologist cannot be contacted for advice.

## 14. Measures to protect retained habitats including boundaries and other onsite features

### 14.1 Aim

To ensure retained habitats including those on- and offsite are protected from accidental or incidental damage during the construction process.

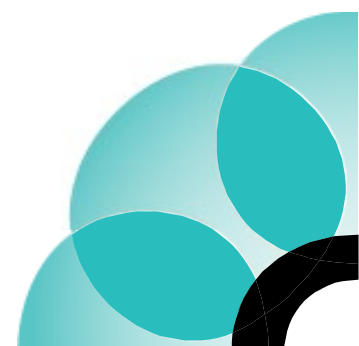
### 14.2 Toolbox talk/site induction

Contractors would be made aware of the importance of protecting retained onsite habitats and those on the site boundary. This would form part of the Site Induction and could be supplemented by a toolbox talk if considered necessary.

### 14.3 Heras fencing

Those features which are most likely to support ecological receptors such as nesting birds would be protected with Heras fencing. These would be supported by signage where required to ensure that the purpose of the exclusion is clear. These features include:

- The **Cornish Hedge** – a 5m buffer is built into the proposals to separate the boundary features and the Circus Field compound wherever practicable. The entrances are an exception to this, as maintenance of the 5m buffer in this location would require a greater degree of temporary removal than necessary which would represent an elevated impact. The 5m standoff would minimise the risk of disturbance to species and habitats associated with these features, including breeding birds and small mammals.
- **Hospital Garden** – those areas of the hospital garden which are to be retained in their current condition would be protected to allow continued enjoyment by the hospital staff/patients during the construction process as well as protect nesting birds and other ecological receptors within the retained habitat.



- **Offsite and Retained Vegetation** – in locations with significant machinery and plant movement in close proximity to boundary and retained vegetation. This would be agreed between the Site Manager and the Ecologist in consultation with neighbouring land owners where required.
- **Retained Shed (Circus Field)** – the retained shed within the Circus Field site would be protected by Heras Fencing as this area is known to support rabbits and may also support nesting birds and roosting bats.

## 15. Measures to protect nesting birds, bats, rabbits and other wildlife

These issues are addressed by pre-commencement inspections; buffer zones; RAMMS and PMW outlined in full detail elsewhere in this CEMP.

## 16. Measures to protect retained trees

See accompanying report EV-4666-AMS TPP by Evolve Tree Consultancy dated April 2024.

## 17. Measures to address or minimise the risk of spreading invasive non-native species;

### 17.1 Aim

To ensure legislative compliance with regards to the Wildlife and Countryside Act (1981, as amended), works would be undertaken in a manner which does not result in the Schedule 9 plant being spread either within the existing site or elsewhere.

### 17.2 Three-cornered Leek

This species is present on both sites however it is widespread and impossible to fully delineate as discreet stands; rather it is a low-level, ubiquitous presence. This reflects its status across the Isles of Scilly in general where it can be found frequently in the majority of habitats. The existing ubiquity of this invasive species on the islands including all adjacent habitats to the



site should be taken into account when considering a proportionate approach to control.

Contractors undertaking site clearance would be made aware of the nature of this species. It is identified as:

- A perennial herb, with white bulbs. The leaves are green, hairless and narrow with 2-5 leaves per bulb. Leaves die back once the plant has flowered around May - June.
- Flower stems measure 10 – 45cm in height with white flowers, with a strong green stripe, similar in shape to bluebells. Stems have a triangular cross section giving rise to its common name.

The species can be removed mechanically by digging or excavation, this is most easily done in spring when surface vegetation is present, ensuring that all plant material and bulbs are removed.

Waste materials containing three cornered leek are considered 'controlled' waste and would be disposed of appropriately.

No topsoil to be imported – re-using existing, clean fresh aggregate only

## 18. A method statement for the dismantling of the section of existing drystone wall and Cornish hedge and their subsequent restoration

### 18.1 Aim

To ensure that the process of dismantling; storage of materials; and re-construction of the Cornish hedge and drystone walls allow them to be restored to their prior condition following completion of works.

### 18.2 Dismantling

The Cornish hedge and drystone walls would be carefully dismantled by hand. Stones would be lifted carefully and any species such as small mammals identified would be allowed to disperse to a new location.



The scope of removal of the Cornish hedge would be restricted to the minimum required to provide access into the field; but would be staggered with the height stepping up from ground level to the apex of the feature to ensure stability. Additional supports would be installed if required to secure this for the duration of works.

## 18.3 Storage

The stones would be stored carefully onsite until their restoration. Those stones which were facing outwards would be stored upright to allow the mosses, lichens and bryophytes to survive intact for the storage period. In dedicated storage area as shown on plan.

## 18.4 Restoration

The stone field wall feature would be restored carefully by a contractor competent in the construction of a Cornish hedge. This involves correct selection and placement of the stones to create an interlocking structure built to the correct batter and using appropriate subsoil for the core.

Drystone walls would be similarly restored by an experienced contractor to ensure their long term structure and stability.

Once restored structurally, the Cornish hedge would be allowed to regenerate a natural botanical composition – there is an abundance of species within the retained portions of the structure to ensure an adequate seed source for this.

# 19. Persons responsible for implementing the works

This section sets out the key roles and responsibilities relating the implementation of environmental management during the construction of the proposed welfare compound. The applicant for proposed development is Community 1st Cornwall. The Principal Contractor for the proposed development is METS Ltd.

The Principal Contractor will be in charge of employing and delegating tasks to appropriate and suitable personnel, meaning those with the correct training and experience for the role. This may involve using subcontractors, and working with environmental specialists, where specialist knowledge and techniques are required.

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## 20. Measures to manage control/minimise the emission of dust, dirt vibration, light and air pollution and odour during demolition/construction

- Arrangements will be made to ensure that, should excessive noise, dust or vibration operations become necessary, they will only be undertaken after liaison with the Council and with any third parties liable to be affected. Any operations that may cause any excessive noise, dust or vibration will be reported in advance.
- All compressors shall be 'noise reduced' models that are fitted with properly lined and sealed acoustic covers which shall be kept closed whenever the machines are in use. All ancillary pneumatic percussion tools shall be fitted with mufflers or silencers of the type recommended by the manufacturers.
- Wherever possible mains electricity or battery powered equipment shall be used instead of diesel or petrol powered generators.
- The handling of materials shall be conducted in such a manner that minimises noise, including minimising drop heights into hoppers and lorries.
- No stereos or similar amplified devices shall be audible beyond the site boundary.
- All plant and equipment shall be maintained in accordance with manufacturer's recommendations to ensure emissions to atmosphere are minimised.
- Any equipment used to cut paving blocks, kerbs, flagstones etc. shall be operated with a water suppression attachment or a dust filter.
- Engines of plant, machinery, and lorries shall be turned off at all times when not in use.
- Delivery activities, plant, stockpiled materials and/or any other activities liable to significant dust generation shall be located as far away as possible from the development site boundaries and neighbouring properties.



- Stored materials liable to dust generation shall be dampened down, covered with tarpaulin, or otherwise contained as far as reasonably possible.
- Drop heights from conveyors, loading shovels, hoppers, and other loading or handling equipment shall be minimised and fine water sprays should be used on equipment where necessary.
- Skips, chutes, and conveyors shall be covered and if necessary enclosed to ensure that dust does not escape.
- All vehicles carrying dusty materials shall be securely covered. Water suppression shall be used in dry conditions to reduce dust emissions (e.g. mobile bowsers or fixed sprayers as appropriate). A water suppression contingency plan should be included detailing water supply to site and what equipment will be kept available (e.g. number and size of bowsers, sprinklers, mist canons etc).
- The CEMP must include an assessment of dust from demolition and construction inline with the Institute of Air Quality Management (IAQM) Guidance on the assessment of dust from demolition and construction or equivalent industry standard document. Where a screening identifies possible receptors and a need for a detailed assessment the IAQM guidance shall be followed and the appropriate dust assessment report and accompanying tables shall submitted to the LPA.
- The public highway must be kept in a condition whereby it is mud free. This is applicable to both roads and pavements.
- Flood lighting, security lights, and any other obtrusive external lighting shall be sensitively located so as to avoid nuisance to neighbouring properties and should only provide the necessary luminance for the relevant task(s).

