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| Project                   | Isles of Scilly – Capital Delivery Programme                   |
| Document Title or Subject | Technical Note – Response to Environment Service Team Comments |
| Document Reference        | 107780-PEF-ZZ-602 -TTN-H-0001                                  |
| Revision Reference        | P01  |
| Date                      | 1st May 2025   |

**RECEIVED**

By Tom.Anderton at 5:16 pm, May 01, 2025

## 1 Introduction

### 1.1 Summary

- 1.1.1 Pell Frischmann (PF) has been appointed by Trant Engineering Limited (TEL) to provide transport and highways consultancy services to support the proposed wastewater capital improvement project for the Isles of Scilly covering St Mary's, St Martins, St Agnes, Bryher and Tresco. The Local Planning Authority is The Council of the Isles of Scilly and the Highway Authority is the Environment Services Team (EST).
- 1.1.2 The improvement project will consist of a series of projects to enable TEL to upgrade, modernise and provide new South West Water Limited (SWWL) assets across the archipelago. SWWL currently own infrastructure on St Mary's. This includes sewage pumping stations (SPS) which transfer flows and a biobubble sewage treatment works at Old Town, St Mary's.

### 1.2 Purpose of this Document

- 1.2.1 PF produced a Construction Traffic Management Plan (CTMP) in support of proposals for the construction of an enlarged wastewater infrastructure building to replace the existing SPS at Bishop and Wolf on St Mary's, dated January 2025. The CTMP was submitted as part of the suite of documents prepared in support of a planning application. The application was validated on the 07/02/2025 under planning reference P/25/008/FUL.
- 1.2.2 Following review of the CTMP, EST Highways provided a written response dated 13.02.2025. This Technical Note (TN) has been prepared to respond to the observations provided by EST in their review of February 2025. A copy of the consultation response comments is provided at **Appendix A**.
- 1.2.3 The remainder of this document is set out providing each observation from the EST response in italics followed by the PF response explaining how each matter is addressed.

## 2 Highway Comments and PF Responses

### 2.1 Temporary Parking Displacement

EST Highways comment

- 2.1.1 *Whilst the development represents essential infrastructure required, there are concerns regarding the proposed traffic management plan. In particular, the proposed restrictions proposed for on street parking on Little Porth Road and Porthcressa View, and although not part of the classified Highway, the restrictions placed on residential parking at Parson's Green and the knock-on effect this will have to on street parking elsewhere in Hugh Town. This will compound existing car parking restrictions in close proximity to the area due to the closure of Silver Street and loss of car parking spaces at the rear of the Town Hall, due to the redevelopment of the Town Hall.*

PF Response

- 2.1.2 It is expected that the parking suspensions identified in the CTMP will equate to a temporary loss of approximately 21 parking spaces, this including 12 spaces south of Parsons Green and approximately 9 spaces along Little Porth. The latter allowing 6m of kerbside per parking space. It is understood that as a result of other local developments 9 spaces have been displaced near the town hall and approximately 8 spaces along Silver Street, the latter again allowing for 6m of kerbside per parking space. When considered collectively there is a requirement for 228m of kerbside space to accommodate displaced vehicles when parked parallel to a kerb.
- 2.1.3 There are a number of potential alternative existing parking locations to the east of the site, particularly on the Strand, Church Street, Church Road, Porthcressa Road and Telegraph Road. Review of historic satellite imagery suggests that gaps in existing parking develop along these roads presenting unused kerbside space that could be utilised by residents whose normal parking has temporarily been displaced. **Figure 2-1** below provides an indication of locations along which unused kerbside space appears to be present including approximate lengths of available space (see **Appendix B** for largescale image). Whilst it is acknowledged the exact length of available kerbside space will vary from day-to-day this exercise has identified that approximately 312m of free space was available at the time of recording. This is 84m more than would be necessary to accommodate the displaced parking and would allow for fluctuations in availability. All of the locations identified are within 700m of the Parsons Green Site, with this equating to an approximate 10-minute walk.

