URS

Planning Statement:

St Mary's Airport Construction Compound

January 2014

Prepared for: Lagan Construction Ltd.

UNITED KINGDOM & IRELAND











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1. INTRODUCTION

1.1 Proposed Development

This Planning Statement accompanies the planning application for the temporary use of land located at grid reference SV 91773 10786 ('the Site') as a construction compound for the upgrade of the St. Mary's Airport, hereafter referred to as the 'Proposed Development'.

The Site of the Proposed Development lies north of St. Mary's airport, with direct access to the airport. The Proposed Development comprises an area for the processing of asphalt and concrete using a mobile asphalt batching plant and a mobile concrete batching plant, and space for construction material storage, as well as accommodation, welfare and office facilities and car parking.

The Proposed Development is required to support the expansion project due to occur at St. Mary's Airport which is occurring under the Airport's Permitted Development Rights¹. The expansion of St. Mary's Airport involves:

- Resurfacing of both runways (including conversion of one half of one runway from grass to asphalt), one taxiway and the apron;
- Construction of a new paved taxiway and local expansion of the apron;
- Replacement of existing airfield ground lighting and provision of new approach light systems;
- New airfield road:
- Other airport related minor works;
- Expansion and refurbishment of the terminal building; and
- Expansion of the car park/drop off area and realignment of the access road.

The expansion of St. Mary's Airport is critical to the economy of the Isles of Scilly, and is in accordance with local planning policy. Expansion of the airport will help maintain an effective, affordable and accessible year round transport system, which will aid the island's local communities and visiting tourists alike.

1.2 Content of Planning Statement

This Planning Statement details the role the Proposed Development will play in assisting with the construction phase of the runway and highway works and provides the following:

- Information on the Site and surroundings (Chapter 2);
- A full description of the Proposed Development, including information on Site clearance and preparation, Site layout and Site operation (Chapter 3);
- A review of relevant planning policy and how the Proposed Development accords with national, regional and local planning policy (Chapter 4); and

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¹ The Town and Country Planning (General Permitted Development) Order 1995



Conclusion (Chapter 5).

This Planning Statement should be read in conjunction with the following other planning application documents (provided separately):

- Planning Application Form;
- Infrastructure Assessment;
- Noise Assessment;
- Transport Assessment;
- Ecological Assessment;
- · Arboriculture Management Plan;
- Location Plan Drawing 47065269-PL-1000;
- Access Routes and Site Compounds Drawing 47065269-C-1001;
- Site Compound, Plant and Unit Layout Drawing 47065269-PL-1002;
- Supplementary Information:
 - Supplementary Information 1 Roadstar 2000 Asphalt Batching Plant; and
 - Supplementary Information 2 RBM 1000 Robomescolator Concrete Batching Plant



2. SITE AND SURROUNDINGS

The Proposed Development is located to the north of St. Mary's Airport, on the southern side of the A3110, close to the junction with the A3112 (grid reference SV 91773 10786).

The Site is 1.56 hectares in area, and is located on land owned by the Duchy of Cornwall. The land is currently occupied by a tenant farmer who is currently using the land for grazing/rearing cattle and farming chickens.

The Site is surrounded by trees and hedgerows, including a hedgerow which runs north to south down the centre of the Site, separating Field 1 (western side) and Field 2 (eastern side). A photograph of the site is provided in Figure 1. The hedgerows are traditional stone-faced hedgebanks, which are overgrown and dilapidated in places.



Figure 1: Photograph of the Site of the Proposed Development (facing north-west towards the A3110)

The Site is located approximately 200 metres away from the nearest residential property, as shown on Figure 2.

The Isles of Scilly have a rich heritage, with numerous Scheduled Ancient Monuments, with many of these close to the airport. However, the site is located approximately 320 metres away from the closest monument. The Site is located between two Site(s) of Special Scientific Interest (SSSI): Higher Moors & Porth Hellick Pool SSSI and Lower Moors SSSI, located approximately 200 metres and 340 metres away, respectively. Both the surrounding Scheduled Ancient Monuments and SSSIs are shown on Figure 3.







3. THE PROPOSED DEVELOPMENT

Planning permission is being sought for the temporary use of the Site as a construction compound (the Proposed Development) for the upgrade of the St. Mary's Airport. The first phase of the works will generally focus on the resurfacing of the runways, taxiways, aprons and roads, including roads in Hugh Town. The construction compound will feature: site office, welfare and accommodation facilities, asphalt and concrete batching plant, construction material and aggregate storage, and car parking.