## 21. Working hours

No work to be undertaken on the site except between the hours of 08.00 and 18.00 on Mondays to Saturday inclusive and no work to be undertaken on Sundays, Bank and Public Holidays.

Any deliveries outside the above hours cannot be undertaken without prior written approval of the LPA.



## 22. Details of public engagement both prior to and during the construction works.

Courtesy calls to nearest neighbours on a regular basis to ensure disruption and disturbance is kept to a minimum.

Delivery times of plant and machinery which may cause disruption to the highways network will be clearly marked in advance through signage.

An information display board shall be prominent and shall detail the nature of the works being undertaken, start and completion dates, a contact name of the Site manager and telephone number (including a telephone number to be used outside normal working hours).

A complaints register shall be kept and shall include complainant's details, date and time of the complaint, cause(s) of the complaint, action taken to resolve the complaint, date and time of action taken to resolve the complaint, and reasons for any unresolved complaints.



RECEIVED

By Liv Rickman at 3:03 pm, Apr 29, 2024

APPROVED

By Lisa Walton at 2:29 pm, May 10, 2024



# Construction Waste Management Strategy. (CWMS)

Temporary use of the Circus field in conjunctions with the construction of the Integrated Health and Social Care Centre located to the south-east of St Mary's Hospital, Hospital Lane, Hugh Town St Mary's Isles of Scilly TR21 0LQ

On behalf of The Cornwall Partnership NHS Foundation Trust  
April 2024

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# 1. Introduction

Situ8 Ltd have been instructed to act on behalf of The Cornwall Partnership NHS Foundation Trust, to write a supporting CWMS in relation to Temporary use of the Circus field in conjunction with the construction of the Integrated Health and Social Care Centre located to the south east of St Mary's Hospital, Hospital Lane, Hugh Town St Mary's Isles of Scilly TR21 0LQ. (hereinafter referred to as 'the site').

This report is submitted to address the requirements of the following planning condition in relation to planning application P/24/006/FUL

**C5 With the exception of ground strip for archaeological investigation purposes only, no development shall take place, including any demolition or clearance works, until a scheme for recycling/disposing of all waste resulting from demolition and construction works has submitted to and agreed in writing with the Planning Authority. The development shall thereafter proceed in strict accordance with the approved scheme.**

Reason: To ensure adequate consideration is given to the minimisation of unnecessary waste generation, and adherence to the waste hierarchy, in accordance with the requirements of Policy SS2 (2) and Policy OE5 of the Isles of Scilly Local Plan 2015-2030. This is required to be a pre-commencement condition because it is necessary to have agreed such details prior to commencing any building works.

We have also submitted this report in support of the Temporary use of the Circus field P24/019/COU.

## 2. Site Waste Management Plan

Effective waste management is fundamental to sustainable construction practices, aligning with the commitment to environmental responsibility and regulatory compliance. Any Site Waste Management Plan (SWMP) for the proposed Integrated Health and Social Care Facility should serve as a strategic blueprint to systematically manage, control, and minimise construction waste generated during the project's lifecycle.

The Principal Contractor is METS Ltd who has been appointed for the project and their full construction methodology, waste protocols and waste estimates have been included in this report.

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A decorative graphic in the bottom right corner consisting of several overlapping circles in various shades of teal and light blue, with a black curved shape at the bottom right.

All contractors waste will be handled in accordance with the Council of the Isles of Scilly and Cornwall NHS Foundation Trust waste management policies. Statutory industry standard will also be complied with. The unique challenges of disposing of waste on the Isles of Scillies are recognised and all designs and plans will be configured to reduce waste as much as possible. Once the principal contractor has been appointed further detail on their Site Waste Management Plan will be provided.

Please see the CEEMP for access arrangements for construction traffic.

Notwithstanding the above this document outlines some of the approaches, objectives, and procedures that will be employed to ensure responsible waste management throughout the construction process.

## 3. Waste Stream Identification

The construction project will generate various waste streams, each requiring specific management practices to ensure environmental responsibility and regulatory compliance. These key waste streams include:

### 3.1 Excavated soil and earthworks:

Description: Soil and earth materials removed during excavation and groundwork activities.  
Management: Reuse on-site, if possible, or arrange for responsible disposal at Parting Carn composting facility

### 3.2 Concrete and Masonry waste:

Description: Broken concrete, bricks, and masonry materials from demolition or construction activities.  
Management: Recycle as aggregate for new construction or dispose of responsibly in designated facilities.



### 3.3 Wood and Timber waste:

Description: Scrap wood, pallets, and timber from construction and packaging materials.

Management: Recycle for reuse. Ensure proper disposal at Porthmellon Waste Site if recycling is not feasible.

### 3.4 Metal waste:

Description: Scrap metal, steel, and other metal components generated during construction or demolition.

Management: Recycle at metal recycling facilities. Return to mainland for recycling. Salvage valuable metals for reuse.

### 3.5 Plasterboard Waste:

Description: Gypsum-based plasterboard or drywall waste.

Management: Segregate from other waste streams and dispose of in dedicated recycling facilities for return to mainland facility.

### 3.6 Packaging waste:

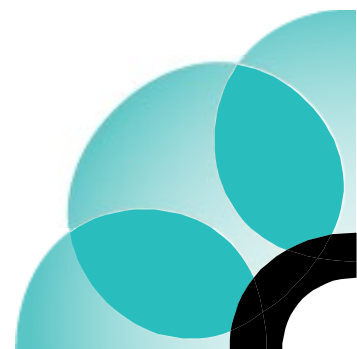
Description: Packaging materials such as cardboard, plastic, and foam used for materials and equipment arising from construction and staff welfare.

Management: Segregate and recycle materials wherever possible. Dispose of non-recyclables responsibly. Either on Island or mainland disposal / recycling.

### 3.7 Asphalt and bitumen waste:

Description: Waste generated from asphalt and bitumen materials during roadwork or paving activities.

Management: Recycle for use in new asphalt mixes or dispose of in designated facilities.



## 3.8 Hazardous waste:

Description: Materials containing hazardous substances, including paint, adhesives, and certain construction chemicals.

Management: Handle and dispose of hazardous waste in compliance with relevant regulations. Use licensed hazardous waste disposal services on the mainland.

## 3.9 Insulation materials:

Description: Waste insulation materials, such as fiberglass or foam board.

Management: Segregate and dispose of in designated facilities, ensuring proper recycling where feasible.

## 3.10 Roofing materials:

Description: Waste generated from roofing activities, including old roofing materials, tiles, and membranes.

Management: Recycle roofing materials where possible retain for future repairs. Dispose of non-recyclables responsibly.

## 3.11 Paint and coatings waste:

Description: Waste generated from unused or leftover paints, coatings, and related products.

Management: Dispose of in accordance with hazardous waste regulations or donate unused paint to community projects.

## 3.12 Electric and electronic waste:

Description: Discarded electrical and electronic equipment from construction activities.

Management: Separate and recycle through designated facilities. Comply with regulations governing electronic waste disposal.



### 3.13 Glass waste:

Description: Waste glass from construction, demolition or staff welfare activities.

Management: Recycle glass materials through designated facilities. Ensure proper containment and transportation or crush on the island use as aggregate.

### 3.14 Mixed general waste:

Description: Non-recyclable waste that does not fall into specific categories, to include waste from staff welfare facilities

Management: Dispose of responsibly in accordance with waste management regulations. Minimise the volume of mixed general waste through segregation efforts. Incinerator or return to mainland.

### 3.15 Sewage waste from temporary toilet facility

In regard to sewage waste we will have an agreement with one of the island contractors to empty the holding tanks and dispose of legally through the SWW point on a regular basis.

## 4. Waste Stream Minimisation Objectives and Strategies

Waste minimisation objectives and strategies associated with the construction process on the project will aim to reduce the environmental impact of construction activities, conserve resources, and comply with waste management regulations. METS Ltd will adopt proactive strategies and incorporating waste reduction measures, the construction project can significantly reduce the environmental impact and contribute to resource conservation.