**Figure 2-1: Available kerbside parking locations**



Source: Google Maps and Map Data © 2025 with Pell Frischmann annotations

- 2.1.4 In addition to the above paragraph 5.10.1 of the CTMP confirms that areas of parking suspension will be delineated using “cones, or similar, to prevent access” and paragraph 5.10.3 states that “Residents and affected local businesses will be notified in advance of the periods that the parking will be suspended. It is expected that this notification will come in the form a programme circulated to local residents and businesses prior to construction beginning. TEL will set out the cones on the morning of the anticipated delivery and will remove them down as soon as daily deliveries cease.”
- 2.1.5 A key extract in the above quote that should be recognised, is that traffic cones delineating those areas of parking to be suspended during daily deliveries will be removed once these activities have ceased each day. This allowing residents to park as normal overnight and during the times that the cones are not present. Furthermore it must be noted that the build programme is expected to last approximately 6 months and is therefore temporary in nature – meaning that this will be a short-term inconvenience to local residents and businesses.

## 2.2 Emergency Service Vehicle Access

EST Highways comment

- 2.2.1 *Further concerns in the proposed restricted areas of Highway relate to access for emergency vehicles, and subsequently the knock-on effect for emergency service vehicle access from displaced parked cars elsewhere.*

PF Response

- 2.2.2 As identified in Section 5.10 of the CTMP, areas of parking suspension will be delineated using “cones, or similar, to prevent access”. This form of access control is very much temporary and can quickly be relocated by site workers or first responders in the event of an emergency vehicle becoming obstructed. Indeed, whilst the proposed restriction measures are in emergency service vehicles will have improved access as parked vehicles present a less easily moved obstacle than traffic cones which do not require identification of the owner to move.
- 2.2.3 The largest emergency service vehicle on St Mary's Island is understood to be a 2008 Man appliance for responding to fires. This vehicle has a typical length of 7.91m and width of 2.6m. A vehicle tracking exercise has been undertaken, using a 7.9m Fire Tender, in proximity of the site to demonstrate the vehicles manoeuvring requirements - the results of this exercise are presented in **Appendix C**. It can be seen from the vehicle tracking that in the existing situation, with cars parked along the kerbside, a fire tender would be obstructed and would need to mount kerbs and footways to avoid parked cars. This confirming our observation that the temporary restrictions to car parking in proximity to the site will improve emergency vehicle access during the construction programme.
- 2.2.4 In addition to the above it is also considered unlikely that displaced cars / vans will impede emergency vehicle access to any greater degree than already experienced on the island, with most residents likely to identify kerbside spaces on adjacent/local roads where parking already occurs.

## 2.3 HGV Access and Turning

EST Highways comment

- 2.3.1 *Sally Port is generally unsuitable for heavy goods vehicles and traffic and should not be used for access or a turning area due to its narrowness and restricted access.*

PF Response

- 2.3.2 The CTMP provides evidence in form of vehicle tracking, included in Appendix D of the CTMP, that the largest vehicles expected to utilise the Sally Port / Parsons Field junction as a turning head are able to do so, with the most onerous manoeuvres undertaken under the supervision of a Banksman. The observation provided by EST does not appear to fully acknowledge the constrained nature of the highway network on St Mary's, whereby opportunities for vehicle access and turning are few in number. The alternative to using the turning facilities as proposed would require HGV's to reverse over longer distances which is less desirable from a highway safety perspective.
- 2.3.3 Further to the above it evident from Tables 2-1 and 2-2 in the CTMP that the number of daily HGV movements is proposed to be very limited with a combined maximum of 4 HGV's attending the Bishop and Wolf / Parsons Green sites daily – this does not represent a significant impact on the operation of the local highway network and under the supervision of Banksman road safety will be managed effectively.

## 2.4 Development Timing

EST Highways comment

- 2.4.1 *Consideration on the time of year should be taken into account for this development proposal.*

PF Response

- 2.4.2 It is understood that the Local Planning Authority are seeking commitment to the construction programme falling outside the peak tourism months during the summer period. It is expected that the proposed development will adhere to this aspiration.