The details of this planning application focus on this first phase of work and the plant and logistics required for that. However, planning permission is being sought for further phases of work expected to occur in 2014, predominantly the expansion and refurbishment of the terminal building and car park.

The Proposed Development is vital to meeting the needs of the airport expansion project, which cannot be met within the St. Mary's Airport site boundary. In combination with the airport expansion project, the Proposed Development will have a range of benefits to local communities on the Isles of Scilly, including improving links to the mainland, a key policy requirement in the Isles of Scilly Local Plan.

3.1.1 Programme

For the first phase it is proposed to make use of the site from 17th February 2014 and it is anticipated that the use would cease in approximately 20th July 2014, however this is weather and programme dependant. The current Site timeline for works is as follows, and should be used as an indication only:

Activity	Date
Site Set-Up	17th February to 30th March
(mobilisation of plant, materials and compound set-up)	
Hugh Town Works Phase I	31st March to 20th April
(Garrison Hill, Hugh Street, Church Street & Church Road)	
Airside Works	
Runway Works	7th April to 4th May
Apron Works	28th April to 18th May
AGL Works	31st March to 18th May
ATC Works	31st March to 18th May



Activity	Date
Hugh Town Works Phase II	9th June to 22nd June
(Lower Strand and Strand Road)	
Finishing Works	16th June to 29th June
Site Demobilisation from First Phase	30th June to 20th July
Use of the site as a construction compound for further work on St. Mary's Airport, focusing on the expansion of the terminal building	Expected 2014

3.2 Site Set-Up

It will be necessary to remove the end section of stone faced hedgebank as well as one tree to facilitate construction access for larger vehicles (Lagan Construction Ltd. to confirm exact length to be removed). In addition, two sections of the hedgebank that runs through the middle of the site will need to be removed to facilitate access between the two fields. It is intended to retain all other trees and site hedgerows on Site. Maintenance and clearance of other vegetation will be undertaken where necessary, particularly at site access points, to allow sufficient track width. Hedgebank will be reinstated on decommissioning of the site. For further details please see the 'Tree Protection & Landscape Restoration Proposals' Drawing in the Arboricultural Management Plan.

The intention is to minimise the impact on the Site; this also reduces the need for site restoration at the end. Hardcore will be used to cover the footprints of the asphalt batching plant, the concrete batching plant, the material stockpiles and roadways; this is approximately 80% of the total area of Field 2. In Field 1, hardcore will be provided in the car park. Additionally, geotextile grids (or an equivalent) will be used for site paths, thus limiting soil erosion on site. The topsoil will be stripped and stored for areas covered in hardcore.

Internally, it is proposed to use red and white Melba blocks for demarcation internally, with hardcore roadways provided on site.

3.3 Site Layout

The indicative site layout is shown in Drawing 47065269-PL-1002 (submitted with this planning application). Specific aspects are outlined below.

3.3.1 Site Access

The Site entrance will be used for deliveries and other vehicular and pedestrians access (e.g. by construction workers). The airside entrance will be used to access St. Mary's Airport. The proposed access points on Site are shown in Drawing 47065269-PL-1002.

A small length of the Site entrance track will be tarmaced to improve access into the site. Furthermore, the track to the airfield will need to be levelled and tarmaced, to allow deliveries to go between the Site and the airfield, thus avoiding the public highway.



It is proposed to leave these tarmaced areas in place, as St. Mary's Airport see a benefit in having an additional emergency exit from the airfield.

3.3.2 Static Units

The Proposed Development features a range of single storey static units which will be used for site offices, welfare and accommodation facilities, storage and other uses, as detailed below:

Quantity	Static Unit Use and Size
1	Parts store (20ft by 8ft)
1	Oil Store (20ft by 8ft)
1	Fitting shop (20ft by 8ft)
1	Asphalt laying equip store (40ft x 8ft)
1	Laboratory container (40ft x 8ft)
10	Accommodation (12ft by 8ft)
10	Accommodation (30ft by 8ft)
2	Kitchen Facilities (20ft by 8ft)
1	Laundry (20ft by 8ft)
2	Rec Room (20ft by 8ft)
1	Drying Room (20ft by 8ft)
4	Office (20ft by 8ft)
4	Store Containers (30ft by 8ft)

3.3.3 Plant and Vehicles

The two main items of plant on site will be:

- Mobile asphalt batching plant
- Mobile concrete batching plant

Information on the batching plant are submitted with this planning application in documents Supplementary Information 1 and 2.