The following key objectives and strategies will be considered by the principal contractor when appointed:

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## 4.1 Overall waste reduction:

**Objective:** Minimise the overall volume of waste generated during the construction project.

**Action:** Implement strategies to optimise processes, reduce inefficiencies, and carefully manage materials to prevent overordering.

**Impact:** Encompasses environmental, economic, and social benefits, contributes to sustainable construction practices, and aligns with goals of resource conservation.

## 4.2 Prefabricated and modular construction:

**Objective:** Minimise the overall volume of construction waste, packaging reduction, and design for efficient material use.

**Strategy:** Embrace off-site prefabrication and modular construction methods off site to minimise on-site waste generation.

**Impact:** Reduces on-site construction waste, as components are manufactured off-site with greater precision and efficiency. At least 80% of the new build elements will be constructed off site.

## 4.3 Reuse of materials:

**Objective:** Promote and prioritise the reuse of salvaged materials or components from demolition activities in the new construction project.

**Action:** Identify opportunities where possible to incorporate reclaimed materials into the current project and implement design principles that facilitate material reuse.

**Impact:** Extends the lifespan of materials, reducing the demand for new resources and minimising waste generation.

## 4.4 Recycling targets:

**Objective:** Achieve high recycling rates for construction waste.

**Action:** Set specific targets for recycling various waste streams such as concrete, metal, wood, and packaging. Collaborate with recycling facilities and monitor progress.

**Impact:** Diverts materials from landfills, promotes a circular economy, and conserves natural resources.





## 4.5 Waste segregation:

**Objective:** Implement effective waste segregation practices to separate different types of waste at the source.

**Action:** Provide color-coded or labelled containers for different waste streams, educate workers on segregation practices, and regularly monitor compliance.

**Impact:** Facilitates recycling efforts and ensures that specific waste streams, such as hazardous materials, are handled appropriately.

## 4.6 Reducing hazardous waste:

**Objective:** Minimise the generation of hazardous waste and ensure its safe disposal.

**Action:** Identify and replace hazardous materials with safer alternatives, train operatives on proper handling, and implement measures to prevent spills or accidents.

**Impact:** Addresses environmental, health and safety, economic, and regulatory aspects, minimises negative impacts on both the environment and human health.

## 4.7 Lean construction practices:

**Objective:** Apply lean construction principles to optimise processes and minimise waste.

**Action:** Streamline construction activities, eliminate unnecessary steps, and identify areas for process improvement to enhance overall efficiency.

**Impact:** Enhances overall project efficiency, decreases the likelihood of errors, and reduces the generation of waste.

## 4.8 Packaging reduction:

**Objective:** Minimise packaging waste associated with construction materials.

**Action:** Work with suppliers to reduce excessive packaging, encourage the return or recycling of packaging materials, and explore alternatives such as reusable packaging.

**Impact:** Resource conservation, reduced energy consumption, decreased landfill burden, and facilitates recycling efforts.



## 4.9 Smart demolition practices:

Objective: Minimise waste during demolition activities and maximise material recovery.

Action: Implement careful demolition practices to salvage and recover materials for reuse, carefully dismantle structures to preserve reusable components, and segregate demolition waste for recycling.

Impact: Minimises the amount of waste generated during demolition activities and maximises resource recovery.

## 4.10 Design for deconstruction:

Objective: Promote sustainability and resource efficiency.

Strategy: Design buildings and structures with the future in mind, allowing for easier disassembly and material recovery during demolition or renovation. All modules are bolted into place.

Impact: Facilitates the reuse and recycling of materials, reducing the overall volume of waste generated.

## 4.11 Energy efficient construction:

Objective: Reduce energy-related waste during construction activities.

Action: Optimise energy use on-site, choose energy-efficient construction methods, and explore renewable energy sources where feasible.

Impact: Reduced greenhouse gas emissions, climate change mitigation, optimised resource use, lower operating costs, improved indoor environmental quality.

## 4.12 Materials procurement planning:

Objective: Waste minimisation, sustainable material selection, procure materials with minimal environmental impact, and efficient use of resources.

Strategy: Plan and procure materials with precision to minimise overordering and excess inventory.

Impact: Reduces the amount of surplus materials that may become waste and lowers disposal costs.



## 4.13 Supplier collaboration for sustainability:

Objective: Encourage sustainable practices among suppliers to minimise environmental impact.

Action: Collaborate with suppliers to adopt environmentally friendly packaging, source materials responsibly, and adhere to sustainability standards.

Impact: Reduces unnecessary packaging waste and promotes sustainable supply chain practices.

## 4.14 Training and awareness:

Objective: Educate construction personnel on waste reduction practices and the importance of minimising waste.

Action: Conduct regular training sessions, provide informational materials, and foster a culture of waste reduction awareness among workers.

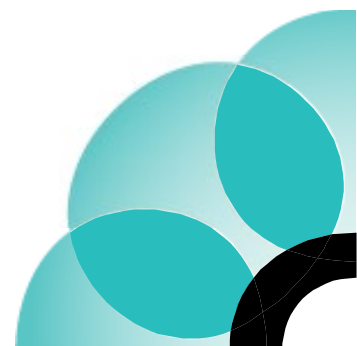
Impact: Raises awareness, promotes responsible behaviour, and fosters a culture of waste reduction on-site.

## 4.15 Waste audits and monitoring:

Objective: Continuously evaluate and improve waste minimisation practices throughout the construction project.

Action: Regularly review waste management procedures, conduct waste audits, and incorporate lessons learned to enhance waste reduction efforts. The Principal Contractor will review this process at least every month. They will check it meets the needs of the project's waste management and recycling rates. Quantities of waste reused, recycled, recovered, incinerated, or landfilled will be recorded. A comparison should be made with estimated waste arisings where relevant. Targets should be adjusted / improved where possible.

Impact: Provides insights into areas for improvement and helps track progress toward waste reduction goals.



**RECEIVED**

By Liv Rickman at 3:33 pm, Mar 07, 2024

## ECOLOGICAL ASSESSMENT

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CIRCUS FIELD,  
ST MARY'S, ISLES OF SCILLY

**APPROVED**

By Lisa Walton at 2:22 pm, May 10, 2024



*Client: Situ8 Planning Consultancy*

*Our reference: 24-1-2*

*Planning reference: Report produced in advance of submission*

*Report date: 5<sup>th</sup> March 2024*

*Revision: B*

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# Executive Summary

<b>Overview</b>
<p>The Circus Field site was subject to a Preliminary Ecological Assessment (PEA) and Preliminary Bat Roost Assessment (PRA) in February 2024.</p> <p>This Ecological Assessment (EA) report outlines the results of the PEA and PRA as well as recommendations and proposed mitigation measures arising from the ecological baseline.</p>
<b>Proposals</b>
<p>The proposed works involve the temporary use of the field as a site compound associated with the development works to extend the existing St Mary's hospital.</p>
<b>Ecological Assessment</b>
<p>The proposals would result in the short-term conversion of the field to a storage and site compound for a period of approximately 12 months after which the land would be restored to grassland. A temporary access would be created in the Cornish Hedge in the north-western corner of the site – this too would be restored to its original condition after approximately 12 months. An access in the south-eastern corner may require removal of individual young pine tree(s) and short-term re-location of a shed used as an Honesty Stall.</p> <p>The proposals have the potential to impact upon bats and nesting birds, in the absence of measures to control this. There would be a short-term decrease in the availability of suitable nesting habitat for breeding birds during works – this would be restored after 12 months. The potential for roosting bats to make use of the Cornish Hedge is very low and can be controlled through an appropriate method of works without requirement for further surveys. There would be a short-term reduction in tree cover on site; however the young age of the trees means this can be restored in the medium-term.</p>
<b>Recommendations</b>
<p>Recommendations provided in this EA report will ensure that impacts to protected species are avoided and ecological impacts mitigated or compensated where appropriate. These include:</p> <ul style="list-style-type: none"><li>• A pre-commencement nesting bird and rabbit burrow survey;</li><li>• Measures to protect nesting birds including protection from disturbance of retained boundary habitats;</li><li>• Measures to protect bats and other species during works to the Cornish Hedge;</li><li>• Measures to protect retained habitats including boundary and onsite features such as the offsite tree line and onsite shed;</li><li>• Avoidance or minimisation of external lighting – any lighting to be cowled or targeted to avoid light spill on boundary and offsite habitats to secure continued suitability of foraging resources for bats and invertebrates;</li><li>• Development of a Habitat Restoration Plan to detail how the habitats will be restored to their original condition at the end of the project;</li><li>• Measures to control or minimise the risk of non-native invasive species spreading within or outside of the site.</li></ul>