## 2.5 Temporary Traffic Regulation Order/Notice

EST Highways comment

- 2.5.1 *Further The Isles of Scilly is not a designated Civil Enforcement Area and so the Council is unable to enforce any parking suspensions arising from a Temporary Traffic Regulation Order/Notice (TTRO/N).*

PF Response

- 2.5.2 A Temporary Traffic Regulation Order (TTRO) or Notice can still be applied for and put in place even if the Isles of Scilly is not a designated Civil Enforcement Area (CEA). While the Council may not be able to enforce parking suspensions, the TTRO itself can still be legally established to manage traffic during construction. In instances in which parking is not within a CEA the enforcement of the TTRO is a matter for the local police to address.
- 2.5.3 Notwithstanding the above it is acknowledged that without enforcement capabilities there may be challenges in terms of ensuring compliance with the parking suspensions. The CTMP therefore identifies, in Section 5.10, that *“Residents and affected local businesses will be notified in advance of the periods that the parking will be suspended. It is expected that this notification will come in the form a programme circulated to local residents and businesses prior to construction beginning. TEL will set out the cones on the morning of the anticipated delivery and will remove them as soon as daily deliveries cease.”* This approach demonstrates the developer’s awareness of the temporary inconvenience for local residents and seeks to minimise this by enabling residents to park according to their usual habits overnight and during those times where deliveries have concluded for the day The communications to be issued to residents and businesses will also provide a platform for discouraging parking on Sally Port and suggesting alternative locations to the east as identified on **Figure 2-1**.

## 2.6 Additional Highways Comments

- 2.6.1 The following additional questions / comments have also been received from the local authority, albeit they are not included in the response provided in **Appendix A**. As with the above each question / comment from the local authority is provided in italics followed by the PF response explaining how each matter is addressed.

EST Highways comment

- 2.6.2 *How will the GO-EV electric charging port be protected and accessed?*

PF Response

- 2.6.3 In relation to the two GO-EV electric vehicle charging points located immediately south of Parsons Green – these are located outside the proposed temporary stopping up area defined in the CTMP and unfettered access to the EV spaces will be maintained throughout the proposed build programme.

EST Highways comment

- 2.6.4 *Does SWW have a green travel plan? The council is concerned that contractors could each bring their own vehicles, exacerbating traffic problems.*



PF Response

- 2.6.5 As confirmed in the submitted CTMP “Construction staff associated with the development are to be based at the welfare compound on St Mary’s located on Parting Carn Lane – see planning application P/24/029/ROV.” As part of the permitted application for the welfare compound its confirmed that staff will be transferred from the compound by minibus. It is expected that this practice will be adopted for the proposed development at Bishop and Wolf, with the option to walk or cycle between site and the accommodation also available at worker discretion. It should also be noted that the ability to bring private vehicles on to the island is very limited and therefore contractors will leave their vehicles on the mainland and use local transport methods on the island.
- 2.6.6 Accounting for the above, the proposed development intrinsically incorporates sustainable travel methods such as walking, cycling, and use of a multi-occupant minibus. This aligns with the principles of a green travel plan and demonstrates the developer’s commitment to reducing environmental impact. However, the scale of the development, and limited travel options available, suggests that the preparation of a green travel plan is not required.

### 3 Summary

- 3.1.1 This report has been prepared to respond to EST Highway comments received on the 13.02.2025 in relation to the proposed SPS development at Bishop and Wolf, St Mary's, including the Parsons Green construction compound.
- 3.1.2 The response provided considers each of the EST comments in turn and provides justifications where appropriate. Accounting for the observations in this report, the submitted CTMP is considered acceptable from a traffic, transport and highway perspective.