In addition to this, plant being either used on site includes:

- Asphalt Pavers and Planners
- Tackcoat Sprayer
- Crawler Crane
- Generators
- Compressor
- Rollers

- Dumper
- Excavators
- Diggers
- Boom Lift
- Fork Lift
- Coring Rig

The following vehicles will also be used on site:

- Pickups
- Transit Vans
- Minibus
- Tractors for use with Trailers, Low-loader, Water Tanker and Fuel Tanker
- Concrete Batch Truck

3.3.4 Construction & Aggregate Materials

The Site will be used to store construction materials as well as aggregates. The primary materials planned to be stored are outlined below:

- Crushed Stone
- Sand
- Dust/Filler
- Bitumen and associated products
- Cement and associated additives

- Geotextile Membrane
- Manhole covers
- Polythene
- Kerbs
- Drainage products

3.3.5 Site Security

The Site will utilise the pre-existing tree and hedgerows, which form a distinctive boundary to the site. This negates the need for perimeter fencing. Heras fence panels will be used where required to secure the site, most noticeably at site access points, or at any gaps in the vegetation.



A security hut will be stationed at the south-eastern corner of the site where direct access is provided to St. Mary's Airport (hereafter referred to as the 'airside entrance').

3.3.6 Site Lighting

Ten mobile tower lights (Wacker Lights) are to be located at the A3110 entrance and the airside entrance, as well as area floodlights on the mobile asphalt batching plant.

3.4 Site Operation

This section provides details of the site operation, including operating times, numbers of construction workers, as well as key traffic and transport details.

3.4.1 Operating Times

The Site will operate at different times, depending on where the works are occurring.

Airside Phase

During the airside phase of the works the following hours will be worked:

- Monday to Friday 19:00 07:00
- Saturday 16:00 Monday 07:00
- During this phase there will be no day work except maintenance in the site compound.
 Friday or Monday shifts will be taken as a rest day in the event that there have been no weather delays. Generally it is intended to have one day off per week, but flexibility is required because of the weather.

Landside / Hugh Town Phase

During the landside / Hugh Town phase the following hours will be worked:

- Monday to Friday 07:00 to 19:00
- Saturday* 07:00 13:00
- Sunday* no work

While it is not currently intended to operate over the Easter Bank Holiday, depending on the programme of works nearer the time this may be necessary. If this is the case an agreement will be sought from the Council of the Isles of Scilly for work to occur.

3.4.2 Construction Personnel and Accommodation

There are expected to be a maximum of 30 construction personnel on site at any one time, with accommodation provided on site. Those staff not catered for on site will either have accommodation arranged for them at local hotels or bed and breakfasts, or already live on the island.

^{*} shift times may vary on these days if time has been lost due to weather during the week.



3.4.3 Traffic and Transport

Further details on traffic and transport are provided in the associated report, submitted alongside this application.

Delivery Route

Deliveries of plant and materials will be delivered to St. Mary's via a mixture of landing craft and tug & barge to Port Mellon beach and Town Beach. Deliveries will then be transported to site along the route shown in Drawing 47065269-PL-1001.

Site Access Arrangements

To ensure safety of other road users a mirror will be positioned opposite the Site entrance to allow vehicles leaving the site to see clearly in both directions. At the airfield entrance, there is a possibility of using a small internal traffic light system to ensure safe passage of vehicles between the Site and the airfield.

Development Trip Generation

The mobilisation phase is estimated to generate:

- 30-40 loads asphalt plant and equipment;
- 6 loads office accommodation; and
- 20-30 loads residential accommodation.

The operation phase is estimated to generate overall:

- Aggregate 775 loaded and 775 return journeys between the beach and the site;
- Bitumen 29 loaded and 29 return journeys between the beach and the site;
- Outputs from the batching plant 804 movements based on the above from the site, 694 between the batching plant and the airport and 110 between the site and the island's roads;
- 804 empty return journeys, 694 between the site and the airport and 110 between the site and the island's roads; and

The decommissioning phase is estimated to generate:

- 30-40 loads asphalt plant and equipment;
- 6 loads office accommodation: and
- 20-30 loads residential accommodation.