## Report Status

This EA report represents a comprehensive ecological baseline to support a Planning Application. The following documents will be submitted in the application and should be read alongside this report

- A **Site Layout Plan** demonstrating the 5m standoff between the compound and the retained Cornish Hedge;

The following additional documents would be required and should be submitted either as supplemental information prior to determination, or could be conditioned in any permission granted in order to secure the mitigation and enhancement measures. These include:

- A **Construction Ecological Management Plan (CEMP)**;
- A **Habitat Restoration Plan (HRP)** outlining how onsite habitats will be restored to their previous condition following decommissioning of the site.

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# 1. Introduction

## 1.1. Project Overview

The site comprises a field set to the south-east of the existing hospital on St Mary's, Isles of Scilly

The proposals relate to the temporary use of the field as a storage compound associated with the proposed hospital extension which is subject to a separate planning application.

The proposed works considered in this assessment were identified by the client.



**Map 01** – Site location indicated by the red circle. Reproduced in accordance with Google's Fair Use Policy.



## 2. Site Location and Description

### 2.1. Site Location

The Site comprises the field known as Circus Field and a small adjacent field to the south. The National Grid Reference for the centre of the site is SV 90821 10303 (see Map 1).

### 2.2. Site Description

The site is approximately 0.5 hectares (ha) in size. The pasture field dominates the site with areas of undermanaged grassland gaining a tall ruderal sward to the west. The site is bounded for the majority of the perimeter by a Cornish Hedge with a post-and-wire fence present for the remainder. A small shed, used historically as a poultry enclosure, is present to the west of the site and a further wooden shed used as an Honesty Stall is present in the gateway in the south-eastern corner of the site. A line of young pines bisects the grassland separating a smaller field in the south from the main Circus Field in the north.

### 2.3. Local Landscape Setting

The site is on the south-eastern edge of Hugh Town with the last line of residential houses present to the north and the hospital to the west.

The main town is densely developed but the footprints of properties become larger and more spaced towards this field, including those bounding the field to the north and east. To the south and south-east, beyond the holiday cabins of Peninnis Farm, is open countryside characterised by small agricultural fields with evergreen windbreaks.

Beyond the hospital there is the green space of Buzza Hill situated to the north-east of the site with allotments to the south-west. The shoreline situated to the west is rocky at its closest point giving way to sandy beaches such as Porthcressa to the north and south.



**Map 02** – Showing the landscape and habitats immediately surrounding the site. Reproduced in accordance with Google’s Fair Use Policy.

## 2.4. Relevant Designations

The Site itself is not subject to any statutory or non-statutory designations of relevance to the consideration of ecological value or impacts.

There are four statutory designated sites of conservation importance situated within a 1km radius of the site. Details of these designations are provided below:

- **Isles of Scilly SAC Complex** – Encompassing the coastline around St Mary’s and situated 260m to the south-west at its closest point, the SAC is designated for its nationally important numbers of Grey Seal and the nationally rare Shore Dock. Annex 1 habitats that are the primary reason for site selection include mudflats; inter-tidal sandflats; reefs and sub-tidal sandbanks.
- **Isles of Scilly SPA Complex** – Encompassing the coastline around St Mary’s and situated 180m to the south-west at its closest point, the SPA designated for its internationally important seabird assemblage of 13 species including internationally important numbers of lesser black-backed gull and nationally important numbers of European storm petrel and European shag.
- **Lower Moors SSSI** – Situated 310m north-east of the proposed development lies Lower Moors SSSI – this is a topogenous mire, whereby seasonal fluctuations of freshwater from rainfall cause the partial breakdown of plant material, which then turns to peat. The site has

several, small shallow open water areas which are known to be important feeding areas for passage and over-wintering migrants and waders.

- **Peninnis Head SSSI** – Situated 290m south of the proposed development lies Peninnis Head SSSI, designated primarily for its geology including prominent granite cliffs and tors but it also supports maritime heathland, maritime grassland and scrub habitats together with populations of rare plant and lichen species.

## 2.5. Planning Context

### 2.5.1. National Planning Context

The **National Planning Policy Framework (NPPF)**<sup>1</sup> sets out the Government's policies on conserving and enhancing habitats and biodiversity through the planning system in paragraphs 174 to 182. Whilst these policies are primarily expected to be incorporated into development planning documents at regional and local scales, they are also of material consideration for individual planning applications.

Paragraph 174 states that:

*Planning policies and decisions should contribute to and enhance the natural and local environment by:*

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.'*

Paragraph 180 states that:

*When determining planning applications, local planning authorities should apply the following principles:*

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts),*

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<sup>1</sup> National Planning Policy Framework (Crown Copyright, 2023)

*adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*

- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate*

In addition to the NPPF, the **Office of the Deputy Prime Minister (ODPM) circular 06/0511**<sup>2</sup> provides guidance on the application of law relating to planning and nature conservation. Paragraph 98 states *“the presence of a protected species is a material consideration when a planning authority is considering a development proposal, that if carried out, would be likely to result in harm to the species or its habitat.”* Whilst Paragraph 99 states *“it is essential that the presence or otherwise of a protected species, and the extent that they may be affected by the proposed development, is established before planning permission is granted.”*

### 2.5.2. Local Planning Context

The following policies are most relevant to this assessment:

- **Core Policy 1** - Environmental Protection;
- **Policy OE2** - Biodiversity and Geodiversity.

The following planning guidance documents are also of relevance:

- The Isles of Scilly Local Development Framework Supplementary Planning Document: Biodiversity and Geological Conservation<sup>3</sup>.

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<sup>2</sup> Office of the Deputy Prime Minister. (2005). Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System. ODPM Circular 06/2005

<sup>3</sup> <https://www.scilly.gov.uk/sites/default/files/IslesofScillyBiodiversity&GeodiversitySPD.pdf>

## 3. Survey Methodology

### 3.1. Desktop Survey

A full desktop study was undertaken for the presence of bats based on the list of roosts and other records held by the Isles of Scilly Bat Group.

Background Data was sourced from the Environmental Records Centre for Cornwall and the Isles of Scilly (ERCCIS) within a 1km radius of the site.

The desk study also included accessing the Multi-Agency Geographic Information for the Countryside (MAGIC)<sup>4</sup> database in order to establish the presence of statutory designated sites, including all internationally and nationally designated sites such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), RAMSAR sites and Sites of Special Scientific Interest (SSSIs) within 1km of the site.

Other resources used include aerial photography to identify the presence of habitats in close proximity to the site. This assists in the assessment of the potential of the site and its surrounding habitat to support protected species.

### 3.2. Vegetation and Habitat Assessment

An assessment was made of all areas of vegetation within the site based on the standardised Phase 1 survey methodology<sup>5</sup>. This involved a walkover survey to identify broad vegetation types, which were then classified against Phase 1 habitat types, where appropriate.

A list of characteristic plant species for each vegetation type was compiled and any invasive species encountered as an incidental result of the survey are noted.

### 3.3. Bats

The Preliminary Bat Roost Assessment (PRA) comprised a survey of onsite and adjacent structures and vegetation for bats, signs of bats and features potentially suitable for use by roosting bats, and an assessment of the surrounding habitat in terms of its suitability for commuting and foraging bats.

The survey was carried out in accordance with relevant Best Practice methodology<sup>6</sup>.