This report is to be regarded as confidential to our Client and is intended for their use only and may not be assigned except in accordance with the contract. Consequently, and in accordance with current practice, any liability to any third party in respect of the whole or any part of its contents is hereby expressly excluded, except to the extent that the report has been assigned in accordance with the contract. Before the report or any part of it is reproduced or referred to in any document, circular or statement and before its contents or the contents of any part of it are disclosed orally to any third party, our written approval as to the form and context of such a publication or disclosure must be obtained.

| <b>Report Ref.</b> |      | <b>107780-Pef-Zz-602 -Ttn-H-0001</b>   |            |            |         |          |
|--------------------|------|--|------------|------------|---------|----------|
| <b>File Path</b>   |      | E:\Data\PROJINFO\107780 - Isles of Scilly\Documents\Transport\Documents\Transport Reports - St Marys Bishop and Wolf 2024 Application\107780-PEF-ZZ-602 -TTN-H-0001.docx |            |            |         |          |
| Rev                | Suit | Description  | Date       | Originator | Checker | Approver |
| P01                | S3   | Draft  | 24/04/2025 | PW         | LC      | LC       |
| P01                | S3   | Final  | 01/05/2025 | PW         | LC      | LC       |
|                    |      |  |            |            |         |          |
|                    |      |  |            |            |         |          |

Ref. reference. Rev revision. Suit suitability.

Appendix A Highway Comments

# Council of the Isles of Scilly Planning Application

Ref: P/25/008/FUL

## Consultation Response

**Date:** 13.02.2025  
**Ref:** P/25/008/FUL  
**Site:** South West Water Pumping Station, Little Porth, Hugh Town, St Mary's, Isles of Scilly  
**Proposal:** Redevelopment of the Bishop and Wolf Sewage Pumping Station, including the construction of an enlarged wastewater infrastructure building and temporary construction compound on land at Parsons Field (Affecting the setting of a Listed Building)

You are being consulted on this application as you may wish to make comments before a decision is made. Should you wish to make any comments on this application, please complete the response form below and return to [planning@scilly.gov.uk](mailto:planning@scilly.gov.uk) by the **6<sup>th</sup> March 2025**.

Link to application: <https://scilly.gov.uk/planning-application/planning-application-p25008ful>

I look forward to receiving your comments in due course. If I have not heard back from you by the **6<sup>th</sup> March 2025** then I will assume you have no comments to make.

**Consultee Name: Environment Services, Council of the Isles of Scilly**

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### Lead Local Flood Authority Response

We note the comments and conditions provided by the Environment Agency. These should take precedence over the LLFA response.

The site is located in Flood Zone 3 with expected flood levels to reach 4.49mAOD; The MCC unit will be sat on a mountain frame set at 4.6mAOD, proving 100mm freeboard over the 1%AEP defended scenario with climate change.

The Flood Risk Assessment provided, is a good assessment and proportionate to the scale of development.

The applicant may consider using a flood door/gate on the walled entrance and using the external wall as a physical barrier to prevent water free flowing into the pump station via the surface gullies for rainwater disposal and overloading the pump station with brine water which can cause odours and reduce machinery longevity.



# Council of the Isles of Scilly Planning Application

Ref: P/25/008/FUL

## Highway Authority

Whilst the development represents essential infrastructure required, there are concerns regarding the proposed traffic management plan. In particular, the proposed restrictions proposed for on street parking on Little Porth Road and Porthcressa View, and although not part of the classified Highway, the restrictions placed on residential parking at Parson's Green and the knock-on effect this will have to on street parking elsewhere in Hugh Town. This will compound existing car parking restrictions in close proximity to the area due to the closure of Silver Street and loss of car parking spaces at the rear of the Town Hall, due to the redevelopment of the Town Hall. Further concerns in the proposed restricted areas of Highway relate to access for emergency vehicles, and subsequently the knock-on effect for emergency service vehicle access from displaced parked cars elsewhere.

Sally Port is generally unsuitable for heavy goods vehicles and traffic and should not be used for access or a turning area due to its narrowness and restricted access.

Consideration on the time of year should be taken into account for this development proposal.

The Isles of Scilly is not a designated Civil Enforcement Area and so the Council is unable to enforce any parking suspensions arising from a Temporary Traffic Regulation Order/Notice (TTRO/N).