Construction Worker's Car Parking





The accommodation of the majority of staff on site will reduce the need to travel. Parking will be provided on Site for 10 cars, with other site vehicles (including a minibus) used to transport workers when required.



4. PLANNING POLICY

1.1 Introduction

This chapter identifies the Development Plan and other national, regional and local planning policies relevant to the Proposed Development.

4.1 The Development Plan

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that determination of applications for planning permission be made in accordance with the 'Development Plan' unless material considerations indicate otherwise.

Currently, the Development Plan in this case consists of the following document:

Isles of Scilly Local Plan - A 2020 Vision

The Council of the Isles of Scilly are in the process of replacing the Isles of Scilly Local Plan with a Local Development Framework (LDF), the core document of this will be the Core Strategy, however this has not yet been produced. Other Supplementary Planning Documents (SPD) have already been produced as part of the LDF, this includes:

- The Isles of Scilly Statement of Community Involvement 2010
- The Isles of Scilly Strategic Transport Framework
- Biodiversity and Geodiversity SPD Planning Good Practice Guidance

The relevant policies from each of these documents are outlined in the sections below.

4.1.1 Isles of Scilly Local Plan – A 2020 Vision

The vision of the Local Plan is to:

"Ensure the viability of resident communities on the islands by providing sufficient housing, local employment, means of transport and general social infrastructure in order to meet their needs and aspirations whilst preserving and enhancing the islands' outstanding environment and natural beauty."

Policy 1 - Environmental Protection

Policy 1 recognises the need of proposed developments to "respect and protect the recognised quality of the islands' natural, archaeological, historic and built environment"; development will only be permitted where they:

- "(a) Conserve or enhance the natural beauty, wildlife and cultural heritage of the Area of Outstanding Natural Beauty and protect the unspoilt character and good appearance of the Heritage Coast;
- (b) Preserve nationally important archaeological remains and their settings;



- (c) Preserve or enhance the character or appearance of the Conservation Area and preserve the architectural or historic interest of all listed buildings, including their features and settings;
- (d) Safeguard the integrity and nature conservation objectives of Special Protection Areas (SPAs), Ramsar Sites and Special Areas of Conservation (SACs); Protect a statutorily-protected plant or animal species and the wildlife, geological and geomorphological interest and features of designated Sites of Special Scientific Interest; and locally important biodiversity habitats, species and landscape features; and
- (f) Secure the future character, appearance and setting of any Parks and Gardens of Special Historic Interest included in the English Heritage Register."

The Proposed Development is of a temporary nature and any modest negative impact on natural beauty will be for the short term and will be mitigated. Site selection and layout has had due regard to the preceding policy, in that the site was selected due to its distance from Scheduled Ancient Monuments and Ecological Designations (see Chapter 2). The site is also well shielded from view by a row of tall conifers to the west, as well as hedgerows and trees to the north and east, thus reducing impacts on natural beauty.

There will be some loss of hedgerow and one tree, as described in Chapter 3, to allow access for vehicles at both the Site entrance, as well as providing further access between Field 1 and 2. However, this shall be restored after. Further detail on this is contained in the Arboricultural Management Plan which accompanies this planning application.

Policy 2 - Sustainable Development

The Proposed Development is in accordance with Policy 2, as it supports the expansion of the Isles of Scilly Airport, which plays a significant contributory role in maintaining the sustainability of the islands', economy and local communities.

Policy 4 - Economic Development

Policy 4 states that developments based on the existing economic base of tourism will be supported where development contributes to the essential modernisation of the islands' economy.

The Proposed Development supports the expansion and modernisation of the Airport which provided a vital link to the mainland, thus supporting and improving potential economic development on the Islands.

Policy 5 - Transport

The Local Plan states:

"In order to achieve and maintain an effective, affordable and accessible year round transport system on and between the islands and the mainland, the requisite land-based facilities will be supported and other forms of development permitted where:

- a) located so as to minimise demand for additional transport facilities and they do not harm or prevent the further maintenance and improvement of the transport system;
- b) designed, located or laid out in order to increase alternative modes of transport to the private car;
- c) the functioning of the local road network or the safety of highway users is not harmed as a result of the amount and type of traffic generated; and,



d) they provide or facilitate the enhancement of transport infrastructure so as to increase the choice of alternative modes of travel to the private car."