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<sup>4</sup> <http://defra.magic.gov.uk>

<sup>5</sup> JNCC (2010). Handbook for Phase 1 Habitat Survey: A technique for environmental audit – Field manual

<sup>6</sup> Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London

### **3.4. Birds**

The assessment of breeding and wintering birds on the site was based on the suitability of habitat present, evidence of nesting such as old or currently active nests and the presence of bird species that may potentially nest within the available habitat.

### **3.5. Other Protected Species**

An assessment of potential and suitability for other protected species was made based on the habitats present both on- and offsite; the local status of these species; and the background records.

No further protected species survey methodologies were required to support a comprehensive EA at this site.

### **3.6. Surveyor Competence**

The PEA and PRA surveys were undertaken by James Faulconbridge MRes MCIEEM trading as IOS Ecology. James is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM); he is a Licensed Bat Worker (Class Licence Level 2) and has over 15 years' experience undertaking a range of ecological surveys and assessing the factors that affect ecology in relation to construction and the built environment.

### **3.7. Survey Dates**

The PRA and PEA surveys were both undertaken on 2<sup>nd</sup> February 2024. An update to include the small south-eastern field was completed on 29<sup>th</sup> February 2024.

### **3.8. Zone of Influence**

The Zone of Influence (ZOI) is the area within which the ecological impacts arising from a proposed development are likely to be significant. Due to the nature of the proposed development the core ZOI is identified as the site and the habitats which immediately bound it.

The sensitivity and value of offsite statutory and non-statutory sites mean that the potential for impacts arising from the proposed development should be considered within a wider ZOI. Therefore, scoping for direct and indirect impacts to designated sites is conducted within a ZOI of 1km of the Survey Site.

### **3.9. Assessment of Ecological Value**

The ecological values provided within this report are based around both the professional judgement of the author and current published relevant guidance, including “Guidelines for Ecological Impact Assessment in the United Kingdom.”<sup>7</sup>

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<sup>7</sup> CIEEM (2016). Guidelines for Ecological Impact Assessment in the UK and Ireland. 2nd Edition. Chartered Institute of Ecology and Environmental Management. Winchester.

## 4. Results

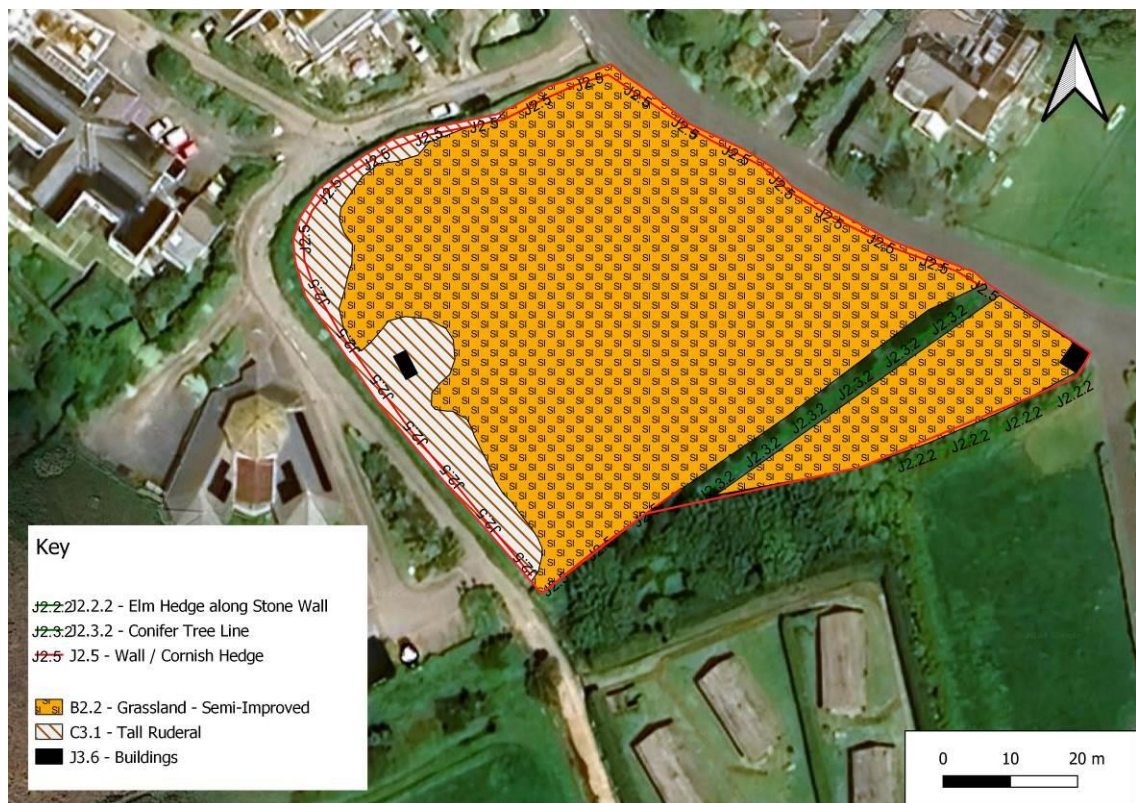
### 4.1. Background Data

The results of the background data search from ECCIS do not return any records of species or habitats of significance to the proposed development within the 500m search radius.

Records relating to bats are provided by the Isles of Scilly Bat Group and are discussed in the context of the survey results in Section 4.3.1 of this report.

### 4.2. Habitats

The habitats present onsite are illustrated in Map 03 and described below.



**Map 03** – Showing the broad habitats identified within the site. Reproduced in accordance with Google's Fair Use Policy.

#### 4.2.1. Boundary Wall

There is a Cornish hedge running around the northern, eastern and western boundary of the site – it appears to be in good structural condition but ecological condition varies significantly with the species composition dominated by native species on the eastern boundary but largely non-native and invasive species on the northern and western boundaries. The structure is present for a portion of the southern boundary at the western edge, just beyond the gate, before giving way to a post-and-wire fence for the remainder of the southern boundary of Circus Field. Significant ivy (*Hedera helix*) growth is present in places along with



bramble (*Rubus fruticosus*) and occasional honeysuckle (*Lonicera periclymenum*) – this woody growth is managed in places by cutting.

The structure is raised above the surrounding land on the northern and western boundaries; however on the eastern boundary it is raised above the road to the east but acts as a retaining wall to the land on the west where the grassland sward is level with the top of the structure.

Native species growing within and upon the Cornish Hedge include sea spurrey (*Spergularia marina*), navelwort (*Umbilicus rupestris*), yarrow (*Achillea millefolium*), polypody ferns (*Polypodium sp.*), cat's ear (*Hypochaeris radicata*), ribwort plantain (*Plantago lanceolata*), bird's foot trefoil (*Lotus corniculatus*), pellitory of the wall (*Parietaria judaica*), cleavers (*Galium aparine*), common nettle (*Urtica dioica*), fumitory (*Fumitoria sp.*) and foxglove (*Digitalis purpurea*).

Invasive species include locally dominant three cornered-leek (*Allium triquetrum*), alexanders (*Smyrniololus atratum*) and Bermuda buttercup (*Oxalis pes-caprae*), cotoneaster (*Cotoneaster sp.*), dewplant (*Ruschia sp.*), house leek (*Aeonium sp.*), liquorice plant (*Helichrysum petiolare*), red valerian (*Centranthus ruber*) and nasturtium (*Tropaeolum majus*).

#### 4.2.2. Semi-improved Grassland

The site is dominated by a semi-improved grassland field. The sward is often tussocky, but variable in composition and condition with more herb-rich patches occurring within an otherwise grass-dominated sward. The condition and quality of the grass overall indicates a degree of agricultural improvement in the past.