## Waste Management

It is welcome the applicant has applied the waste hierarchy to this application to minimise waste disposal. However, details are required, when available, of the waste arisings from this development and how these will be managed. The Council manages the only waste transfer station on the islands and does not accept Construction and Demolition waste, so this should be taken into account.

We require an understanding of the anticipated volumes of screened waste proposed to be disposed of at the Council's waste transfer station so we can review acceptance of this material in line with our site permit.

Concerns regarding access for waste collection vehicles with the proposed Highway restrictions.

**A Licence to Occupy will need to be agreed with the Council before any works begin.  
A TTRO/N will need to be applied for separately to the Highways Authority.**

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**Name: Rebecca Williams, Head of Environment, Council of the Isles of Scilly      Date: 8/04/25**

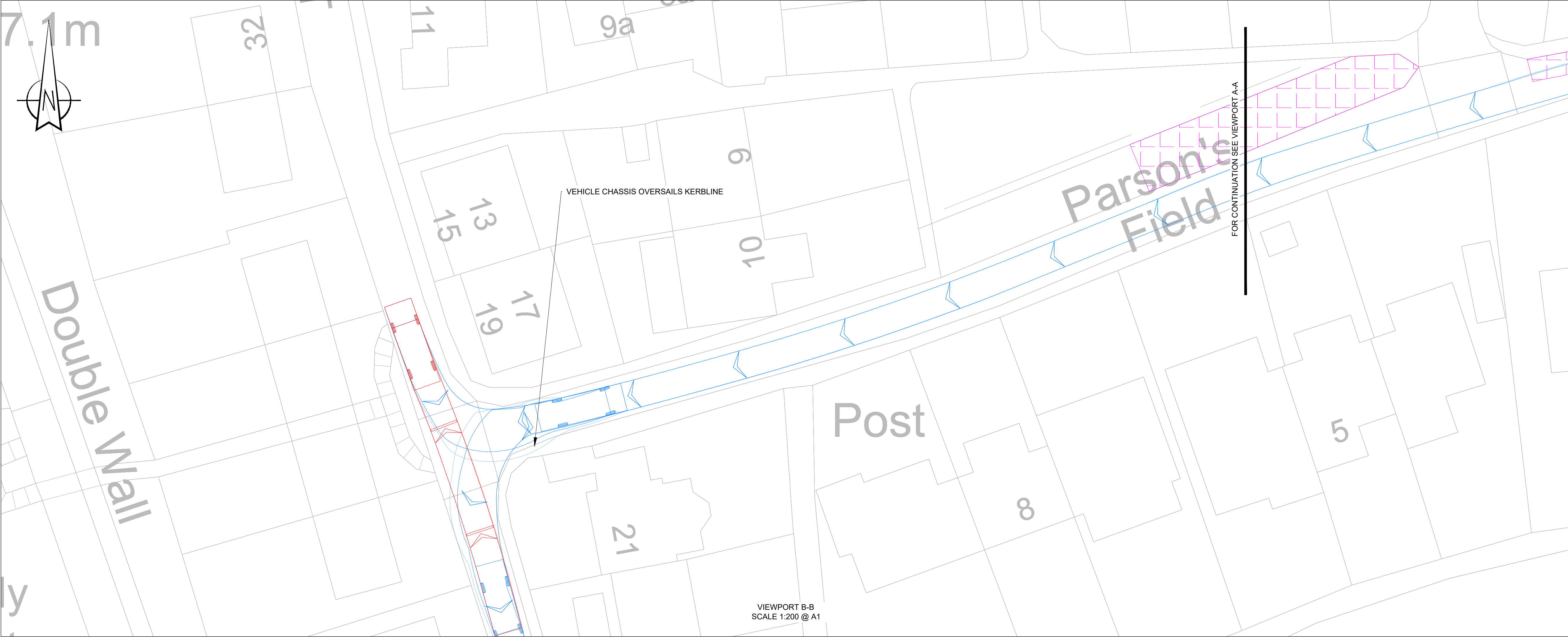
## Appendix B Kerbside Parking Locations