The Proposed Development will support the expansion of St. Mary's Airport, one of two main modes of transport to the mainland. As stated in Transport Assessment, the Proposed Development will result in a small amount of inconvenience over a short period, as vehicle movements occur in concentrated batches. However, the Proposed Development is vital for maintaining an effective, affordable and accessible year round transport system, which will aid the island local communities and visiting tourists alike. Therefore, it is concluded that there will be a long term benefit in the improvement to the airport and in the condition of the surface of local roads and car parks.

Policy 6 - Infrastructure for Sustainable Communities

To maintain viable residential communities on the islands, Policy 6 states that development proposals, where appropriate "development proposals must, where appropriate:

- "(a) either improve existing infrastructure or impose no unsustainable burden upon it;
- (b) ensure that water supplies, in terms of quality and quantity, can be adequately provided and that local water sources remain unharmed and unpolluted by proposed sewerage arrangements; and
- (c) in areas not served by a sewerage system, connect proposed development to an approved treatment plant and agree to share such arrangements, where possible, with other properties."

Furthermore, development proposals, in keeping with the particular scale and character of the islands, will be supported, where they:

- "(a) are for renewable energy projects; or
- (b) facilitate improvements to the electricity supply network or the under grounding of all cables; or
- (c) would provide telecommunications infrastructure of immediate community benefit; or
- (d) are for recycling or the composting of waste closer to its source; or
- (e) are for new or enhanced community, health, education, childcare, sport, recreational, arts and culture facilities.
- (3) All forms of future development should ensure reasonable access, by both permanent inhabitants and seasonal visitors, to homes, workplaces, leisure facilities and other services."

The Proposed Development is in accordance with Policy 6; as the development supports the expansion and resurfacing of the airport and resurfacing of roads on St. Mary's.

The Infrastructure Assessment accompanying this planning application reviewed water, sewerage and utility supply to the site. The water supply running along the A3110 is not capable of supporting the Site, so alternative means of water supply have been considered. Sewerage will be arranged by the contractor, with the potential to install a septic tank on the Site.



Policy 10 - Air Travel Infrastructure, St Marys & Tresco

The Proposed Development directly supports Policy 10, which aims to protect St Mary's Airport to allow "continued operation, expansion or improvement".

4.1.2 Local Development Framework (LDF)

The Isles of Scilly Strategic Transport Framework

Within the action plan (Section 6.2), in respect to the condition of roads and pavements on the island, it states: "Develop re-surfacing plan for roads based on next resurfacing of St Mary's Airport runway. Localised problem areas in Hugh Town to be a priority. Plan to ensure any necessary utilities works are undertaken first and embargo for set period after resurfacing."

The Proposed Development will undertake resurfacing works of the island roads in conjunction with the re-surfacing of the runway.

Council of the Isles of Scilly Community Strategy

The community's vision statement for the future for the Isles of Scilly is: "The Isles of Scilly – a strong, vibrant and sustainable Island Community". The key elements of this are reflected in the following objectives:

- "To provide excellent services for children, young people and families
- To promote healthy and inclusive communities, including working towards meeting the housing needs of our community
- To promote economic vitality
- To protect our outstanding natural environment
- To meet the local transport and local infrastructure needs of our community"

Biodiversity and Geodiversity SPD Planning Good Practice Guidance

The Biodiversity and Geodiversity SPD Planning Good Practice Guidance highlights the importance of protecting and enhancing the islands' biodiversity and geodiversity. The Proposed Development has some modest negative impact on biodiversity; however it is to be mitigated.

The Proposed Development will see the removal of some hedgebank and one tree within the Site. This is necessary to allow vehicular access to the site, and the amount of removal has been minimised and planned to avoid the most sensitive areas. The hedgebank that is to be removed will be re-instated. An Ecological Survey Report and Arboricultural Management Plan have been produced for the Proposed Development and describe in greater detail the recommendations being put forward for removal and reinstatement. Tree and hedgebank removal will occur outside bird nesting season thereby reducing impact on the bird population.