Grass species include cock's foot (*Dactylis glomerata*), Yorkshire fog (*Holcus lanatus*), common bent (*Agrostis capillaris*), red fescue (*Festuca rubra*), meadow grass (*Poa sp.*) and perennial rye-grass (*Lolium perenne*). Herbaceous species include yarrow, cat's ear, ribwort plantain, broadleaf dock (*Rumex obtusifolium*), daisy (*Bellis perennis*), dandelion (*Taraxacum officinale agg.*), creeping buttercup (*Ranunculus repens*), sticky mouse-ear (*Cerastium glomeratum*), nipplewort (*Lapsana communis*), lesser celandine (*Ranunculus ficaria*), dove's foot cranesbill (*Geranium molle*) and annual mercury (*Mercurialis annua*),

The sward on the western boundary is more rank, overgrown and undermanaged with bracken at the edges in places – this habitat is mapped as tall ruderal in the Phase 1 map provided (Map 01). Species such as nettle and bramble are more prevalent here but can be found to varying degrees within the wider sward as well, or in locations where historical disturbance has occurred. Rabbits are active in this area.

Three-cornered leek can be found close to the boundaries throughout. Other invasive and non-native species typical of the islands are found predominantly in the south-western corner, potentially indicating historical dumping of garden waste, with species including tree mallow (*Malva arborea*), madeira geranium

(*Geranium maderense*), nasturtium, daffodil (*Narcissus sp.*), alexanders, Italian lords and ladies (*Arum italicum*) and African daisy (*Osteospermum sp.*).

The small field to the south-east, separated from the main field by the pine line, is of the same broad composition but has a higher proportion of ruderal species and those indicating nutrient enhancement, such as hogweed and broadleaf dock, as well as a higher prevalence of three-cornered leek within the main sward as well as at the peripheries.

#### 4.2.3. Pine Trees

There is an line of pine trees which bisects the two fields to the south and forms the western boundary to the larger Circus Field. The tree line follows a post-and-wire fence. Trees have a Diameter at Breast Height (DBH) of approximately 10-15cm with a height of 3-4m. The ground layer beneath is largely composed of ruderal species such as cleavers, bramble and common nettle as well as occasional species represented in the surrounding grassland sward.

#### 4.2.4. Elm Line

The southern boundary of the smaller field is a drystone wall comprising granite blocks, with semi-mature elms (*Ulmus sp.*) on the offsite side. These are suckering resulting in a dense understorey of saplings on both sides of the wall. The ground layer beneath is drawn from the species composition of the adjacent semi-improved grassland sward.

#### 4.2.5. Offsite Habitats

The offsite vegetation at the western end of the southern boundary is a dense karo (*Pittosporum crassifolium*) shelterbelt which overhangs the site in places with ivy growing through.

#### 4.2.6. Wooden Sheds

There is a dilapidated single-skin wooden shelter on the western boundary of the field with a flat roof topped with roofing felt. There is mesh on the front and it appears to have been historically used as a poultry shed but is currently disused. There are remains of a pen and other artificial debris to the east including piled timber amongst abundant bramble mounds. There is also evidence of horticultural use with remnants of brassicas and other allotment crops, along with occasional karo saplings. There is a line of stones around the shed to the east which is indicative of an old building or wall from which the majority of the stones have been removed. There are abundant rabbit droppings in this location and there may be burrows within the shed itself.

A further wooden shed structure is present in the south-eastern tip of the site – this is in active use as an honesty stall at the time of survey. The rear portion of the shed is boarded off from the sales area at the front, and there is evidence of bird droppings viewed through a rear window. The structure is a typical single-

skin timber construction with a gently sloping mono-pitch felted roof secured with battens. It is open on the north-eastern aspect and stocked daily with farm produce.



**Photo 01** – Showing the Cornish Hedge on the western boundary with abundant three-cornered leek



**Photo 02** – Showing the eastern boundary where the Cornish Hedge is level with the Circus Field sward to the west (left) but rises above the offsite pavement to the east (right).



**Photo 03** – Showing the pasture field; three-cornered leek prevalent around the boundaries.



**Photo 04** – Showing the bramble mounds present in the undermanaged western boundary.



**Photo 05** – Showing the wooden shed and surrounding bramble scrub.



**Photo 06** – Showing the pine line separating the two fields.



**Photo 07** – Showing the drystone wall and elm trees on the southern boundary.



**Photo 08** – Showing the rear of the honesty stall in the south-eastern tip of the site with the pasture sward of the smaller field visible in the foreground.

### 4.3. Bats

#### 4.3.1. Background Data

The desk study does not identify any records of bats previously roosting within the site.

A data search revealed information on five species of bat recorded on St Mary's. The species conclusively identified were common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*) and brown long-eared bat (*Plecotus auritus*). Leisler's bat (*Nyctalus leisleri*) and Nathusius pipistrelle (*Pipistrellus nathusii*) records are recorded during the summer period but these are thought to be itinerant or migratory individuals – no roost has been confirmed and the encounter frequencies do not suggest a breeding population.

There are three records of bat roosts within 500m of the site – all relate to common pipistrelle roosts utilising features such as hanging slates around dormer windows in Hugh Town to the north and north-east of the site. Details of the nature of the roost such as number of bats, season or conservation status, are not available.

#### 4.3.2. PRA Results

There are no trees on site which might provide suitable habitat for roosting bats – the pine trees are not of an age, structure or condition to provide suitable roosting features.

The dilapidated shed described in 4.1.6 could potentially provide roosting opportunities for individual bats on a transient basis – however this is likely restricted to free-hanging from the timbers or occupying a small cavity between timbers. The condition, situation and structure of the shed indicate negligible potential.

The shed which is used as an honesty stall does not appear to provide any suitable roosting niches for bats and is considered to have negligible potential for these species.

#### 4.3.3. PRA Results – Boundary Walls

There are limited examples of bats roosting in drystone walls and Cornish hedges in the UK but this has been recorded in several instances. The low number of records may reflect the considerable extent of these features and the infrequency of surveys or other opportunities to identify roosting bats.

The Cornish Hedge on the boundary of Circus Field appears to be too densely covered with soil and vegetation to provide suitable roosting opportunities; however this risk cannot be fully ruled out given the size and scale of the feature and occasional gaps may occur.

The drystone wall on the southern boundary of the smaller field has a wider range of cavities and, whilst the majority of these appear too open and exposed to provide suitable roosting opportunities, this cannot be ruled out due to the scale and complexity of the potential features available.

#### 4.3.4. Foraging and Commuting Habitat

The site is likely to provide a foraging resource for local common pipistrelle populations as part of a wider landscape. The ecotone between the pasture field and the boundary features including the offsite vegetation to the south are likely to be used by common pipistrelle which favour 'edge' habitat.

The Cornish Hedge and the pine line may be used by commuting bats to navigate between roosts and foraging habitat in the wider landscape. However common pipistrelle bats are less strongly reliant on uninterrupted linear features to navigate the landscape, compared with some species found in the UK, and the connectivity provided by these feature is likely to be widely replicated within the local environs; in the case of the pine line there is the parallel linear feature of the elm line which provides a stronger landscape scale connectivity.

### 4.4. Birds

#### 4.4.1. Nesting Habitat

The following onsite habitats are likely to support nesting birds during the breeding season:

- The onsite shed used historically as a poultry house;
- The rear portion of the shed used as an honesty stall;
- The tall ruderal and developing scrub habitats to the west of the field, including bramble and tussocky, undermanaged grassland;
- The pine tree line;

- The Cornish Hedge and drystone wall/elm trees.

These are likely to support a common assemblage of farmland and peri-urban bird species.

There is also a low risk that ground nesting birds such as skylark or yellow hammer might make use of the grassland within the proposed footprint of the site compound for nesting, depending on management and the presence of livestock in advance of clearance.

#### 4.4.2. Foraging Habitat

All habitats on site are likely to provide foraging habitat for common bird species as part of a wider resource landscape.

#### 4.5. Other Ecological Receptors

There is evidence of **rabbit burrows** in the following onsite habitats:

- The base of the Cornish Hedge;
- The westerly edge of the drystone wall on the southern boundary;
- The area of bramble scrub and tall ruderal vegetation on the western boundary including the shed.

The habitats onsite are likely to support a wide range of **invertebrates**, as well as common small mammal species such as **white-toothed shrew**.

The background data search does not identify any further species which would require consideration in order to support the current planning application.

## 5. Evaluation

### 5.1. Proposals

The proposed works were identified by the client and the impact assessment is based on the proposed layout submitted to support the application alongside this report.