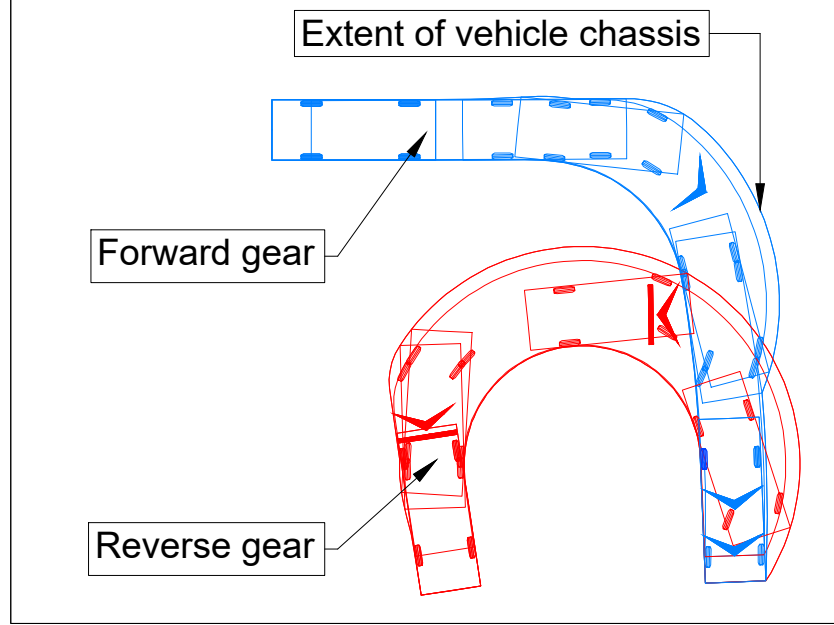




## Appendix C Emergency Services – Vehicle Tracking



- NOTES:
1. Do not scale from this drawing, work to figured dimensions only.
  2. Dimensions are in metres unless stated otherwise.



|                             |        |
|-----------------------------|--------|
|                             |        |
| Pumping Appliance           |        |
| Overall Length              | 7.900m |
| Overall Width               | 2.500m |
| Overall Body Height         | 3.300m |
| Min Body Ground Clearance   | 0.140m |
| Track Width                 | 2.500m |
| Lock to Lock Time           | 4.00s  |
| Kerb to Kerb Turning Radius | 7.750m |

KEY:

On street parking to be suspended

|   |             |          |                |                                  |            |
|---|-------------|----------|----------------|----------------------------------|------------|
| P01   | FIRST ISSUE | EF       | PW             | LC                               | 24.04.2025 |
| REV   | DESCRIPTION | DRN      | CHK            | APP                              | DATE       |
| <b>Pell Frischmann</b>                          |             |          |                |                                  |            |
| BURRATOR HOUSE, PENINSULA PARK, EXETER, EX2 7NT |             |          |                |                                  |            |
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| www.pellfrischmann.com                          |             |          |                |                                  |            |
| Client  |             |          |                |                                  |            |
| Trant Engineering Ltd                           |             |          |                |                                  |            |
| Project   |             |          |                |                                  |            |
| Isles of Scilly                                 |             |          |                |                                  |            |
| Drawing Title                                   |             |          |                |                                  |            |
| Parsons Green                                   |             |          |                |                                  |            |
| Swept Path Analysis                             |             |          |                |                                  |            |
| Fire Tender                                     |             |          |                |                                  |            |
|   | Name        | Date     | Scale          | 1:200 @ A1                       |            |
| Drawn   | EF          | APR 2025 |                |                                  |            |
| Designed  | -           | -        | File No.       | 107780-PEF-ZZ-602-DDR-H-0010.dwg |            |
| Checked   | PW          | APR 2025 | Drawing Status | FOR INFORMATION                  |            |
| Approved  | LC          | APR 2025 |                |                                  |            |
| Drawing No.                                     |             |          |                |                                  | Revision   |
| 107780-PEF-ZZ-602-DDR-H-0010                    |             |          |                |                                  | P01        |