4.2 Other Material Considerations

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that determination of applications for planning permission be made in accordance with the 'Development Plan'



unless material considerations indicate otherwise. Other material considerations in this case include:

- · National Planning Policy Framework;
- · Aviation Policy Framework;

4.2.1 National Planning Policy Framework

National Planning Policy Framework (NPPF) was introduced in March 2012 (Communities and Local Government, 2012a). Considerable weight should be given in the determination of this planning application to the contents of the NPFF. Great weight should be given to the delivery of sustainable economic development objectives when determining planning applications and, in circumstances where development proposals are in accordance with sustainable development principles established in national policy, the sustainable economic development benefits of development proposals may need to outweigh limited local impacts caused by the development.

Sustainable Development

The NPPF acknowledges that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 14 of the NPPF states that: "At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking." It goes on to explain that "for decision-taking this means²:

- approving development proposals that accord with the development plan without delay; and
- where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless:
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted³."

With regard to the development plan, the NPPF states at paragraph 211 that "....the policies in the Local Plan...should not be considered to be out-of-date simply because they were adopted prior to the publication of this Framework." This statement confirms that the Isles of Scilly Local Plan should not be considered out of date.

The Proposed Development is necessary to provide improved facilities at St. Mary's Airport, thus ensuring the long-term sustainable development of the Isles of Scilly in terms of sustainable communities, business and tourism.

Transport

Section 4 of the NPPF covers the promotion of sustainable transport. At paragraph 32, the NPPF states that "All developments that generate significant amounts of movement should be

² Unless material considerations indicate otherwise.

³ For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.



supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."

The Proposed Development is in accordance with the NPPF. The Proposed Development is only temporary, supporting the airport expansion project; however a transport assessment has been carried out, this includes a route for accessing the airport from the site, thus avoiding using the main road.

There is projected to be a maximum of 30 workers on site at any one time. Car parking will be provided for 10 vehicles. A mini bus is intended to be used to transport construction workers to the site. No parking will be allowed on surrounding roads for construction workers.

Flood Risk

Section 10 of the NPPF covers, amongst others things, flood risk. Specific guidance on flood risk is also given within the Technical Guidance to the NPPF (Department for Communities and Local Government, 2012b). Paragraph 100 of the NPPF advises that development should be directed away from areas at highest risk of flooding, but where development is necessary in these areas, it should not increase flood risk elsewhere. Paragraph 103 goes on to state that:

"When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that:

- within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and
- development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems."

The Proposed Development is not located in an area at risk of flooding, so in accordance with the NPPF.

Natural Environment

Section 11 of the NPPF covers the conservation and enhancement of the natural environment. Paragraph 109 recognises that the planning system should contribute to and enhance the natural and local environment by

- "protecting and enhancing valued landscapes, geological conservation interests and soils;
- recognising the wider benefits of ecosystem services;
- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;



- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."

Paragraph 111 states that the re-use of previously developed land should be encouraged provided it is not of high environmental value.

With regard to agricultural land, paragraph 112 of the NPPF recognises that the economic and other benefits of the most versatile land should be taken into account, with poorer quality land used in preference to higher quality land for development.

Paragraph 113 explains that "..... Distinctions should be made between the hierarchy of international, national and locally designated sites⁴, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks."

With regard to the coastal areas, paragraph 114 states that local planning authorities should "maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast."

Paragraph 115 recognises that great weight should be given to conserving landscape and scenic beauty in those areas having the highest status of protection, namely National Parks, the Broads and Areas of Outstanding Natural Beauty, noting also that conservation of wildlife and cultural heritage are also important considerations in these areas. Paragraph 116 goes on to state that "planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest....."

In determining planning applications, paragraph 118 states that the following principles should be applied

- "if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted. Where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have 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;
- development proposals where the primary objective is to conserve or enhance biodiversity should be permitted;
- opportunities to incorporate biodiversity in and around developments should be encouraged;

⁴ Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.



- planning permission should be refused for development resulting in the loss or deterioration
 of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees
 found outside ancient woodland, unless the need for, and benefits of, the development in
 that location clearly outweigh the loss; and
- the following wildlife sites should be given the same protection as European sites:
- potential Special Protection Areas and possible Special Areas of Conservation;
- listed or proposed Ramsar sites⁵; and
- sites identified, or required, as compensatory measures for adverse effects on European sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites."

Paragraph 119 explains that "the presumption in favour of sustainable development does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined."

With regard to risks from pollution and land instability, paragraph 120 states that "planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account."