The proposals involve the temporary use of the field as a storage compound associated with the hospital extension project.

The use of the field would be approximately 12 months from April 2024 to April 2025. The aim at the end of the works would be to restore the field and boundary structures to their original habitats and condition.

### 5.2. Assessment of Ecological Impacts

#### 5.2.1. Statutory and non-statutory Sites

The proposed development would not impact directly or indirectly upon any offsite statutory sites.

#### 5.2.2. Habitats

The proposals would lead to short term damage to the habitat where the site compound is to be situated. This is predominantly semi-improved grassland of a relatively species-poor sward, along with some areas of tall ruderal vegetation on the western boundary.

Provided appropriate remediation works are designed, there would be no long-term impact to this habitat resource.

The Cornish Hedge would be largely retained though there would be removal of a portion of the wall in the north-western corner for the duration of the site compound to provide access. This stretch of the structure is in a poorer ecological condition with the species present dominated by invasives and non-natives. The proposals would represent a short-term fragmentation of this linear feature and a short-term loss of habitat. Both of these could be restored with a high degree of confidence at the end of the works.

There would be no direct impact on the shed or retained grassland habitats provided measures are put in place to secure this.

The proposals may require the removal of individual pine tree(s) within the onsite pine line to facilitate access. This would result in the long term loss of these trees; however they are both young and non-native to the islands which reduces the significance of this impact and restoration with equivalent or more suitable trees would be easily achievable in the medium term.

There could be short-term damage to grassland habitats if used for access and movement of heavy machinery and equipment – if this led to compaction of the ground then longer-term damage could occur.

### 5.2.3. Bats

The proposals are highly unlikely to impact directly or indirectly on any habitat which could be used by roosting bats, provided measures are put in place to avoid indirect impacts or disturbance to the retained shed.

The Cornish Hedge is considered to have a negligible risk of use by roosting bats based on the balance of evidence available at the time of writing. The risk of disturbance impact arising from the potential presence of a roost in a retained feature would not rise to the level which would justify further surveys given the low likelihood of use. However the temporary removal of a portion of the Cornish Hedge in the north-western corner could result in killing/injuring of bats in the unlikely event of their presence, and this would justify the recommendation of measures to control risk.

The short-term loss of foraging habitat is considered to be negligible within the wider scope of foraging resource available to bats on the island. It is highly unlikely that the temporary removal of the portion of the Cornish Hedge in the north-western corner or the removal of individual pine tree(s) would have a significant impact on commuting routes or connectivity within the local landscape. Both habitat and connectivity would be restored after approximately 12 months.

Inappropriate lighting of the habitats associated with the storage compound have the potential to negatively impact the suitability of these features for use by foraging or commuting bats if measures are not taken to control this.

### 5.2.4. Birds

The site provides various habitats suitable for use by common nesting bird species.

If works affect the undermanaged grassland, tall ruderal vegetation, Cornish Hedge, pine line or honesty stall during the breeding season, they could result in the short-term disturbance, damage or destruction of nests and the potential killing or adults or chicks/eggs if measures are not taken to avoid this.

There is also a low risk for the grassland within the main field to be used by ground nesting birds – if these were present at the time of clearance, this could result in the short-term disturbance, damage or destruction of nests and the potential killing or adults or chicks/eggs if measures are not taken to avoid this.

The presence of the compound with associated noise, dust, machinery and contractor presence would have the potential to disturb nests associated with retained onsite and boundary habitats in the absence of measures to control this.



All habitats would be restored to their original condition at the end of works – therefore there would be no long-term loss of breeding habitat.

#### 5.2.5. Other Species

Ground works and clearance could impact upon rabbits if their burrows are within or extend beneath the works area. This could lead to killing, injuring or entombment in the absence of an appropriate working methodology.

## 6. Recommendations

### 6.1. Further Survey Requirements

The ecological baseline presented in this report is considered to be sufficient to assess the impact of the proposals upon ecological receptors.

No further survey requirements are identified.

### 6.2. Lighting

Lighting of the compound should be avoided, or minimised to the extent compatible with site safety requirements.

The use of cowls or other mechanisms to control and constrain lighting to the target areas should be considered to minimise light pollution where lighting is required for security or safety purposes.

### 6.3. Boundary Walls

Where modifications to the Cornish Hedge are required to permit access, the removal of stones should be undertaken carefully and by hand where possible in order to minimise the risk of killing or injuring of bats, small mammals or other species present within the feature. This should also allow stones with abundant mosses and lichens to be set aside and restored to the exterior of a restored wall to facilitate the restoration of an ecologically functional feature.

The drystone wall and elm line to the south would not be directly impacted and should be protected from incidental damage where appropriate.

The site layout should aim to maintain a 5m buffer zone between the boundary features and the compound itself wherever practicable. The entrances themselves are an exception to this, as maintenance of the 5m buffer in this location would require a greater degree of removal than necessary which would represent an elevated impact. The 5m standoff would minimise the risk of disturbance to species and habitats associated with these features, including breeding birds and small mammals.

A Method Statement for the dismantling of the existing features and their subsequent restoration should be produced prior to works taking place and included within the CEMP – this could be conditioned in any approval granted at the discretion of the Planning Authority.

### 6.4. Nesting Birds

Measures should be put in place to ensure that nesting birds are not affected by the proposed works.

The onsite vegetation, Cornish Hedge, pine line and honesty stall offer suitable nesting habitat for breeding birds. In order to ensure legislative compliance, the contractors undertaking the works must ensure that nesting birds are not disturbed in accordance with requirements under the Wildlife and Countryside Act (1981)<sup>8</sup>.

#### 6.4.1. Timing of Works - Avoidance

The potential for site clearance works to be completed outside of the breeding season is constrained by the timeframe of the application and availability of funding for the infrastructure project.

Following discussion and review within the design team, it has been determined that no appropriate mechanisms for avoidance of the nesting season are available; therefore the methodology outlined in Section 6.4.2 must be employed to control risk and ensure legislative compliance.

#### 6.4.2. Works during the Breeding Season - Mitigation

Prior to site clearance and establishment works, a nesting bird survey must be carried out by a suitably qualified person. Careful observation of any potential nesting sites would be required to ensure that the parent birds are not visiting a nest and provisioning the young. Nests are only protected if they are active (i.e. being used to rear young) or in the process of being built.

- Where active nests are identified, works affecting these areas must be delayed until the chicks have fledged the nest.
- Once it is confirmed that nests are absent or no longer active, the relevant features should be dismantled carefully and by hand as a precaution.

#### 6.4.3. Disturbance Impacts

Measures to protect retained habitats which might support nesting birds should be built into the CEMP to avoid disturbance to nests within adjacent or boundary habitats.

This may include barriers where required, and signs identifying areas where contractors should avoid including the retained shed. This should be advised by the ecologist, as required.

### 6.5. Biodiversity Net gain

Subject to an appropriate Habitat Restoration Plan (HRP) as outlined in Section 6.6, the project would restore the existing habitats post-development to ensure no net loss in a measurable manner consistent with policy OE2 of the Local Plan.

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<sup>8</sup> HMSO (1981). Wildlife and Countryside Act 1981 (as amended). HMSO, London.

## 6.6. Habitat Restoration

The grassland to be impacted by the temporary works should be restored to its previous condition by natural regeneration where possible. This could be facilitated by ground preparation works followed by spreading of green hay from a native, species-rich sward or similar.

If this is not appropriate, seed mixes should be locally sourced where possible, and tailored to the species native on the islands.

The Cornish Hedge should be restored structurally by an experienced and competent contractor who is familiar with the construction of these geographically specific features. Once restored structurally, the Hedge should be allowed to regenerate a natural botanical composition – there is an abundance of species within the retained portions of the structure to ensure an adequate seed source for this.

Planting of new tree(s) to replace those removed from the pine line should be undertaken to ensure long-term retention of this resource. In order to maintain the integrity of the single-species line, replacement with new pine trees may be most appropriate but consideration could be given to planting additional native species within the broader site to mitigate in the long-term for the short-term reduction in tree cover on the site.