Paragraph 123 deals with noise issues and states that "planning policies and decisions should aim to:

- avoid noise from giving rise to significant adverse impacts⁶ on health and quality of life as a result of new development;
- mitigate and reduce to a minimum other adverse impacts⁶ on health and quality of life arising from noise from new development, including through the use of conditions;
- recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established⁷; and
- identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason."

The Proposed Development is of a temporary nature and the modest negative impact on natural beauty will be for the short term and will be mitigated. Site selection and layout has had due regard to the preceding policy, in that the site was selected due to its safe distance from Scheduled Ancient Monuments and Ecological Designations (see Chapter 2). The site is also well shielded from view by a row of tall conifers to the west, as well as hedgerows and trees to the north and east, thus reducing impacts on natural beauty.

Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate

Special Area of Conservation or Ramsar site.

 5 See Explanatory Note to the Noise Policy Statement for England (Department for the Environment, Food and Rural Affairs).

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⁵ Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which

Subject to the provisions of the Environmental Protection Act 1990 and other relevant law.



There will be some loss of hedgerow and one tree, to allow access for vehicles at both the Site entrance, as well as providing further access between Field 1 and 2. However, this shall be reinstated after. Further detail on this is contained in the Arboricultural Management Plan which accompanies this planning application. All other trees and hedges on site shall be protected.

Some of the nearest residential properties will experience an increase in noise levels at certain times during the works but this should not be significant. For full details refer to the Noise Assessment which accompanies this planning application.

Heritage

Section 12 of the NPPF focuses on conserving and enhancing the historic environment. The following paragraphs are considered particularly relevant.

Paragraph 128 gives information about the level of information required to support a planning application stating ".....where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."

Paragraph 131 explains that in determining planning applications "local planning authorities should take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- the desirability of new development making a positive contribution to local character and distinctiveness."

Paragraph 132 goes on to state that "when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."

Paragraph 134 recognises that where a development proposal will lead to substantial harm to the significance of a designed asset this should be weighed against the public benefits of the proposal.

Paragraph 135 deals with effects of proposals on non-designated heritage assets stating that "in weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

In conclusion, Paragraph 141 states "local planning authorities should....... require developers to record and advance understanding of the significance of any heritage assets to



be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible⁸. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted."

The Isles of Scilly has many archaeological sites and monuments; however, the Proposed Development is located away from these receptors and no impact will occur to these sites (see Chapter 2).

4.2.2 Aviation Policy Framework

In preparing their local plans, local authorities are required to have regard to policies and advice issued by the Secretary of State. This includes the Aviation Policy Framework, to the extent it is relevant to a particular local authority area, along with other relevant planning policy and guidance. The Aviation Policy Framework may also be a material consideration in planning decisions depending on the circumstances of a particular application.

In the section on 'The growth and importance of airports outside London' it states:

"One of the Government's aims in helping the economy to grow is to encourage investment and exports as a route to a more balanced economy."

The Framework goes on to state that airports are important for "...creating local jobs and fuelling opportunities for economic rebalancing in their wider region or area."

The Proposed Development is in agreement with the Aviation Policy Framework. This planning application is vital for the upgrade of St. Mary's Airport, which is being undertaken to upgrade the airport's facilities and runway; benefitting the Isles of Scilly's economy.

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⁸ Copies of evidence should be deposited with the relevant Historic Environment Record, and any archives with a local museum or other public depository.



5. CONCLUSION

The Proposed Development is for the temporary use of the Site as a construction compound for the upgrade of the St. Mary's Airport.

The Proposed Development provides direct access to the airfield through a new tarmaced track, thus reducing impact of construction vehicles of public roads as well as providing an emergency route to and from St. Mary's Airport.

Site selection and layout has had due regard to environmental constraints; for example the site is located away from ecological designations and Scheduled Ancient Monuments, and also shielded from view by a row of tall conifers to the west, as well as hedgerows and trees to the north and east, thus reducing impacts on natural beauty.

The Proposed Development will result in one tree being removed on site. Removal of sections of hedgebank and the topsoil will only be temporary, as they will be reinstated.

The refurbishment and essential resurfacing of St. Mary's Airport is critical to the economy of the Isles of Scilly, and in accordance with local planning policy. Expansion of the airport will help maintain an effective, affordable and accessible year round transport system, which will aid the island's local communities and visiting tourists alike.

It is therefore respectfully concluded that planning permission should be granted for the proposed development.