## 6.7. Rabbits

Rabbits are covered under the Wild Mammals Act 1996<sup>9</sup> which prevents causing unnecessary suffering. If works impact or block burrows, this could lead to killing, injuring or entombment which would contravene the legislation.

A pre-commencement survey should be undertaken to identify any active rabbit burrows which would be directly or indirectly impacted by the proposals. In the first instance, avoidance of impacts should then be targeted through re-arrangement of the compound layout.

If the burrows are active and cannot be avoided, rabbits should be evacuated from the burrows prior to works proceeding. Measures to achieve this in a humane manner include excavation with hand tools, or use of ferrets to flush the rabbits out. This should be undertaken between October and February when there will not be dependent kittens in the tunnels. Where there is uncertainty regarding the active use of a warren, trail cameras could be used to establish activity.

A Method Statement detailing the measures which would be put in place for this site clearance should be produced prior to works taking place and included within the CEMP – this could be conditioned in any approval granted at the discretion of the Planning Authority.

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<sup>9</sup> HMSO (1996) Wild Mammals (Protection) Act 1996. HMSO, London.

## 6.8. Invasive Species

Under the Wildlife and Countryside Act, 1981<sup>10</sup>, a number of alien plant species are listed in Schedule 9 Part II. These are species which have become naturalised in Britain, usually as garden escapees. Section 14 (2) of the Act states that an offence is committed “*if any person plants or otherwise causes to grow in the wild any plant*” in Schedule 9.

Three-cornered leek is listed on Schedule 9; however the species is ubiquitous across the islands and its low-level presence on the site is commonplace. Cotoneaster is present only in the north-eastern corner of the boundary wall and it is not anticipated that this area would be affected by the proposed works.

It is incumbent on a landowner to ensure that any actions of land management or development do not result in these plants being spread either within the existing site or elsewhere. Working practices associated with the use of the site as a temporary compound should be designed to ensure this.

## 6.9. Survey Validity and Update

The surveys were completed in February 2024. Many species are transient in their use of habitats, and apparently minor changes in condition or use of the site can affect suitability. However in the absence of significant changes in condition or use of the site, the nature and character of the site suggest that:

- The EA assessment including the PEA and PRA can be considered valid for a period of 12 months after the survey was completed, until February 2025.

If Planning Permission is not applied for by this date, the ecology surveys should be updated as required.

## 6.10. Application Documents or Planning Conditions

The following documents will be submitted in the application and should be read alongside this report

- A **Site Layout plan** showing the 5m standoff between the site compound and the retained Cornish Hedge, with the exception of the access in the north-western corner where such a standoff would necessitate further removal of the feature and would therefore not be ecologically desirable. The plan should also show retention and standoff from the dilapidated shed.

The following additional documents would be required and should be submitted either as supplemental information prior to determination, or could be conditioned

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<sup>10</sup> HMSO (1981, as amended). Wildlife and Countryside Act 1981. HMSO, London.

in any permission granted in order to secure the mitigation and enhancement measures. These include:

- A **Construction Ecological Management Plan** (CEMP) should be conditioned which includes the following measures:
  - A pre-commencement survey for nesting birds and rabbit burrows;
  - A two-stage cut of the grassland within the site footprint upon establishment, first with a high blade to remove the upper layers to create disturbance and encourage small mammals to leave the area. A period of several days should be left before a low cut to remove the remainder of the sward to ground level;
  - Measures to protect nesting birds in retained or boundary habitats during the creation and operation of the site compound;
  - Measures to protect bats and other species during works to the Cornish Hedge;
  - Measures to protect retained habitats including boundary and offsite features;
  - Measures to ensure that rabbits are not killed, injured or entombed;
  - Measures to protect the RPA of retained pine trees if damaging activities such as movement of heavy plant are proposed within this area;
  - Measures to address or minimise the risk of spreading invasive non-native species including three-cornered leek.
- A **Habitat Restoration Plan** detailing how the grassland field and Cornish Hedge would be restored to their original habitat and condition when the compound is decommissioned. It should also include tree planting proposals to mitigate any removal of young pine trees.

## Appendix 1 – Relevant Legislation

### **The Habitat Regulations 2017 (as amended)**

The Conservation of Habitats and Species Regulations 2017 (as amended) or the 'Habitat Regulations 2017 (as amended)', ensures wild animals of a European Protected Species and their breeding sites or resting places are protected under Regulation 43. Such wild animals of a European Protected Species include great crested newts, otters, dormice and all species of bat. It is an offence to deliberately capture, injure or kill any such wild animal and in the case of great crested newts, deliberately take or destroy their eggs. It is also an offence to deliberately damage or destroy a breeding site or resting place of any such wild animal.

Wild animals of a European Protected Species are also protected from disturbance under Regulation 43. Disturbance of such wild animals includes in particular any disturbance which is likely:

*(a) To impair their ability -*

- *to survive, to breed or reproduce, or to rear or nurture their young; or*
- *in the case of animals of a hibernating or migratory species, to hibernate or migrate; or*

*(b) To affect significantly the local distribution or abundance of the species to which they belong.*

### **The Wildlife and Countryside Act (as amended) and Countryside and Right of Way Act (CRoW) Act 2000 (as amended)**

The Wildlife and Countryside Act 1981 (as amended) and the CRoW Act 2000 (as amended) afford protection to wild birds in England and Wales under Part 1. It is an offence to intentionally kill, injure or take any wild bird. It is also an offence to intentionally take, damage or destroy the nest of any wild bird whilst it is in use or being built, or intentionally take or destroy their eggs. If the wild bird is included on the Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), it is additionally an offence to intentionally or recklessly disturb the wild bird whilst on the nest during the breeding season.

Certain species of animal, such as the water vole, are offered 'full protection' under the Wildlife and Countryside Act 1981 (as amended) and the CRoW Act 2000 (as amended) by being included in Schedule 5 in respect of certain offences under Section 9. Such offences include:

*9(1) Intentional killing, injuring or taking of a Schedule 5 animal;*

*9(4a) Intentional or reckless damage to, destruction of or obstruction of any structure or place used by a Schedule 5 animal for shelter or protection;*

*9(4b) Intentional or reckless disturbance of a Schedule 5 animal occupying such a structure or place.*

Widespread species of native reptiles occurring within England and Wales such as the adder or common lizard are protected against intentional killing and injuring under the Wildlife and Countryside Act 1981 (as amended) only. Animals of a European Protected Species are now only protected under offences 9(4a) and 9(4b) of Section 9, the main legislative tool covering such animals is under the 'Habitats Directive 2010 (as amended)'.

### **The Hedgerow Regulations 1997**

Under the Hedgerow Regulations 1997, it is an offence to remove most hedgerows without the issuing of a Hedgerow Removal Notice from the Local Planning Authority. 'Important hedgerows' are those protected under the 1997 Regulations if they are over 30 years old and satisfy one of the criteria under Part II, Schedule 1, based on archaeology and history or wildlife and landscape.

In the case of 'Important' hedgerows, the Local Planning Authority will only issue a Hedgerow Removal Notice if there are sufficient circumstances to justify its removal. If sufficient circumstances do not exist then the Local Planning Authority will issue a Hedgerow Retention Notice and the 'Important' hedgerow will be protected under the 1997 Regulations. Unauthorised removal of the 'Important' hedgerow may result in a fine and/or a requirement for the hedgerow to be replaced.

### **Natural Environment and Rural Communities Act 2006**

The Natural Environment and Rural Communities (NERC) Act came into force on 1st Oct 2006. Section 41 (S41) of the Act requires the Secretary of State to publish a list of habitats and species which are of principal importance for the conservation of biodiversity in England.

The S41 list is used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under Section 41 of the Natural Environment and Rural Communities Act 2006, to have regard to the conservation of biodiversity in England, when carrying out their normal functions.

Fifty-six habitats of principal importance and 943 species of principal importance are included on the S41 list. The habitats and species on the S41 list are included within the UK Biodiversity Action Plan (UK BAP) as requiring conservation action. The requirement for action continues to be regarded as a conservation priority in the subsequent UK Post 2010 Biodiversity Framework. At a local level the actions and targets are still referred to as BAPs.